

*under:* the Fast-track Approvals Act 2024

*in the matter of:* applications for resource consents and archaeological authorities and notices of requirement by the New Zealand Transport Agency Waka Kotahi to develop a rapid transit link and associated infrastructure and connections between Brigham Creek and Auckland City centre, alongside State Highway 16, known as 'North West Rapid Transit'

*applicant:* **New Zealand Transport Agency**  
*Requiring Authority and Applicant*

Statement of Evidence of Karyn Sinclair for New Zealand  
Transport Agency Waka Kotahi

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Dated: 3 June 2026

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## **STATEMENT OF EVIDENCE OF KARYN SINCLAIR FOR NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI**

- 1 My full name is Karyn Joy Sinclair. I am a co-author of Part 4 of the Application – Resource Management Act 1991 Approvals (*Part 4*).<sup>1</sup>
- 2 My qualifications and experience are set out in Part 4, noting one amendment below. I reaffirm the Code of Conduct statement set out in Part 4.
- 3 I note that since the Application was lodged, I have resigned from Jacobs (in January 2026) and am now a self-employed consultant.
- 4 My evidence has been prepared to support the New Zealand Transport Agency Waka Kotahi’s (*NZTA*) response to Minute 7 dated 19 May 2026 (*RFI#3*). My evidence goes on to address comments on NZTA’s notices of requirement (*NORs*) and applications for resource consents and archaeological authorities (together, *Application*) for the North West Rapid Transit Project (*Project or NWRT*).

### **SCOPE OF EVIDENCE**

- 5 My evidence addresses:
  - 5.1 Paragraphs 10(a) and (c) of RFI#3;
  - 5.2 The comments from:
    - (a) Stride Holdings Ltd (*Stride*) relating to the NZTA’s assessment of alternatives and the Auckland Unitary Plan (*AUP*) provisions for the Metropolitan Centre zone;
    - (b) Selkprop Investments relating to alternatives assessment; and
    - (c) Te Ākitai Waiohua relating to the AUP provisions for outstanding natural features (*ONFs*).

### **RFI#3 – THE ALTERNATIVES ASSESSMENT PROCESS WAS COMPREHENSIVE**

- 6 Section 3.3.1 of Part 4 of the Substantive Application summarises the process NZTA followed to identify the Indicative Design and the Proposed Designation. In the following sections, I expand on that summary to support NZTA’s response to RFI#3.

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<sup>1</sup> Part 4 – Resource Management Act 1991 Approvals, dated 15 December 2025, updated 28 April 2026 (*Part 4*).

- Framework**
- 7 NZTA developed an Investment Framework for assessing options for the Project. The Investment Framework consisted of three categories or “sieves”:

7.1 *Sieve 1: Project objective and benefits:*

Enable bus rapid transit between Brigham Creek Road and Auckland City Centre measured by key performance indicators addressing:

- (a) improved travel times;
- (b) increased corridor capacity and throughput;
- (c) improved travel reliability;
- (d) improved user experience;
- (e) increased public transport mode share;
- (f) increased public transport ridership; and
- (g) increased opportunity for residential and employment growth.

7.2 *Sieve 2: Critical success factors for delivering on strategic priorities quickly, efficiently and effectively:*




- (a) optimise use of existing assets;
- (b) flexible, stageable and focused on early benefit realisation;
- (c) technically feasible; and
- (d) value for money.

7.3 *Sieve 3: Environmental effects categories were evaluated in the following areas:*

- (a) property;
- (b) noise;
- (c) vibration;
- (d) landscape and visual;
- (e) terrestrial ecology;
- (f) freshwater ecology;
- (g) avifauna;

- (h) marine ecology and coastal avifauna;
- (i) archaeology and built heritage; and
- (j) social and open space.

