BEFORE THE INDEPENDENT HEARINGS PANEL
OF HUTT CITY COUNCIL

UNDER	the Resource Management Act 1991 ("**RMA**")
AND	
IN THE MATTER	of the Proposed Hutt City District Plan ("**Proposed Plan**")

STATEMENT OF EVIDENCE OF MARK GRANT GEORGESON ON BEHALF OF WASTE MANAGEMENT NZ LIMITED AND TE KĀREAREA LIMITED (HEARING STREAM EIGHT)

TRAFFIC

27 OCTOBER 2026

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1. EXECUTIVE SUMMARY

1.1 This statement of evidence addresses traffic management matters relating to the proposed rezoning of 30 Benmore Crescent, Manor Park ("**Site**") from General Rural to General Industrial zone, with a Benmore Crescent Precinct, or to a Special Purpose Industrial zone in the Proposed Plan.

1.2 The Site is well connected to the regional roading network via Benmore Crescent, Manor Park Road and the SH2 / SH58 interchange.

1.3 Resource consent RM230018 was granted by Hutt City Council ("**HCC**") on 27 January 2025. This authorises upgrades to the Benmore Crescent / Manor Park Road intersection, including a dedicated right turn bay, and to the Manor Park rail level crossing, including a new pedestrian crossing. I understand the upgrade works form part of the existing environment as described in Mr Gibson's evidence.[1]

1.4 With the consented upgrades, modelled traffic of around 2,900 vehicle movements per day to and from the Site can be accommodated with little delay or queuing at the intersection or the interchange, and without unacceptable knock-on effects on the local or state highway network or the level crossing, including for emergency vehicles. Condition 15 of RM230018 limits traffic from the Site to 2,900 movements per day.

1.5 I agree with the recommendation in the Section 42A Report for Hearing StreamEight ("**Section 42A Report**") that the Site be rezoned General Industrial. However, I consider there is sufficient justification for a site-specific standard setting an upper limit of 2,900 vehicle movements per day, in preference to the Proposed Plan's high trip generator provisions, given that limit has already been assessed, approved by the relevant road and rail authorities, and imposed through RM230018. Ms Goodwin provides a standard addressing this in her evidence, which I support.[2]

1.6 Overall, from a traffic perspective, I consider the proposed rezoning is appropriate.

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1 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [4.13]-[4.15] and [4.19].

2 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at Attachment 1 (GIZ-PREC1-R13).

2. INTRODUCTION

2.1 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.

2.2 For the last 33 years I have worked as a traffic engineer with Stantec New Zealand ("**Stantec**"), practising as a traffic engineering specialist throughout New Zealand. I am:

(a) a member of Engineering New Zealand and its specialist Transportation sub-group;

(b) an International Professional Engineer; and

(c) a member of the Institute of Transportation Engineers USA.

2.3 My experience involves provision of traffic engineering advice for many industrial and commercial developments throughout New Zealand. That advice spans from master planning through to land rezoning, development consenting, and to construction and operation.

2.4 In this instance, I have been engaged by Waste Management NZ Limited ("**WM**") and Te Kārearea Limited ("**TKL**") to assess the transportation needs and effects relating to the proposed rezoning of the Site to General Industrial or a Special Purpose Industrial zone.

2.5 Whilst this evidence is given in support of the current proposed re-zoning of the Site to General Industrial, I consider my long-standing involvement with the Site is relevant to this. I first began advising WM and TKL in relation to this Site in 2021. Since then I have been responsible for a number of traffic assessments, analysis and reporting, including considerable engagement with NZTA, KiwiRail and HCC. That work has resulted in a number of reports, including the following reports for RM230018 and for WM's separate resource recovery park application (RM230019):

(a) The Te Rangihaeata Tenancy Development Transportation Assessment Report dated November 2022, that was part of the documentation submitted by Rosco Ice Cream Ltd ("**Rosco**") / TKL for site works (roading and servicing) – Council reference RM230018;

(b) The Te Rangihaeata Tenancy Development Transportation Assessment Report dated February 2024, that was submitted with amendments to RM230018;

(c) The Te Rangihaeata Waste Management NZ Resource Recovery Park Traffic Engineering Report dated December 2022, that was part of the documentation submitted with an application by WM to establish a resource recovery park on part of the Site (RM230019); and

(d) The provision of further information to HCC relating to RM230018 and RM230019, and provision of further information to NZTA regarding the section 176 application made by Rosco/TKL.[3]

2.6 I have also variously contributed to the traffic engineering layout and function of the proposed WM part of the Site, informing the design.

