

SUBMISSION ON A RESOURCE CONSENT APPLICATION THAT IS SUBJECT TO PUBLIC NOTIFICATION BY THE KAPITI COAST DISTRICT COUNCIL

Pursuant to section 96 of the Resource Management Act 1991

Application Number:	RM210151
Applicant:	Kapiti Retail Holdings Limited
Proposal:	Land use consent to undertake earthworks that do not meet the permitted activity standards for the construction of a building to be occupied by a retail activity that does not meet the permitted activity standards for the General Industrial Zone, vehicle movements, signs, access and landscaping and requires consent under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health
Legal Description(s):	Lots 1 & 2 DP 63027 and Lot 3 DP 63992– 160 Kapiti Road, Paraparaumu

DUE AT COUNCIL OFFICE NO LATER THAN 5:00PM ON WEDNESDAY 10 NOVEMBER 2021

This is a submission on an application from Kapiti Retail Holdings Limited to undertake earthworks that do not meet the permitted activity standards for the construction of a building to be occupied by a retail activity that does not meet the permitted activity standards for the General Industrial Zone, vehicle movements, signs, access and landscaping and requires consent under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health. It is located in the General Industrial zone and is a Non-Complying Activity.

Please note: This form is only a guideline. If you don't wish to use this form please make sure your submission includes all the following details (see Resource Management (Forms, Fees, and Procedure) Regulations 2003, Form 13 for official submission content requirements):

Please send your Submission to:

To:	Or:
The Chief Executive Officer	Email: submissions@kapiticoast.govt.nz
Kāpiti Coast District Council	
Private Bag 60 601	
Paraparaumu 5254	

Note: You are required to send a copy of your submission to the applicant as soon as reasonably practicable after you have served your submission on the Kāpiti Coast District Council.

Please serve a copy of your submission to Kapiti Retail Holdings Limited (the Applicant) as below:

Kapiti Retail Holdings Limited
PO Box 24463
Royal Oak
Auckland 1345

Or email: kay@formeplanning.co.nz

Attention: Kay Panther Knight

Submitter/s Details:

Title:	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Dr Other:		
My/Our Full Name(s):	Templeton Kapiti Limited		
Address for service:	oleg.sennikov@templetongroup.co.nz	Post Code:	
Physical Address:	60 Toru Road, Paraparaumu	Post Code:	
Home Ph:		Work Ph:	
Home Fax:		Work Fax:	
Cell:		Email:	oleg.sennikov@templetongroup.co.nz

Note: Correspondence will be via email unless otherwise requested.

Submitter/s Position:

Trade Competition

- I am a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
 I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

Please use a clear tick in the appropriate box below (✓) to show whether you support the application in full or in part, or oppose the application in full or in part, or are neutral.

<input type="checkbox"/> I / We support the application in full	<input type="checkbox"/> I / We support part of the application *
<input type="checkbox"/> I / We oppose the application in full	<input checked="" type="checkbox"/> I / We oppose part of the application *
<input type="checkbox"/> I / We are neutral on all aspects of the application	<input type="checkbox"/> I / We are neutral on part of the application *

* If you indicate you support, oppose or are neutral for part of the application, please clearly set out the part(s) of the application you are submitting on (including reasons) in the 'My Submission Is' section of this form below.

Reasons for Submission:

The specific parts of the application that my submission relates to are:

Give details:

Traffic effects, particularly the methodologies and conclusions in the Transport Assessment.

Please use additional pages if required.

My Submission Is:

Include further detail on whether you support, oppose or are neutral on the application or specific parts of it; and the reasons for your views:

Please see attached sheet.

Please use additional pages if required.

Decision Sought:

I / we seek the following decision from the Kāpiti Coast District Council (provide precise details including the general nature of any conditions or changes sought):

TKL seeks that further information is supplied that verifies the findings of the Transport Assessment in relation to effects on the transportation network or new information is provided that addresses the matters raised in this submission.

