

**Before the Hearing Panel
Appointed by the Gore District Council**

In the Matter of

The Resource Management Act
1991 (**Act**)

And

In the Matter of

submissions and further
submissions on the Proposed Gore
District Plan

**Statement of Rebuttal Evidence of
Jason Bartlett
for McNab Management Limited**

Dated: 21 November 2024

INTRODUCTION

Qualifications and Experience

1. My name is Jason Alexander Bartlett. I am a traffic and transportation engineer for Bartlett Consulting.
2. I have the qualifications and experience set out at paragraphs [2] – [5] of my primary statement of evidence dated 7 October 2024.

Code of Conduct

3. Whilst this is not an Environment Court hearing I reconfirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence is within my area of expertise, except where I state that I am relying on material produced by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

4. My rebuttal evidence responds to:
 - (a) The evidence of Helen Dempster for the New Zealand Transport Agency Waka Kotahi (NZTA), and
 - (b) The transport elements of the Gore District Council (**GDC**) Section 42A and the appended Transport Review prepared by Abley Consultants (refer Appendix H of the Section 42A Report).
5. In addition, in this this rebuttal evidence I provide additional assessment of the local road network to identify if further upgrade works are required within the local road network.
6. In doing so, I have considered the following proposed Policy and Standards:
 - (a) Proposed Policy LIZ-PREC3-P1;
 - (b) Proposed Standard LIZ-S11(1); and
 - (c) Proposed Standard LIZ-S11(2); and
 - (d) Proposed Standards LIZ-S11(3) and (4).

REBUTTAL EVIDENCE

Local Road Network

7. Within my Statement of Evidence, I assessed and described part of the local road network. This assessment generally focused on the portions of McKinnon Road and Talbot Street closest to the site. I note that the Transport Review of Abley Consultants provides greater detail of the Local Road network¹ including the routes between the site (McKinnon Road) and Gore.
8. I have undertaken a review of the wider transport network including McKinnon Road, Talbot Street and Wentworth Street.
9. The direct transport route between the site (McKinnon Road) and Gore town centre is via SH1. However, there are alternative routes which pass through East Gore including:
 - (a) Via Talbot Street and Wentworth Street, this route is longer by 1 minute travel time and 300m². The benefit is that this route meets SH1 at the Wentworth Street intersection within the 70km/hr speed limit which means that the turning to/from SH1 will be easier.
 - (b) Via McKinnon Road and Wentworth Street, this route is longer by 2 minutes travel time and 900m. The benefit is that this route meets SH1 at the Wentworth Street intersection within the 70km/hr speed limit which means that the turning to/from SH1 will be easier.
 - (c) Via McKinnon Road, Whiterig Road and Hamilton Street, This route is longer by 3 minutes and 1.7km. The benefit is that this route meets SH1 at the Hamilton Street intersection within the 70km/hr speed limit which means that the turning to/from SH1 will be easier.
10. These roads are all low volume local roads and are provided as two lane roads. Being two lane roads, these roads will all accommodate a higher traffic flow.
11. The maximum delay time of queuing at the McKinnon Road intersection with SH1, as a result of full development of the site in accordance with the requested zoning, will be approximately 20 seconds. This suggests using SH1 between McKinnon Road and Gore town centre will be the quickest travel route. Overall, it is possible that some development traffic may use alternative traffic routes. However, as

¹ Refer the Gore District Council Section 42A Report, Appendix H Transport Review prepared by Abley Consultants, Section 3. Transport Network.

² Travel times and distance comparisons from Google maps.

alternative routes do not reduce the overall travel time, or distance, this will be minimal. This means that upgrading these roads to accommodate higher traffic flow is not necessary or warranted based on the effects, or traffic generated by the requested zoning. I consider that there are no additional road upgrades (beyond the left turn that I have already recommended) required within the local road network to accommodate the requested zoning.

12. Within my Statement of Evidence, I have recommended that the left turn from SH1 to McKinnon Road is to be upgraded. I have suggested that this is upgraded to a Channelised Left Turn Treatment (CHL) based on Austroads Guidance. This is also confirmed by the Transport Review³. I note the comments from the Transport Review that the design of this left turn lane should reduce the speed of vehicles turning left from SH1 to McKinnon Road. I can confirm, for consistency, this is the same as a the 'separated left turn lane' as requested within the evidence of Ms Dempster⁴.
13. The Transport Review also notes that the right turn treatment, from SH1 to McKinnon Road will change from Channelised Right Turn Treatment short (CHR(s)) to a Channelised Right Turn Treatment (CHR) based on the Austroads Guidance. In New Zealand both of these turn treatments are based on a marked right turn lane. The difference being the ability to accommodate vehicle queuing within the CHR intersection type. Within my modelling undertaken I note that the right turn queuing, from SH1 to McKinnon Road, remains at no more than 1 vehicle. Based on this modelling it is not necessary to amend the existing marked right turn bay. I consider that no changes or upgrades are required to the existing right turn bay (turn treatment) from SH1 to McKinnon Road.

