

## Marnie Rydon

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**From:** Kay Panther Knight <kay@formeplanning.co.nz>  
**Sent:** Tuesday, 3 August 2021 8:13 am  
**To:** Marnie Rydon  
**Cc:** Tim Kelly  
**Subject:** RE: RM210151 - Further Information Request - 160 Kapiti Road, Paraparaumu

Hi Marnie

What I'm requesting is for the transport engineer to review that information previously issued against the requests made in the s92 and confirm whether the queries remain outstanding or if they have been appropriately addressed. Whatever process you need to adopt to make that work is acceptable to us.

Thanks and kind regards,

**Kay Panther Knight | Director | Forme Planning Limited**

**Mobile:** 029 502 4550  
**Physical:** Level 10, 11 Britomart Place, Auckland  
**Post:** PO Box 24463, Royal Oak, Auckland 1345

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**From:** Marnie Rydon <marnie@incite.co.nz>  
**Sent:** Tuesday, 3 August 2021 7:54 am  
**To:** Kay Panther Knight <kay@formeplanning.co.nz>  
**Cc:** Tim Kelly <tim@tktpl.co.nz>  
**Subject:** RE: RM210151 - Further Information Request - 160 Kapiti Road, Paraparaumu

Morena Kay

If you are confirming that the email is the formal response to the roading part of the fir, then yes, Council will review this and be in touch with any queries.

Kind regards

**Marnie Rydon**  
Resource Management Consultant



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**From:** Kay Panther Knight <[kay@formeplanning.co.nz](mailto:kay@formeplanning.co.nz)>  
**Sent:** Monday, 2 August 2021 9:25 am  
**To:** Marnie Rydon <[marnie@incite.co.nz](mailto:marnie@incite.co.nz)>  
**Cc:** Tim Kelly <[tim@tktpl.co.nz](mailto:tim@tktpl.co.nz)>  
**Subject:** RE: RM210151 - Further Information Request - 160 Kapiti Road, Paraparaumu

Hi Marnie

Thanks for the clarification, can I just confirm therefore that the transport engineer will consider that response alongside Tim's ITA and confirm whether anything further is required on transport matters?

Thanks again and kind regards,

**Kay Panther Knight | Director | Forme Planning Limited**

**Mobile:** 029 502 4550  
**Physical:** Level 10, 11 Britomart Place, Auckland  
**Post:** PO Box 24463, Royal Oak, Auckland 1345

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**From:** Marnie Rydon <[marnie@incite.co.nz](mailto:marnie@incite.co.nz)>  
**Sent:** Monday, 2 August 2021 7:49 am  
**To:** Kay Panther Knight <[kay@formeplanning.co.nz](mailto:kay@formeplanning.co.nz)>  
**Subject:** RE: RM210151 - Further Information Request - 160 Kapiti Road, Paraparaumu

Morena Kay

I have spoken to the Roding team about this and it seems like the information in the email you provided was maybe not included in the application and therefore could not be considered a formal response.

Nga mihi

Marnie

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**From:** Kay Panther Knight <[kay@formeplanning.co.nz](mailto:kay@formeplanning.co.nz)>  
**Sent:** Wednesday, 28 July 2021 11:14 am  
**To:** Marnie Rydon <[marnie@incite.co.nz](mailto:marnie@incite.co.nz)>  
**Cc:** Tim Kelly <[tim@tktpl.co.nz](mailto:tim@tktpl.co.nz)>; David Lippard <[david@ipm.co.nz](mailto:david@ipm.co.nz)>  
**Subject:** RE: RM210151 - Further Information Request - 160 Kapiti Road, Paraparaumu

Hi Marnie

Many thanks for issuing the section 92, we will review and respond. Just one query up front – attached is the exchange between Tim Kelly and Gary Adams on transport matters prior to lodgement of the application. Many of the queries in the section 92 appear to replicate these queries and we wondered whether Gary had taken into account / considered Tim's earlier responses – attached?

Can you please confirm and I think the best way to proceed might be for Gary and Tim to meet and discuss in the first instance.

Thanks and kind regards,

**Kay Panther Knight | Director | Forme Planning Limited**

**Mobile:** 029 502 4550

**Physical:** Level 10, 11 Britomart Place, Auckland

**Post:** PO Box 24463, Royal Oak, Auckland 1345

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**From:** Marnie Rydon <[marnie@incite.co.nz](mailto:marnie@incite.co.nz)>

**Sent:** Tuesday, 27 July 2021 4:44 pm

**To:** Kay Panther Knight <[kay@formeplanning.co.nz](mailto:kay@formeplanning.co.nz)>

**Subject:** RM210151 - Further Information Request - 160 Kapiti Road, Paraparaumu

Kia ora Kay

Please find attached the further information request for the above application.

If you have any questions, please don't hesitate to contact me.

Nga mihi

Marnie Rydon

## Marnie Rydon

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**From:** Tim Kelly <tim@tktpl.co.nz>  
**Sent:** Thursday, 1 July 2021 9:09 am  
**To:** Gary Adams  
**Cc:** Kay Panther Knight  
**Subject:** Re: FW: Countdown Traffic Assessment

Hi Gary

Thanks for sending the questions through. I've provided responses below **[in red]** - but I note that since lodgement of the application is now close, it may be best to handle any further assessment or consultation as part of the process following receipt of the application by KCDC.