2.7 Overall, given my extensive involvement in traffic assessments related to the use and development of the Site to date and as a long-time resident of Lower Hutt, I consider I am very familiar with the Site and the surrounding traffic environment. As such, as I set out below, I am able to strongly support the current proposal to re-zone the Site in the District Plan to General Industrial.

2.8 Mr Gibson has also set out the background to the engagement with both NZTA and KiwiRail to undertake works within their respective designations for the proposed intersection upgrade works.[4] My understanding is that written approval for the consent application was provided by NZTA and KiwiRail in late 2024. Consent was granted to RM230018 on 27 January 2025. These approvals and RM230018 include authorisation for the following works:

(a) design changes to Manor Park Road and Benmore Crescent;

(b) widening of the Manor Park Road approach to the interchange;

(c) changes to the level crossing; and

(d) construction of a right turn bay into Benmore Crescent.

2.9 The approvals and conditions of RM230018 come with requirements for detailed design drawings of the above works to be prepared for engineering

[3] These responses are dated 21 July 2023, 13 October 2023 and 27 October 2023.

[4] Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [4.15].

approval. In addition to the current proposed re-zoning of the Site, I am also currently progressing further engagement with NZTA, KiwiRail and HCC for that purpose, on behalf of WM and TKL.

Code of conduct

2.10 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. I will continue to comply with it when giving oral evidence. Except where I state that I am relying on the evidence of another person, the issues addressed in this evidence are within my area of expertise, and I have not omitted material facts known to me that might alter or detract from my evidence.

3. SCOPE OF EVIDENCE

3.1 This statement of evidence will:

(a) describe the existing traffic conditions relevant to the Site;

(b) outline the consented traffic access and roading upgrades for the Site under RM230018 and confirm that they can cater for the traffic associated with the industrial zoning of the Site proposed by WM and TKL;

(c) set out the relevant transport provisions of the Proposed Plan and the case for a site-specific traffic generation rule for the Site;

(d) respond to transport matters raised in the Section 42A Reports for Hearing Streams Six and Eight;

(e) respond to traffic management related matters raised in submissions; and

(f) provide an overall conclusion on WM's and TKL's proposed rezoning of the Site from a traffic perspective.

3.2 In preparing this evidence I confirm I have read the following documents:

(a) the Section 42A Officer's Report for Hearing Stream Six as relevant to traffic matters;

(b) the Section 42A Report as relevant to traffic matters; and

(c) the planning evidence of Ms Goodwin for Hearing Stream Six.

4. SITE CONTEXT

4.1 Figure 1 below shows the location of the Site, in the context of the surrounding transport environment.



Figure 1 : Aerial Photograph of the Site identified as Development Area (extracted from the Te Rangihaeata Tenancy Development Transportation Assessment Report dated 2024)

4.2 As shown in Figure 1, the Site is bounded by SH2 to the west, the Wairarapa Line rail corridor to the east and Te Awa Kairangi / Hutt River to the south. Access to the Site (and the existing Downer's yard at 10 Benmore Crescent, coloured blue) is achieved via Benmore Crescent, which is a no exit street connecting with Manor Park Road (to the north) via a tee-intersection. Manor Park Road in turn connects with the SH2 / SH58 grade separated interchange to the immediate north. The interchange affords access to the wider regional roading network, connecting with Upper Hutt and the Wairarapa to the north, Porirua and Kāpiti to the west and Lower Hutt and Wellington to the south. From a transport perspective the position of the Site in relation to the road network makes it suitable to cater for industrial uses.