Zone Provisions

Policy LIZ-PREC3-P1

14. Ms Dempster has recommended the following amendments to LIZ-PREC3-P1(2):⁵

LIZ-PREC3-P1 – Enable light industrial and rural service activities within the McNab Precinct in order to support the District's rural industry while managing adverse effects by:

...

³ Refer Gore District Council Section 42A Report, Appendix H Transport Review prepared by Abley Consultants, Section 4.3 McKinnon Road / SH1 intersection.

⁴ Statement of Evidence of Helen Dempster dated 31 October 2024, at para [5.9 to 5.12].

⁵ Statement of Evidence of Helen Dempster dated 31 October 2024, at para [5.2].

2. avoiding multiple connections onto the State Highway and avoiding ice formation from shading of the sealed carriageway of the State Highway.

15. I identified in my Statement of Evidence⁶ that a buffer and shading of State Highway as being of concern to NZTA. This has resulted in the provision of a rule within the Statement of Evidence of Christine McMillan. I agree with the request of Ms Dempster that this may follow through into the policies of the Zone and support the proposed amendment by Ms McMillan to LIZ-PREC3-P1 which addresses Ms Dempster's point..

Standard LIZ-S11(1)

16. Ms Dempster has raised some concerns in relation to the proposed buffer screening development from State Highway 1. Ms Dempster considers that the provisions should introduce a requirement for the buffer or screen to be maintained over time, as well greater restrictions on shading of the State Highway.
17. Ms Dempster has recommended the following amendments to LIZ-S11(1):⁷
1. Prior to the operation of any industrial, light industrial or rural industry activity within the McNab Precinct, a buffer or screen is to be established, and thereafter maintained, on or near the State Highway 1 boundary to prevent light glare to drivers on State Highway 1 as a result of activities within the precinct. The buffer or screen ~~may must~~ not result in shading of the sealed carriageway of the State Highway during ~~the winter months~~ the months of May to September.
18. The Section 42A Report considered if there is any need for the buffer area as it is not required for other similar zones. The purpose of this buffer is set out in my Statement of Evidence, at paragraph 37. It is primarily required on or near the SH1 boundary to prevent light glare to drivers on SH1 from activities within the Zone. A driver's eye height is between 1.1m for a car driver to 2.4m for a truck driver⁸. This suggests that any screen should be approximately 3m height above the road surface. NZTA have also requested that this buffer is set so that it does not shade the carriageway of SH1 during the winter months. I note that the Section 42A Report requires more detail for this buffer, being either vegetation or fencing, to enable this to be established/constructed through a building consent.⁹
19. I have reviewed the proposed wording of LIZ-S11(1) being suggested by Christine McMillan in her Rebuttal Evidence. I suggest that this approach provides a definitive

⁶ Statement of Evidence of Jason Bartlett dated 7 October, at para [37].

⁷ Statement of Evidence of Helen Dempster dated 31 October 2024 at para [5.8].

⁸ Refer Austroads Guide to Road Design Part 3: Geometric Design, Section 5.2.1 Driver Eye Height.

⁹ Section 42A Report – McNab Management Limited Rezoning, at para [217].

or prescriptive approach to the provision of an appropriate buffer and I agree with this approach. This approach also addresses the Section 42A Reporting Officer's recommendation to establish a height limit for the buffer or screen.

Standard LIZ-S11(2)

20. Ms Dempster, on reliance on NZTA Safety Engineer Roy Johnston's feedback, considers that provisions should be made for a *separated* left turn lane to facilitate safe, efficient and effective turning movements.
21. Accordingly, Ms Dempster has recommended the following amendments to LIZ-S11(2):¹⁰
 2. Prior to the operation of any industrial, light industrial or rural industry activity within the McNab Precinct, a separated left turn lane shall be constructed on State Highway 1 at the intersection with McKinnon Road, to the satisfaction of New Zealand Transport Agency.
22. As discussed above, my modelling and the Transport Review confirmed that the left turn, from SH1 to McKinnon Road is to be upgraded. I agree with the wording of this standard suggested by Ms Dempster. This wording is further refined by Christine McMillian in her Rebuttal Evidence, and I agree with this approach.
23. This standard means that the left turn lane is to be upgraded prior to operation of any industrial or rural service activity within the McNab Precinct.

