

**BEFORE THE INDEPENDENT HEARING COMMISSIONER
OF NEW PLYMOUTH DISTRICT COUNCIL**

IN THE MATTER

of the Resource Management Act 1991 ("**RMA**")

AND

IN THE MATTER

of an application to New Plymouth District Council by
Bunnings Limited for resource consent for
construction of a Bunnings warehouse with
associated parking, loading and access and
cancellation of a consent notice at 662 Devon Road,
New Plymouth - Applications LUC25/48839 &
SUB17/46785.02.

**STATEMENT OF EVIDENCE OF MARK GRANT GEORGESON ON BEHALF OF
BUNNINGS LIMITED**

(TRANSPORT)

14 SEPTEMBER 2026

1. EXECUTIVE SUMMARY

- 1.1 My evidence is filed on behalf of Bunnings Limited ("**Bunnings**") in support of its resource consent application to construct and operate a Bunnings Warehouse with associated parking, loading and access ("**Proposal**") at 662 Devon Road, Waiwhakaiho ("**Site**"). My evidence addresses the transportation effects of the Proposal, and responds to matters raised in submissions, and the Section 42A Report.
- 1.2 The Site benefits from frontage to Devon Road, Smart Road and Katere Road, and has five total access points, providing convenient customer access and efficient distribution of traffic across the surrounding road network. The Transportation Assessment Report ("**TAR**") demonstrates that the Proposal can be accommodated on the surrounding road network without requiring off-site mitigation works. Both the NZ Transport Agency ("**NZTA**") and the New Plymouth District Council ("**NPDC**") agree that the Proposal's transportation effects are acceptable, subject to the implementation of appropriate conditions.
- 1.3 Two submissions were received on the Bunnings application from Puketapu Hapū and Ngāti Tāwhirikura Hapū. In response to the concerns raised by Ngāti Tāwhirikura Hapū regarding effects on Aotere Pā, access from Smart Road has been reduced from a road width of approximately 12m to a driveway of around 6m, increasing the offset from the Pā boundary to approximately 9m. In response to Puketapu Hapū's concerns regarding Te Pou Tūtaki, the Proposal does not require any road widening that would necessitate alteration or relocation of Te Pou Tūtaki.
- 1.4 I have reviewed the Section 42A Report, which concludes that the traffic effects of the Proposal will be acceptable. I generally agree with the conditions contained in the Section 42A Report, subject to some minor changes, particularly relating to driveway wing design and disabled parking.
- 1.5 Overall, I consider the transport effects of the Proposal are acceptable.

2. INTRODUCTION

- 2.1 My name is Mark Grant Georgeson.

- 2.2 For the last 34 years, I have worked as a traffic engineer at Stantec New Zealand ("**Stantec**"), and I am currently the Private Sector Market Leader for the New Zealand business.
- 2.3 I am a Chartered Professional Engineer and hold a Bachelor of Civil Engineering degree from the University of Auckland.
- 2.4 I have 34 years of professional experience as a practising traffic and transportation engineer. I am:
- (a) a Member of Engineering NZ and its specialist Transportation Group;
 - (b) an International Professional Engineer; and
 - (c) a Member of the Institute of Transportation Engineers USA.
- 2.5 My experience includes provision of transportation engineering advice for a wide range of development activities. I appear regularly as an expert witness for consenting and other processes, including at council level hearings and in the Environment Court.
- 2.6 I have been involved with the Proposal since 2023, when I provided preliminary transport advice to Bunnings on traffic and access matters, and was involved in early engagement with the NZTA and the NPDC. Subsequently, I was responsible for preparation of the TAR dated June 2025 submitted with the resource consent application, and the responses dated 19 November 2025 to further traffic information sought by NZTA and NPDC.
- 2.7 I have visited the Site on multiple occasions during this period.

Code of conduct

- 2.8 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving oral evidence before the Hearing Commissioner. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

3. SCOPE OF EVIDENCE

- 3.1 My evidence relates to the resource consent application by Bunnings to develop its site at 662 Devon Road for a Bunnings Warehouse with associated parking, loading and access ("**Application**").
- 3.2 My statement of evidence will:
- (a) describe the existing transport environment and the transport assessments taken to date;
 - (b) provide a description of the transport effects of the Proposal;
 - (c) respond to matters raised in submissions; and
 - (d) respond to matters raised in the section 42A Report.

