

BEFORE AN EXPERT CONSENTING PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application by NTP Development Holdings Limited under the FTAA for approvals relating to the Pound Road Industrial Development, Christchurch (FTAA-2505-1057)

BRIEF OF EVIDENCE BY HAROUN TURAY (NZTA)

Transport

Dated: 4 March 2026

1. INTRODUCTION

- 1.1 This brief of evidence is provided by Haroun Turay on behalf of New Zealand Transport Agency Waka Kotahi (**NZTA**) in relation to the application by NTP Development Holdings Limited (Applicant) for the Pound Road Industrial Development (Project) – FTAA-2505-1057 (Application).
- 1.2 This brief addresses transport matters arising from the Application. Safety matters are addressed separately by Roy Johnston from NZTA. Planning matters are addressed by Rory Power from NZTA.
- 1.3 This brief responds to the evidence of Mr Nick Fuller of Novo Group, set out in Appendix 2 of the Applicant's submissions dated 26 February 2026 (Fuller Evidence). I set out the matters on which I agree with Mr Fuller, the matters on which I disagree, and my reasons.

2. QUALIFICATIONS AND EXPERIENCE

- 2.1 My full name is Haroun Turay. I am a Principal Transport Planner at NZTA Waka Kotahi based in Christchurch, a role I have held since 2016.
- 2.2 I hold a Master of Science in Transportation and Highway Engineering from Napier University, Edinburgh, United Kingdom. I am a Chartered Engineer (CEng) with the Chartered Institution of Highways and Transportation (CIHT) in the United Kingdom.
- 2.3 I have over 20 years of experience in transport planning and traffic engineering across the United Kingdom and New Zealand. Prior to joining NZTA I held a series of senior roles in both the private and public sectors in the UK, spanning transport planning, traffic engineering, infrastructure design and transport network operations.
- 2.4 Since joining NZTA in Christchurch my work has included transport planning for major infrastructure investments in the Christchurch region. Of direct relevance to this proceeding, I have been involved in the Hornby Access Improvements Indicative Business Case Scoping, which covers the wider Hornby corridor within which the Pound Road Project is located. I therefore have particular familiarity with the strategic transport context of the SH1 / Pound Road area.

3. CODE OF CONDUCT

- 3.1 I have read the Environment Court's Code of Conduct for Expert Witnesses (2023) and agree to comply with it.
- 3.2 My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my areas of expertise.
- 3.3 I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

4. DOCUMENTS REVIEWED

- 4.1 In preparing this brief I have reviewed the following documents:
- (a) Appendix 2: Nick Fuller, Novo Group, Pound Road Christchurch, Applicant Response to Minute 14 (Fuller Evidence);
 - (b) Memorandum of Counsel, Anderson Lloyd, accompanying the Applicant's Response to Minute 11, Minute 14 and the Panel's Further Information Request, dated 26 February 2026;
 - (c) Appendix 1: Natalie Hampson, Savvy Consulting Limited, Pound Road Christchurch, Applicant Response (economic assessment);
and
 - (d) Panel Minute 14 and the record of the Panel-Convened Transportation Conference held on 5 February 2026.

5. MATTERS OF AGREEMENT WITH MR FULLER

- 5.1 I agree with Mr Fuller on the following matters, which I consider to be well-founded and consistent with my own assessment of the transport context.

Traffic Contribution and intersection performance

- 5.2 I accept Mr Fuller's analysis of the development's proportionate traffic contribution through the combined SH1 / Pound Road and Pound Road / Waterloo Road intersections at each stage: 6% at Stage 1, 12% at Stage 2, 17% at Stage 3, and 20% at Stage 4. I have no basis to dispute this modelling.

- 5.3 I accept that by Stage 3 completion (2037) and beyond, without the Intersection Upgrades, both intersections will be operating over-capacity during peak periods. Mr Fuller's analysis in Appendix 2 shows that at Stage 3, right turns to and from Pound Road at SH1 are at Level of Service F with delays of 71–95 seconds in the AM peak, and all three arms have movements exceeding a degree of saturation of 0.9. These are significant operational failures on the Strategic Road Network (SRN).
- 5.4 I agree that Stage 1 of the development can proceed without the Intersection Upgrades in place. The traffic contribution of Stage 1 (6%) does not by itself push the intersections into failure.

Holistic treatments of the intersections

- 5.5 I agree that the two intersections and the Pound Road level crossing must be treated as a holistic package. The physical proximity of the intersections means that queueing effects interact between them, and any upgrade to one must be coordinated with the other. Fuller's own modelling illustrates this interdependence directly: at Stage 3 completion (2037), the northbound queue on Pound Road from the Waterloo Road intersection is predicted to extend back to SH1, meaning the two intersections are not merely geometrically linked but operationally inseparable under congested conditions.