8 The framework is illustrated below:

Category	Criterion	KPI
 Sieve 1: Objective & Benefits	Enable rapid transit between Brigham Creek Road and Auckland City Centre	Improved travel times
		Increased corridor capacity and throughput
		Improved travel reliability
		Improved user experience
		Increased public transport mode share
		Increased public transport ridership
 Sieve 2: Critical success factors	Deliver on strategic priorities quickly, efficiently and effectively	Increased opportunity for residential and employment growth
		Optimise use of existing assets
		Flexible, stageable and focused on early benefit realisation
		Technically feasible
 Sieve 3: Effects criteria	Property Noise Vibration Landscape and visual Terrestrial ecology Freshwater ecology Marine ecology and coastal avifauna Avifauna Archaeology and built heritage Social and open space/community facilities	Value for money

9 The Sieve 3 assessment was undertaken by subject matter experts (SMEs) in each of the fields identified. Where these SMEs did not identify any effect in their specialist field, the option was evaluated as zero.

10 Operational transport effects were captured in Sieve 1 and construction traffic effects were considered as part of technical feasibility in Sieve 2. Accordingly, to ensure there was no double-counting, traffic was not a category considered in Sieve 3.

11 Property impacts were evaluated using the following key considerations: number of impacted properties and landowners; property type; area impacted; impacts on planned/consented developments; landowner willingness to sell; and acquisition complexity.

12 In addition to the Investment Framework, the selection of the preferred option was informed by engagement with and feedback from the community, stakeholders, and Iwi Partners.

**Approach**

13 In my opinion, the alternatives assessment for a rapid transit corridor is more complex than for a traditional roading project. This complexity arises as a successful rapid transit project involves multiple interrelated considerations. Each decision depends on the one before it, so the assessment must follow a logical sequence as shown in Figure B below. Changes made at later stages may therefore require earlier assessments to be revisited.

- 14 The approach to the alternatives assessment undertaken for the NZTA Investment Case 2025 is set out in section 3.3.1.3 of Part 4. The approach is illustrated in Figure B showing the sequence of decisions on the features that make up a successful rapid transit project:



Figure B: Key options assessments required to inform the Emerging Preferred Option

- 15 The mode, corridor, city centre connection and station catchment options were initially assessed using a three-point scale against Sieves 1 and 2 to identify the preferred option for these elements.
- 16 The options for form,<sup>2</sup> station position and alignment were assessed using a seven-point scale against all three Sieves. I consider this approach was appropriate to reflect the greater level of detail and granularity for those options.

#### **Mode**

- 17 Bus was identified as the preferred mode for the Project. A bus-based solution met the Project objective and the benefits criteria and performed well against the critical success factors as it delivers good value for money, existing infrastructure, and delivery can be staged to realise early benefits.

#### **Corridor**

- 18 The State Highway 16 (SH16) motorway corridor was selected as the preferred corridor for the Project. This corridor performed well against all Project objective criteria and most critical success factors. The corridor was able to be staged to deliver benefits early and the likely benefits would deliver value for money.

#### **Form**

- 19 Form options that minimised new infrastructure and adjacent property acquisition requirements were considered first, including reallocating existing motorway lanes to bus operations and enhanced shoulder running for buses (both with grade-separated interchanges).
- 20 Reallocating existing motorway lanes was discounted, as it did not achieve the Project objective, with moderate negative travel time impacts for general traffic and reduced capacity for SH16 to accommodate future traffic growth.
- 21 The enhanced shoulder running option was identified as the preferred for the causeway section (Waterview-Te Atatū). The causeway section of the Project is not in scope of the Application as it does not

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<sup>2</sup> Form refers to a general 'cross section' for a bus-based solution along the SH16 corridor envelope.

require any resource consents or modifications to existing designations.

- 22 For the sections to the east and west of the causeway, form options that avoided (or substantially minimised) private land acquisition (for example, motorway-running options) did not achieve or perform well against the Project objective and would not deliver the benefits sought.
- 23 The dedicated busway options performed very well against the Project objective for the corridor, both in the east and the west of the causeway. North side, south side and central elevated busway options were considered. The north side and south side busway options were assessed as delivering good value for money (based on the likely benefits), could be staged to deliver benefits early, but would have higher full and partial property acquisition requirements.
- 24 The central elevated busway option would reduce the level of private property required along the corridor and performed well against the Project objective, but was technically very complex to construct within an operational motorway environment. A central elevated busway would require extended construction timeframes to deliver and would need to be constructed in its entirety to be operational, severely reducing opportunities for early benefits realisation. The central elevated busway would have a capital cost likely outside the cost envelope for this Project, delivering poor value for money.
- 25 Based on the form assessment, the north side and south side dedicated busway options were progressed, and the central elevated busway option was discounted.