4. TRANSPORT CONTEXT

- 4.1 The Site enjoys frontage to Devon Road, Smart Road and Katere Road. These multiple frontages assist with traffic attraction and distribution to and from the adjoining road network, to avoid concentration at any one location for entry to and exit from the Site.
- 4.2 The transport environment surrounding the Site is well set out at Chapter 2 of the TAR, and Chapter 4 presents a full summary and assessment of the five total access points which, as above, provide convenience and choice for customer access and egress.
- 4.3 Section 4.4 and Figure 4-8 of the TAR describe a future link road planned by NPDC. While the New Plymouth Part Operative District Plan ("**NPDP**") shows this indicative road following an extension of Colson Road between Henwood Road and Smart Road, as shown by the Figure 1 image from the NPDP below, NPDC has considered this future road could be provided for by an extension of Katere Road instead, linking across the rear of the Site. The Bunnings Site is shown by the black outline added to this image.
- 4.4 Figure 4-8 of the TAR (repeated below as Figure 2) shows the indicative alignment of that road as provided by NPDC. I note the Bunnings plan used in this Figure 2 has since been updated to a newer version, as I refer to at my Paragraph 6.7.

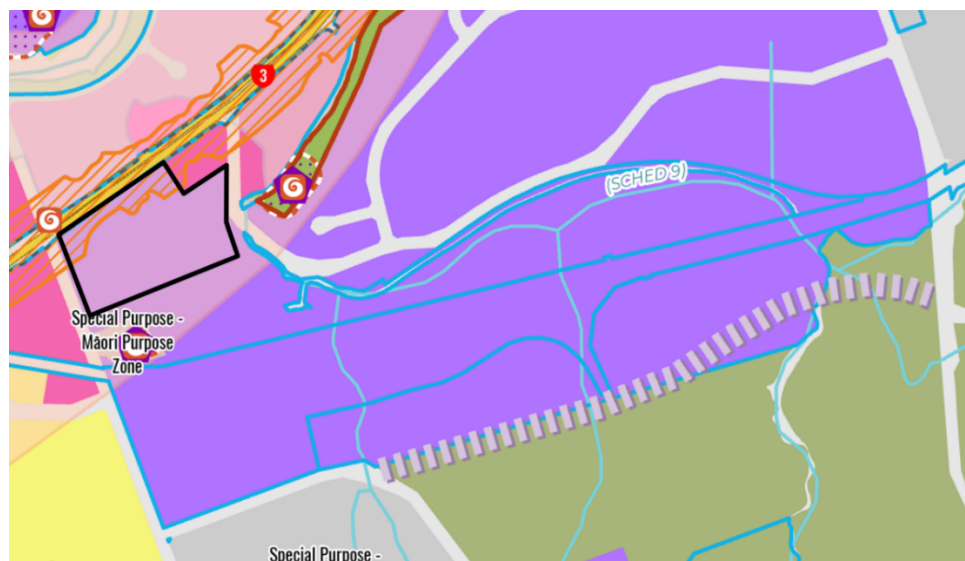


Figure 1: NPDP map showing indicative road.

