

BEFORE THE NELSON CITY COUNCIL

Under the Resource Management Act 1991 (the Act)

and

In the Matter of Plan Change 31 to the Nelson Resource Management Plan.

Statement of Evidence of Mark Georgeson

Traffic

14 November 2023

INTRODUCTION

1. My full name is Mark Grant Georgeson. I am a Chartered Professional Engineer and hold a Bachelor of Civil Engineering degree from the University of Auckland.
2. I am an International Professional Engineer, and a member of:
 - a) Engineering New Zealand and its specialist Transportation sub group
 - b) the Institute of Transportation Engineers USA; and
 - c) the Institute of Public Works Engineering Australasia.
3. For the last 31 years I have worked as a traffic engineer with Stantec New Zealand ("**Stantec**") practicing as a traffic engineering specialist throughout New Zealand. I appear regularly as an expert witness.
4. I appear in this matter as a traffic witness for GP Investments Ltd, who is: the landowner of the site subject to Plan Change 31; the applicant of the related request for a Private Plan Change; and a submitter on Plan Change 31 (Submitter S6).
5. I prepared the Traffic Report dated March 2023 lodged with the Private Plan Change Request, which sought amendment of Schedule N of the Nelson Resource Management Plan to provide for supermarket activities as a controlled activity instead of a non-complying activity on the site at 33 Cadillac Way (known as Nelson Junction).

CODE OF CONDUCT

6. In the preparation of my evidence, I have read the Environment Court Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I confirm that my evidence has been prepared in accordance with this Practice Note. I confirm that I have considered all the 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.

STRUCTURE OF EVIDENCE

7. I have been provided with and read the Section 42A Report prepared by Mr Dennis Bush-King, Submissions S2 through S7, and Further Submissions FS1, FS2 and FS3.
8. My evidence is structured as follows:
 - a) Background
 - b) The Officer's Section 42A Report
 - c) Comment on submissions
 - d) Conclusion
9. I do not propose to repeat the detail of my Traffic Report, and rather will concentrate on responding to relevant matters raised by the Reporting Officer and submitters.

BACKGROUND

10. The property at 33 Cadillac Way was subject to a previous Private Plan Change in 2006 (PC06/01) and to several resource consent applications. I contributed to the original Plan Change and have been involved in the various subsequent consent applications, on behalf of both GP Investments Ltd and the previous landowners.
11. GP Investments Ltd lodged a request for a Private Plan Change to the Nelson Resource Management Plan in April 2023 to amend the rules relating to the Nelson Junction site at 33 Cadillac Way (contained in Schedule N of the Industrial Zone) to provide for supermarket activities as a controlled activity instead of a non-complying activity.
12. The Council decided at its meeting on 4 May 2023 to adopt the Plan Change under Clause 25 of the First Schedule of the Resource Management Act and to consequently process the Plan Change as a Council Plan Change. The Plan Change was notified on 11 August 2023 as Plan Change 31.

13. GP Investments Ltd lodged a submission (Submission S6) in support of the Plan Change, seeking that it be approved in its entirety. I agree with the traffic comments expressed in that submission.

OFFICER'S SECTION 42A REPORT

14. I have reviewed the Section 42A Report and I agree with the assessment and recommendations made in it.
15. Paragraphs 7.7 through 7.10 address traffic effects.
16. At Paragraph 7.8, Mr Bush-King notes that "*Schedule N already provides for a range of bulk retail and trade activities which have traffic generating effects. The addition of a supermarket on the site, if consented, based on the s32 Report, will not disproportionately affect this permitted baseline.*"
17. I agree with this interpretation, which arises from my Traffic Report of March 2023 submitted with the Plan Change Request. At Chapter 6, that Report presents an analysis of Site traffic generation and concludes that the forecast Site traffic flows are not materially different from the original PC06/01 traffic thresholds, being just +1% and -3% within the expected trip generation levels.
18. At Paragraph 7.9, Mr Bush-King responds to a concern raised in Further Submission FS2, regarding the Site access to Pascoe Street and its proposed upgrading. He correctly identifies that the intended arrangements have a history of approval, from the drawing provided for by PC06/01 (as included at Page 31 of his Report), to Condition 9(a) of RM085213V5 and RM225273 relating to the timing of the access works. Condition 20 of RM085213V6 is also relevant, requiring a safety audit of the entrance design, relevant to a concern expressed by one of the submitters.

