

**Before Independent Hearing Commissioners appointed by Wellington
City Council**

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

And

In the matter of hearing of submissions on the Proposed Wellington City District
Plan

Between

**Stride Investment Management Limited and Investore
Property Limited**

and

Wellington City Council

Statement of evidence of Mark Georgeson on behalf of Stride
Investment Management Limited (submitter 470) and Investore
Property Limited (submitter 405)

Hearing Stream 4 – Metropolitan Centre Zone

Dated 12 June 2023

MinterEllisonRuddWatts.

PO Box 105 249 Auckland City 1143

T +64 9 353 9700

Solicitor acting: Amy Dresser | amy.dresser@minterellison.co.nz

Partner responsible: Bianca Tree | bianca.tree@minterellison.co.nz

901419467:1

MAY IT PLEASE THE COMMISSIONERS

INTRODUCTION

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. I hold professional memberships with the following:
 - (a) Engineering New Zealand;
 - (b) International Professional Engineers;
 - (c) The Institute of Transportation Engineers; and
 - (d) The Institute of Public Works Engineering Australasia.
3. For the last 31 years I have worked as a transport engineer with Stantec New Zealand, practicing as a transport engineering specialist throughout New Zealand. I have resided in the Wellington for these same 31 years.

CODE OF CONDUCT

4. I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. 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

5. My statement of evidence is presented on behalf of Stride Investment Management Limited (**Stride**) and Investore Property Limited (**Investore**).
6. It addresses Stride and Investore's submission points on the Proposed Wellington City District Plan (**PDP**), as they relate to the Metropolitan Centre Zone (**MCZ**) Chapter of the PDP.

7. Specifically, my evidence covers the following areas of the MCZ from a transport perspective:
 - (a) whether Johnsonville centre can accommodate the transport needs associated with the proposed Metropolitan Centre zoning;
 - (b) whether construction impacts associated with private development within the MCZ are better dealt with through the MCZ Chapter provisions or the general Transport Chapter; and
 - (c) whether a 'development cap' is an appropriate trigger for determining the activity status for 'integrated retail activities' within the MCZ.

8. In preparing my evidence, I have reviewed the following:
 - (a) The PDP's Section 42A report in relation to the MCZ, including associated appendices;
 - (b) The Section 32 Evaluation Report 'Part 2: Transportation'; and
 - (c) Relevant transport statutory documents including the National Land Transport Programme (**NLTP**).

STRIDE AND INVESTORE SUBMISSIONS

9. The Stride and Investore submissions on the PDP supported the application of the MCZ to the Johnsonville centre, as follows:

"Stride / Investore supports the application of the Metropolitan Centre zoning to its Johnsonville Site, and supports the recognition of the centre within the Proposed Plan as a major sub-regional centre."

10. The Stride submission sought to amend MCZ-P9 to remove specific reference to *"the impact of construction on the transport network"*, as follows:

"Stride opposes that part of the MCZ-P9 which relates to managing the impact of construction activities on the transport network. This is a matter that is better addressed in the transport chapter, while a focus of transport effects may constrain and lengthen construction periods."

11. Both the Stride and Investore submissions seek an amendment to the development threshold proposed for integrated retail activities to be permitted within the Johnsonville MCZ, as follows:

“MCZ-R13 provides that integrated retail activity is a permitted activity where the total gross floor area does not exceed 20,000m², otherwise integrated retail activity would be restricted discretionary activity. Stride and Investore seeks amendments to this rule in order to provide a 30,000m² gross floor area threshold for triggering a Restricted Discretionary activity status in the land zone Metropolitan Centre in Johnsonville.

A 30,000m² threshold for this rule would be more appropriate given the scale of existing and consented development, large lot sizes, land in common ownership, and the anticipated development in the Johnsonville Metropolitan Centre.”

12. I agree with the submission points above made by Stride and Investore from a transport perspective, and provide context to my view through the evidence that follows.

THE SECTION 42A REPORT

13. I have read the conclusions reached by the reporting Officer in the Section 42A Report as relevant to the submissions raised by Stride and Investore, and summarise these along with my own assessment from a transportation perspective in turn, below.