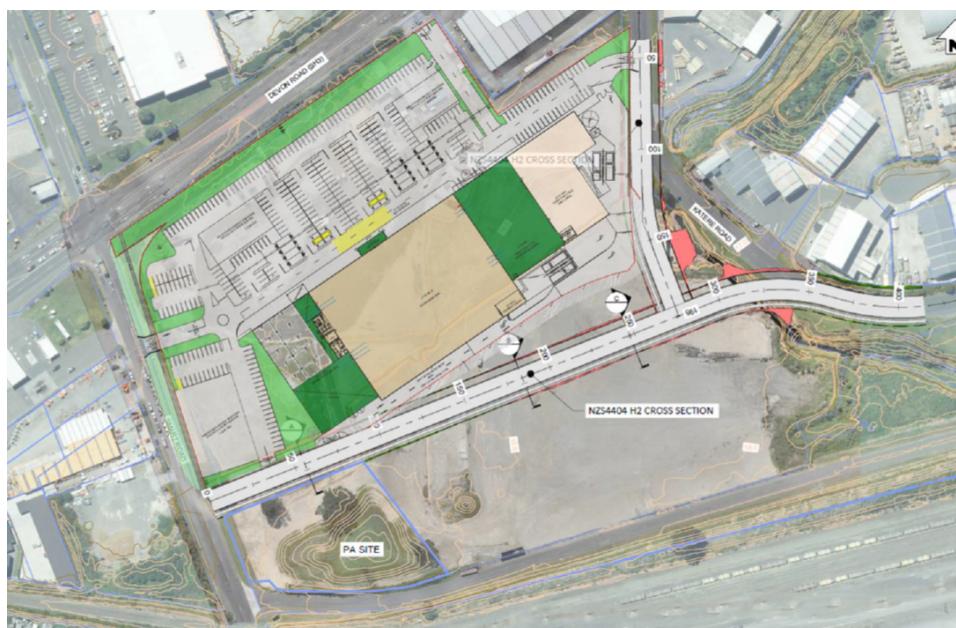


Figure 2: Figure 4-8 from TAR showing NPDC's future link road between Smart Road and Katere Road

- 4.5 As noted in the same Section 4.4 of the TAR, the future link road is not needed to serve the Bunnings development. While Bunnings had volunteered to construct the western portion of the link road (between Smart Road and Access 5 (the service vehicle entry)) in its final form, a standard access driveway would be suitable for Bunnings' purposes, as now proposed. I return to that point later in my evidence.

5. TRANSPORT EFFECTS

- 5.1 Chapter 7 of the TAR presents the substantive analysis of anticipated traffic generation for the Site, its distribution to and from each of the access points, and the modelling undertaken for the two key intersections on the adjacent road network at Devon Road / Smart Road and at Devon Road / Katere Road, at the two northern corners of the Site. This modelling was carried out for a weekday PM peak hour, representing the busiest traffic period on the road network, and for a Saturday peak hour, representing the busiest traffic period for Bunnings.
- 5.2 The Devon Road / Smart Road signalised intersection is the key intersection of interest to NZTA and NPDC. From early engagement with these authorities, it was accepted that a change in level of service ("LoS") resulting from the Proposal would trigger the need for the consideration of mitigation requirements. With the traffic modelling demonstrating that an intersection LoS D (as measured on a scale of LoS A to LoS F) can be maintained with Bunnings traffic added, it was concluded that the Bunnings development could be undertaken without the need for off-site mitigation works.
- 5.3 There is no change in LoS because Bunnings traffic is modest during the weekday PM peak when the road network is busier, and when there is more Bunnings traffic on weekends, the road network is less busy such that more traffic can be absorbed without change to levels of service. As such, and noting again, there is no identified need for mitigation works on the road network.
- 5.4 The detail in the TAR together with the further information response to NZTA has led to NZTA providing their written approval dated 19 February 2026 for the Proposal. The approval includes five recommended conditions of consent which Bunnings have accepted, and which have been incorporated in the amended condition suite presented as Appendix 1 to Mr Norwell's evidence, which I address in Section 7 of this evidence.
- 5.5 NPDC sought a traffic review of the TAR that was undertaken by Mr Carr of Carriageway Consulting Limited and presented in a report dated 30 March 2026. That report concludes that *"having reviewed the TAR, and in particular the matters identified regarding trip generation and distribution and consequential effects on various intersections, we are of the opinion that we can agree with the conclusion that there are no transportation engineering reasons to preclude the proposed Bunnings development."*

- 5.6 The peer review report goes on to say that this conclusion is dependent on the implementation of conditions, which are presented in the Section 42A report I turn to shortly.
- 5.7 Overall NZTA and NPDC are in agreement that the transport effects of the proposed Bunnings development do not preclude its consent and that with appropriate conditions, as both volunteered and accepted by Bunnings, the proposal can be accepted from a transportation perspective.

6. RESPONSE TO MATTERS RAISED IN SUBMISSIONS

- 6.1 Two submissions were received on the Bunnings Application from Puketapu Hapū and Tāwhirikura Hapū.
- 6.2 The submission by Ngāti Tāwhirikura Hapū raises concerns that the proposed future road corridor associated with the Bunnings development may permanently sever the connection between Aotere Pā and the wider landscape, and that the full transport effects cannot be adequately assessed because the extent of future development remains uncertain. The hapū identifies a risk that Aotere Pā could become surrounded by roading corridors, access ways, or parking areas as a cumulative result of the development and its associated infrastructure layout.
- 6.3 As included in the TAR and summarised at my Paragraph 4.5 above, the future link road does not form part of the Bunnings Application and is a project for NPDC to advance in their own right. While Bunnings initially volunteered to build a short length of the possible future road between Smart Road and Access 5, to tie in with any future eastwards extension of that road by NPDC, it is not a requirement of the Bunnings development to build it in that final form.
- 6.4 With a view to mitigating the concerns expressed by Ngāti Tāwhirikura Hapū, access for Bunnings purposes from Smart Road is instead now proposed as a single-width inward-only driveway to Access 4 (the Site carpark) and Access 5 (the service vehicle entry). This change enables the previously proposed road width of about 12m to be reduced substantially to a driveway width of around 6m, and for the southern edge of the road (closest to Aotere Pā) to be shifted from just 3m to the boundary with Aotere Pā to instead be offset by around 9m. This in turn removes the need for any retaining walls to be built along the edge of Aotere Pā and for that edge to instead be battered to the new Bunnings driveway.

