

**BEFORE THE HEARING PANEL
APPOINTED BY KAPITI COAST DISTRICT COUNCIL**

IN THE MATTER OF | I TE TAKE O the Resource Management Act 1991
AND | ME

IN THE MATTER OF | I TE TAKE O Proposed Plan Change 5 (Private):
100 and 110 Te Moana Road,
Waikanae, Kāpiti Coast District

**STATEMENT OF EVIDENCE OF
LUKE BENNER
ON BEHALF OF ERIC, VINCE AND RAECHEL OSBORNE**

Dated 2 September 2026

Introduction

1. My full name is Luke Michael Benner.
2. I have prepared this Statement of Evidence regarding Private Plan Change 5 (PC5) to the Kapiti Coast District Plan, in relation to the transportation and traffic engineering matters associated with the proposal.

Qualifications and experience

3. I am the director of LBC Traffic Engineers Limited, a traffic and transportation engineering consultancy based in Kapiti. I hold a New Zealand Diploma in Engineering (Civil) and I am a member of Engineering New Zealand as well as a member of the Transportation Group.
4. I have approximately 10 years' experience and my career to date has involved 5 years working within local government across the areas of traffic engineering, road safety and the planning and design of sustainable transport projects across walking, cycling and public transport. My most recent role was with Porirua City Council as a traffic and road safety engineer between 2019 and 2021.
5. I have worked within my own consultancy since 2019 (part time) and full time since April 2021 providing traffic engineering services to public and private clients across the Wellington and Manawatu regions. My experience includes completing integrated transport assessments for private clients as well as assessing transport consents for Porirua and Hutt City Councils as well as Kāpiti Coast District Council. I have also carried out road safety audits and the planning and delivery of public transport projects

Code of Conduct

6. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

Overview of work completed

7. I was engaged in mid-2024 to undertake a Transport Assessment to assess the potential transportation effects of the proposed rezoning of 100 & 110 Te Moana Road, Waikanae from its existing rural zoning to residential. The initial assessment and reporting covered a detailed review of the existing transportation network including its operational characteristics and performance

including that of the neighbouring signalised interchange on Te Moana Road but did not initially include any modelling.

8. The potential development yield was assessed at 150 dwellings, with this comprising of up to 50 lots with 3 dwellings on each lot. This dwelling density has been used as it is understood that the Medium Density Residential Standards (**MDRS**) would apply to the PC5 site if rezoned. An assessment was then carried out with respect to traffic generation and distribution, road safety and sustainable transport, followed by an assessment of PC 5 against the objectives and policies of the Transport Chapter of the District Plan as well as the Council's Sustainable Transport Strategy.
9. The initial Transport Assessment identified the need for a new intersection fronting Te Moana Road to provide vehicle, pedestrian and cycle access to and from the PC 5 site, with the assumption being that this intersection would provide for all movements on and off Te Moana Road. The need for future pedestrian connections both along and across Te Moana Road was identified with the expectation being that the design of a future intersection, incorporation of footpaths along Te Moana Road and potentially a crossing point would be considered in the detail through future resource consenting processes, should PC 5 be confirmed.

RFI Requests & Responses

10. Upon the draft plan change being lodged with Kapiti Coast District Council in December 2024, initial review comments were received from the Council's Access and Transport team and their consultant Mr Colin Sheilds in early 2025, seeking that SIDRA modelling analysis be carried out of the nearby interchange taking into account the cumulative traffic effects of consented development within Ngarara Farm as well unconsented but enabled (rezoned) land from within this same area.
11. In February 2025 I met staff from the Council's Access and Transport team and their consultant peer reviewer to discuss the feedback received including the potential scope of the SIDRA modelling to be undertaken. The Council's Team Leader Transport Planning and Safety provided me with earlier reports dating back to 2014 including an Integrated Transport Assessment prepared by Jacobs which had assessed the transportation effects arising from the Waimeha North (land to the west of the expressway), Te Kouka & Homestead neighbourhoods at Ngārara Farm. This report is provided as **Attachment 1** and was used to inform the traffic volumes used in SIDRA modelling carried out.
12. Upon reviewing the Jacobs report it was clear that following the acquisition of a large part of the Ngārara Farm site by NZTA for the MacKay's to Peka Peka

Expressway project (**M2PP**) the overall development yield had reduced to 900 dwellings within the portion of the Ngārara Farm site located to the west of the expressway which connects to the Te Moana interchange (refer to section 2 and Figure 2-2 as well as Table 5-6 of Attachment 1). My review and conclusions made regarding the level of development and associated traffic generation from Ngārara Farm were put to the Council's Transport & Access Team via email in March 2025, with a representative from the Council confirming my approach and conclusions were acceptable for use in the base case SIDRA models.