#### **City centre connection**

- 26 The city centre connection assessment considered 13 options for a dedicated busway to connect from the city centre fringe to the local street network in the city centre. Based on the assessment against the Project objective, benefits criteria and critical success factor criteria, Ian McKinnon Drive was selected as the preferred connection location. This location delivers large benefits against the Project objective, makes use of existing assets, provides flexibility for staged delivery and delivers good value for money.

#### **Station catchment**

- 27 Station catchments are key to the overall success of a rapid transit service. A total of 13 catchments were assessed, and the best performing catchments identified in Sieves 1 and 2 were Brigham Creek; Westgate; Royal Road; Lincoln Road; Te Atatū; Point Chevalier; and Western Springs. These catchments serve existing and developing activity centres (eg education and/or employment/business areas) and residential areas, will deliver large benefits against the Project objective and benefits criteria and perform well against the critical success factor criteria.

### **Station position**

- 28 A range of positions within each catchment were considered for each station, which included positions occupying private, Crown-owned and/or other publicly owned land. Eight options were assessed for Royal Road, Te Atatū and Point Chevalier stations, seven options were assessed for Lincoln Road station and six for Western Springs station.
- 29 NZTA adopted the recommended location of Brigham Creek Rarawaru station contained in the AT 2018 IBC<sup>3</sup> on the basis that:
- 29.1 The location is within the rapid transit designation<sup>4</sup> obtained as part of the SGA programme; and
- 29.2 The location can support significant urban growth and provide good accessibility to the existing and planned local transport network.
- 30 NZTA adopted the station position for Westgate Te Waiarohia identified in the AT 2018 IBC because the proposed location is consistent with the alignment of the NZTA Rapid Transit Corridor designation (D6789) and the location can support significant urban growth and provide good accessibility to the existing and planned local transport network.
- 31 The local service interface components of Westgate are under construction.
- 32 The recommendations for preferred station positions were based on assessment against all three categories of the Investment Framework, which included a detailed assessment of property requirements for each position. It was determined that the stations at Royal Road, Lincoln Road and Te Atatū would be positioned on the south side of SH16 and stations at Point Chevalier and Western Springs would be positioned on the north side of SH16.

### **Alignment**

- 33 North side and south side alignment options<sup>5</sup> were considered for the city centre fringe-Waterview; Te Atatū-Westgate; and Westgate-Brigham Creek corridor sections and the alignment options were assessed against all three categories of the Investment Framework. The preferred station positions were a key input to the alignment

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<sup>3</sup> Auckland Transport North West Rapid Transit Corridor Indicative Business Case 2018.

<sup>4</sup> NZTA Designation 6789 Construction, operation and maintenance of a public transport corridor (Rapid Transit Corridor).

<sup>5</sup> 'North side' and 'south side' were nominally used with reference to SH16 as descriptors for the purposes of evaluation. North side is used to talk about the side closest to the Waitemata Harbour, albeit sometimes it is east of SH16.

assessment for each section, as was the preferred city centre connection location for the city centre fringe-Waterview section.

- 34 A north side alignment was identified as preferred for the section from city centre fringe-Waterview. It aligns with the preferred north side position for both Point Chevalier and Western Springs stations and delivers large benefits against the Project objective. A north side alignment delivers best value for money and greater opportunities for staged delivery and early benefits realisation. The north side alignment optimised a significant length of corridor within the existing NZTA SH16 designation (from Arch Hill through to Ian McKinnon Drive especially) while the south side required residential land acquisition.
- 35 A south side alignment was identified as the preferred alignment for the Te Atatū-Westgate section, aligning with the outcomes of the station position assessment for Te Atatū, Lincoln Road and Royal Road stations. A south side alignment performed well against the Project objective and critical success factors, and required fewer adjacent properties, areas of open space and identified social and community facilities compared to a north side alignment.
- 36 A south side alignment was determined to be preferred for the Westgate-Brigham Creek section, as it delivers large benefits and opportunities for early benefits realisation by aligning with the preferred south side station positions at Westgate and Brigham Creek. A north side busway alignment would have required a number of private properties while the south side can be predominantly delivered within the existing SH16 designation.

