Whangarei District Council

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Attn:
Jason Dawson
Director Regional Relationships Northland and Auckland
NZ Transport Agency Waka Kotahi

Dear Jason,

We write to outline our political support to the Alternative to the Brynderwyn Hills Project, along with key non regulatory considerations that we consider need to be worked through as part of this project. This letter compliments, but is not part of, Council's comments on the Brynderwyn Hills Alternative Fast Track application.

The Brynderwyn Hills corridor is a critical lifeline connecting Northland to Auckland and the rest of New Zealand. It serves as a key freight, tourism and community linkage for the region and is fundamental to the social and economic wellbeing of Northland communities. The vulnerability of the existing route has been well demonstrated through recent weather events and network disruptions, highlighting the importance of investment in a more resilient and reliable transport connection.

The project is also identified as an important enabler of broader economic development through the Northland Regional Deal Light Touch proposal and the emerging Regional Infrastructure Plan for Northland. It sits alongside and enables other major initiatives such as the port expansion, proposed growth in marine manufacturing and the dry dock, improved freight connections, opportunities associated with a special economic zone, and broader investment across Northland's economy. Reliable transport infrastructure is fundamental to the success of these initiatives and the long-term prosperity of the region.

Council Roles
In providing this covering letter, Council is conscious of the different roles it holds in relation to the Alternative to the Brynderwyn Hills Project. In summary Council has:

- A political and advocacy role in supporting infrastructure that enables regional growth, resilience and economic development.
- An asset owner and landowner role where the proposal interfaces with Council land, infrastructure or operational responsibilities.
- A ratepayer representative role in considering both the wider regional benefits of the project and the potential impacts on affected communities and landowners.
- A statutory and regulatory role which must be exercised independently through the relevant approval processes.

This letter addresses Council's political, asset owner, landowner and ratepayer representative interests outside of the regulatory process. Technical and regulatory comments compiled separately by regulatory staff and specialist advisers, and will be submitted directly to the Expert Panel. Those comments should be considered separately from this political letter.

Regional Growth and Economic Development
The Alternative to the Brynderwyn Hills Project will assist in providing the level of regional connectivity needed to support future development, housing growth, business investment and community resilience. It will help enable the wider infrastructure and economic development opportunities being pursued across Northland, through the Regional Deal programme and associated growth initiatives. Council considers that resilient strategic infrastructure is essential to ensuring Northland can accommodate future growth in a coordinated and sustainable manner while continuing to improve economic opportunities and quality of life for its communities, and is committed to doing its part.

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Network Resilience
Recognising potential funding constraints, Council encourages NZTA to prioritise investment in the detour routes so that they are capable of accommodating heavy vehicles and high traffic flows during the inevitable closures of SH1 on the Brynderwyns. Whangarei and Kaipara District Council have identified the projects needed to improve resilience, however funding needs to be provided at a programme level. This should recognise that the benefit is purely in relation to the diversion of traffic from the State Highway. As such, a 100% FAR is appropriate. The core objective should remain the strengthening of Northland's connection to the rest of New Zealand and reducing the potential for prolonged network disruption.

Council also notes that the project may result in sections of the existing state highway network transferring to local road status. Council does not support the transfer of the of State Highway 1 (particularly the existing Brynderwyn section) into the local road network where this would transfer the associated maintenance, renewal and operational liability to local ratepayers. Given the strategic function and legacy costs of this corridor, Council considers that any future change in road status must be accompanied by an appropriate and enduring funding arrangement that avoids imposing those costs on the local community.

Community Representation
Council recognises that while the project is expected to deliver significant regional benefits, there will also be landowners and communities who may be directly affected by the eventual alignment. Council has a responsibility to support infrastructure that delivers benefits for the wider region while also representing the interests of those residents and ratepayers who may experience direct impacts.

Council notes that the corridor currently sought for designation is extensive. While recognising the need for that, which was has been explained through the regulatory process, Council encourages NZTA to continue reviewing the extent of the designation corridor to ensure it remains appropriately aligned with the project's objectives and does not unnecessarily affect land beyond what is reasonably required. Council acknowledges and supports the commitment from NZTA to conditions on the designation providing for ongoing public communication about the corridor and project.

Council also strongly encourages NZTA to work proactively and constructively with affected landowners and communities and to seek timely resolution of property-related matters wherever possible. Stakeholders such as the Piroa Conservation Trust and ratepayer and resident groups provide important local perspective, voice and context. This, alongside NZTA's ongoing engagement with hapu, will be critical to the success of the project as it progresses.

Conclusion
To conclude, Whangārei District Council reiterates its strong political support for the Alternative to the Brynderwyn Hills Project and the important role it will play in improving Northland's transport resilience, economic connectivity and long-term prosperity.

Council considers the proposal to be of regional and national significance and supports continued progress toward a resilient transport corridor that underpins Northland's future growth and development. At the same time, Council acknowledges the importance of appropriately addressing impacts on communities, landowners and infrastructure, alongside the considerations of the statutory process.

Nāku noa, nā

Brad Flower
Chair – Infrastructure
Whangārei District Council