13. Prior to commencing work on the SIDRA modelling, I requested various inputs and data from the Wellington Traffic Operations Centre (**WTOC**) including traffic volume data for the Te Moana interchange covering the weekday AM and PM peak hours and well as signal phasing and timing data. This data was used to set up the base case "existing" models covering the AM and PM peak hour periods.
14. Ultimately the following scenarios were modelled utilising the available data and inputs from WTOC as well as the traffic generation rates agreed with the Council associated with Ngārara Farm and for the PC 5 site.
 - Existing Te Moana Rd/SH1 Interchange (AM & PM Peaks)
 - Existing Te Moana Rd/SH1 Interchange + Ngārara Farm (AM & PM Peaks)
 - Existing Te Moana Rd/SH1 Interchange + Ngārara Farm + Plan Change Site (AM & PM Peaks)
15. The results of the modelling were included with the Transport Assessment filed with the PC 5 request (dated 18 April 2025). They showed that the interchange currently operates at a level of service D during the AM and PM peak hour periods, with the level of service remaining at this level upon adding the additional traffic from Ngārara Farm albeit with significantly longer delays and queuing along Te Moana Rd and on the northbound expressway offramp, particularly in the AM peak hour (refer Attachment 1 to the Transport Assessment).
16. Upon adding the additional traffic flows associated with the PC 5 site on top of Ngārara Farm, this was projected to increase queuing slightly and delays on the eastbound approach along Te Moana Rd during the AM peak, noting the level of service for the interchange was projected to remain at D. The reverse was projected to occur in the PM peak with queuing and delays increasing on the westbound Te Moana Rd approaches as well as the northbound expressway offramp, and the level of service for the interchange was projected to drop to E.
17. Following the PC 5 request being formally lodged with the Council, a request for further information was received dated the 4th of June 2025. This set out 8

matters requiring further assessment with these being related to the SIDRA modelling carried out including the incorporation of the Te Ara Kawakahia intersection into the various scenarios that were modelled. The SIDRA modelling and report was subsequently updated by including the requested further information, with a revised Transport Assessment report (dated 23 July 2025) submitted to the Council. The SIDRA modelling outcomes for the Te Moana interchange remained very similar to those reported in the April Transport Assessment, and as described at paragraphs 15 to 16 above (refer Attachment 1 to the 23 July Transport Assessment).

18. Except as modified as now discussed in the following sections of my evidence (as to modelling outcomes in particular), I **adopt** the 23 July Transport Assessment as my opinion for the purpose of this hearing.

Submissions

19. Following public notification of PC 5 a submission was received from the NZTA dated 20th November 2025. This submission raised concerns with the potential traffic effects of PC 5 including traffic generation, traffic growth & pedestrian protection phasing. NZTA's submission included a request to include a higher trip generation rate in the modelling, update the SIDRA modelling for pedestrian safety, correct signal phasing configuration, eliminate phase repetition and to standardise signal offset methodology.
20. While other submissions were received with respect to transport, less detail was included within those submissions. My assessment and responses to NZTA's submission are considered to address all other submissions involving transport.
21. Following a meeting with NZTA's planner and engineers from the Wellington Transport Alliance (**WTA**) on the 2nd of February 2026 it was agreed that the requested changes and improvements would be carried out to the modelling. At this time, I engaged the services of Tohunga Transport Advisory Partners (**TTAP**) based in Lower Hutt to assist with carrying out the requested updates to the SIDRA modelling. TTAP were engaged for this work due to their specific expertise in undertaking traffic modelling.
22. Following the requested updates to the SIDRA modelling by TTAP, I provided an email response to NZTA on the 6th of March 2026 in which I stepped through in detail the updates carried out to the modelling in response to their submission. This included providing a copy of the SIDRA file. It should be noted, that the trip generation rates of the PC 5 site were not increased through this update, with the reasons for that explained below.

