

MEMORANDUM OF THE NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE MT WELCOME DEVELOPMENT, PUKERUA BAY, PORIRUA 30 JULY 2026

1. Introduction

- 1.1 This memorandum presents the assessment undertaken by the New Zealand Transport Agency Waka Kotahi (NZTA) of the substantive application for the Mt Welcome, Pukerua Bay, Porirua **(the Application/the proposed development)** (NZTA reference 2025-0646), submitted by Pukerua Property Group Limited Partnership **(the Applicant)** under the Fast Track Approvals Act 2024 **(FTAA)**.
- 1.2 NZTA appreciates the opportunity to comment on the Application.
- 1.3 The assessment has been prepared in response to an invitation from the Expert Panel **(the Panel)** to provide comment and includes a summary of NZTA's preliminary findings as they relate to the state highway network.
- 1.4 This assessment is based on the Application materials submitted to the Environmental Protection Agency **(EPA)**.
- 1.5 NZTA is the sole Road Controlling Authority (RCA) for New Zealand's entire state highway network. It is responsible for the planning, maintenance, and operation of all state highways. It is also a Requiring Authority under the Resource Management Act 1991 (RMA).
- 1.6 NZTA has drawn on input from qualified and experienced internal staff when putting together its comments. Specifically, input was sought from:
 - Errol Ritson: Senior Safety Engineer based in the NZTA Wellington Office. Errol has been employed by NZTA since 2019 as the Wellington Regional Safety Engineer and holds the qualification of a Masters in Civil Engineering: Road and Transport from Durban University of Technology.
 - Samson Ko: Transport Engineer, WSP. Samson is the Acting Road Safety Lead, Wellington Transport Alliance and has been part of the WTA project since 2023. He holds a Bachelor of Engineering (Honours) from University of Auckland.
 - Adam Nicholls: Regional System Design Lead based in the NZTA Wellington office. Adam has been employed by NZTA since 2017. Adam holds a Postgraduate Diploma in Transport Engineering & Planning from the University of Salford (UK). Adam is also a Chartered Transport Planning Professional (CTPP).
 - Jeremy Blake: Lead System Planner for Wellington / TOTS based in the NZTA Wellington Office. Jeremy has been employed by NZTA in the Integrated Planning and

System Planning, since 2011. Jeremy holds the qualification of Bachelor of Resource and Environmental Planning with Honours from Massey University.

- Charlotte Lockyer – Principal Consultant, Hydrology & Hydrogeology – Asia Pacific, SRL Consulting, BSc Hons Physical Geography, BCA.
- Susan Rawles: Senior Planner based in the NZTA New Plymouth Office. Susan has been employed by NZTA in their Environmental Planning team, since 2019. Susan holds the qualification of Bachelor of Resource and Environmental Planning with Honours from Massey University.

1.7 NZTA wishes to comment on the following matters:

- State Highway 59 Strategic Context
- NZTA Approvals Outside the FTAA
- The Proposed Transport Connection to SH59
- Response to Minute Four of the Expert Panel and the Applicants Response
- Water Quality and Stormwater Discharges

2. **State Highway 59 Strategic Context**

2.1 The application site is located adjacent to State Highway 59 (SH59), between Pukerua Bay and Plimmerton. SH59 is a strategically important corridor with a One Network Framework classification of 'Interregional Connector'. An interregional connector is a national state highway route designed to safely, reliably, and efficiently move people and freight over long distances between and within regions. It is a high-speed environment with a 100km/h posted speed limit.

2.2 SH59 is an important alternative route to State Highway 1 Transmission Gully (TG).

2.3 Recent freight-sector feedback on the draft Wellington State Highway Strategic Plan has highlighted that SH59 continues to be used by a significant proportion of overweight and over-dimension vehicles. These vehicles require a network free from obstruction.

2.4 Strategic planning for the Porirua Northern Grown Area Master Plan (Master Plan) adjacent to SH59 is underway, led by Porirua City Council (PCC). PCC has advised that the development of the Master Plan area would enable approximately 6000 houses. This level of development adjacent to SH59 is likely to result in the growth of traffic volumes to levels consistent with or higher than those experienced prior to the opening of TG.

2.5 SH59 is classified as a 'Rural Connector' under the Land Transport Rule Setting of Speed Limits 2024 (the Rule). Under the Rule a road with this classification can have a speed limit of 80km/h or 100km/h. Due to the rural nature of the road, and the proximity to the dual carriageway and merge, the suitable speed limit for this section of SH is 100km/h.