4.3 The local roading arrangements are illustrated in the aerial photograph included at Figure 2**,** which shows the current layout of the Benmore Crescent / Manor Park Road intersection adjacent to the Manor Park rail level crossing, and with the Manor Park railway station shown by the red star to the north.

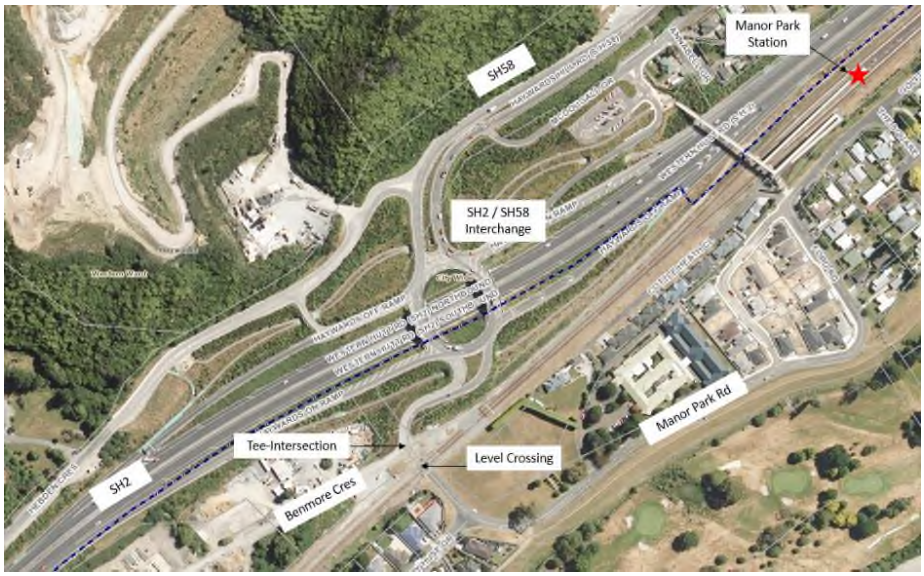


Figure 2: Adjacent Roading Arrangements (extracted from the Te Rangihaeata Tenancy Development Transportation Assessment Report dated 2024)

4.4 Reflecting their roading functions, SH2 carries about 30,000 vehicles per day, Manor Park Road about 1,500 vehicles per day, while Benmore Crescent has a property access function of providing for essentially just traffic to and from the Downer's yard and any construction traffic related to the earthworks at the Site.

5. TRAFFIC ACCESS AND ROAD UPGRADES

5.1 Access to the Site is achieved via the current Benmore Crescent tee-intersection with Manor Park Road. At present, vehicles turning right on Manor Park Road to access Benmore Crescent are required to wait within the through traffic lane, noting that with the modest volumes currently turning at the intersection this is seen as an acceptable operation.

5.2 The development of the Site for industrial purposes will trigger an increase in turning traffic at this intersection, such that it is appropriate to widen the carriageway in this location to provide for a dedicated right turn bay, to allow right turning vehicles (including heavy vehicles) to wait clear of through traffic on Manor Park Road.

5.3 Figure 3 below shows the intersection upgrade consented under RM230018, which involves the widening of Manor Park Road to create a right turn bay for traffic accessing Benmore Crescent and the Site, along with upgrades to the adjacent rail level crossing, including a new pedestrian crossing. I include a larger version of that plan as **Attachment 1**. As set out in Mr Gibson's

evidence, the consent forms part of the existing environment because it is likely to be implemented.[5]