In the event this information is not provided, TKL seeks that the application be refused.

In the event that an accurate transportation assessment confirms that the grant of consent would adversely affect development of the Airport Zone Mixed Use Precinct in accordance with its zone provisions, TKL seeks that consent be refused.

TKL's concerns are addressed in more detail in the attached letter from Carriageway Consulting dated 9 November 2021.

TKL seeks any other relief necessary to resolve the concerns identified.

Please use additional pages if required.

Wish to Speak at Hearing:

Please indicate below whether you would like to speak at the hearing for the application (if a hearing is required). Use a clear tick in the appropriate box below (✓).

I / we do not wish to be heard and hereby make my / our submission in writing only.
(This means that you will not be advised of the date of the hearing and cannot speak at the hearing)

OR

I / we wish to be heard in respect of my / our submission (to speak at the public hearing)
(This means you can speak at the hearing. If at a later date you decide you no longer wish to speak at the hearing you can withdraw from being heard)

If others make a similar submission, I / we will consider presenting a joint case with them at the hearing.
(This is only for parties wanting to be heard)

I / we intend to call expert witness(es). Please indicate the disciplines of expected expert witnesses.
(If you do not tick this box, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Hearing Panel might make) Transport Engineering

Pursuant to Section 100 of the Resource Management Act 1991, I / we request that the Council delegates its functions, powers and duties required to hear and decide the application to one or more hearings commissioners who are not members of the Kapiti Coast District Council.

If you do wish to make a request for an Independent Commissioner pursuant to Section 100, please see notes below for potential cost implications to you.

I / we are aware that I / we are required to send a copy of my / our submission to the applicant as required under section 96(6)(b) of the Resource Management Act 1991 (please tick).



10-11-2021

Signature

Date:

Signature

Date:

Please note: Signature of submitter, or person authorised to sign on their behalf is required. Signature is not required for electronic (email) submissions. If this is a joint submission by two or more individuals, each individual's signature is required.

Privacy Disclaimer

Please note: All submissions (including names and contact details) will be made publicly available at Council offices and public libraries. A summary of submissions including the name of the submitter may also be made publicly available and posted on the Kāpiti Coast District Council website. Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of subsequent steps and decisions. All information will be held by the Kāpiti Coast District Council, with submitters having the right to access and correct personal information.

Notes to Submitters:

- The Resource Management Act (RMA) 1991 prefers electronic methods of communication.
- The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.
- If you make a request for an independent commissioner(s) under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.
- You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
- If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

Include further detail on whether you support, oppose or are neutral on the application or specific parts of it; and the reasons for your views:

Templeton Kapiti Limited (TKL) is the owner of land on the southern side of Kāpiti Road located within the Airport Zone, including the retail area known as “Kāpiti Landing”.

The Airport Zone Mixed Use Precinct (MUP) provides for a range of non-aviation commercial and other employment opportunities, including limited retail activities that are consistent with supporting the role and function of the District's centres.

The MUP is subject to standards limiting cumulative gross floor area to 102,900m² (AIRPZ-R13). In addition, any development that exceeds a cumulative gross floor area of 43,050m² requires a transport assessment to be carried out. This transport assessment must consider the impact of the cumulative development of the area on the safety and efficiency of the transport network. A further transport assessment is required for any development that exceeds 62,500m².

TKL has concerns that the additional traffic generation that will arise as a result of this application will affect the overall capacity of the transportation network in a manner that has not considered the anticipated extent of development enabled by the MUP rules and/or may adversely affect the ability of the MUP to be developed as anticipated by the MUP.

Particularly, TKL is concerned about the level of detail in the Transport Assessment submitted with the application and the conclusions about the effects on the transportation network reached as a result. The concerns with the Transport Assessment have been set out in detail in the **attached** letter from Carriageway Consulting dated 9 November 2021.

For these reasons, TKL seeks that further information is supplied that verifies the findings of the Transport Assessment in relation to effects on the transportation network, or new information is provided that addresses the matters raised in this submission.