Standard LIZ-S11(3) and (4)

24. These consent conditions are an outcome of my Statement of Evidence, paragraph 56. Both the Section 42A Report and the evidence of Ms Dempster suggest that this standard is limited to undertaking the traffic assessment and may not necessarily require any actions which may be required to minimise or mitigate potential effects of identified by the traffic assessment.
25. My expectation is that the intersection of McKinnon Road with SH1 can accommodate the full industrial and rural lifestyle development of the site based on my assumed traffic generation rates. I note that the Transport Review considers these transport rates to be appropriate¹¹. The purpose of these traffic assessments is to confirm that, with the actual development, traffic generation and/or actual traffic growth within the road network and any potential effects also remain acceptable.

¹⁰ Statement of Evidence of Helen Dempster dated 31 October 2024 at [5.12].

¹¹ Refer Gore District Council Section 42A Report, Appendix H Transport Review prepared by Abley Consultants, Section 4.2 Traffic Generation.

However, should a traffic assessment determine that there are potential traffic or transportation impacts that are not acceptable there are further transport initiatives which should be considered as suggested by the standard. There may be an action required or recommended by the traffic assessment and therefore this standard is expected to trigger an action. I note that Christine McMillian has addressed this in her Rebuttal Evidence with the addition of a new standard, LIZ-S11(5), which requires any recommendations arising from the traffic assessment to be implemented prior to the activity occurring. I agree with this approach and her recommended wording. I consider that this provides certainty that any required actions will be undertaken following a traffic assessment being undertaken. On that basis I do not consider Ms Dempster's suggestion to link LIZ-S11(3)-(4) to a rule triggering resource consent is necessary as the standard will require the relevant effects to be assessed and actioned at the appropriate triggers. .

26. In my Statement of Evidence¹² I recommended that that traffic assessments are undertaken at specific trigger points, 30% and 55%. These are based on the proportion of land area within the McNab Precinct which is to be developed as industrial, light industrial or rural industry activity. These specific points have been selected as these are points identified in the traffic modelling which may have a noticeable effect within the local road network. The 30% trigger is when queuing on McKinnon Road (from the SH1 intersection) may extend to the intersection with Talbot Street and specific intersections treatments may be appropriate. The 55% trigger is when queuing, on McKinnon Road, may extend to the site access intersection located at the existing 90 degree curve in McKinnon Road.
27. These effects are limited to the length of the traffic queue, whereas efficiency indicators such as delay time remain within acceptable limits. This means that there will be periods, following the upgrade to a separated left turn (from SH1) prior to any development there is no need for any further assessment or traffic interventions until 30% of the McNab Precinct has been developed. At this stage there will be further traffic data available to assess actual traffic generated by development, and any growth within the background traffic on the local road network and/or SH1.
28. The Section 42A Report seems to have removed these specific triggers¹³, which I interpret as meaning that each and every development within the McNab Precinct would require a traffic assessment, I consider that this is unnecessary.
29. The wording of these standards, LIZ-S11(3) and (4), is further refined by Christine McMillian in her Rebuttal Evidence, this includes the provision of a traffic

¹² Statement of Evidence of Jason Bartlett dated 7 October, at para [37].

¹³ Section 42A Report – McNab Management Limited Rezoning, at para [221] and recommended standard GRUZ-S10-PREC15(2) and (3).

assessment as specific stages, 30% and 55% of land area as I have previously recommended. I agree with this approach.

CONCLUSION

30. I have undertaken a review of the local road network with respect to transport routes between the site (McKinnon Road) and Gore. I consider that the development of the requested zone may result in a minor increase traffic flow on these routes. I do not consider that any upgrades are necessary or warranted along these alternative routes to facilitate additional traffic.
31. I have also reviewed the right turn bay from SH1 to McKinnon Road, the queuing for this remains at not more than one vehicle and therefore I consider that no changes or upgrades are required to the existing right turn bay (turn treatment) from SH1 to McKinnon Road.
32. With respect to the planning provisions, I have reviewed the amendments refinements recommended by Christine McMillian in her Rebuttal Evidence, I agree with these recommended changes.



Jason Bartlett

21 November 2024