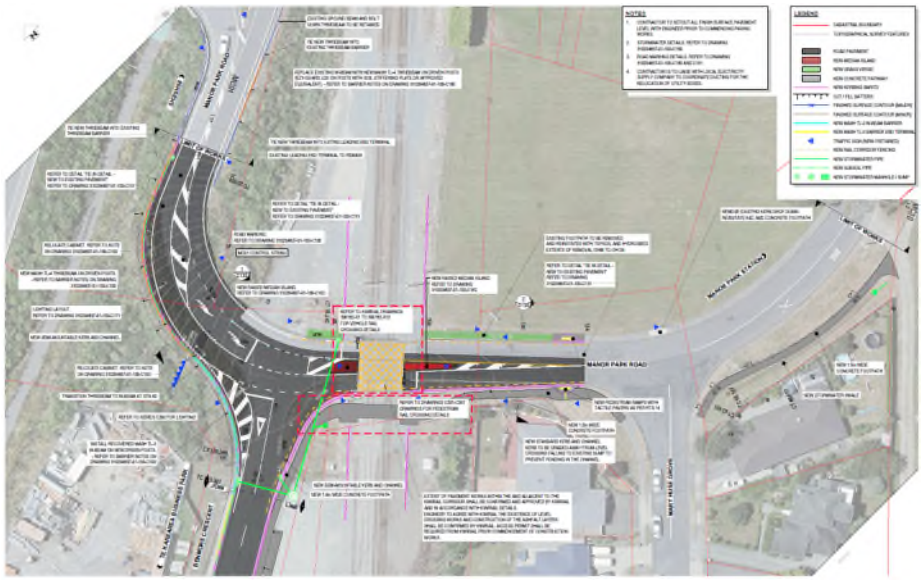


Figure 3: Manor Park Road/ Benmore Crescent intersection upgrade (extracted from the Te Rangihaeata Tenancy Development Transportation Assessment Report dated 2024)

5.4 The upgrade design has drawn from traffic modelling, to provide sufficient queuing capacity to accommodate the forecast demand for right turning vehicles into Benmore Crescent at peak times, with up to 2,900 vehicle movements per day to and from the Site, and has been designed to accommodate all vehicle types, including heavy vehicles.

5.5 Accordingly, the consented right turn bay allows for trucks to queue and wait without blocking the eastbound through lane on Manor Park Road. In addition to provisioning for the right turn bay, the consented widening of Manor Park Road also allows for simultaneous right turn in/left turn out movements to/from Benmore Crescent.

5.6 The very low volume of opposing westbound movements on Manor Park Road will provide ample opportunities for right turning traffic to access Benmore Crescent, such that the delay in giving-way to priority traffic for vehicles using the right turn bay will be minimal. This is illustrated by the traffic modelling recorded in the reports I listed earlier at paragraph 2.5.

5.7 The engineering drawings for the roading improvements were provided for review by NZTA, KiwiRail and HCC. As I record at paragraph 2.8, I understand

[5] Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [4.19].

NZTA and KiwiRail provided their written approvals to the consent application and HCC granted RM230018, which will be given effect to as described by Mr Gibson.[6] As I note at paragraph 2.9, detailed design and engineering approvals are required under the conditions of RM230018, and I am progressing those with NZTA, KiwiRail and HCC.

5.8 In addition to improving safety for vehicles at the rail level crossing, the upgrade works provide for the current Manor Park Road footpath to be extended to connect with Benmore Crescent, and will include a formalised safe pedestrian route across the rail crossing. A new 1.5m wide footpath will also be constructed along the south-eastern side of Benmore Crescent, and a new section of footpath will be constructed on the south side of Manor Park Road to the east of the level crossing that will connect with the Hutt River Trail, and also provide for those people who choose to walk between the Site and the Manor Park rail station.

5.9 As set out in the 2022 and 2024 Transportation Assessment Reports, my analysis forecasts that development of the Site for a mix of industrial purposes could generate some 2,900 vehicle movements per day, of which around 20% could occur in the busiest peak hour.[7] These volumes, including their forecast light and heavy vehicle splits, were carried forward to the traffic modelling presented in the same reports, demonstrating that such volumes arising from development of the Site (including heavy vehicles) can be accommodated with the capacity and performance uplifts afforded by the consented roading improvements. Consistent with this, condition 15 of RM230018 limits traffic movements from the Site to 2,900 movements per day (measured on a seven-day average), secured by a proposed covenant on the Site's title under condition 16. This covenant is addressed in Mr Gibson's evidence.[8]

5.10 Furthermore, with little delay and queuing shown at either the Benmore Crescent / Manor Park Road intersection or the Interchange, there will be no unacceptable knock-on effects of development traffic on the adjacent local or strategic roads, or the rail level crossing. This was one of the fundamental findings that informed the respective approvals of NZTA, KiwiRail and HCC.

