

Before the Expert Consenting Panel

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 Ida Dowling for New Zealand Transport Agency Waka Kotahi

Dated: 3 June 2026

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STATEMENT OF EVIDENCE OF IDA DOWLING FOR NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI

- 1 My full name is Ida Dowling. I was NZTA's Investment Case lead for the Project and am currently the Project Development lead. I also supported the preparation of the Assessment of Transport Effects (*Transport Assessment*).¹
- 2 I am a Principal Transport Consultant and Associate at Commute Transportation. I have 26 years' experience in transport planning and engineering.
- 3 I hold a Bachelor of Engineering (Honours) from the University of Auckland in Civil Engineering. My work experience includes acting as an expert witness for both private and public clients and providing solutions to address transport issues affecting a variety of development activities, with a focus on active mode and demand management solutions.
- 4 I am a Fellow of Engineering New Zealand (FEngNZ), a Chartered Professional Engineer (CPEng) and a registered International Professional Engineer (IntPE). From 2017 to 2019, I was the President of the Association of Consulting and Engineering (ACENZ), a non-profit organisation dedicated to elevating the voices, preparedness and professionalism of consultancy firms working in the built and natural environment.
- 5 Although the present application is not before the Environment Court, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.
- 6 My evidence has been prepared to support the New Zealand Transport Agency Waka Kotahi's (NZTA) response to 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

- 7 My evidence responds to the transport-related comments received on the Project, and specifically addresses:
 - 7.1 The Project's overall transport effects;

¹ Part 6 – Attachment 20, Assessment of Transport Effects (*Transport Assessment*).

- 7.2 The alternative design (Option 3) that Stride Holdings Limited (*Stride*) considers should be preferred; and
- 7.3 The transport-related conditions proposed by Stride, Costco Wholesale New Zealand Limited (*Costco*), Westgate Town Centre Limited (*WTCL*), NZRPG Management 2017 Limited and Westgate Property Limited (*NZRPG*), and Woolworths New Zealand Limited (*Woolworths*) (together, *Westgate Commenters*).²

THE PROJECT'S TRANSPORT EFFECTS ARE POSITIVE OVERALL

- 8 The Westgate Commenters are concerned about increased congestion and travel times due to the construction of the Project, and the performance of key intersections adjacent to their sites including during off-peak times.
- 9 Fred Taylor Drive, Gunton Drive and the SH16 on- and off-ramps carry high traffic volumes, particularly close to motorway ramps. The intersections of Fred Taylor Drive / Gunton Drive / SH16 off-ramp and Fred Taylor Drive / Hobsonville Road / SH16 on-ramp currently operate with queues and delays, particularly during commuter peak periods, but also at other times of the day. Those factors have been taken into consideration during the alternatives assessment process, and in preparing the Indicative Design and associated effects assessment.
- 10 I note that the Project will deliver significant benefits to the wider transport system, as well as the transport network specifically within the Westgate area. The Project will not add traffic to the existing transport environment. Rather, it will offer a reliable, rapid and frequent public transport service, which will give workers and shoppers a real alternative to private car usage. The Project supports the functionality of the wider transport system through the provision of transport choice. The increase in travel options will enable improved choice for those wishing to shop or work at Westgate.
- 11 The current lack of attractive alternative modes means travellers to and from Westgate have limited options to avoid existing delays, leading to sustained or increasing congestion.
- 12 The Project will provide attractive options that will allow travellers to avoid vehicle congestion by using rapid transit services, available throughout the day. There is ongoing work by Auckland Transport and Auckland Council to make urban centres safer and more attractive for walking and cycling, which will support those travelling to and using the rapid transit service.

² Comments 28, 34, 36 and 37.

- 13 I am aware that customers for some types of retail activity (e.g. 'big box' and home improvement) may purchase bulky goods that are impractical to transfer using public transport. However, by providing improved travel options for other road users throughout the day, the Project encourages mode shift away from private vehicles such that those customers that need to drive are able to do so more freely.
- 14 I acknowledge that there will be temporary transport impacts associated with the construction of the Project. I agree with Ms Bates' evidence that, although the overall duration of construction in the vicinity of Westgate is estimated to be in the order of four years:³

The Project's construction effects are not lasting or permanent... It is to be expected that the construction of some stages of the Project will be in the order of four years. However, the construction traffic effects will not be constant over that period. They will vary in use and duration, and will be intermittent and temporary, and will be particular to the different construction activities and locations. For example, temporary night time lane closures, lane realignments, and speed reductions will be used in different places, at different times, for different durations of the overall construction period.

