

**Before the Hearing Commissioners appointed by Hawke's Bay
Regional Council & Hastings District Council**

In the matter of the Resource Management Act 1991
(**the Act**)

And in the matter of an application by The Te Mata
Mushroom Company Limited to
discharge contaminants into air from a
composting and mushroom growing
operation and associated activities at
174-176 Brookvale Road, Havelock
North

And in the matter of an application by The Te Mata
Mushroom Company Limited to
expand an existing intensive rural
production activity at 174-176
Brookvale Road, Hastings

**Statement of Evidence of Mark Grant Georgeson
on Behalf of The Te Mata Mushroom Company Limited**

17 July 2018

Sainsbury Logan & Williams
Solicitors
Cnr Tennyson Street & Cathedral Lane, Napier
PO Box 41
Phone: 06 835 3069
Fax: 06 835 6746
Ref: Lara Blomfield

INTRODUCTION

Qualifications and experience

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. I am:
 - (a) A Member of Engineering New Zealand and its specialist Transportation 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 Australia;
 - (e) A Member of the NZ Parking Association;
 - (f) A Member of the Association of Local Government Engineers New Zealand; and
 - (g) An Associate Member of the NZ Planning Institute.
2. From 1992 I worked as a traffic engineer with Traffic Design Group Ltd, practicing as a traffic engineering specialist throughout New Zealand. As of 1 April 2018, my Company joined Stantec, for which I have a Central Region responsibility as Group Manager of Transportation.

Expert witness Code of Conduct

3. I have been provided with a copy of the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note dated 1 December 2014. I have read and agreed to comply with that Code. This evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

PURPOSE AND SCOPE OF EVIDENCE

4. My former colleague Glen Randall was responsible for the Transportation Assessment dated 27 April 2018 that was submitted to Hastings District Council with the application for land use consent.¹
5. In this matter I have been asked by Counsel for The Te Mata Mushroom Company Limited to review and confirm that original assessment, giving particular consideration to the transport-related matters raised by submitters and to the assessment and findings of the Hastings District Council's Section 42A Report.
6. In so doing, I summarise the key findings of the Transportation Assessment, comment on the key traffic-related themes of the submissions received, address the Section 42A Report, and provide a view on consent conditions.
7. I am familiar with the site location and the surrounding road network.

SUMMARY OF TRANSPORTATION ASSESSMENT

8. The Transportation Assessment sets out and details the transportation context of the site, the development proposal, the projected uplift in traffic operations and associated effects, and includes an assessment of the proposal against the transport related rules of the Hastings District Plan.
9. The key conclusions of the Transportation Assessment as included at Chapter 7 of the report are that:
 - (a) The intensified operations are likely to generate an additional 90 vehicle trips per day;
 - (b) The priority-controlled intersection of Brookvale Road / Arataki Road and the site access will not experience any deterioration in capacity and performance;

¹ Appendix 2 of the application

- (c) The existing parking available on-site is large enough to accommodate the additional parking arising from an increase in employees, and will not spill over to Brookvale Road;
 - (d) The two existing adjacent vehicle crossings are to be formalised as a single point of access, which will provide sufficient capacity to accommodate the anticipated increase in vehicle demand generated by the development proposal; and
 - (e) With an overall conclusion that *“considering ... the current arrangement ... operates without any impact on the local road network and that the proposed increase in production is not likely to generate significantly higher levels of traffic, it is assessed that the proposals would not cause adverse effect on the function, safety or capacity of the adjacent road network”*.
10. Having considered the matters raised by submitters and in the Section 42A report, I do not have cause to revisit these principal conclusions of the Transportation Assessment.

RESPONSE TO MATTERS RAISED BY SUBMITTERS

- 11. I have read the submissions. There are 37 that raise transport matters, and each replicates a single common traffic theme to the effect that the proposal will generate increasing traffic that will have more than minor effects that are not proposed to be mitigated.
- 12. The submitters do not provide any further detail or explanation of the traffic concerns expressed.
- 13. By comparison, the Transportation Assessment submitted with the application includes considerable detail as to the existing and forecast future traffic operations, and includes a full evaluation of the effects of the increased development traffic on the performance and safety of the adjacent road network.
- 14. I acknowledge that the proposed increased levels of production will lead to increased levels of traffic, but not to an extent that would generate traffic

effects that are more than minor and otherwise need to be mitigated through physical improvements or operational management.

15. The exception involves the access itself which, as reported, is to be formalised by combining the two existing accesses and constructing a single legible access as illustrated by the concept drawing included as Figure 5 of the Transportation Assessment. I describe a possible condition of consent for achieving it next.

RESPONSE TO MATTERS RAISED IN THE SECTION 42A REPORT

16. I have reviewed the Hastings District Council's Section 42A report issued on 8 July 2019. At her concluding Section 14 on Page 46, the reporting planner states that she has "*...assessed that the adverse effects of this activity are likely to be less than minor with respect to traffic and parking effects...*".
17. Traffic and parking effects are addressed primarily at Section 8.2.1 on pages 28 and 29 of the report. The reporting planner indicates that the Council's transportation engineers have reviewed the application and consider that the vehicle entrance onto Brookvale Road should be upgraded to the standards of the Council's Engineering Code of Practice, with a preference for the vehicle entrance to be upgraded prior to the activity commencing. In turn, the reporting planner considers that imposition of a condition of consent would be appropriate.
18. As above, it is proposed that the existing entrance be formalised and upgraded and, to that end, I confirm the Applicant is accepting of an appropriate condition of consent. While the suggestion has been made to require the entrance to be upgraded to comply with the Council's Engineering Code of Practice, it is possible that some departure from the standards may be necessary in this instance to meet the particular requirements of the site and interface with Brookvale Road.
19. To that end, I suggest that, should the proposal be granted consent, a condition that requires the two existing accesses to be combined as a single access, with a site-specific design developed to the satisfaction of the Council

would be appropriate, with work completed prior to any increase in site activity. By requiring a site-specific access design, I am of the view that an equivalent (or better) outcome would be achieved, compared to strict compliance with the Code standards.

CONCLUSIONS

20. Based on my assessments, I conclude that the findings of the Transportation Assessment submitted with the application present a fair and reasonable account of the transport-related operations and effects of the proposal, and I am satisfied that the predicted traffic increases can be accommodated safely, with only minor effects at most, provided improvements are made to the site access in the manner recommended.
21. There is nothing in the submissions or Section 42A report that give me cause to change the findings and opinions expressed in the Transportation Assessment. I note that the Council is similarly satisfied, having concluded that the traffic and parking effects are likely to be less than minor.
22. In my view, there is no transportation related reason on which consent should not be granted.

Mark Grant Georgeson

12 July 2019