Metropolitan Centre Zoning

14. Paragraphs 11 to 36 of the Section 42A report address matters relating to the PDP’s application of the MCZ.
15. At paragraph 12 the reporting officer notes that *“Johnsonville and Kilbirnie are proposed to be zoned MCZ under the PDP. This zoning aligns with their current Sub-Regional zoning under the ODP¹.”*

¹ Operative District Plan.

16. The PDP's CEKP-01 describes Metropolitan Centres as follows:

“These centres provide significant support to the City Centre Zone at a sub-regional level by offering key services to the outer suburbs of Wellington City and the wider Wellington region. They contain a wide range of commercial, civic and government services, employment, office, community, recreational, entertainment and residential activities. Metropolitan Centres are major transport hubs for the City and are easily accessible by a range of transport modes, including rapid transit. As a result, these centres [are] will be major live-work hubs for the City over the next 30 years. Intensification for housing and business needs will be enabled in these locations, to complement the City Centre.”

17. At paragraph 23 the Reporting Officer recommends the MCZ for the Johnsonville centre, as proposed in the PDP, be retained as notified.

18. I agree with this conclusion by the Reporting Officer, and consider that the transport infrastructure that serves Johnsonville both now and in the future can support the level of multi-modal demand anticipated in a metropolitan centre as proposed in the PDP. My reasons for this include:

- (a) The Wellington City Council, Waka Kotahi, Greater Wellington Regional Council, and Metlink have combined to provide significant transport improvements within and around the Johnsonville centre through the last decade, including roading infrastructure enhancements around the ‘Johnsonville Triangle’ to increase capacity, efficiency and safety; new bus facilities on the western side of Moorefield Road directly adjacent to the Johnsonville rail station with greater service span and higher capacity double decker buses; new trains serving the rail station with increased frequency and improved comfort; and the provision of a shared path on Moorefield Road and cycle lanes on Johnsonville Road to support active mode accessibility. These provisions will help support increased transport demands and multi-modal access to and from the Johnsonville centre under the proposed MCZ.
- (b) In addition to these recent improvements, a series of other enhancements have been considered and may be introduced over time as the Johnsonville Centre is redeveloped. Some of the possible

future roading options have been tested previously to support the consented Johnsonville Shopping Centre redevelopment schemes (which I refer to later at paragraph 29). These options include upsizing intersections on Broderick Road and optimisation of layouts at signalised intersections; establishing a new signalised intersection on Moorefield Road at a new entrance point to the Shopping Centre; and the addition of two new signalised pedestrian crossings on Moorefield Road, providing safer links with the bus stops, community facilities and residential areas that lie to the west of Moorefield Road. These changes can complement other infrastructure works described in bullet 'd' below.

- (c) As addressed in my evidence for Hearing Stream 1, I consider the Johnsonville Rail Line meets both the National Policy Statement on Urban Development (**NPS-UD**) and NLTP (2021-2024) definitions of a rapid transit service. The importance of such provision is identified in the NLTP as:

“It is a strategic corridor that plays a critical role in an urban area’s public transport system linking major parts of the urban area, enabling substantial numbers of people to access key locations, and enabling and supporting major growth and urban development opportunities. It enables a sufficiently high speed service to be competitive with travel by private car at peaks times.

It has high capacity that can capture and sustain a material share of corridor trips that would otherwise be made by private car.”

As I expressed at Hearing Stream 1, in my opinion the Johnsonville Rail Line meets these criteria in providing an established high frequency rail link to the CBD that is capable of competing with travel times by private car during peaks, and accommodating a material share of existing and forward travel demands to/from the CBD. This rapid transit service gives Johnsonville a point of difference to other centres in the district, and will serve to both support and enable the centre’s development under the MCZ. I am aware that the Council Officer’s right of reply confirms the Council Officer’s position that the