CCL Ref: 14797-101121-sennikov

10 November 2021

Oleg Sennikov
Templeton Kapiti Limited

By e-mail only: oleg.sennikov@templeton.co.nz



A. PO Box 29623, Christchurch, 8540
P. 03 377 7010
E. office@carriageway.co.nz

Dear Oleg

RM210151: Proposed Countdown Supermarket, Paraparaumu: Review of Transportation Matters

Further to recent discussions, we understand that an independent review is sought of the proposal by Kāpiti Retail Holdings Limited for a 3,800sqm supermarket plus ancillary units at 160 Kāpiti Road, Paraparaumu. This letter sets out our review of the six documents provided to us, namely:

- RM210151: Appendix 5, Integrated Transportation Assessment by Tim Kelly Transportation Planning Limited;
- RM210151: Extract from proposal;
- RM210151: Extract from proposal addressing traffic effects;
- RM210151: Further Information Request response dated 3 August 2021;
- RM210151: Further Information Request response dated 12 August 2021; and
- Provisions of the District Plan relating to the Airport Zone Rules (dated October 2021)

We have reviewed the documents in depth but this letter has been written to be suitable for a submission and to be read by a non-expert. Consequently although we have covered all relevant matters we have sought to avoid the very high degree of detail that would typically be expected of a full peer review. Furthermore, the level of detail with regard to traffic volumes that we would usually expect to see within an Integrated Transportation Assessment (ITA) is not present in this case, which has precluded a more detailed evaluation of a number of matters.

As relevant, we have referred to the section or paragraph for ease of reference and we have focussed on the areas of the assessment where we have concerns.

Appendix 5, Integrated Transportation Assessment (Tim Kelly Transportation Planning Limited)

Section 2.3: Traffic Counts

The ITA notes that detailed turning counts were carried out by Woolworths NZ in June 2018 and by the Council in February 2018, and link volumes were counted by the Council in August 2017, 2018 and 2019, and November 2020.

Table 2.1 of the ITA only shows the link counts carried out by the Council however, with no detail presented for the turning counts of 2018, and in particular, the volume entering and exiting Friendship Place where significant delays are forecast. We discuss this omission subsequently.



Section 2.4: Traffic Volumes

The traffic volumes during the Saturday peak hour are noted as being “*slightly higher*” than in the weekday evening peak hour, with the weekday evening period and during the late morning period on Saturdays being the periods used for assessment. We discuss this subsequently.

Section 2.4: Traffic Growth

The traffic growth factors have been found from evaluating the historic growth rates. While this is an appropriate approach, it shows that while the weekday peak hour, and the daily weekday and daily Saturday volumes have increased by around 1.5%, the Saturday peak hour volume has reduced by 1.5%. When the data is evaluated further, this appears to be largely due to a reduction of 10.2% in the westbound traffic volume in the Saturday peak hour.

Such a reduction is very large, and in our view it is plausible that it arises because the 2017, 2018 and 2019 counts were carried out in the month of August, but the 2020 count was carried out in November. The Waka Kotahi factors for scaling the traffic generation of developments (set out in Table B.2 of Research Report 453 ‘*Trips and Parking Related to Land Use*’) show that with all other factors held constant, a traffic count carried out in November would be expected to be 8.3% lower than a count carried out in August. In other words, the ITA has not compared ‘like with like’ but rather, the difference may arise because of the timing of the surveys.

The ITA sets out that the difference may be due to ‘peak spreading’ whereby drivers are adjusting their travel time to avoid the busiest periods. If peak spreading is assumed to occur, then the traffic volumes set out in Table 2.1 show that it occurred at a threshold of 913 vehicles per hour (as in the next year, the volume had reduced to 820 vehicles per hour). Therefore this is the ‘ballpark’ volume at which peak spreading should occur on this section of the road. However such peak spreading did not occur in the previous year, when the traffic volumes were similar. Peak spreading also does not occur in the westbound direction where volumes of more than 950 vehicles were observed. This is not the outcome that would be expected if peak spreading explained the difference.