RESPONSE TO SUBMISSIONS

19. A total of six submissions (two in support, two opposed and two opposed in part) and three further submissions were received on Plan Change 31. The Reporting Officer summarises the matters raised by submitters in Table 1 of his report.

20. I comment on those submissions that reference traffic matters.
21. Ruth Newtown (Submitter S2) raises a traffic concern of the Site being located alongside a complex traffic environment and being difficult for traffic to access from adjacent roundabouts.
22. It is relevant that the Site has been the subject of multiple traffic investigations and analyses, from which various roading upgrades have been determined and constructed in view of a full build-out of the Site. I provide that context at Chapters 2 and 3 of my Traffic Report.
23. It is relevant also that I engaged directly with Waka Kotahi as part of my traffic investigations from which they confirmed that “...*inclusion of a supermarket as part of the controlled activity scheme for Nelson Junction does not trigger the need for further detailed transport modelling of the adjacent State Highway network, since the effects are no greater than those anticipated and assessed in detail during the prior PC06/01 process*”, as recorded at Section 4.1 of my Traffic Report. As such, the traffic concerns expressed by the submitter are not shared by Waka Kotahi as the relevant road controlling authority.
24. Importantly also, the Site will not rely on single access via Cadillac Way, but incorporates an upgraded access to Pascoe Street that will serve as a customer entry and exit point, not just its current servicing function for Mitre 10.
25. The submitter also raises a concern regarding Site activities encouraging car use. That is not the case. Chapter 3 of my Traffic Report describes connections to public transport, and provides a summary of the extent to which the Site is well served by active modes.
26. Since preparing my Traffic Report, Nelson City Council launched a new e-bus service on 1 August 2023, providing more routes and greater bus frequencies. Route 2 follows adjacent the Site along Annesbrook Drive, Quarantine Road and Nayland Road, and Route 4 to and from the Airport via Bolt Road. The layout of the Site does not foreclose the ability for these routes and services to be reviewed in the future, to offer better bus choice for Site staff and customers.

27. Two particular improvements for active modes are proposed. that have been developed in collaboration with the Council, involving the connection to the Old Railway Route and Annesbrook Drive, and the path linking to Pascoe Street, both supporting good connections for the adjoining residential catchments.
28. Harry Pearson (Submitter S3) supports the Plan Change, presenting that a supermarket at the Nelson Junction site would afford travel efficiencies and would be easily accessible by road, foot and bicycle (no matter which side of the highway one lives on). His Further Submission (FS1) elaborates further and describes that this is the most accessible location for a supermarket for travellers using SH6 or the airport, and that allowing people to shop here, to serve the communities of Tāhunanui, Whakatu, Enner Glynn and Annesbrook, will reduce traffic congestion elsewhere.
29. These views align with my own.
30. The submission by the Tāhunanui Business and Citizen Association (Submitter S5) holds a view that a better site for a supermarket would be in Tāhunanui, and raises concerns that the Nelson Junction Site is not well supported for access by non-car modes. I disagree, for the reasons I express at Paragraphs 25 through 27 above.
31. The submission of the Tāhunanui Community Hub also expresses a view of an alternate supermarket site in Tāhunanui, suggesting it would be better served by new bus routes and be well connected to good pedestrian and cycling infrastructure already in place. Again I disagree that the Nelson Junction Site is not well suited to people accessing by non-car modes.
32. The Further Submission by Mey Khong (FS2) raises concerns around the design and safety of the proposed improvements to deliver the Pascoe Street access. As I mentioned at Paragraph 18 above, a condition of consent of RM085213V6 requires that a safety audit be undertaken of the proposed design, from which any road safety matters can be identified and addressed pre-construction.

33. In my view, there is nothing in these submissions and further submission that cause me to review or alter the findings I reached in my Traffic Report or the opinions I express here.

CONCLUSION

34. Plan Change 31 seeks amendment of Schedule N of the Nelson Resource Management Plan to provide for supermarket activities as a controlled activity instead of a non-complying activity on the site at 33 Cadillac Way (known as Nelson Junction).
35. I remain of the view that the traffic outcomes anticipated by allowing development of a supermarket on the Nelson Junction site are in line with those already anticipated and accepted by the current Nelson Resource Management Plan, and I therefore concur with the recommendation of approval made by the Reporting Officer.



Mark Grant Georgeson

14 November 2023