23. On the 23rd of June 2026 an email update was provided by the NZTA outlining one primary remaining concern which related to a projected queue on the northbound offramp extending onto the expressway with the NZTA stating that this was projected to reach 1003.7m long (for the Existing + Ngarara Farm + Plan Change Scenario), but with the offramp being 480m long.
24. Three secondary concerns also remained as follows:
1. The traffic predictions for the proposed plan change may be underestimated given the use of Transport for New South Wales trip rate which are 16% lower per day than those currently recommended by NZTA and 35% lower in the peak hour. This could result in an under prediction of queue lengths.
 2. The proposed access to the plan change area is very close to the adjacent Te Moana Road intersections which is likely to require closely spaced right turn bays. These could potentially confuse drivers.
 3. It's noted that the applicant's most recent SIDRA modelling introduced changes to signal phasing for the plan change scenarios without explanation. This raises concerns regarding the robustness of the modelling and may undermine the validity of the assessed effects of the proposed plan change.
25. In seeking to resolve the outstanding matters, NZTA's planner advised that Fergus Tate of WSP had been engaged on behalf of the WTA. Following further review and interrogation of the modelling by myself and TTAP, a meeting was held with Mr Tate on the 1st of July 2026.
26. Through this meeting it was confirmed that NZTA, the WTA and their reviewers were not looking at the results of the modelling correctly under the network output function of SIDRA. As the interchange is operated in a connected and coordinated manner the outputs of the intersections need to be looked at on that network basis as opposed to individual isolated intersections. The actual queuing length on the north bound offramp was projected to be a maximum of 200m against an offramp of 480m long, indicating ample queuing capacity.
27. With respect to NZTA's concerns regarding the trip rates used, at the time of preparing the original (April 2025) Transport Assessment, I considered using the typical residential dwelling trip rate of 10.7 vehicles per day and the peak hour trip rate of 1.3 vehicles per hour (as later sought by NZTA) , however on the basis that PC 5 was being assessed assuming each lot would accommodate up to 3 dwellings (as is permitted under the MDRS), I considered that the traditional residential trip rate for *low density* housing would be too high. I

therefore adopted the daily and peak hour trip rates found in the Transport for New South Wales publication “Guide to Traffic Generating Developments” with this being a daily rate of **9.0 vehicles per dwelling per day** and a **peak hour rate of 0.85 vehicle movements** on the basis that this would be more closely aligned with the traffic generation rates of *medium density* housing.

28. It should be noted that in September 2025, NZTA updated its Planning Policy Manual, releasing the document “Access onto the State Highway from Private Property”. Section 8.9 of this document contains information on trip generation rates, with Table 8-4 confirming a daily trip rate for medium density residential of **6.8 vehicles per dwelling per day** and **peak hour rates of 0.8 vehicle movements**. The PC 5 site at three dwellings per lot would be consistent with medium density housing, therefore under this updated NZTA guidance, the level of traffic generation from PC 5 would actually be lower than has been assessed through the SIDRA modelling in the Transport Assessment.
29. The remaining item noted concerns regarding the updated modelling outputs and changes to signal phasing without explanation. As noted above, I provided a detailed response via email to NZTA’s planner on the 6th of March 2026 which stepped through all of the changes and refinements made to the modelling. Explanation was provided in that email as to all the changes that were made alongside the actual SIDRA file.
30. However, after these updates and explanation, a duplication in the AM peak hour flows was identified in the model with this overstating the peak hour flows approaching the PC 5 site from the west. The duplication in flows was removed and the updated SIDRA file provided to NZTA on the 21st of July 2026.
31. A further information request was then received from the NZTA on the 23rd of July 2026 outlining the following concerns.
 - The traffic-demand assumptions require further explanation, as some movements reduce despite additional development traffic being added. The basis for these changes has not been adequately explained.
 - The previously identified concern regarding trip generation does not appear to have been fully addressed. Peak-hour demand remains lower than would be expected under NZTA PPM guidance, and the basis for that difference has not been sufficiently demonstrated.
 - The adopted peak-flow factors and gap-acceptance parameters require further explanation and validation, given their influence on modelled delays and queues. These assumptions have also not been applied consistently across the scenarios, which makes direct comparison difficult.