On this basis, the differences are not in our view explained by peak spreading, but are more likely to be due to the traffic counts being carried out in different months. We therefore consider that the negative growth rate seen in the Saturday peak hour is not reliable.

This matter also affects the calculation of traffic growth during the weekday – again, the use of a different month where traffic volumes are expected to be lower means that the annual growth rate calculated is likely to be lower than is currently occurring.

Section 4.2: Assessment Methodology: Traffic Model

The approach set out, of considering the situation with a base year (in this case 2018) and a future design year (in this case 2026) is appropriate but this necessarily involves factoring the 2018 traffic volume data. In order to do this, for the Saturday peak hour, the negative growth rate calculated above has been applied (as confirmed in the first paragraph of Annexure C, section 2). The specific turning volumes used are not shown in the ITA, but Table 4.1 shows that the total traffic volume used in 2026 on Saturday was 2,018 vehicles compared to 2,293 vehicles in 2018. This is a 12% reduction, which corresponds to 8 years of -1.5% growth. As noted above, we do not consider that this negative rate is reliable.

Furthermore, this approach is inconsistent in our view. If peak spreading starts to occur around 913 vehicles per hour (the volume that Table 2.1 shows occurred before the volume started to reduce), this does not mean that traffic volumes continue to decline in every future year. Rather, volumes



should remain fairly static around this threshold because it represents the upper limit of capacity. They would not continue to decrease into the future.

Applying a 1.5% reduction to the traffic flows each year is therefore not the appropriate approach in our view. Rather, it will lead to the volumes on the road network during the Saturday peak hour, noted in the ITA as being the highest peak hour, being underestimated.

As noted above the growth rate calculated for weekdays is also likely to be lower than the current rate, as a result of this methodology.

Section 4.2: Assessment Methodology: Assessment Periods and Scenarios

The approach of considering a design year and making allowance for any “*consented development*” in the area is valid in our view, but there is no indication in the ITA of what developments have been taken into account nor of their effects on the traffic flows. However the response to the Further Information Request sets out that in practice, no consented development has been allowed for.

There is also no commentary provided regarding whether permitted development in the area, that is, development which could occur but for which no consents are needed, has been taken into account. With that in mind, we have reviewed the District Plan provisions for the Airport Zone and note that:

- Kāpiti Coast Airport is a significant transport infrastructure node (AIRPZ-P2); and
- Business activities will be undertaken with regard to connectivity and access within and to the Working Zones and opportunities for transport choice and efficiency will be maximised (AIRPZ-P4); and
- Development thresholds are set out with the Airport Mixed Use Precinct only requiring a Transportation Assessment when a cumulative gross floor area of 43,050sqm is exceeded.

We note that the Airport Mixed Use Precinct is served by Friendship Place, with access onto Kāpiti Road at the same roundabout as proposed by the supermarket. Since the District Plan is newly operative, we consider that this strongly suggests an assumption of growth in activities in this Precinct, which can be expected to increase traffic flows through the roundabout. However there is no indication in the ITA that this has been taken into account.

In respect of this, and the modelling approach, we note that the Further Information Request queries why the Council’s transportation model was not used for the analysis. Use of a complex transportation model of this nature typically enables permitted development to be taken into account (as it is included in the model) and also enables a comparative assessment of traffic growth. Even if ultimately the Council’s model was not used for the analysis, we consider that it would have been helpful for the volumes and growth output to have been used for benchmarking the analysis presented, to show that it is not inconsistent. It would also have been helpful to demonstrate that the rationale for future negative traffic growth is supported.

Section 4.3: External Vehicle Access Points

The ITA notes that as a result of the proposed supermarket, the traffic passing through the Kāpiti Road / Friendship Place roundabout would increase by 14-15%. It is also noted that this increase in the weekday evening peak period leads to a change from Level of Service B or C, to F. This is due to vehicles being unable to exit from Friendship Place.