**The alternatives assessment process was comprehensive**

- 37 Overall, the alternatives assessment was, in my opinion, very comprehensive. It followed a consistent framework and used a robust evaluation process, enabling a preferred option that achieved the Project objective to be identified with care. The preferred option was endorsed by the NZTA Board as part of the Investment Case in 2025.

**ALTERNATIVES ASSESSMENT AT WESTGATE**

- 38 Following endorsement of the preferred option, NZTA continued to refine the Project prior to lodgement of the Application. A 'design refinement framework' was applied after the preferred option was identified to confirm the Indicative Design and Proposed Designation prior to lodgement of the Application. I summarise the 'design refinement framework' below.
- 39 In response to the Stride comments, I explain how the Investment Framework and then the design refinement framework were applied at Westgate.

### Design refinement framework

- 40 To assist the refinement of the preferred option, NZTA set up a framework for considering design decisions, which took the Investment Case framework and developed a simplified set of criteria.
- 41 A qualitative consideration was undertaken of potential design refinements with inputs from relevant multidisciplinary workstream leads, and recommendations were ratified by the Project leadership team.
- 42 The table below identifies the framework within which design refinements were considered:

Category	Criterion	Description
Objective & Benefits	Alignment with Project Objective and Benefits	Enable bus rapid transit on the SH16 corridor between Brigham Creek Road and Auckland City Centre, providing the following benefits: - Improves travel time and reliability - Increases corridor capacity and throughput - More attractive and efficient public transport - Supports growth and urban development
Critical Success Factors	Optimise use of existing assets	Extent to which the option optimises use of existing transport network, connections, services, station access, etc.
	Flexible, stageable and a focus on early benefits realisation	Extent of flexibility for future designers and constructors, to enable future innovation and staging scenarios, and to realise benefits early
	Value for money	Assessment of cost and affordability
	Technically feasible - Operations	Operational impacts on existing motorway operation, interchanges, local road network (all modes), including existing WX1 service. Level of safety of the operational solution.
	Technically feasible - Constructability	How straightforward is it to construct? What is the level of safety and disruption during construction?
Utilities	Utility services	Impact on existing network utility services
Effects	Environmental	Significance of effects on the environment
	Economic and social	Significance of economic and social effects
Cultural	Cultural	Any relevant feedback from Iwi Partner Working Group
Property	Property	Complexity and cost of property acquisition. Extent of impact on private property
Discipline Principles	All disciplines	Is the decision consistent with discipline Philosophy Principles

### Alternatives assessment process: Westgate

- 43 As noted above, the AT 2018 IBC recommended the Gunton Drive site for a local bus station. The Auckland Transport Board endorsed the recommendation.
- 44 The first stage of the Westgate Te Waiarohia bus station is under construction, having already obtained statutory approvals. As connectivity and ease of transfer between services is key to the success of the Project, the position of the Westgate station recommended in the AT 2018 IBC (and subsequent implementation) was adopted for the NZTA Investment Case and was not assessed any further.