- Different signal phasing and cycle times have been applied between the scenarios. The different degree of optimisation limits the reliability of direct comparisons between the resulting modelled outcomes.
- Further information is required to demonstrate how cumulative traffic associated with surrounding growth has been accounted for and whether its effects have been fully captured.

Independent Review (Modelling)

32. After receiving the further information request from NZTA, it was decided to engage an independent suitably qualified and experienced expert to undertake a (yet further) review of the SIDRA modelling carried out to date. Mr Don Wignall of Transport Futures Ltd was engaged to undertake this review, noting his extensive experience in using SIDRA and other modelling packages including SATURN and AIMSUN. Mr Wignall has been also involved in producing the Council's Kapiti Traffic Model, Version 4 (**KTM4**).
33. As part of the Transport Futures review completed by Mr Wignall, it was identified that my modelling had assumed that all traffic to and from Ngārara Farm was to be distributed via Te Moana Road only. However, the structure plan for this development includes the extension of Te Ara Kawakahia through to Ngārara Road, therefore, to assess the full development of Ngārara Farm as planned would mean that this collector road connection has been made, rather than all traffic being distributed through the Te Moana interchange via Te Ara Kawakahia.
34. Additionally, it was identified that the Council's KTM4 Model already includes traffic from the Ngārara Farm future development area, with trip distribution patterns being well defined within this model. The SIDRA modelling in the Transport Assessment assumed a heavy concentration of vehicle movements to and from Ngārara Farm via Te Ara Kawakahia and Te Moana Road during the respective peak periods, which has been proven to be significantly different (i.e. generally greater) than under KTM4. The trip distribution rates of the KTM4 Model have therefore been adopted as part of the Transport Futures review.
35. Despite the reasoning set out above supporting a lower (medium density) type trip rate for the PC 5 site, it was agreed with Mr Wignall to test all of the modelling with the higher (NZTA preferred) residential trip rate of 1.3 vehicles per hour per dwelling as a worst-case scenario. The Transport Futures review is included as **Attachment 2** to my evidence.
36. As detailed in Attachment 2, the Transport Futures review investigated six scenarios across both AM and PM peak hours. Within the six scenarios, three

new options to those included in the Transport Assessment were tested as follows:

1. Existing plus 'plan change' traffic, assuming 150 dwellings @ 1.3 peak hour trips per dwelling (195 Passenger Car Units (**PCU**) in the am and pm peak hours).
 2. Existing plus consented future development (including retirement units) at the Ngārara Farm development, (481 dwelling equivalents, i.e. 626 PCU).
 3. Existing plus consented future development (including retirement units) at the Ngārara Farm development (626 PCU) plus 'plan change' traffic (195 PCU in the am and pm peak hours).
37. These additional scenarios were modelled upon receiving further information from Council as to the existing level of consented (or currently being consented) development within Ngārara Farm. While Ngārara Farm will theoretically yield 900 dwellings in total, the actual level of development will be significantly less than this at 821 dwellings as set out in the following paragraphs.
38. Specifically, within the structure plan for the Ngārara Farm there are two relevant neighbourhoods now consented as follows:
- Waimeha North (land to the west of expressway connecting to the Te Moana interchange)
 - Te Kouka
39. Table 1 of the Transport Futures review sets out the level of development consented across the above two neighbourhoods along with the corresponding levels of traffic generation which is estimated at 626 PCU. If converted to a residential dwelling equivalent (applying the 1.3vph used in the updated modelling) this would be 481 dwelling equivalents.
40. To the north of the Te Kouka is the neighbourhood, Homestead Dunes. The structure plan for this neighbourhood anticipates 340 dwellings with consents yet to be lodged.
41. Based on the consents in place for Waimeha North and Te Kouka as well as then including the potential future development of Homestead Dunes, the total level of development would amount to 821 dwellings which is less than what the structure plan and district plan anticipated at 900 (as modelled in the Transport Assessment). The actual number of consented dwellings (or dwelling equivalents, given the retirement villages) at Ngārara Farms is 481 dwellings (**Ngārara Consented** scenario)