There is insufficient information presented in the ITA to enable an independent check of this because as noted earlier, the traffic flows used in the analysis are not included. In particular, the turning volumes to/from Friendship Place are not included in the report, despite this being the



roundabout approach that experiences the greatest change in delay. This also means that we are unable to evaluate how many drivers exiting the site are assumed to turn towards the southeast via the secondary access, compared to how many will pass through the Kāpiti Road / Friendship Place roundabout. This may affect the modelling results further.

However the delays are included in Table 4.1, and this shows that for traffic on Friendship Place, delays increase from around 26 seconds per vehicle to around 130 seconds per vehicle during the weekday peak hour. In our view, such an increase is substantial.

The ITA notes that on Saturday, the existing roundabout would operate with acceptable levels of queuing and delays. We note that as a negative growth rate has been applied, then this is not unsurprising – the supermarket increases traffic volumes but the negative growth rate reduces them. We note that the increase in traffic volumes is almost completely offset through the approach used in the ITA¹.

In passing, the ITA notes that the secondary access towards the south would operate as left-in/left-out only. However there is no indication given as to how this will be implemented. We would expect that a raised median will be required within the flush median to prevent drivers from attempting to turn right.

Section 4.5: Kāpiti Road / Friendship Place Roundabout – Mitigation

The mitigation suggested for the roundabout is the provision of an additional traffic lane on Friendship Place. On our assessment of the Council's GIS information though, the legal width of this part of Friendship Place is only around 13m and it appears unlikely that a second traffic lane could be added and achieve a roundabout geometry that meets appropriate guides/standards without requiring land that is presently outside the legal road corridor. We note that no design has been provided for this (we would not expect a detailed design, but a sketch showing a viable 'proof of concept' would typically be included within an ITA).

Section 4.8: Walking and Cycling

The use of cycling for smaller shopping trips is common, and therefore we expect that there would be an increase in this form of travel, as well as walking trips. While a qualitative assessment has been carried out of the effects of this, we note that the increase in traffic volumes will potentially give rise to a reduced level of service for pedestrians walking north-south along Kāpiti Road and there may also be road safety effects at the roundabout for cyclists. Both of these could be quantified to fully evaluate their effects, but this has not been done.

4.11: Servicing

The ITA notes that servicing will occur with vehicles travelling clockwise around the main building. For this, vehicles will be required to turn around the Kāpiti Road / Friendship Place roundabout, and the ITA refers to swept paths shown on Figure 3.1. This is at a small scale but we note that:

- The vehicle shown is a truck and trailer. However typically the most onerous vehicle type which is associated with a supermarket is a semitrailer or a B-train.
- The swept paths shown appear to have omitted the required 0.5m clearance around the vehicle. In some locations the vehicle touches the kerbs, which in practice means their wheels will scrape against the kerbface or there will be a minor amount of over-running.

¹ Table 4.1 shows that in 2026 plus the supermarket plus the application of negative traffic growth, the total traffic volume is just 0.5% greater than was observed in 2018.

Without adopting the required 0.5m clearance from the vehicle and allowing for the appropriate type of vehicle, we cannot confirm that service vehicles will be able to easily enter and exit the site.

We also note that the swept path for the exiting vehicle is not fully shown and therefore it has not been demonstrated that the vehicle can undertake this movement without travelling into the opposing traffic lane.