2.6 The capacity, form, and function of SH59 as an Interregional Connector will need to be retained into the future.

3. NZTA Approvals Outside the FTAA

- 3.1 All works within the state highway road reserve and state highway designation will require separate approval from NZTA as the road controlling authority and requiring authority outside the FTAA process. These approvals include:
- a. Approval under S176(1)(b) of the RMA for work within the state highway designation.
 - b. Approval under S93 of the Government Roading Powers Act 1989, to deem the limited access road a road, so legal access can be established for the development.
- 3.2 All works within the state highway will be required to be delivered under a legal developer agreement between NZTA and the Applicant.
- 3.3 All works within the state highway require an approved corridor access request, prior to the start of works.
- 3.4 The S176(1)(b) approval under the RMA will include appropriate conditions regarding development and approval of detailed design for all proposed works within the state highway. This includes the NZTA standards, Austroads guidance, Safe System principles, and geometric design requirements to be met.
- 3.5 It is not appropriate for this level of detail to be provided or assessed as part of the resource consent application.
- 3.6 Final approval of the detailed design for works within the state highway, should be the responsibility of NZTA. Therefore, resource consent conditions requiring approval of detailed design and implementation of works within the state highway should be avoided.
- 3.7 Regional resource consents granted by the Panel to the developer for the delivery of works within the state highway will need to be handed over to NZTA along with the physical assets. As such NZTA is likely to inherit post construction conditions with ongoing maintenance responsibilities. Therefore, it is critical that NZTA is involved in condition drafting and finalisation for post construction conditions on these consents.
- 3.8 The application is unclear with regards to stormwater assets within the state highway and who will be responsible for these, NZTA or PCC. If PCC is to be responsible for assets in the state highway road reserve NZTA will require a separate maintenance agreement.

4. The Proposed Transport Connection to SH59

- 4.1 NZTA supports, in principle, the staged approach to the access proposed in the Integrated Transport Assessment provided by the Applicant, subject to confirmation of the timing for the priority T intersection with right turn bay (interim intersection) and dual lane roundabout (permanent intersection).
- 4.2 The conditions submitted by the Applicant allow for a temporary construction access prior to granting of the s224 certificate. However, the ITA does not include an assessment of the appropriateness of this temporary construction access.
- 4.3 NZTA considers that implementation of the interim intersection is required prior to any construction or enabling works for the development. This is to ensure provision of a safe and

efficient access to the site for all construction vehicles. Appropriate conditions should be included to ensure this is realised.

- 4.4 The concept design for the interim intersection is acceptable for construction traffic and for some initial vehicle movements generated by the residential development.
- 4.5 The Applicant is proposing to transition from the interim intersection to the permanent intersection upon completion of 110 residential dwellings. However, the ITA does not include an assessment of this threshold, so it is not possible to understand how it was determined and whether it is appropriate.
- 4.6 The modelling¹ presented in the ITA indicates that, with the development of 63 lots, the interim priority T intersection with right turn bay (RTB) has a slightly higher predicted Death and Serious Injury (DSI) crash rate of 0.011 compared with 0.009 for the permanent dual lane roundabout. While this marginal difference may be acceptable in isolation, given that the overall predicted injury crash rate remains lower for the interim priority T-intersection, it nonetheless demonstrates that the permanent dual lane roundabout provides a lower serious crash risk outcome from an early stage of development.
- 4.7 More significantly, the modelling shows that at 123 lots the predicted DSI crash rate for the interim priority T-intersection with RTB increases to 0.018, compared with 0.011 for the roundabout option. Although the total injury crash rate remains lower for the priority T-intersection with RTB (0.057) than for the roundabout (0.098), from a Safe System perspective, greater weight should generally be given to outcomes relating to death and serious injury risk rather than total crash frequency alone in alignment with DSI equivalent (DSIeq).
- 4.8 Therefore, NZTA requests that the developer demonstrate, from an overall safety risk perspective, how the 110-lot threshold has been determined and whether it represents the optimal point at which to upgrade the intersection from the interim to permanent intersection solution. In particular, the Applicant should provide:
- a. the predicted DSI crash rate for the 110 lots development threshold, and
 - b. a comparison of the total DSIeq outcomes for both the interim priority T-intersection with RTB and permanent dual lane roundabout options at various development levels to identify the appropriate threshold.
- 4.9 This analysis will assist in understanding whether the proposed trigger appropriately balances overall crash frequency against the increased risk of death and serious injury.
- 4.10 Subject to determining the appropriate trigger for the permanent dual lane roundabout intersection, NZTA agrees with the assessment, crash analysis and conclusion of the ITA that a dual lane roundabout is required as the permanent intersection solution. The dual lane roundabout significantly reduces the likelihood and severity of high-speed angle and turning crashes while providing an intersection form that is aligned with the operating environment of the SH59 corridor.