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6 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [4.19].

7 Operative District Plan, Appendix Transport 2. See also HCC, RM230018 decision report (27 January 2025) at section 3.1.

8 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [4.16]-[4.17].

6. PROPOSED PLAN

6.1 Part 2 of the Proposed Plan contains district-wide matters, including objectives, policies, rules and standards relating to transport. The introductory comments to that section describe that a safe and efficient transport network is essential for the social and economic wellbeing of Lower Hutt, and that to achieve sustainable development, the transport network must be integrated with land use, so that people can easily move around the city, and businesses can move goods efficiently. In my view, the proposal to rezone the Site to General Industrial (or similar) aligns with these transport outcomes.

6.2 I understand that TKL seek a site-specific traffic generation rule that would replace the district wide traffic generation standard. This is supported by WM and I refer to Ms Goodwin for the wording of the standard that is proposed.[9]

6.3 As set out in the preceding sections of my evidence, I have had considerable engagement with NZTA, KiwiRail, and HCC in developing road upgrades that suit the Site and industrial traffic needs. All three authorities have contributed to the upgrade designs to achieve capacity and safety improvements. NZTA and KiwiRail gave their written approvals to the consent application, and HCC granted RM230018, on the basis that the upgrades can cater for up to 2,900 vehicle movements per day to and from the Site, including heavy vehicles, which is now secured by condition 15 of that consent.

6.4 NZTA and KiwiRail have considered bespoke designs relative to the mix of light and heavy traffic anticipated to move to and from the Site, including the road/rail interface with the Manor Park level crossing where a particular safety improvement of a pedestrian rail crossing with gates and fences has been consented. That safe crossing facility does not currently exist.

6.5 Policy TR-P5 (High trip generating activities) of the Proposed Plan describes that there is a need to manage the design and location of high trip generating activities, including to minimise adverse effects on the safety, efficiency, and multi modal function of the transport network.

6.6 Rule TR-R3 (All activities – Trip generation) of the Proposed Plan then describes that any activity that exceeds the high trip generation thresholds specified in Table 8 (High trip generating activity thresholds) is a restricted discretionary activity, with discretion including consideration of effects on the capacity, safety, efficiency, and multi-modal function of the transport network,

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[9] Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at Attachment 1 (GIZ-PREC1-R13).

whether safe and effective access can be provided and maintained for emergency service vehicles to the site and within the transport network, and whether any improvements to the transport network are proposed or required as a result of the activity.

6.7 The provisions go on to say that applications made under this rule must include an Integrated Transport Assessment prepared by a suitably qualified traffic engineer or transport planner. As I have explained, the traffic effects of industrial development of the Site have already been assessed in detail through the Transportation Assessment Reports I prepared for RM230018, which in my view address the matters that an Integrated Transport Assessment would cover.

6.8 Within Table 8, industrial activities are described as potentially involving business parks, warehousing or storage, or manufacturing type activities, with respective thresholds based on number of tenancies and building floor areas. These thresholds are not also given a traffic volume threshold, but the table does provide a "catch-all" provision for "any activity not listed above" at 200 vehicle trips per day. This is substantially less than the 500 trips per day threshold included in the Operative District Plan.[10]

6.9 Both provisions will be exceeded by the scale of development enabled by industrial rezoning of the Site. The assessment work that I listed earlier at paragraph 2.5 which was advanced to inform the required roading upgrades and Site mitigations, was done in this context, to assess the effects of the anticipated Site traffic on the transport network. That work determined that development of an example mix of industrial activities across the Site could generate some 2,900 vehicle movements per day.