- 45 As part of the NZTA Investment Case, 13 alignment options in the Westgate / Fred Taylor Drive area were developed and assessed.
- 46 Using Sieve 1, the options were reduced to six. These six options were subject to assessment through the full Investment Framework as set out above.
- 47 The six options were:
- 47.1 Option 3 – under the SH16 west bound on-ramp, and under Fred Taylor Drive;
  - 47.2 Option 5 – under the SH16 west bound on-ramp and using the existing SH18 link under the Hobsonville overbridge;
  - 47.3 Option 7 – under Fred Taylor Drive and over Gunton Drive;
  - 47.4 Option 11 - over Fred Taylor Drive and over Gunton Drive;
  - 47.5 Option 12 – over the SH16 westbound on-ramp and over Hobsonville Road; and
  - 47.6 Option 13 – over a realigned Gunton Drive and over Fred Taylor Drive.
- 48 The analysis of the six options determined that:
- 48.1 No option was easy to construct with all options being scored moderate to large negative for technical feasibility.
  - 48.2 Options 5, 11 and 12 did not score as well as the other options in relation to flexibility and/or stageability.
- 49 Option 13 was considered the preferred solution and formed part of the Investment Case, including because construction would be able to occur in a manner that could appropriately manage impacts on the transport network.
- 50 Following the Investment Case and leading up to lodgement of the Application, the alignment at Westgate was refined to:
- 50.1 resolve the interface between different parts of the Project (eg utilities clashes) at a level of detail not required for the Investment Case;
  - 50.2 respond to engagement with stakeholders and landowners; and/or
  - 50.3 ensure that the Indicative Design and Proposed Designation were a suitable basis on which to obtain statutory authorisations.

- 51 NZTA assessed and compared an underpass and an overpass within the Option 13 alignment. The underpass design was refined from the original Option 7 (“the underpass option”), and the overpass design was refined from the original Option 13 (“the overpass option”). The two refined options benefited from more detailed consideration from a geometric design and constructability perspective. Notably, the underpass option was refined to include a realignment of Gunton Drive similar to the overpass option for constructability purposes.
- 52 The outcome of this design refinement was that the underpass option was preferred and formed the Indicative Design that is included in the Application. The underpass option enables better long-term customer and operational benefits for the Project, for example the overpass option with 8% grade had a sharp crest curve and 60 km/h operating speed limit.

### **NATIONAL POLICY STATEMENT FOR INFRASTRUCTURE 2025**

- 53 Since the Application was lodged, the National Policy Statement on Infrastructure 2025 (*NPS-I*) was released. Policy 4(2) of the NPS-I is:

(2) Decision-makers must:

(a) recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity; and

(b) have regard to existing information and assessments undertaken by the infrastructure provider, including, but not limited to, information prepared using the Better Business Cases methodology developed by The Treasury New Zealand, infrastructure strategies prepared under the Local Government Act 2002, or the Infrastructure Priorities Programme developed by New Zealand Infrastructure Commission Te Waihanga.

- 54 In my opinion, the process used to identify the Indicative Design and Proposed Designation followed the guidance from Treasury.<sup>6</sup> In light of the NPS-I, I consider this adds weight to my opinion that the Indicative Design and Proposed Designation have been informed by an appropriate alternatives assessment process.

### **RESPONSE TO COMMENTS RELATING TO ALTERNATIVES**

#### **Stride Holdings Limited**

- 55 Stride has commented that the “wrong option” has been adopted for the purposes of the Indicative Design, and that the NZTA’s consideration of alternatives is fundamentally flawed. In my opinion, the alternatives assessment process was rigorous. Such a process is

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<sup>6</sup> <https://www.treasury.govt.nz/information-and-services/public-sector-leadership/investment-management/better-business-cases>

intended to identify a preferred option in a robust way, not the 'right' or the 'best' option (which is subjective).