Section 6.3: KCDP Part 2 District Wide Matters / Transport: Rules

In reviewing the compliance with the Rules, we note that the ITA states “the primary access will utilise the existing fourth arm of the Kāpiti Road / Friendship Place roundabout”. However this reference to ‘existing’ is not strictly true. The existing fourth arm currently meets the roundabout at 90-degrees (as shown in yellow below). However Figure 3.1 of the ITA shows that the arm is to be realigned (as shown in red below):

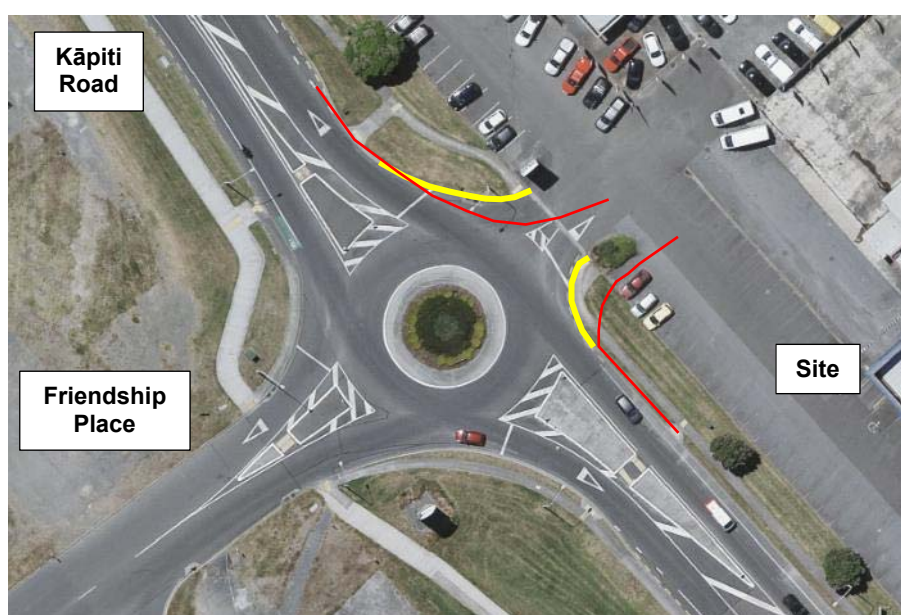


Figure 1: Existing Kāpiti Road / Friendship Place Roundabout (Fourth Arm Highlighted)

For completeness, Figure 3.1 of the ITA is at low resolution and therefore there is a margin of error in Figure 1. However based on Figure 3.1, the realignment of the fourth arm is in the order of 20 degrees. One outcome of this is that there is minimal deflection provided for traffic exiting the supermarket, that is, drivers do not have to deviate their route but can drive straight ahead onto the circulating carriageway. Reduced deflection is often associated with elevated road safety risk. The revision to the fourth arm also means that any vehicle exiting the site to turn south will have to turn through a greater angle. While this often does not create difficulties for drivers of smaller vehicles, in the event that larger vehicles were to undertake the movement, they may not be able to avoid over-running the kerb.

While we appreciate that Figure 3.1 is not a detailed design, we consider that the ITA does not show that a roundabout design meeting appropriate standards/guides can be achieved.



Summary

Having reviewed the ITA, we consider that:

- The use of negative growth, that is, a diminishing volume of traffic, is very unusual in our view. This will tend to mean that the future year traffic volumes are lower than could be expected though ambient traffic growth. The rationale provided (peak spreading) does not correspond well to the results, since it means that peak spreading occurs at a particular threshold in one direction on the road while in the other direction it does not occur even though volumes are greater. We consider that a more likely explanation is that the traffic count was carried out in a different month. Even if peak spreading was occurring, the application of ongoing negative growth into the future is not supported – rather, under peak spreading, volumes should remain the same.
- The same approach (of using different months for the calculation of traffic growth) is likely to have also resulted in the weekday peak hour growth rates being calculated to be lower than is actually the case.
- The analysis does not appear to account for consented development, nor for traffic that could be generated as of right and served from Friendship Place.
- Taking the above matters into account, we consider that the projected 2026 traffic volumes on the network are underestimated. However because the report does not include current volumes on Friendship Place, a revised assessment using more appropriately scaled volumes cannot be undertaken. Moreover, because negative growth has been applied to the Saturday late-morning period (which the ITA identifies as the period when in 2018 the volumes were greatest), the effect of the supermarket at this time is shown to be negligible, because the extra traffic generated is almost completely offset by the assumed reduced traffic volumes on the network.
- Thus the most critical time periods (from a transportation perspective) have been tested using volumes that in our view are artificially low.
- No allowance has been made for permitted development that could occur within the Airport Mixed Use Precinct, and which would be served by Friendship Place. Permitted development will increase traffic flows even further from the 2026 'baseline' volumes of the ITA.
- The level of detail in the report does not enable an independent evaluation to be carried out of the split of vehicles using the secondary access (to the south of the roundabout) compared to passing through the roundabout. This could increase traffic flows at the roundabout even further and hence increase the queues and delays forecast.
- The modelling shows that the level of service at the Kāpiti Road / Friendship Place roundabout would decrease such that delays of more than two minutes per vehicle for traffic exiting Friendship Place would arise. The ITA responds to this by proposing a second approach lane for Friendship Place, but this is not demonstrated to be formed within the legal road reserve.
- Another revision made at the roundabout is that the site access is reorientated towards the south, meaning that it would meet the roundabout at approximately 20 degrees from the perpendicular (rather than the perpendicular angle currently in place). This can lead to difficulties in achieving appropriate roundabout geometries, and the ITA does not include sufficient detail to show how a suitable layout can be provided.
- The swept paths provided do not allow for a 0.5m clearance around a service vehicle, and may not show the most onerous vehicle. The swept path for an exiting service vehicle does not demonstrate that the movement can be carried out without over-running the kerb (or running through the opposing traffic lane of Kāpiti Road) because it stops at the site boundary.



- A quantitative assessment has not been included of the effects of the proposal on walking and cycling.

Overall, one of the underlying concerns we have with the report is the absence of information regarding the traffic flows. Within an ITA we would normally expect to see a presentation of the data collected through traffic surveys, the traffic volumes expected in a future year without the development in place, and the traffic flows expected with the development in place. These are commonly (but not always) presented using 'stick diagrams' which show the turning volumes, but irrespective, the inclusion of the turning volumes means that the core calculations of the ITA can be checked. Best practice in respect of ITA production remains as set out in Waka Kotahi Research Report 422 'Integrated Transport Assessment Guidelines' which confirms that an ITA should include turning counts at critical intersections.

In this case though, no information has been presented regarding the current or future traffic volumes at the most critical location of the Kāpiti Road / Friendship Place roundabout particularly with regard to vehicles turning to and from Friendship Place. In turn, this means that there can be no independent check on the volumes used, nor any check on the modelling outcomes, nor any sensitivity testing of (say) applying a different traffic growth factor or assessing whether additional development within the Airport Mixed Use Precinct has a material effect on the results.

Conclusions

Based on the methodology set out in the ITA, we consider that the prevailing future traffic flows adjacent to the site have been underestimated. As such, the analysis of the Kāpiti Road / Friendship Place roundabout presents queues and delays that are better than will arise in practice. However we are unable (due to the lack of traffic volumes in the ITA) to undertake our own modelling using different parameters. As a result, we cannot confirm that the mitigation proposed at the roundabout will be appropriate.

We also have concerns that the proposed roundabout layout presented does not achieve appropriate design standards/guides. While we appreciate that the layout presented is a sketch rather than a detailed design, it includes elements that suggest a non-complying design may arise. As such, we cannot confirm that the proposed site access (which angles the arm through 20 degrees from the perpendicular), nor the deflection for traffic, nor the proposed additional approach lane on Friendship Place, are able to be achieved.

Overall then, we do not consider that the ITA demonstrates that the proposed supermarket can be accommodated on the adjacent roading network without adverse efficiency and/or safety effects arising.

Please do not hesitate to contact me if you require anything further or clarification of any issues.

Kind regards
Carriageway Consulting Limited

Andy Carr
Traffic Engineer | Director

Mobile 027 561 1967
Email andy.carr@carriageway.co.nz