

BEFORE THE EXPERT PANEL UNDER THE FAST-TRACK APPROVALS ACT 2024

IN THE MATTER of a substantive application by Port of Tauranga Limited for resource consents and a wildlife approval for the Stella Passage Development project (**Project**), being a listed project in Schedule 2 of the Fast-track Approvals Act 2024

STATEMENT OF REPLY EVIDENCE OF DR LYNETTE SUSAN DENISON

DATED 30 JULY 2026


HOLLAND BECKETT

45 The Strand
DX HP40014
Private Bag 12011
Tauranga 3143
Telephone: (07) 578 2199

Solicitor: Vanessa Hamm
Laura Murphy
Cory Lipinski

Email: 



Introduction

1. My full name is Dr Lynette Susan Denison. I confirm my qualifications and experience as set out in my statement of evidence in response to the s 53 comments, dated 7 May 2026.
2. At the direction of the Stella Passage Development Expert Panel, I participated in conferencing on public health matters that occurred on July 15, 16 and 20 July 2026 and the preparation of the Joint Witness Statement dated 20 July 2026 (**JWS**) that arose from that conferencing.
3. I also re-confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses, as contained in the Environment Court's Practice Note 2023. I confirm that this evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of evidence

4. This statement of reply evidence is focused on responding to issues raised by Professor Simon Hales in his amended Statement of Evidence, dated 21 July 2026 (**Amended Evidence**), specifically paragraphs 73 and 74 of that statement.

Response to Amended Evidence

5. In paragraph 74 of his Amended Evidence, Professor Hales has criticised the use of the age standardised mortality rates in calculations that I undertook during the expert conferencing process to assess the potential impact of the Project. These calculations were not done to estimate the number of deaths attributable to existing air pollution but to provide an estimate of the potential impact of air emissions from the Project.

6. The outcomes of my analysis are presented in Schedule 4, Attachment B to the JWS.
7. In Professor Hales' comments on the use of age standardised mortality rates he has used assumptions that are incorrect to form his opinion that the use of these rates is invalid. In particular, he has used the age standardised mortality rates for 2018 and 2019 that I used in my risk assessment approach with the average of the 2023 - 2025 number of deaths for Mount Maunganui to state that the numbers do not match. This is incorrect as the population of Mount Maunganui is significantly higher now that it was in 2018 - 19 therefore his calculations are incorrect.
8. The age standardised mortality rates that I used are consistent with the age standardised mortality rates for New Zealand of 3.3/1,000 deaths as published by Statistics NZ on the InfoShare site¹.
9. As discussed in paragraph 31 of my Statement of Evidence dated 7 May 2026, the age standardised mortality rates are important as they account for differences in mortality in populations that have different age profiles, such as Mount Maunganui which has an older population than New Zealand as a whole. The mortality rate increases with age purely from natural causes associated with age. Therefore, attributing all these deaths to air pollution, as Professor Hales has done, is incorrect and will lead to an overestimate of the health effects attributable to air pollution.
10. In undertaking the calculations in Schedule 4, Attachment B to the JWS I have undertaken two approaches:
 - (a) A risk assessment approach; and
 - (b) Population Attributable Fraction (**PAF**) approach used by Professor Hales in his calculations.

¹ <https://infoshare.stats.govt.nz/ViewTable.aspx?pxID=88bcffdf-bdb1-4bfe-8111-e7f9b3cd116f>

11. Even using the PAF approach, the estimates of deaths that I calculated are much lower than those predicted by Professor Hales. In both sets of calculations Professor Hales and I have assumed that the air pollution levels monitored at the Whareroa Marae extend across the whole Mount Maunganui SA3 population. This is a highly conservative assumption and leads to an overestimate of the potential health effects attributable to air pollution.
12. As discussed above at paragraph 5, I did not undertake the calculations presented in the JWS to determine a baseline number of deaths due to air pollution in Mount Maunganui as suggested by Professor Hales. The calculations were done to provide an estimate of what the potential impact of the Project may be which is not addressed by Professor Hales.
13. The important point is that irrespective of the method used, potential health effects attributable to emissions to air from the Project are minimal and with respect to the method used by Professor Hales there was no increase in the number of deaths attributable to the Project.
14. This is the case when the unrealistic assumption that the increment from the Project predicted for the Whareroa Marae would be experienced across the whole Mount Maunganui SA3 area.
15. In paragraph 73 of the Amended Evidence it appears that Professor Hales accepts the assessment that I have done using the PAF approach and has not commented on my estimates of mortality arising from the Project.

Dr Lynette Denison

30 July 2026