- 56 The evidence of Mr Don McKenzie for Stride says (at paragraph 50) the Indicative Design has been identified in the absence of adequate consideration of the Westgate Metropolitan Centre either during construction or its long-term operation.
- 57 I reject that assertion. Mr McKenzie's conclusion fails to acknowledge the substantial body of work that underpins the alternatives assessment of which he and Stride were provided the reported outcomes. In my opinion the overall assessment was comprehensive, followed an appropriate and robust process and that process was subsequently relied on to reexamine options given feedback from Stride.
- 58 Stride asserts that "*NZTA's MCA is flawed and inconsistent*" in its scoring methodology and has led to an inappropriate preferred option.<sup>7</sup>
- 59 I reject this assertion. The Investment Framework and design considerations framework were the basis for all alternatives assessment by NZTA. The scoring used consistent measures as set out in section 3.3.1.3 of Part 4 - RMA 1991 Approvals. It did not give (and I consider it should not have given) more weight to the development proposal of the commenter specifically. To do so would have skewed the assessment process inappropriately in my opinion.
- 60 Mr McKenzie's evidence states that "*impacts on private land, the operation of the NorthWest Centre, and the effects on the Resource Consent had not been properly evaluated and balanced against the technical construction matters*".<sup>8</sup>
- 61 As I discuss earlier, impacts on private land, including consented developments, were captured appropriately in the 'property' category in Sieve 3 of the Investment Framework. I assume given Mr McKenzie's expertise that his comments relating to "*the operation of the NorthWest centre*" relate to traffic effects. Construction traffic effects were part of the 'technical feasibility' criterion in Sieve 2. To give one component of an overall assessment (such as construction traffic effects on a specific landowner) priority or greater weighting would inappropriately skew the assessment process and undermine the robustness and transparency of that process.
- 62 While Stride may hold the opinion that there is a 'better' option or 'optimal' as suggested in the evidence of Mr Rankin (paragraph 5), that option has been (more than) adequately evaluated, and was not preferred by NZTA.

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<sup>7</sup> Stride legal submissions, paragraph 48(d).

<sup>8</sup> Evidence of Mr McKenzie, paragraph 55.

63 As set out above, in my opinion, the alternatives assessment undertaken by NZTA reflects a robust, consistent and transparent process. The frameworks adopted provided a replicable process as demonstrated by their use through the whole alternatives assessment exercise, from identification of the preferred mode through to identification of the Indicative Design and the Proposed Designation.

#### **Selkprop Investments Limited**

64 Selkprop Investments have requested that more work is done to find an alternative that enables the Tāmaki Medical Centre building to be retained.<sup>9</sup>

65 As set out above, the alternatives assessment has been robust, and identified and tested a wide range of alternatives using a consistent framework. There are a number of complex, interrelated factors that needed to be considered in the alternatives assessment, and while some options would avoid the Medical Centre building, those options were not preferred when all the factors were taken into consideration.

### **STATUTORY ASSESSMENT**

#### **Regional Policy Statement and Metropolitan Centre zone**

66 I make the following comments regarding the relevant provisions of the Regional Policy Statement and the Metropolitan Centre zone.

67 In my opinion, the AUP does not seek to avoid traffic congestion in the Metropolitan Centre zone, in fact it appears to recognise traffic impacts as a potential outcome of urban development. For example, the Metropolitan Centre zone is excluded from Policy 27.3(1) which requires consideration of trip generation that results in "*more than minor adverse effects on the safe, efficient and effective operation of the transport network*". The AUP requires resource consent to be obtained for trip generation above specified thresholds as a restricted discretionary activity E27.6(1) and (2) in other zones, but not in the Metropolitan Centre zone (E27.6.(1) and (2)).

68 Further, there are no parking standards required for the Metropolitan Centre zone. In my opinion, the AUP does not seek to manage any congestion that might arise from parking and or traffic generation in the Metropolitan Centre zone.

69 I consider RPS B2.2.1.(2) seeks to enable "*(d) good accessibility for all people, including by improved and more efficient public or activity transport*" to support the role and function of the Metropolitan Centre zone.

70 I consider the role and function of the Metropolitan Centre zone would be undermined by a failure to provide efficient public transport, especially as urban growth is enabled through the Future

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<sup>9</sup> Comment 11 – Selkprop Investments Ltd, page 2

Urban Zone to the north of Westgate otherwise adding users to the road network.

- 71 In my opinion, Stride has ignored RPS provisions that are just as relevant to the Panel's consideration, beyond that identified in their legal submissions including the objective of B3.3 Transport:

Objectives (1) Effective, efficient and safe transport that:

(a) supports the movement of people, goods and services;

(b) integrates with and supports a quality compact urban form;

(c) enables growth;

(d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and

(e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.