- 15 A Construction Traffic Management Plan (*CTMP*) will be prepared to ensure that the adverse construction traffic effects of the Project are managed appropriately. The *CTMP* will ensure the contractor appropriately manages any adverse traffic safety and efficiency impacts on other road users caused by the Project. Ms Bates' evidence describes NZTA's approach to managing construction traffic effects in more detail and notes that "*NZTA's proposed CTMP condition will ensure the Project's construction traffic effects are minor and managed appropriately*".⁴
- 16 In conclusion, in my opinion, the Project's transport effects are overwhelmingly positive, and a *CTMP* is the appropriate mechanism to manage the Project's construction traffic effects.

THE PROJECT HAS LESS CONSTRUCTION TRAFFIC EFFECTS THAN STRIDE'S PREFERRED OPTION 3

- 17 The evidence of Ms Meredith Bates addresses the construction traffic effects of the Project, and concludes they will be minor and temporary. I agree.

³ Statement of Evidence of Meredith Bates (Construction Traffic) dated 3 June 2026 (*SOE Bates*), paragraph 40.

⁴ *SOE Bates*, paragraph 42.

18 Stride would prefer that NZTA adopt Option 3 from the alternatives assessment undertaken at Investment Case stage, including because (in Stride's view) Option 3 has lower construction traffic effects.⁵

19 I disagree for the following reasons:

19.1 The Indicative Design enables a less disruptive construction approach for the Fred Taylor Drive underpass, whereas Option 3 would require a construction approach with greater overall traffic disruption;

19.2 The Indicative Design works proposed for Gunton Drive improve the ability to minimise construction traffic disruption more effectively than Option 3; and

19.3 The Indicative Design has less implications for SH16 than Option 3.

I expand on each of these points below.

20 I note that Ms Sinclair's evidence describes the alternatives assessment process undertaken to determine the Indicative Design, including the process that led to the Indicative Design being preferred over other options, including Option 3.

Design differences between Indicative Design and Option 3

21 The key design differences relevant to traffic between the Indicative Design and Option 3 at the intersection of the SH16 off-ramp / Gunton Drive / Fred Taylor Drive are:

	Indicative Design	Option 3
Busway alignment	Underpass located immediately to the west of the Gunton Drive / SH16 intersection. This physical separation enables that intersection to remain largely operational during construction with minimal disruption.	Located immediately to the east of Hobsonville Road bridge abutment. This alignment minimises impact on SH16 offramp but requires speed reduction on SH18 ramp due to geometric constraints. This alignment requires multiple lane closures on the Hobsonville Road bridge during construction, resulting in significant disruption.
SH16 westbound off-ramp	The 'Offramp Improvements' discussed in Ms Bates' evidence.	No change.

⁵ Comment 34b – Stride Traffic Statement, paragraphs 77(d) and (e). Comment 34c – Stride Engineering Statement, paragraph 5 and 32-37.

Gunton Drive	<p>Realigned away from SH16 motorway mainline.</p> <p>An additional westbound through lane provided between Fred Taylor Drive and Tawhia Drive compared with the existing lane arrangement.</p>	Realignment during construction.
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- 22 The Indicative Design at the intersection of Fred Taylor Drive / Gunton Drive / SH16 off ramp is shown in **Figure 1**.

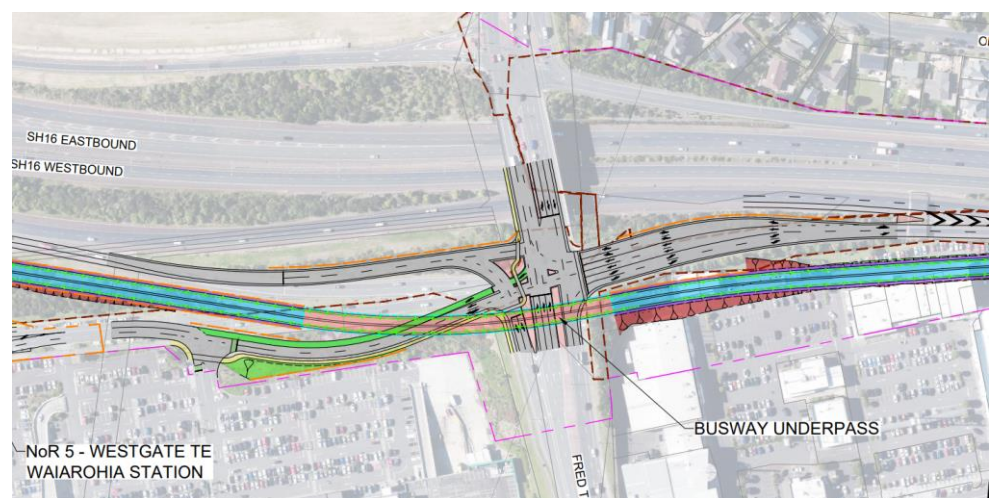


Figure 1 – Indicative Design at the intersection of the SH16 off-ramp / Gunton Drive / Fred Taylor Drive (extract from Attachment 6.1 Indicative Design West)