6.10 With this assessment work undertaken and reported in a form equivalent to the Integrated Transport Assessment required by Rule TR-R3, approvals given by NZTA and KiwiRail and RM230018 granted by HCC for roading upgrades to support that scale of Site trip making, and the 2,900 vehicle movements per day limit already imposed by condition 15 of RM230018, it would in my view be reasonable to include a site-specific transport rule for the Site that recognises this upper limit for total traffic generation, in preference to relying on the high trip generation standards, the purpose of which has effectively already been met through that assessment work. I understand from Mr Gibson and Ms Goodwin that this is what is sought by TKL and supported by WM.

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[10] Operative District Plan, Chapter 14 General Rules, Chapter 14A Transport, Appendix Transport 2 - High Trip Generator Thresholds.

7. RESPONSE TO THE SECTION 42A REPORTS

7.1 The matter of high trip generating activities was first commented on in Hearing Stream Six. I did not participate in Hearing Stream Six, but note that the submission by TKL (447.6), supported by the WM further submission (FS39), sought site-specific traffic limits for the Site. In their assessment of this submission point at paragraph 278, the Reporting Officer for Hearing Stream Six considered that a sufficient rationale was not provided to support the relief requested, and recommended rejecting this at paragraph 287.

7.2 In her planning evidence for Hearing Stream Six Ms Goodwin addressed transport matters relating to the section 42A report prepared by Peter McDonald dated 24 August 2026, and recommended that the treatment of high trip generating activities for 30 Benmore Crescent be considered in Hearing Stream Eight.[11] That is a focus of my evidence.

7.3 The Reporting Officer for Hearing Stream Eight accepts the relief sought by WM and TKL requesting that the Site be rezoned to General Industrial, but rejects requests for some site-specific provisions sought, including in relation to an upper limit traffic threshold, and does so on the basis that insufficient justification is provided.[12]

7.4 As set out through Sections 5 and 6 of my evidence, I believe there is sufficient justification for a site-specific rule relating to Site traffic generation, including on the basis that RM230018 has been granted and forms part of the existing environment, and that condition 15 of that consent already limits traffic movements from the Site to 2,900 per day. Ms Goodwin puts forward some suggested wording for that site-specific provision in her planning evidence.[13]

8. RESPONSE TO SUBMISSIONS

8.1 The Section 42A Report records approximately 243 submission points from 141 submitters in relation to the Site, including approximately 134 submissions using a common template (referred to in the Section 42A Report as "Submitter Group A"). I have focused on those submissions raising transport matters. The template submissions seek that development at the Site avoids adverse effects on the existing Manor Park community, including its people, property,

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11 Section 42A Report for Hearing Stream 8 at [215] and [216].

12 Section 42A Report at [215]-[216].

13 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at Attachment 1 (GIZ-PREC1-R13).

the transport network and public spaces.[14] Other submissions raise concerns about heavy vehicle traffic and congestion,[15] or reference increased traffic generation,[16] and the Section 42A Report records concerns about the ability of emergency vehicles to continue to access the Manor Park community safely. Some submissions specifically reference effects on the interchange.[17]

8.2 From the outset of my involvement, the focus of the transport work was to confirm whether the Site, being well-connected to the regional transport network, could support (or be upgraded to support) the level of traffic and types of vehicles associated with industrial use. That led to the engagement with NZTA, KiwiRail and HCC that considered, assessed and addressed the various transport matters raised by submitters. I outline that engagement, the assessments and reporting undertaken, the design developed and the approvals gained at paragraphs 2.5 to 2.9 above.

8.3 In my view, the transport effects and needs to serve industrial development of the Site have been very carefully considered and reviewed by myself and multiple authorities, with jointly-acceptable outcomes. That is, all relevant authorities - NZTA, KiwiRail and HCC are satisfied that the traffic effects of industrial development on the Site can be managed and mitigated, including by the consented roading changes and improvements and the 2,900 vehicle movements per day limit imposed under RM230018.