42. It was considered necessary to assess the effects of development of the PC 5 site at a theoretical maximum of 150 dwellings against the existing levels of traffic on Te Moana Road within the six scenarios modelled by Transport Futures, as this had not previously been modelled under the scenarios set out at paragraph 14 above (which only applied PC5 traffic *in addition to* Ngārara Farm). This is on the basis that should PC 5 be confirmed, resource consents for the PC 5 site could be lodged before consents for further stages of Ngārara Farm are lodged, potentially resulting in lesser effects on the operations of the interchange than assessed to date, and to better determine the specific impact of PC5 traffic in its own right.
43. As explained in Attachment 2, the link road through to Ngārara Road will reduce the AM and PM peak hour flows at the Te Moana interchange from the Ngārara Farm development by 27% overall (see paragraph 2.6).
44. The results of the updated SIDRA modelling runs are outlined in Tables 2 and 3 of attachment 2 covering both the AM and PM peak hour periods. The results show that during the AM peak hour the interchange currently operates at a level of service C and will continue to do so under the Existing + Plan Change scenario with no approaches or movements operating a level of service F.
45. Under the Existing + Ngārara Consented scenario the interchange would operate at a level of service D during the AM peak. Under the Existing + Ngārara Consented + Plan Change scenario the level of service is projected to also be a level of service D with the right turn from Te Moana Rd onto the expressway onramp projected to operate at level of service F.
46. For the theoretical scenarios of Existing + Ngārara Farm at 900 dwellings and Existing + Ngārara farm at 900 dwellings + Plan Change, the level of service would drop to E in the AM peak. Under both scenarios the right turn from Te Moana Rd onto the expressway onramp is projected to operate at level of service F. The scenario that includes the PC5 site would also result in the left turn lane off the northbound expressway offramp operating a level of service F with queueing into the right turn lane.
47. In terms of the PM peak the interchange currently operates at level of service C, while for the Existing + Plan Change scenario the level of service would be projected to drop to D which is driven by side road delays for vehicles turning out of the plan change site. For the Existing + Ngārara Consented scenario the level of service is projected to be a C, noting the PC 5 site is not included so there would be reduced side road delays. For the Existing + Ngārara Consented + Plan Change scenario the level of service is projected to reduce to D. No one movement is projected to operate at level of service F.

48. For the theoretical scenarios of Existing + Ngārara Farm at 900 dwellings and Existing + Ngārara Farm at 900 dwellings + Plan Change the level of service would be D. No one movement is project to operate at level of service F.
49. It should be noted that as part Transport Futures review, each scenario in SIDRA was run under the “Network Practical Time” function whereby this results in the model optimising the phasing and cycle times in order to operate the interchange in the most efficient way. This inevitably has resulted in differences in how each of the land use scenarios perform, whereby phasing and phase times are optimised based on the different demands on the respective approaches etc.

Section 42A Report

50. I have read s 42A Report and supporting Technical Evidence of Mr Colin Shields
51. I can confirm Mr Shields account of his interactions with me are correct leading up to formal lodgement PC5 as well the subsequent exchanges of information following his review of my transport assessment and SIDRA modelling outputs. Paragraph 12 of Mr Shields evidence mentions that he sent an email sent to me on the 3rd of August 2026 outlining some outstanding concerns with respect to the updated modelling outputs provided to Mr Shields on 21 July.
52. The concerns raised in Mr Shields email on the 3rd of August relate to a miscalculation of the PM peak hour flows through the interchange (i.e. lower traffic volumes in the updated modelling compared to those set out in the Transport Assessment). I can confirm that Mr Shields is correct (the figures are lower in the updated modelling), however I did not seek to update this modelling further as Mr Wignall had been engaged to undertake his review at this time, which would effectively supersede the earlier modelling.
53. Paragraph 20 of Mr Shields evidence states that within the Ngārara Development Area, 350 dwellings have either been constructed or consented but not yet built which is compared to the 900 dwellings approved within the Ngārara Development Area Structure Plan. Through my own review I assess the figure is higher at 481 dwelling equivalents that have been consented or are being consented, however I disagree that the Ngārara Development area will accommodate 900 dwellings with my reasoning as outlined in paragraphs 37 to 41, noting this is based on the information the Council has provided to date as well reports provided to inform the SIDRA modelling as part of the 2025 Transport Assessments.
54. While the initial SIDRA modelling carried out as part of the 2025 Transport Assessment as well as two of the new scenarios modelled by Mr Wignall have been done based on a theoretical maximum of 900 dwellings, I consider that

this results in the effects on the surrounding network and at the interchange being overstated.