Underpass construction implications

- 23 Option 3 would require an additional span to be added to the Hobsonville Road bridge compared to the Indicative Design. The constructability inputs to the technical feasibility assessment that informed the alternatives assessment during the Investment Case phase indicated that adding a span would require multiple full lane closures on the bridge for substantial periods of time, with consequent high traffic disruption effects and prolonged construction durations. A temporary bridge deck is not possible with Option 3.
- 24 In comparison, the constructability inputs during the same phase indicated that the Option 7 underpass alignment (subsequently adopted for the Indicative Design) would be less complex to construct than Option 3 and achievable with minimal need for temporary lane closures. It is possible to provide a temporary daytime bridge deck over a cut and cover trench, worked at night, on Fred Taylor Drive west of its intersection with Gunton Drive, meaning that Fred Taylor Drive can remain operational during peak traffic

times and as such there would be less disruption to traffic heading to Westgate.

- 25 Overall, in my opinion, Option 3 would be significantly more disruptive for traffic movements, including those to and from the south, compared to the Indicative Design.

Gunton Drive implications

- 26 As noted in Ms Sinclair's evidence, the Indicative Design refined the underpass option during the consenting phase to realign Gunton Drive to reduce impacts on that road, reduce constructability challenges and improve options for construction staging. This realignment also enables Gunton Drive to remain open during peak daytime traffic periods (with limited exceptions), and NZTA will be offering a condition to this effect.

- 27 For Option 3, constructability needs are such that realignment of Gunton Drive is likely to be required, and therefore the Proposed Designation extent is also required.

SH16 implications

- 28 Due to its geometric constraints, Option 3 would also require a speed reduction on the SH18 ramp to enable the underpass to cross into the Westgate Station. I consider this would have adverse impacts for motorway traffic because slower speeds are likely to increase delays on the SH18 ramp.

- 29 Mr McKenzie and Mr Rankin consider Option 3 would reduce traffic disruption on the SH16 off-ramp,⁶ particularly for people travelling to the NorthWest Centre from the south via Gunton Drive. While Option 3 may appear less disruptive to traffic entering the Centre from the south (green arrow in Figure 2 below), in my opinion that would not be the case.

- 30 I consider that Option 3 would be much more disruptive overall for people travelling from the south than the Indicative Design. Importantly, these people must also exit the centre, with the main exit route towards the south likely to be via Tawhia Drive and Fred Taylor Drive (purple arrows below), using the SH16 southbound on ramp. This exiting movement would be severely disrupted by any closure of lanes on the Hobsonville Road bridge (shown in orange in Figure 2 below), constraining traffic to the south to a significant degree.

⁶ Comment 34c – Stride Engineering Statement, paragraphs 30-31; Comment 34b – Stride Traffic Statement, paragraph 77.

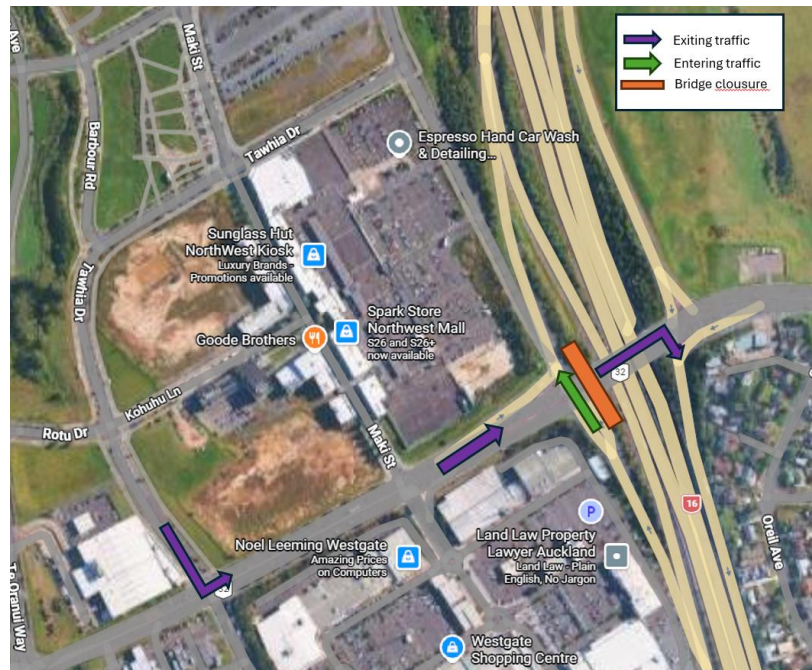


Figure 2 – Typical traffic movements to and from the south, entering and exiting the NorthWest Centre.