8.4 There will not be significant new delays, hold-ups or access restrictions for emergency services as expressed by submitters. Rather, the previously consented design responses are substantial, and include widening and safety improvements that afford efficient and safe movement for all new traffic to and from the Site as well as continuing good levels of service and safety for other users of Manor Park Road, which is the only vehicle access to the Manor Park community. These consented improvements mean, from a transportation perspective, that the Site is very well-suited to an industrial zoning, as proposed by WM and TKL.

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14 Section 42A Report at [43]-[46] and Table 1. The template relief is recorded in the Summary of Decisions Requested, Benmore Crescent - General, pp. 868-895.

15 Nicole Hawtin, 345.2 and 345.3 (heavy vehicle traffic); Anne Rainey, 292.1 (industrial traffic); Kevin Scrimshaw, 219.2 (high traffic flow and congestion creating dangerous conditions). See also Section 42A Report at [87], [189] and [195].

16 Carolyn Walters, 87.2; Chirag Patel, 129.2 and 129.3; Lindsay Streefkerk, 138.2 and 138.3; Steve Williams, 148.1 and 148.3; Christine Williams, 149.1 and 149.3; Sarah Lean, 164.2; Jeffrey Borra, 165.2; Rachel Stevenson, 193.2; Gavin Bint, 221.2 and 221.3; Allison Thwaite, 250.6; Allison Sivorarath, 382.1; Vieng Sivorarath, 389.1.

17 Michael Mark, 78.1; Richard Holt, 356.2.

9. CONCLUSION

9.1 The Site is well connected to the regional roading network, and the upgrades to the Benmore Crescent / Manor Park Road intersection and the Manor Park rail level crossing consented under RM230018 have been designed, with the input and written approval of NZTA and KiwiRail, to accommodate 2,900 vehicle movements per day from the Site. The resulting traffic can be accommodated safely and efficiently without unacceptable knock-on effects on the local or state highway network, the level crossing or emergency vehicle access to Manor Park. This means the Site is very well suited to the industrial zoning proposed by WM and TKL.