55. From paragraph 28, Mr Shields has provided commentary with respect to the base model outputs of the updated SIDRA modelling and has noted differences between modelled queue lengths and those presented in the Transport Assessment, which are based on observed actual queue lengths (at section 3.3). Further calibration was not carried out for the updated modelling supplied to Mr Shields on 21 July hence there are larger differences in the modelled vs actual queue lengths than as presented in the Transport Assessment (refer second column of Mr Shields Table 2, where previously modelled and observed queue lengths are more similar). It should however be noted that the updated modelling also predicted larger queues for the Existing AM and PM peak than those observed on the ground, and so the updated modelling was therefore more likely to overstate queuing effects than to understate them for the growth scenarios.
56. From paragraph 32 onwards Mr Shields provides commentary regarding the future year modelling for scenarios involving Ngārara Farm and PC5 in combination, particularly for specific movements at the Te Moana Road interchange in the morning peak period (Level of Service E and F).
57. As noted above, upon Mr Wignall commencing his review it became apparent that my earlier assumptions around traffic distribution to and from Te Moana Road were incorrect within the KTM4 model context and the eventual connection of Te Ara Kawakahia being made through to Ngārara Road.
58. While Mr Shields comments and concerns are noted with respect to the SIDRA modelling in the Transport Assessment, the updates carried out by Mr Wignall reflecting traffic distribution patterns of KTM4 now supersede the original modelling outputs provided. Paragraphs 44 to 48 outline the updated performance of the original 3 scenarios as well the 3 additional scenarios that have now been tested.
59. It is evident that in correctly applying the traffic distribution parameters of the Kapiti Traffic Model (KTM4) to Ngārara Farm and then undertaking conservative SIDRA modelling using a higher 1.3vph trip rate, the potential effects on the interchange are largely driven by further development of the Ngārara Farm, and not development of the PC 5 site.
60. While I agree with Mr Shields (at paragraphs 35 and 54) that further SIDRA modelling should be required to cover future and cumulative effects, this can be done at the relevant time (i.e. when resource consent applications to develop the PC5 site are lodged). However, the starting point for any future SIDRA

modelling should be based on the existing baseline “as consented” environment then in place and not be required to consider other large sites that are residentially zoned but not consented.

61. I also agree with Mr Sheilds (paragraph 54) in that future development of the PC5 site should include the provision of a right turn bay that incorporates and integrates the existing on road cycle lanes and traffic lane arrangements. Usual practice for any works within road reserve is to carry out safe system audits at the various stages of the design. This is a standard requirement by the Council and is stated with the Council's “Land Development Minimum Requirements”, (LDMR).
62. Similarly, I agree with Mr Sheilds recommendation (paragraph 54) that the design and provision of sustainable transport measures as identified in Figure 12 of my transport assessment along Te Moana Road should be required as part of the future consenting process. I agree that this should also include the provision of these measures along the southern side of Te Moana Road between the PC 5 site and the interchange. These measures would also apply in providing access to nearby bus stops.
63. In paragraph 40, Mr Sheilds comments on my road safety assessment noting that this had identified a historical concentration of rear end type crashes. This crash type is common at traffic signals and so while the development of the PC5 site would increase traffic volumes I don't believe this would warrant the need for an assessment of the crash risk to be considered as a specific plan provision. As covered in the above paragraph it is standard practice for the Council to request safe system audits where changes are being made to the road environment. These audits already consider the crash risk for different users and so I consider that to be sufficient.

Conclusions

64. It is my assessment that the transport network is able to accommodate the increased levels of traffic anticipated by the rezoning of the PC5 site based on a theoretical yield of 150 dwellings. The review by Transport Futures utilising conservatively higher trip rates aligned with NZTA's Policy Planning Manual for the PC5 site as well as a theoretical yield of 900 dwellings within Ngārara farm while applying the traffic distribution patterns of KTM4 confirms that the nearby interchange will operate satisfactorily into the future.
65. Scenario testing has confirmed that should the future development of the PC5 site be carried out in advance of further stages of Ngārara Farm, the level of service effects on the interchange will be acceptable and no worse than level of service D, with no individual movements at level of service F.

Luke Benner

2 September 2026