Johnsonville Line is rapid transit for the purposes of implementing the NPS-UD.²

- (d) The Let's Get Wellington Moving (**LGWM**) 'Johnsonville / Ngā Ūranga' corridor project³ aims to achieve mode shift for people travelling between Johnsonville and the CBD through enhanced bus and cycle connections, including improved access to bus stops and delivery of significant safety improvements for vulnerable road users along this route. These changes will further enhance public transport patronage and serve to support active mode travel between Johnsonville town centre and Wellington CBD. In addition, the Council's current 'Johnsonville-Moorefield Roundabout Improvements Project'⁴ aims to deliver improved safety outcomes at this key intersection at the top of the Johnsonville Triangle, including to better accommodate active mode users.
19. In my view, the underlying public transport infrastructure and services that serve Johnsonville centre are second only to the CBD. This demonstrates the appropriateness of enabling a level of development agglomeration within the centre through the MCZ that can achieve a genuine sub-regional centre scale. A metropolitan centre level of intensification would fully realise the associated transport benefits and efficiencies in sustainable travel choices available to Johnsonville both now and in the future.
20. Such objectives are consistent with the Waka Kotahi Regional Mode Shift Plan⁵ for Wellington and the LGWM Preferred Option Report⁶, where public transport is identified as a facilitator of urban intensification and where increasing development density near public transport nodes increases

² Stream 1 Reporting Officer Right of Reply of Adam McCutcheon and Andrew Wharton on behalf of Wellington City Council dated 14 April 2023 at [34]: <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/right-of-reply/council-officers-right-of-reply---hearing-stream-1.pdf>.

³ Johnsonville / Ngā Ūranga Strategic Case report, June 2022: <https://lgwm-prod-public.s3.ap-southeast-2.amazonaws.com/public/Projects/City-streets/City-Streets-Johnsonville-Nga-Uranga-Strategic-Case.pdf>

⁴ Wellington City Council 'Johnsonville – Moorefield Roundabout Improvements Project': <https://wellington.govt.nz/your-council/projects/johnsonville-moorefield-roundabout-improvements>

⁵ Regional Mode Shift Plan Wellington, September 2020 (Pg.6): <https://www.nzta.govt.nz/assets/resources/keeping-cities-moving/Wellington-regional-mode-shift-plans.pdf>

⁶ Let's Get Wellington Moving Programme Preferred Option Report June 2022 (Pg.54): <https://lgwm-prod-public.s3.ap-southeast-2.amazonaws.com/public/Projects/Mass-Transit/MRT-technical-documents/LGWM-Preferred-Programme-Options-Report-28-June-Post-Board.pdf>

efficiency of this infrastructure, makes sustainable mode choices more attractive, and helps to optimise patronage.

Construction Impacts on the Transport Network

21. The Section 42A Report refers to the MCZ Policy 9 'Managing adverse effects' (ISPP) at paragraphs 147 to 155.
22. In response to Stride's submission to remove MCZ-P9.2 "*The impact of construction on the transport network*", the reporting officer disagrees on the grounds that:

"the policy requires developers to consider how construction traffic effects will be managed and provides consent planners with discretion to impose a Construction Management Plan if considered necessary."
23. In my experience it is common for developers undertaking construction of significant buildings to provide a Construction Management Plan (CMP) and associated Construction Traffic Plan (CTP), to assess the impacts of construction on the transport network along with appropriate mitigations and controls to manage any adverse effects. These CTPs require certification by Council prior to works commencing.
24. Notwithstanding, in reviewing the various PDP zone chapters I note some include an equivalent provision to MCZ-P9.2, such as the Neighbourhood Centre, Local Centre, and City Centre Zones, whilst other zones omit such a requirement, including the Commercial, Mixed Use, and General Industrial Zones.
25. Reasonably, the impacts of construction in any of these zones that do not currently include specific policy wording could create adverse impacts on the transport network, and in my view moving this requirement to the Transport chapter, to apply in all zones, would provide greater consistency. As such, I recommend that the wording from MCZ-P9.2 be deleted from the MCZ chapter and instead provided for within the general Transport chapter.

