

---

**In the Matter of:** The Resource Management Act  
1991

**and**

**In the Matter of:** A Notice of Requirement to  
alter an existing designation at  
the Paekakariki Rail Yard on  
Tilley Road in Paekakariki

(Kapiti Coast District Council  
Application Number  
RM170060)

**Application By:** KiwiRail Holdings Limited

---

**Statement of Traffic Evidence of  
Mark Georgeson**

---

TDG  
Telephone: +64-4-569 8497  
E-Mail: mark.georgeson@tdg.co.nz  
PO Box 30-721  
LOWER HUTT 5040

19 January 2018

## Statement of Evidence of Mark Grant Georgeson, BE(Hons) MIPENZ CPEng IntPE(NZ)

### Introduction

1. My full name is Mark Grant Georgeson.
2. I am a Chartered Professional Engineer and hold a Bachelor of Civil Engineering degree from the University of Auckland. I am:
  - a) a Member of the Institution of Professional Engineers NZ and its specialist Transportation sub group;
  - b) an International Professional Engineer;
  - c) a Member of the Institute of Transportation Engineers USA;
  - d) a Member of the Institute of Public Works Engineering Australasia;
  - e) a Member of the NZ Parking Association; and
  - f) an Associate Member of the NZ Planning Institute.
3. For the last 26 years I have worked as a traffic engineer with Traffic Design Group Limited (TDG), practicing as a traffic engineering specialist throughout New Zealand. I am a Director of the Company and Manager of the Wellington office.
4. I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note. I agree to comply with this Code of Conduct. The evidence I am giving is within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express. I understand it is my duty to assist the hearing committee impartially on relevant matters within my area of expertise and that I am not an advocate for the party which has engaged me.

### Scope of Evidence

5. I have been involved in this matter since November 2017. I am familiar with the application lodged in respect of the Notice of Requirement and submissions received, and have subsequently been involved in expert conferencing. Most recently, I have received and read the Section 42A Report (S42A Report) and the associated Council evidence.

6. I have been asked by KiwiRail to present a summary of the traffic position insofar as it relates to and informs the suggested conditions of consent. I do so with reference to the expert conferencing, S42A Report and the draft conditions, and have not found it necessary to repeat the detail of the traffic context of the location and site that is otherwise well set out in the application, S42A Report and other evidence.

### **Expert Conferencing**

7. I participated in joint expert witness conferencing with Mr Wignall, representing the Kapiti Coast District Council, in December 2017.
8. As set out in full in the Joint Expert Witness Statement (Traffic), dated 10 January 2018, Mr Wignall and I agreed that:
- a) There are some existing deficiencies that may be worsened by activities taking place on the site of the extended designation;
  - b) A range of vehicles will need to access the site, from cars and utes to full-sized trucks (HPMV's);
  - c) The extended designation area may be used in a number of different ways, giving rise to a range of vehicle types and volumes. Traffic movements to and from the extended designation area will be small;
  - d) Extension of the designation to the extent proposed would present traffic safety benefits; and
  - e) Two fundamental traffic improvements can be made, relating to:
    - the form and standard of the Tilley Road driveway; and
    - the form and condition of the yard access beyond the Tilley Road driveway.
  - f) These works can be provisioned for as conditions of consent.

## Section 42A Report and Suggested Conditions

9. The S42A Report prepared by Mr Hindrup draws from the traffic evidence of Mr Wignall. At Paragraph 59, Mr Hindrup concludes that “...I am of the opinion that traffic effects from the proposed designation will be adequately avoided, remedied or mitigated and will offer an improvement to the current arrangements at the site. I have recommended a condition [Suggested Condition 4] that requires the imposition of these improvements in Section R of this report.”
10. I repeat Suggested Condition 4 below:
- 4. Prior to any activity being undertaken on any of Lots 4, 5, 6, 7 and 8 Block III Deposited Plan 2009 which repeatedly facilitates (i.e. on more than five consecutive days) more than three heavy trade vehicle movements per day to those sites via the existing vehicle crossing point between Tilley Road and the existing KiwiRail designation, then that vehicle crossing must be upgraded to meet the relevant Council private access design standard at that time (currently Diagram A4 Diagram D: Private access design standards for heavy vehicles as shown in Schedule 11.1 of the Proposed District Plan). Specifically this will include the formation of the access into the site to a width of 7.5 metres.*
11. As I describe in the above conferencing summary, the need for this condition arises from the possible additional traffic use of the site and the types of vehicles involved, with the need for improvements relating specifically to the effects of truck (heavy trade) movements. The ‘more than three’ threshold arises from a background against the ‘major traffic activities’ provision of the District Plan which has a threshold of 30 equivalent vehicle movements, calculated on the basis of:
- a) 1 car moving to and from a site comprising 2 vehicle movements;
  - b) 1 truck moving to and from a site comprising 6 vehicle movements; and
  - c) 1 truck and trailer moving to and from a site comprising 10 vehicle movements.
12. On this basis, four trucks (involving three trucks and one truck and trailer) would generate 28 vehicle movements (say 30).

13. Monitoring will be the responsibility of KiwiRail and can be managed and recorded directly at the site office located at the existing gated entrance to the yard.
14. As described in the Joint Traffic Statement, the extended designation area could be used for a variety of purposes, from storage activities that will generate nil traffic movements, to a range of rail-related uses that could give rise to a small number of traffic movements. In his evidence, Mr Wignall recommends that the suggested traffic improvements be made prior to any activity occurring on the site. While this may be reasonable in the event that use of the site attracted regular traffic movements, it would in my view be onerous in the event the site had a predominant use for storage purposes, generating nil traffic.
15. There are two other points I wish to make in relation to the draft condition:
  - a) it is relevant that the condition be extended to capture the two fundamental improvements that I set out at Clause (e) of Paragraph 8 above; and
  - b) it is appropriate in my view to provide a timeframe for the improvement works to be constructed, following any trigger of the need to do so in response to the requirements of the condition.
16. I believe the condition as (re)drafted below is a practical approach to giving effect to the position reached by Mr Wignall and I:

*~~Prior to any~~ In the event that an activity being undertaken on any of Lots 4, 5, 6, 7 and 8 Block III Deposited Plan 2009 which repeatedly facilitates (i.e. on more than five consecutive days) more than three heavy trade vehicle movements per day to those sites via the existing vehicle crossing point between Tilley Road and the existing KiwiRail designation, then that vehicle crossing must be upgraded to meet the relevant Council private access design standard at that time (currently Diagram A4 Diagram D: Private access design standards for heavy vehicles as shown in Schedule 11.1 of the Proposed District Plan). Specifically this will include the reformation of the access into the site existing vehicle crossing to a minimum width of 7.5 metres. The length of the existing KiwiRail access road between Tilley Road and the gated yard must also be re-formed as a sealed route. The works must be completed within 6 months of this condition being triggered.*

Note: A heavy trade vehicle has the definition prescribed in the Proposed District Plan, being a vehicle with a gross mass exceeding 3,500kg.

## **Concluding Comments**

17. For the reasons described, I am of the view that there is a sound traffic basis for the Notice of Requirement to be confirmed, with the mitigation introduced by the suggested conditions of consent.

Mark Georgeson  
TDG

19 January 2018