No workable interim solution

- 5.6 Based on the interim solutions assessed by Mr Fuller, I agree that neither option he examined is sufficient short of the full package of Intersection Upgrades. The shared lane option – remarking the Pound Road approach to SH1 to create a shared left/right turn lane – does not attract enough traffic to restore capacity. The standalone right-turn lane is not feasible without realigning Pound Road along its full length between the two intersections. On the basis of those two options as assessed, the full upgrade is the only effective mitigation identified.

Upgrade Design

- 5.7 I agree that the Applicant's proposed intersection upgrade design is appropriate in principle. Note that final design would need to meet NZTA's

standards as Road Controlling Authority for SH1 and would be subject to NZTA's formal design approval process.

Shared path / cycle lanes

- 5.8 I agree with Mr Fuller that marking the shoulders of Pound Road as cycle lanes is an acceptable outcome in the absence of a fully constructed shared path. This is consistent with existing facilities on Pound Road and comparable higher-speed corridors in Christchurch. I accept his conclusion that the number of pedestrian users will be low and that the effects of requiring pedestrians to use internal footpaths to connect to the Waterloo Road network are acceptable.

6. MATTERS ON WHICH I DISAGREE WITH MR FULLER

Reclassification from 'significant' to 'potentially significant'

- 6.1 The most significant matter on which I disagree with Mr Fuller is his revision of the significance of transport effects from 'significant' (as concluded in his original Integrated Transport Assessment) to 'potentially significant.'
- 6.2 Mr Fuller's rationale for this revision is that the intersections, without upgrades, would operate in a manner broadly comparable to other busy parts of the SRN in Christchurch, and that such operation is 'tolerated' by road users. He points to intersections such as SH1 / Yaldhurst Road and SH1 / Sawyers Arms Road as comparable examples.
- 6.3 I do not accept this reasoning. The fact that other intersections on the SRN are already operating with congestion does not make it appropriate to further degrade network performance at these specific intersections as a consequence of private development. NZTA's function as manager of the State Highway Network is to maintain and, where possible, improve network performance – not to treat existing congestion elsewhere as a benchmark that justifies additional degradation.
- 6.4 NZTA's role as manager of the State Highway Network carries an obligation to maintain and improve network performance, not to accept its degradation as an inevitable consequence of growth. The Hornby Access Improvements study, which I have been directly involved in, was initiated precisely because existing performance in this corridor – including at and around the Pound

Road intersections – has been identified as inadequate. That study reflects NZTA's position that Level of Service F on strategic arterials in the Hornby corridor is a problem to be addressed through investment, not a benchmark against which further deterioration should be measured. Mr Fuller's reasoning – that comparable congestion is tolerated elsewhere – is therefore inconsistent with NZTA's own network management approach to this very corridor.

- 6.5 In my view, the relevant question is not whether the resulting operation at these intersections would be comparable to other congested parts of the network. The relevant question is whether the development is generating adverse effects on the SRN that require mitigation. On Mr Fuller's own analysis, the answer to that question is clearly yes: by Stage 3 (2037), right turns at SH1 / Pound Road are at Level of Service F with delays of 71–95 seconds and all three arms operating above a degree of saturation of 0.9. That represents a material deterioration in network performance directly attributable, in part, to this development.
- 6.6 I maintain that the transport efficiency effects of the development, without the Intersection Upgrades, are significant. The downgrading to 'potentially significant' appears, in my assessment, does not reflect a material change in the technical assessment. The underlying traffic modelling has not changed – only the characterisation of what those results mean.

7. CONCLUSION

- 7.1 I agree with Mr Fuller that the Intersection Upgrades are necessary, that the full package is the only viable solution, and that Stage 1 can proceed without them. On these points there is no dispute between us.
- 7.2 I disagree with Mr Fuller's reclassification of transport effects from 'significant' to 'potentially significant.' In my view the effects remain significant. The underlying technical picture has not changed; only the characterisation of those effects has shifted, and in a direction that appears to serve the Applicant's preferred condition rather than reflect a genuine change in assessment.
- 7.3 The question of what condition is appropriate to address those effects is a matter for the Panel, informed by the planning and legal submissions. My evidence is confined to the transport effects themselves: they are significant,

they are directly attributable in part to this development, and Mr Fuller's revised characterisation of them as only 'potentially significant' is not one I share.

DATED the 4th day of March 2026

Haroun Turay

Principal Transport Planner, NZTA