Activity Threshold for 'Integrated Retail Activities'

26. The Section 42A Report addresses the 'MCZ-R13 Integrated Retail Activities' at paragraphs 186 to 195.

27. The Reporting Officer notes the PDP's Permitted Activity threshold of 20,000m² Gross Floor Area (GFA) for Integrated Retail Activities was adopted from the Operative District Plan as a means of safeguarding the vitality and vibrancy of the CBD's retail offerings. The Officer's assessment in response to the Stride and Investore submission points identifies a number of reasons to re-assess the current PDP activity threshold, including:
- (a) the recent NPS-UD directions on the need to deliver adequate business capacity outside of the CBD;
 - (b) an emerging flexibility of work from home arrangements (post COVID-19) and consideration of carbon emissions resulting in people shopping more locally, requiring a lenient development approach that allows more equitable access to the same range of services outside of the CBD; and
 - (c) the advice in Dr Lees⁷ economic evidence (Paragraph 50) that questions the need for any GFA thresholds in the MCZ.
28. In considering these factors, the Reporting Officer recommends removal of any Permitted Activity threshold for integrated retail activities in the MCZ, noting that should the Independent Hearing Panel (IHP) choose to retain a threshold, then a 30,000m² GFA is recommended.
29. I agree with the Reporting Officer's recommendations that the threshold should be removed, noting that consents for the Stride / Investore Johnsonville town centre land approved by Council in 2009 for 42,000m² GFA (SR No.186264) and in 2017 for 26,000m² GFA (SR No.368830) still have legal effect and provide for a larger integrated retail activity to be developed than the originally proposed Permitted Activity threshold of 20,000m² GFA in the PDP.
30. The associated transport network impacts of these development schemes were rigorously assessed during the consent process, and the outcomes determined in a collaborative way through a Transport Working Group

⁷ Dr Lees has provided expert evidence as an Economist on behalf of Wellington City Council in relation to the 'Centres' and 'Mixed Use Zone' activities. See the statement of evidence of Kirdan Ross Lees on behalf of Wellington City Council dated 24 May 2023 at [50].

involving the key stakeholders and road controlling authorities⁸. A series of network mitigation measures were identified (some of which have since been implemented as I mention in paragraph 18, with the remainder able to be realised without compromising the improvements to date), that demonstrated the associated transport impacts of integrated retail activities of this scale could be appropriately managed.

31. With a bigger focus now on multi-modal transport options for the Johnsonville Triangle (as described earlier in paragraph 18), and greater potential for a mixed-use 'work and live' development guided by the NPS-UD, in my view this provides a basis for a larger scale and density of commercial and retail activity than provided for under the consented schemes.
32. In addition to the current GFA cap, the effects of any development within the MCZ on the transport network are required to be considered under MCZ-P1.3 '*Convenient access to active transport and public transport options*' and MCZ-P3 Managed Activities, including with respect to managing "*the location and scale of commercial activities... and the function of the transport network*".
33. In my opinion, these policy-level provisions require appropriate assessment of any new development to consider adverse effects, and to propose adequate and suitable mitigation including in respect of the transport network.
34. In addition, development of the scale proposed within the MCZ will trigger the 'High Trip Generator' threshold under TR-R2 in the Transport chapter provisions. That rule points to the trip generation standard TR-S1 which prescribes that activities generating more than 200 vehicle movements per day are regarded a Restricted Discretionary Activity, with matters of discretion being those set out in TR-P1, as follows:

Provide for high vehicle trip generating activities where they:

- *Safely and effectively integrate with the transport network, including planned network upgrades and service improvements; and*
- *Provide for pedestrian, cycling, micromobility and public transport modes.*

⁸ Including Wellington City Council, Waka Kotahi, Greater Wellington Regional Council, Metlink and KiwiRail.

35. In my view, the scale of development likely to occur within the MCZ would trigger TR-R2 and require assessment as a Restricted Discretionary Activity, that will provide a suitable mechanism to ensure adequate assessment of effects on the transport network is undertaken. As such, I support the Council Officer's recommendation to remove any Permitted Activity GFA cap for integrated retail activities within the MCZ.

CONCLUSION

36. For the reasons provided:
- (a) I support the Metropolitan Centre zoning for Johnsonville centre;
 - (b) I recommend the effects of construction on the transport network be provided for in the Transport chapter provisions; and
 - (c) I support the removal of the GFA cap for integrated retail activities.

DATED this 12 June 2023



Mark Grant Georgeson