### QUESTION 1

Why use growth rates identified in the report rather than the 2026 SATURN model? With the Wellington Regional Growth Framework, the Kapiti District is expecting significantly more growth than has previously been anticipated, which is not in the SATURN model. I think we have agreed to this with other sites but good to have this confirmed.

**As described in the ITA 2.5, detailed growth rates have been calculated based on link counts between the expressway and Arawhata Road, because this is the area of the network most sensitive to the effects of the Countdown. The use of counts specific to the modelled peak hours is considered more relevant than generic district-wide rates, because these reflect the behavioural responses of drivers to peak period conditions i.e. if congestion regularly occurs, some drivers will seek to change their time / frequency of travel etc.**

### QUESTION 2

Related to the above it is understood that the growth rate proposed in the assessment is based on the 2018 and 2020 date, but this is just on some links and we are not sure whether traffic levels were still being slightly skewed by the after effects of COVID / lockdown. These growth rates (1.4%) seem very very low, and are generally not you would expect from background growth – I think this is more likely to be 3% at least. See also comments on Regional Growth Framework.

**Prefer above. Also, while the Nov20 data in Table 2.1 is post-Covid, all of the indications were that conditions were back to 'business as usual' and in this respect it is noted that some of the counts are higher than the corresponding figures for 2019.**

### QUESTION 3

What assumptions have been made in the SIDRA model? Just based on traffic flows. Committed development, east west connector etc.

**Ψου μαγ ρεχαλλ τηατ α πρε-αππ meeting was held with KCDC on 5/11/20 and a proposed assumption set was sent to KCDC in advance of this. This indicated that KCDC was to advise any known consented developments, policies or roading / transportation proposals. This request was again made at the pre-app. No information was supplied by KCDC. The E-W connector is expected if anything to remove traffic from the critical part of Kapiti Road so its exclusion is expected to result in a conservative assessment.**

#### **QUESTION 4**

What about cumulative effects? This includes not only consented but as yet undeveloped sites at Kapiti Landing.

**The assessment can only consider the consented baseline. The effect of as yet undeveloped sites which require consents will be the subject of separate transportation assessments dictated by the relevant consent requirements.**

#### **QUESTION 5**

Is this consistent with the approach taken when the Countdown may have been on the Kapiti Landing site? (Not sure if you worked on that previous transport assessment or have access to it?)

**Ψεσ - similar assumption set but store details esp. access arrangements differ.**

#### **QUESTION 6**

We are concerned about the level of service F on the Friendship Place roundabout and it would be good to see the output showing what mitigation has on level of service. You refer to mitigation making matters better, but by how much? The level of service should really be around C and 14% increase on this roundabout is attributed to this proposal (400 to 430 in the peak hour) – what happens when the rest of Kapiti Landing and the airport are developed? The SATURN model certainly did not take into account a large scale development at the airport and the PDP, airport plan change testing (and rules) are based on a certain level of development here.

**Refer Table 4.1 of ITA - shows effect of mitigation. Shows LOS is B/C for peaks. Cannot take account of development of rest of Kapiti airport area as this will be subject to separate consent applications (noting that the Airport zone rules specifically establish traffic generation thresholds and require consent above those, as well as associated assessment of their potential impact at each trigger/threshold on the network in question)- again we can only assess the permitted and already consented baseline and cannot speculate on which other developments may or may not occur.**

#### **QUESTION 7**

We currently experience queues back to Langdale Avenue in the eastbound direction so we are sceptical as to why Kapiti Road is showing as mainly green in 2026 when we know it probably is not green now, and how 400 to 430 movements in the peak hour will not have more of an impact.

**Models relate to average conditions within peak hour, so possible that some queuing experienced within peak but not across the entire peak. Also need to check whether observed queues are stationary or transitory.**

#### **QUESTION 8**

Page 42 of 48 we're not sure why the assumed traffic distribution is 16.6% onto Langdale Avenue and around 1.5% on Expressway South, 31% west on Kapiti Road (with way fewer east), and 15% to Kapiti Landing? Can we see more detail on how this distribution has been derived.

**T<sub>10</sub> is based on the likely origin/destination of the Countdown shoppers, refer ITA 4.2. So don't expect high % from Expressway South because the catchment is only parts of southern Raumati, Paekak etc. In contrast, Langdale serves a much higher % of residences. Kapiti East is low because this would continue to be serviced by the established Countdown at Coastlands. Can supply full spreadsheet if needed but this is broadly consistent with retail study.**

#### **QUESTION 9**

Page 40, we're not sure that this is a high level of calibration in the model, and the way it has attributed queue lengths may impact on intersection operation / level of service. Are you able to send us a copy of your survey data which has the queue length data?