¹ Table 11-3 Mt Welcome Residential Subdivision Integrated Transport Assessment

- 4.11 Subject to detailed design, the concept design for the permanent dual lane roundabout intersection submitted with the application is acceptable.

5. Response to Minute 4 of the Expert Panel and the Applicants Response

- 5.1 Minute 4 of the expert panel, dated 6 July 2026, requests the Applicant provide information regarding an option to deliver the permanent intersection with a realignment of the Taupo Stream. As the Applicant's response notes, this option relies on the substantial use or acquisition of Crown land, which has not been assessed in detail by NZTA.
- 5.2 Changes or refinement of the design or location for the permanent dual lane roundabout intersection, including works to enable its construction must be undertaken in collaboration with NZTA to ensure that NZTA standards, Austroads guidance, Safe System principles, and geometric design requirements can be met and so that the impact on Crown land can be assessed.
- 5.3 If required, NZTA is open to continuing to work with the Applicant to look at refinements for delivering the permanent intersection (dual lane roundabout).
- 5.4 Paragraph 13 of the Applicant's response to minute 4, expresses the Applicant's preference for a signalised intersection. However, the ITA and crash risk evaluation provided with the application identified the dual lane roundabout as the most appropriate long-term access treatment and did not consider either a signalised intersection or priority-controlled intersection arrangement to be a feasible alternative.
- 5.5 The route function, operating characteristics, and 100km/h speed limit of SH59 do not support the introduction of either a signalised intersection or a priority-controlled T-intersection (beyond the initial construction and development threshold discussed in points 4.4 – 4.10).

6. Water Quality and Stormwater Discharges

- 6.1 The Applicant has proposed to treat some stormwater from the permanent intersection via roadside swales. However, the water quality assessment provided for the roundabout shows an overall increase in contaminant loads.
- 6.2 NZTA considers that this is inconsistent with best practice, which is to treat runoff from all new road surfaces, and with the Greater Wellington Regional Council (GWRC) Natural Resources Plan, which requires the progressive improvement of stormwater quality discharges.
- 6.3 Further, NZTA holds a global stormwater consent for state highway stormwater discharges, and will be required to show 'progressive improvement' to reducing contaminant load to support catchment water quality objectives over time. Even a minor deterioration of the stormwater quality as a result of this project will require further enhancements elsewhere within the catchment.
- 6.4 Therefore, further treatment should be incorporated into the design, such as swales along the untreated stretches of state highway, to ensure stormwater is captured and treated from the full permanent intersection road surface area. Treatment design and options should be designed in consultation with NZTA.

- 6.5 NZTA will not accept any discharge of stormwater from the development (outside of the state highway discharges) into the state highway stormwater network.

7. Conclusion

- 7.1 SH59 is, and will be required to continue to function as a high-speed interregional connector, designed to safely, reliably, and efficiently move people and freight over long distances between and within regions.
- 7.2 NZTA is the road controlling authority and requiring authority for SH59; all works within the state highway road reserve or designation require separate NZTA approval outside the FTAA process.
- 7.3 NZTA involvement is required in development of conditions with regards to consents for works in the state highway that NZTA will inherit as part of the asset handover.
- 7.4 NZTA supports the proposed staged access approach in principle, subject to:
- a. The construction of the interim intersection prior to construction and enabling works, and
 - b. confirmation of the appropriate development trigger for upgrading from the interim priority T-intersection to the permanent dual-lane roundabout.
- 7.5 NZTA agrees that a dual-lane roundabout is required as the permanent intersection solution, with NZTA involvement expected in any further refinement of its location and design.
- 7.6 Stormwater and water quality matters require further resolution, including treatment performance, asset ownership and maintenance responsibilities.