

IN THE MATTER OF

the Resource Management Act 1991

AND

IN THE MATTER OF

Notices of requirement for designations under section 168 of the Act, in relation to Te Ahu a Turanga; Manawatū Tararua Highway Project

BY

NEW ZEALAND TRANSPORT AGENCY
Requiring Authority

**ADDENDUM TO STATEMENT OF EVIDENCE OF SARAH LOUISE DOWNS
(PORTFOLIO MANAGER SYSTEM DESIGN: DEVELOPING REGIONS)
ON BEHALF OF THE NEW ZEALAND TRANSPORT AGENCY**

25 March 2019

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INTRODUCTION

1. My name is **Sarah Louise Downs**.
2. I submitted a statement of evidence on behalf of the New Zealand Transport Agency ("**Transport Agency**") dated 8 March 2019.
3. In this addendum I use the same defined terms as in my evidence.
4. In this addendum to my evidence, I respond to the expert evidence of David Murphy, Mark Read, and Shane Vuletich on behalf of Palmerston North City Council ("**PNCC**").

RESPONSE TO EVIDENCE OF WITNESSES FOR PNCC

5. As noted in my evidence, the Transport Agency understands that people and the local councils see the Project as an opportunity to realise wider benefits.
6. In the case of PNCC, the Transport Agency has a robust working relationship with the Council that spans the full range of transport networks and priorities around the City, and in the surrounding districts.
7. Early in the Project, as part of the Transport Agency's assessment of alternative routes, a joint working group was formed (of which Mr Murphy was a member) to consider the wider economic benefits that could be realised from the Project. The Transport Agency engaged Ernst and Young to assist with this work, and the focus was to understand how the Project could fit in with a freight ring road that was expressed to be a regional priority for PNCC. This was linked to PNCC's preference for Short List option 4, which would have created a further bridge across the Manawatū River that would open up new land for development.
8. I do not recall PNCC raising recreational opportunities in that forum but again, the Transport Agency understands that PNCC and many others see the Project as a means to deliver recreational and other benefits in and around the Manawatū Gorge Scenic Reserve ("**Scenic Reserve**") and the Ruahine and Tararua Ranges.
9. The Project will support those aspirations in the way I have described in my evidence, including by:
 - (a) providing a dedicated walking and cycling connection across the Ashhurst Bridge (Napier Road / SH3) with the Scenic Reserve carpark and the existing network of tracks in the Scenic Reserve, on the south side of the Manawatū River;

- (b) creating a dedicated pedestrian facility across the new Manawatū River Bridge which, together with the shoulders on the Bridge, could connect walkers and cyclists to any future recreational paths on the north side of the River; and
 - (c) improving connectivity for cyclists and pedestrians on the Woodville side.
10. More broadly, the Transport Agency will gladly participate in future planning processes and discussions regarding recreational facilities, which are unknown at this stage, i.e. so far as I am aware neither the Council or Regional Council have initiated any formal investigation process.
 11. In terms of integrating the new walking and cycling facility on the Ashhurst Bridge with existing networks in the Ashhurst Domain, a point raised by Mr Murphy, I confirm that it is the Transport Agency's intention to connect the new cycling and walking facility into the existing network in the Ashhurst Domain and to the existing walking and cycling facility on the Manawatu River. I note that this network is managed by Palmerston North City Council and includes facilities in the Ashhurst Domain that have been affected by recent flooding and are no longer viable cycling paths. Therefore, it will be necessary for the Council to also upgrade part of its network in this location and I can confirm that the Transport Agency will work with the Council to integrate the two separate pieces of work.
 12. I also understand that the evidence filed on behalf of PNCC is arguing that the planning direction and safety risk for cyclists on the new road require the Transport Agency to deliver a recreational path as part of the Project. The Transport Agency disagrees, for the reasons I have given in my evidence.
 13. In a network planning sense, I do not understand there to be any dispute that the Project will create improved (albeit still challenging) conditions for the few hardy cyclists per day who cross the Ranges. Mr Read's evidence discusses the deficiencies in Saddle Road and Pahiatua Track, including the lack of a shoulder, and Mr Dunlop has explained that removing most of the traffic off Saddle Road, in particular, will be beneficial for the safety of cyclists using that route.
 14. To the extent the concern relates to the safety of cyclists using the new route, I defer to the experts on safety matters but can confirm that road safety is a core focus of the Transport Agency's work and rigorous processes are

worked through, based on expert advice, to ensure that new developments provide the appropriate level of safety.

15. Road safety audits are an iterative process with multiple stages providing opportunity for further improvements to be made. The process is illustrated by the first such audit for the Project, which led to increased shoulder widths and various other safety improvements. As Mr Whaley has noted, several more safety audits must be undertaken before the Project will open and, once opened, the performance of the Project will be monitored.

Sarah Downs

25 March 2019