- 6.5 This design change in response to Ngāti Tāwhirikura Hapū does not change the traffic analysis and assessed effects. First, entry from Smart Road to Access 5 was always proposed to be one-way eastbound. Secondly, for Access 4 relating to the carpark, the TAR described it as a two-way driveway connected to the then stub road.
- 6.6 As presented in the further information response to NZTA, traffic movements to and from Access 1 (the Smart Road driveway) and Access 4 were combined for the purposes of the traffic analysis and modelling, because they would present combined additions to Smart Road and at the signalised intersection on Devon Road. As such, if carpark traffic could not exit via Access 4 (as now proposed) and instead exited via Access 1, it would not change the assessment approach and modelling. To that end, the traffic modelling and conclusions remain valid under this revised access scenario.
- 6.7 I note again that the prospect of a future road on the alignment of this Bunnings driveway and extending through to Katere Road is a matter for NPDC to engage with the submitter on. It is not a requirement of the Bunnings development which can be delivered with a standard driveway, as illustrated in the revised scheme plan I include below, and which is presented more fully by Messrs Turner and Siciliano.

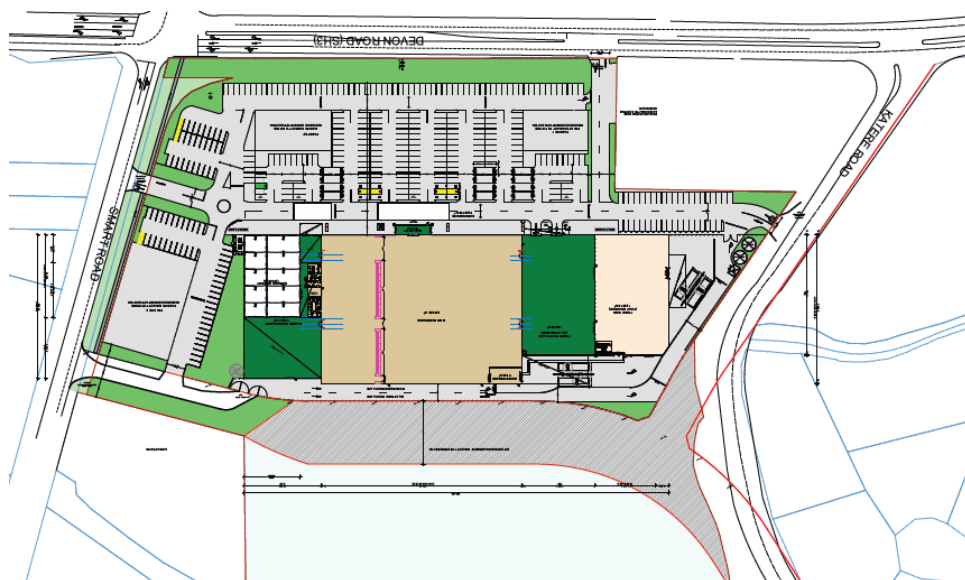


Figure 3: Proposed Bunnings Driveway Reduction from Smart Road

- 6.8 The submission by Puketapu Hapū is concerned that increased traffic volumes and future transportation demands generated by the Bunnings development - including potential road widening, intersection modifications, traffic signal

installations, and lane additions - may create pressure to relocate, modify, or otherwise compromise Te Pou Tūtaki. Puketapu Hapū takes the unequivocal position that Te Pou Tūtaki must not be relocated or altered to accommodate any roading, traffic engineering, or transportation infrastructure requirements arising from this or any subsequent development, and seeks consent conditions to that effect.