- 72 I consider, the Project gives effect to this Objective as the Project will facilitate transport choice, will enable growth of the north-west and will be able to integrate with a quality compact urban form that is enabled within the Metropolitan Centre zone.

- 73 Stride commented on the purpose of the Metropolitan Centre zone under the AUP.<sup>10</sup> The Metropolitan Centre zone provisions have been addressed in Section 22.3 (Table 22-1) of Part 4 under the theme of urban growth and development capacity.

- 74 Stride refers to the AUP RPS Objectives B2.2.1(1) and (2) and asserts that "*NZTA's analysis of the RPS provisions ... fail to consider and take into account the effects on, and the role and function of, NorthWest and the MCZ*".<sup>11</sup>

- 75 In my opinion as set out above, Stride has been inappropriately narrow and selective in its identification of relevant planning provisions.

- 76 The Proposed Designation covers a very limited area of the Metropolitan Centre zone and I consider particular regard has been had to the relevant provisions of that zone as required by s168(3B)(a)(iv) of the RMA and discussed in my evidence above. My analysis of relevant statutory provisions in Part 4 and in evidence above provides a fulsome statutory assessment as required under the RMA that is appropriately balanced, rather than a focused and narrow identification of suitable provisions to support a specific position.

#### **Outstanding natural features**

- 77 Te Ākitai Waiohua commented that, in relation to Meola Creek ONF (ID 95), "*the application does not adequately assess the potential*

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<sup>10</sup> Stride legal submissions, paragraphs 12–17.

<sup>11</sup> Stride legal submissions, paragraph 15.

*impacts of piers on the ONF and how effects would be appropriately mitigated, including addressing Policies 10.3(3) and (4)".<sup>12</sup>*

- 78 The AUP provisions relating to ONFs are in D10. An analysis of the Project against those provisions is set out below.
- 79 I consider objectives D10 (1) and (2) are relevant to this Project. Those objectives seek to protect ONFs from "*inappropriate... use and development*", and recognise and provide for "*ancestral relationships of Mana Whenua with outstanding natural features...*".
- 80 As described above, NZTA undertook a careful consideration of alternatives to identify an appropriate corridor for the Project. Given the alternatives assessment process, I consider the use and development of the Project within the ONF is not inappropriate.
- 81 NZTA's Iwi Project Partners, including Te Ākitai Waiohū, contributed to the alternatives assessment independent of the framework set out above. Their consideration formed part of the overall consideration of the preferred option.
- 82 I consider policies 10.3 (3) and (4) are the relevant policies that set out the means to give effect to the objectives set out above. The Project is generally consistent with these policies as follows:
- 82.1 The integrity of the ONF will be retained by bridging and that outcome is secured by Proposed Designation Condition 24;
- 82.2 Any piers required for the bridge in close proximity to or within the ONF will not impact the natural landform beyond their footprint;
- 82.3 The location of the bridge adjacent to the existing SH16 corridor will consolidate the infrastructure rather than introduce a new structure elsewhere within the ONF, noting that the ONF extends from SH16 to Meola Road to the north;
- 82.4 By recommending a condition for a bridge structure, potential construction impacts can be minimised. Wholesale modification of the feature has been avoided (which may have occurred if the Project had proposed a culvert to contain Waititiko (Meola Creek) in this location. Mana whenua values associated with the ONF were influential in Designation Condition 24 being recommended;
- 82.5 The Project will protect the physical and visual integrity of the ONF by consolidating infrastructure at the edge of the ONF and requiring the ONF to be bridged;

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<sup>12</sup> Comment 15 – Te Ākitai Waiohū Settlement Trust, page 5.

82.6 The ONF is, in the location of the Project is currently overgrown and the Project will increase visibility and appreciation of the ONF in that location from users of the busway.

83 Overall, while the above AUP provisions are not specifically noted in the "Relevant Objectives and Policies" column of the thematic assessment of relevant planning documents (Table 22-1 in Part 4), I consider the conclusions of that section stand. The Project has been developed with particular regard to the ONF, and the relevant objectives and Policies within the AUP.

**Karyn Sinclair**  
**3 June 2026**