- 31 In addition, Option 3 does not include the Offramp Improvements discussed in Ms Bates' evidence. These works improve the ability for construction to be managed in stages, minimising traffic disruption effectively during construction.
- 32 As a result, in my opinion, Option 3 would result in much more significant construction traffic disruption 3 and have much wider transport network effects than the Indicative Design.

RESPONSE TO WESTGATE COMMENTERS' PROPOSED TRANSPORT CONDITIONS

- 33 In this section, I address parts of the transport conditions proposed by the Westgate Commenters. I consider other parts of the proposed transport conditions are unnecessary because they are already addressed in NZTA's Proposed Designation Condition 13. I understand these matters have been identified in NZTA's response to the Westgate Commenters.

Additional CTMPs will add complexity without benefits

- 34 The Westgate Commenters propose that three separate CTMPs are prepared for the Project – an overarching CTMP and specific plans for Westgate (*CTMP-W*) and the North West Centre (*CTMP-NW*).
- 35 I consider that proposal to be unreasonably and unnecessarily burdensome. Managing three separate CTMPs over a relatively small geographic area would create an administrative burden for contractors, with no identifiable benefit. It would frustrate the ability

to manage traffic effectively and efficiently across the network for the benefit of both Centre operators and the Project. I consider a single CTMP covering the whole area to be more appropriate as it allows for integrated management of effects through one plan, and therefore be more likely to achieve good outcomes.

Operational site access and vehicle circulation

36 NZRPG seeks a condition that would require NZTA to design the Project to provide for "*effective and efficient site access and internal vehicle circulation within and around the Westgate Shopping Centre*" and "*a safe and efficient permanent vehicle access point for delivery Vehicles to loading zones in the Shopping Centre*".⁷

37 In my opinion, the proposed conditions are not required. NZTA has proposed a specific condition for Woolworths Westgate to the extent that the Proposed Designation affects its ability to use an accessway NZTA understands it has legal rights to. I have reviewed access arrangements for all other businesses on NZRPG-owned sites, based on my understanding of their current operations, and consider that the Indicative Design and the Proposed Designation do not restrict vehicle access or circulation, either during construction, or permanently.

Unachievable and unrealistic construction traffic outcomes

38 The suggested CTMP-W condition includes requirements to "*maintain capacity and connectivity*" and "*minimise delays and congestion*".⁸ The suggested CTMP-NW condition includes a requirement to "*ensure ... access into and out of the NorthWest Shopping Centre site is maintained at the same or similar level of service, scale, form and proximity of access to the current NorthWest Shopping Centre*" and maintain "*the overall Level of Service of all roadways and intersections adjacent to the NorthWest Centre and the access routes for customers*" throughout construction.⁹

39 In my opinion, those suggestions are unreasonable and unachievable. There will always be some level of capacity and connectivity disruption during construction works and it may at times be unable to be differentiated from congestion due to other reasons (eg cars breaking down in live lanes, accidents, etc). NZTA's proposed CTMP condition NZTA contains requirements for the contractor to "manage" congestion and efficiency, which I consider to be appropriate and reasonable.

⁷ Comment 36 – NZRPG, Schedule A, Proposed condition 14(a).

⁸ Comment 34 – Legal Statement of Stride (*Stride Legal Statement*), Appendix B, Proposed Condition F (b)(ii) – (b)(iii).

⁹ Stride Legal Statement, Appendix B, Proposed Condition G (b)(ii) and (iv).

- 40 The suggested CTMP-W and CTMP-NW conditions also include a requirement to “*avoid construction [works/activities]... between 1 November and 7 February*”.¹⁰
- 41 In my opinion this requirement is both unreasonable and unrealistic. An “avoid” restriction would effectively mean that no construction works could occur during this period. A three-month “no work” period, would substantially extend construction duration and cost. In addition to the three-month “no work period” a process would be required to secure and make the construction site safe, and a commensurate re-mobilisation period upon works restarting. Assuming an indicative four-year construction period, stopping work for more than one quarter of each year would extend a four-year construction period to more than five years. These three months are some of the most productive in a construction calendar for earthworks.
- 42 NZTA’s proposed CTMP condition includes a requirement to consider the “timing of traffic movements”, which I consider to be an appropriate mechanism to ensure this concern is addressed when the CTMP is prepared without compromising the workability of construction activity.

Unnecessary process duplication

- 43 Stride’s suggested CTMP-W condition includes a detailed drafting and consultation requirement (condition F(c)). In my opinion, this is not necessary. The CTMP will be prepared in accordance with the designation conditions and road controlling authority (RCA) requirements and approved through the normal RCA processes. I consider it is not necessary to duplicate this guidance in the conditions, or otherwise overburden the process, as there is already a robust, established process in place that addresses these matters outside conditions.

Ida Dowling
3 June 2026

¹⁰ Stride Legal Statement, Appendix B, Proposed Traffic Condition G(b)(vii) and F(b)(iv).