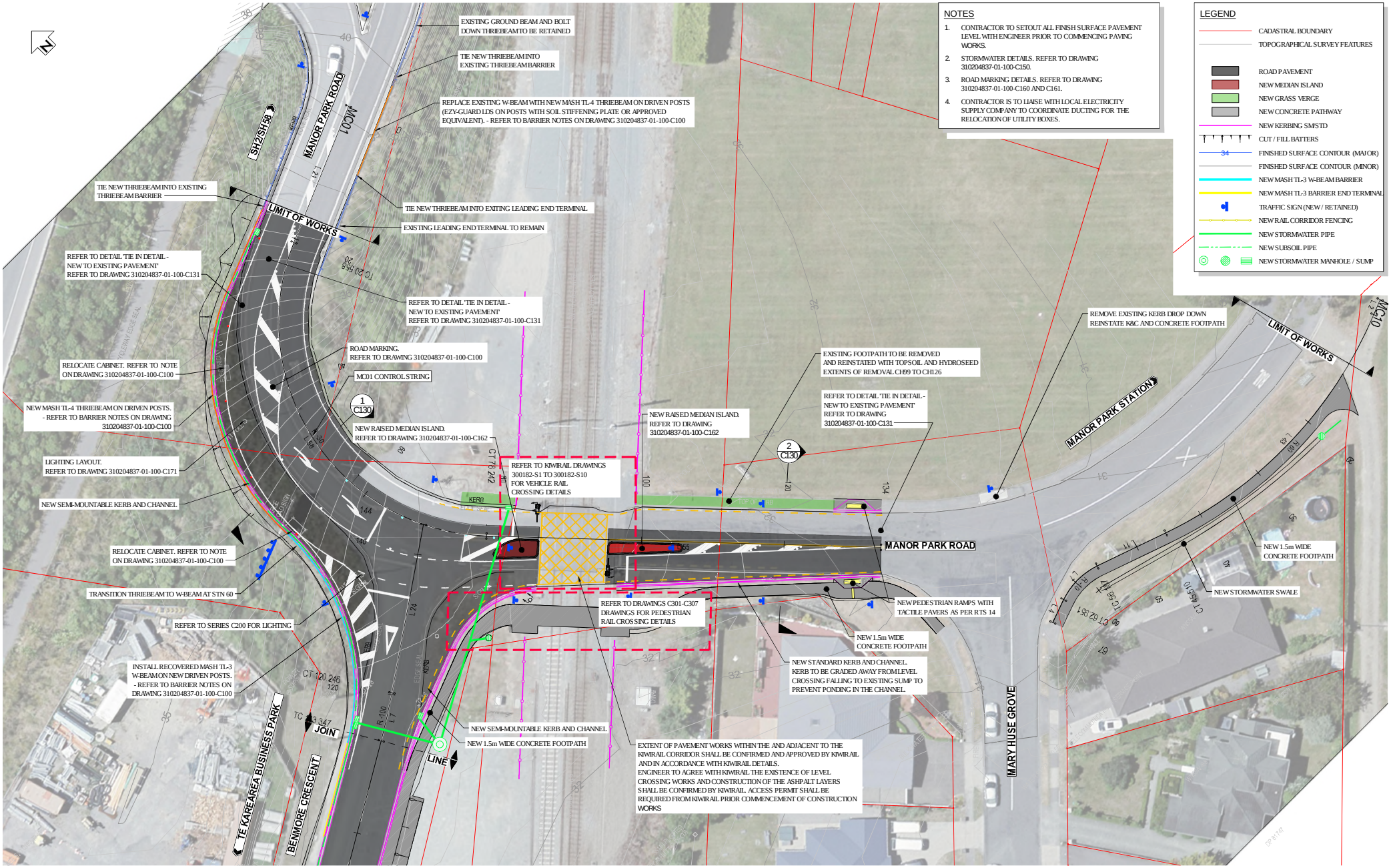
9.2 That traffic level is already secured by condition 15 of RM230018. As such, in my view, a site-specific rule recognising that upper limit from the consent, would manage the traffic effects of development of the Site more efficiently and effectively than the Proposed Plan's high trip generator provisions. Those provisions have effectively already been addressed through the assessment and approval process for RM230018.

9.3 For these reasons, I support the Section 42A Report's recommendation that the Site be rezoned General Industrial (or similar) and consider that the rezoning raises no traffic issues that would prevent it from proceeding. The site-specific rule establishing an upper traffic generation limit, as proposed by Ms Goodwin and based on condition 15 of RM230018, is also supported.

Mark Grant Georgeson

27 October 2026

ATTACHMENT 1



PLAN

SCALE 1 : 250 @ A1

REV	REVISIONS	DRN	CHK	APP	DATE
1	ISSUED FOR CONSTRUCTION	AKJ	TW	MG	16.05.24
0	FOR TENDER	JJ	GC	MG	19.12.22

SURVEYED	SPENCER HOLMES	08.2022
DESIGNED	Janco Jordaan	11.2022
DRAWN	Janco Jordaan	11.2022
CAD REVIEW	Shivneel Sen	29.01.24
DESIGN CHECK	Tjaart van der Walt	29.01.24
DESIGN REVIEW	Jamie Whittaker	29.01.24
APPROVED	Mark Georgeson	29.01.24
PROF REGISTRATION		

Stantec

Client: ROSCO INDUSTRIAL

TE KAREAREA BUSINESS PARK
BENMORE CRESCENT AND MANOR PARK ROAD UPGRADES

GENERAL ARRANGEMENT - SHEET 1 OF 2
MANOR PARK ROAD - MC01

Status Stamp: FOR CONSTRUCTION
Date Stamp: 16.05.24
Scales: AS SHOWN
Drawing No.: 310204837-01-100-C101
Rev.: 1

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