- 6.9 As recorded in the TAR and in the manner I have summarised above at Paragraphs 5.2 and 5.3, the scale of traffic generated by Bunnings does not require any road widening at the Devon Road / Smart Road intersection that would otherwise cause a need to alter or relocate the Te Pou Tūtaki. This assessed traffic outcome is accepted by the two relevant road controlling authorities, NZTA and NPDC.
- 6.10 The submitter seeks consent conditions to that effect. In my view, this is not necessary; there is no widening or mitigation needed at the Devon Road / Smart Road intersection and therefore no need to alter or relocate Te Pou Tūtaki, and the Application does not seek any changes to Te Pou Tūtaki.

7. RESPONSE TO REPORTING OFFICER'S SECTION 42A REPORT

- 7.1 I have reviewed the Section 42A Report prepared by Mr Watkins.
- 7.2 Paragraphs 8.11 through to 8.23 of his report address transportation effects. In his consideration of these effects, Mr Watkins draws from the Council-commissioned peer review undertaken by Mr Carr.
- 7.3 At Paragraph 8.23 Mr Watkins concludes that "*...I am satisfied that the traffic effects of the proposal on the environment primarily being the safe and efficient operation of the adjoining road network will be acceptable*". Mr Watkins also recommends a number of conditions of consent to assist with managing transportation effects. I comment on these variously through the remainder of this section of my evidence.
- 7.4 Pages 8 through 17 of the Section 42A Report respond to the transport rules and standards of the NPDP. Two matters of non-compliance (referred to as "*does not comply*") are identified under TRAN-S3 and TRAN-S18, presenting the same issue in respect of driveway design, and TRAN-S13 relating to the provision of disabled parking.
- 7.5 In terms of TRAN-S3 and TRAN-S18, the Section 42A Report fairly recognises that the wings on one or more of the Site access points will need to be larger

than the width of 1000mm provided for in Section 3.3.17 (and Figure 3.4a) of NPDC's Land Development and Subdivision Infrastructure Standard Local Amendments, to safely accommodate the manoeuvring requirements of larger trucks making deliveries to Bunnings. The same point was made in my Response to Further Information to NPDC, dated 19 November 2025. A design departure is sought accordingly, as captured by amended conditions 36 and 37.

- 7.6 As to TRAN-S13, the eight disabled parks are to be located directly across the traffic aisle from the store entrance, in common with other Bunnings stores throughout New Zealand. In this location, the traffic aisle will be delineated with surface markings and with judder bars to draw attention to this area being used as a crossing zone to and from the store, including as an accessible route for users of the disabled parks.
- 7.7 This location of the disabled parks is such that four of them will not be fully compliant with the Section 5 provisions of NZS4142:2001, to the extent that their users will need to pass behind one other disabled park which is otherwise recommended against in the standard.
- 7.8 In my view, the need to pass behind one other disabled park for four possible users is suitably managed, with the good visibilities provided around the disabled parks, given the adjacent traffic aisle and the shared zone between them.
- 7.9 It seems to me that Mr Carr is also of the same view. In his concluding remarks on Page 13/13 of his peer review, he comments on the Proposal satisfying 'the majority' of the transport standards of the NPDP and concludes that the non-compliances will not "...adversely or materially affect the operation of the carpark".
- 7.10 An amendment is proposed to Condition 30 accordingly, and in further concluding this matter, I am not aware of any safety issues having arisen with this configuration on other Bunnings sites.
- 7.11 Turning now to the proposed conditions, they are set out at Appendix A of the Section 42A Report, with an amended version presented by Mr Norwell.
- 7.12 I have contributed to the amended version of the conditions and support the proposed new wording of the relevant transport ones.
- 7.13 Beyond the comments I have provided above in respect of Conditions 30, 36 and 37, I make one further comment.

- 7.14 In respect of Condition 35, the Section 42A Report wording is that B-train movements from the loading area "*...must occur during low-customer periods*". This is different to the recommendation provided by Mr Carr, where at Page 12/13 he recommends that "*...this exit movement should not occur at the busiest times*". Suggested amendments are made to Condition 35 to reflect this traffic recommendation.

8. CONCLUSION

- 8.1 For the foregoing reasons, and based on my assessments, I consider there are no transport-related reasons that this Bunnings Proposal cannot be approved.
- 8.2 And noting further, I have reviewed the conditions of consent appended to Mr Norwell's planning evidence, have had input to their suggested changes, and confirm the transport-related conditions are in my view appropriate and reflect the matters requiring further detail and control post consent.

Mark Grant Georgeson

14 September 2026