

**BEFORE COMMISSIONERS APPOINTED BY THE WAIKATO DISTRICT COUNCIL**

**IN THE MATTER OF**                      **the Resource Management Act 1991**

**AND**                                      resource consent application LUC0408/19 by  
Woolworths New Zealand for the construction and  
operation of a supermarket at 58 Great South Road,  
Pokeno.

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**STATEMENT OF TRAFFIC EVIDENCE OF GARY BLACK  
ON BEHALF OF Z ENERGY LIMITED**

**16 August 2019**

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## Introduction

1. My name is Gary Black. I am an Associate Transportation Engineer at Abley Limited (**Abley**).
2. I am a Chartered Professional Engineer and a Chartered Member of Engineering New Zealand. I have a Bachelor of Engineering Degree, with honours, from Sheffield Hallam University in the United Kingdom. I have 28 years' experience in traffic and transportation engineering. In 2005 I moved to Auckland from the United Kingdom and have worked as a traffic and transportation engineer in New Zealand for 14 years.
3. In this instance I am providing traffic and transportation advice to Z Energy Limited (**Z Energy**) to assess the operational and safety effects of the proposed supermarket on the Z Energy truck stop and truck park (**the truck stop**) at 41 Great South Road, Pokeno.
4. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from opinions that I express, and that this evidence is within my areas of expertise.

## Scope of evidence

5. My evidence is provided and covers the following aspects:
  - (a) Background statement;
  - (b) Statement of operational and safety concerns
  - (c) Statement of discussions and evidence of Mr Mark Georgeson - Stantec New Zealand Limited (**Stantec**)
  - (d) Statement of discussion with Ms Naomi McMinn of Gray Matter Limited (**Gray Matter**)

## Background Statement

6. Detail regarding the truck stop site and its operations were included in Z Energy's submission<sup>1</sup> and are not repeated here. I do, however, consider it is important to recognise that Z Energy's consent allows for left and right turn movements from the northern crossing to the truck stop. The key outcome sought by Z Energy through this application process is certainty that trucks can continue to make left and right turn movements from the northern access to the truck stop.
7. Z Energy submitted in opposition to the application on transportation grounds and in particular regarding the potential for adverse effects on its existing truck stop.
8. Z Energy was also concerned that Woolworths New Zealand Limited (**the Applicant**) sought to disregard the effects of the vehicle movements to and from the consented Fresh Choice Supermarket (LUC0139/15), noting in particular that resource consent was granted on a non-notified basis without apparent consideration of effects on vehicle movements to and from the Z Energy truck stop.
9. To address these concerns, I met with representatives of the Applicant and also with Gareth Bellamy, traffic engineer at Waikato District Council (**Council**). The discussions were constructive, and the outcome is reflected in the revised plans now proposed by the Applicant and appended at Attachment One to the Statement of Evidence submitted by Mr Mark Georgeson of Stantec .

## Statement of Traffic and Safety Concerns

10. My initial analysis of the Applicant's design drawings and Traffic Assessment Report highlighted a number of matters of concern to me regarding the design of the intersection of Great South Road and Wellington Street and potential effects on existing lawful movements to and from the truck stop. I also

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<sup>1</sup> S42A Report, Appendix I, page 30-38

identified safety concerns with the trucks entering the truck stop at the same time as customers and delivery vehicles turn right into Wellington Street to access the supermarket.

11. The operational concerns for Z Energy have come about because of the close proximity of the northern access of the truck stop to the proposed Wellington Street Intersection. A large truck travelling southbound on Great South Road and turning right into the truck stop at the northern access would be obstructed from making this movement due to a car or delivery vehicle waiting on the flush median to turn right into Wellington Street.
12. Additionally, a truck turning left out of the truck stop to travel northbound would have to encroach into the right turn bay if a vehicle was parked in the shoulder immediately to the north of the northern vehicle crossing. If a vehicle was parked at this location, and a car was waiting in the flush median to turn right into Wellington Street, a truck would not be able to make the left turn out of the northern access at the truck stop.
13. The safety concern relates to large trucks turning right into the truck stop in close proximity to vehicles turning right to enter the supermarket. It is my view that there is a significant risk of side swipe or head-on type crashes if two vehicles travelling in opposite directions access the flush median at the same time.

**Statement of Evidence of Mr Mark Georgeson.**

14. I have read the Statement of Evidence prepared by Mr Georgeson. I agree with the traffic and transportation assessment within his evidence.
15. I reviewed the plans in Attachment One of Mr Georgeson's evidence. I believe the operational and safety concerns identified above have been addressed, as far as is reasonably practicable, in the Applicant's revised design for the intersection of Great South Road and Wellington Street.

**Discussions with Ms Naomi McMinn**

16. To understand the views of Council's traffic expert (Ms McMinn) in relation to the revised drawings proposed by the Applicant I spoke directly to Ms McMinn on Thursday 16 August 2019.
17. Ms McMinn raised concerns regarding the design of the intersection of Great South Road and Wellington Street identified in Attachment One to the evidence of Mr Georgeson. Ms McMinn advised me that she was of the view that a short right turn bay would be safer at this location, as this would provide clear direction to drivers that Great South Road and Wellington Street is an intersection of two public roads.
18. I believe that providing a short (10 metre) right turn bay, in addition to the latest design prepared by Mr Georgeson, will provide a safer intersection arrangement, and I agree with Ms McMinn in this regard.
19. I agree that a short 10 metre right turn bay would provide drivers turning right into Wellington Street with clarity that they have priority over vehicles turning right into the truck stop. Should a truck travelling south seek to turn right into the northern access at the same time that a vehicle is waiting in the right turn bay, the truck can remain within the southbound traffic lane and turn behind the rear of the vehicle to enter the truck stop by the northern access.

**Summary**

20. I agree with statement of evidence of Mr Georgeson, subject to the addition of the right turn bay to the intersection at Wellington Street.
21. I confirm that the revised intersection design at Attachment one of the evidence of Mr Georgeson, subject to the addition of the right turn bay to the intersection at Wellington Street, addresses the operational and safety concerns at the truck Stop.

22. I can confirm the short right turn bay proposed by Ms McMinn will improve safety at the intersection without adversely affecting the operation activities at the truck Stop.
23. The key outcome for Z Energy is certainty that trucks can continue to make left and right turn movements from the northern access.
24. I am happy to answer questions raised by the panel at the hearing.

**Gary Black, Traffic & Transportation**

**16 August 2019**