**As described in the ITA, Q length results were collected as part of the 2018 survey work - this can be supplied if needed. It is considered that the model reproduces intersection delays / Q lengths to an acceptable degree and intersection operation appears reasonable.**

#### **QUESTION 10**

It would be good to get an idea of construction traffic numbers as, whilst this is identified as being in the Construction Management Plan, it is unclear if these would breach the permitted activity standards in the plan and if so by how much.

**We're not sure which permitted activity standards you are referring to regarding construction traffic. The permitted activity trip generation threshold for this site to Kapiti Road is 100 vehicles/day pursuant to Rule 11E.1.2.1. It is unlikely that construction traffic will exceed this limit and a condition of consent could comfortably address this. Further, a draft Construction Traffic Management Plan can also be required as a condition of consent, which would facilitate further assessment and certification by Council at that point, once a contractor is appointed and further details around construction logistics etc are known. This is a temporary effect only and one that can be comfortably managed through standard practice.**

#### **QUESTION 11**

Why are different rates from different countdowns around NZ used for various purposes throughout the assessment? Seems a bit odd. It may be better to look for trip generation rates for a few comparable sites.

We're familiar with the Tawa Countdown but not others. The team are definitely not comfortable with your trip rates, some of it looks to be copied and pasted from another report and already 5 years old. The context of the other sites is not fully explained and our own investigation showed that the Hawera site is a town centre site with the car park likely to be shared/used by shoppers making combined trips (like our Waikanae countdown). NZTA Research Report 453 is indicating a rate of 16.3 and the NZTA Planning Policy Manual app 5b 17.8; so we would need to see a lot more justification for your rates of 10.6 and 9.4.

**These trip rates were advised to KCDC back in Nov 20 and no issues were raised at that time. The criticised use of 5-year old trip rates is rather odd in the context of the recommended use of RR453 data (document published 2011 but much of the data referenced is much older) and the PPM (now 14 years old)! The intention here was to use rates relating specifically to other Countdown stores with a similar retail offer. Notwithstanding, we have undertaken further analysis of additional stores that we consider to be helpful and local examples for comparison. The analysis accepted for the Aotea store (Porirua) adopted rates of 10.3 (weekday) and 8.0 (Saturday). An analysis accepted for the just-opened store in Richmond adopted a weekday rate of 10.4 - no Saturday analysis was undertaken. In this context, the rates adopted in my assessment of 10.6 (weekday) and 9.4 (Saturday) are reasonable, especially given the competing retail offers from Pak & Save (Coastlands), Countdown (Coastlands) and New World (Kapiti Landings).**

#### QUESTION 12

- Can we have more detailed information on how you have derived your reductions to trip rates to accommodate linked trips, Public Transport, walking / cycling and 30% passer by trips? e.g. evidence from other stores, research documents etc?

**30% pass-by is a standard value used for retail - again this was advised in Nov20 but no issues raised. Other values are estimates but are nonetheless considered reasonable in the context of the proposed store.**

Regards

**Tim Kelly**

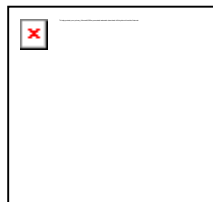
**Tim Kelly Transportation Planning Ltd**

Mahana, Nelson

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e: [tim@tktpl.co.nz](mailto:tim@tktpl.co.nz)

w: [www.tktpl.co.nz](http://www.tktpl.co.nz)



On Tue, 22 Jun 2021 at 10:35, Gary Adams <[Gary.Adams@kapiticoast.govt.nz](mailto:Gary.Adams@kapiticoast.govt.nz)> wrote:

Dear Tim

Our comments on your proposals as follows, noting that these are without prejudice and don't constitute acceptance for the modelling, as we may have more detailed comments at consent stage.

- Why use growth rates identified in the report rather than the 2026 SATURN model? With the Wellington Regional Growth Framework, the Kapiti District is expecting significantly more growth than has previously been anticipated, which is not in the SATURN model. I think we have agreed to this with other sites but good to have this confirmed.
- Related to the above it is understood that the growth rate proposed in the assessment is based on the 2018 and 2020 date, but this is just on some links and we are not sure whether traffic levels were still being slightly skewed by the after effects of COVID / lockdown. These growth rates (1.4%) seem very very low, and are generally not you would expect from background growth – I think this is more likely to be 3% at least. See also comments on Regional Growth Framework.
- What assumptions have been made in the SIDRA model? Just based on traffic flows. Committed development, east west connector etc.
- What about cumulative effects? This includes not only consented but as yet undeveloped sites at Kapiti Landing.
- Is this consistent with the approach taken when the Countdown may have been on the Kapiti Landing site? (Not sure if you worked on that previous transport assessment or have access to it?)
- We are concerned about the level of service F on the Friendship Place roundabout and it would be good to see the output showing what mitigation has on level of service. You refer to mitigation making matters better, but by how much? The level of service should really be around C and 14% increase on this roundabout is attributed to this proposal (400 to 430 in the peak hour) – what happens when the rest of Kapiti Landing and the airport are developed? The SATURN model certainly did not take into account a large scale development at the airport and the PDP, airport plan change testing (and rules) are based on a certain level of development here.
- We currently experience queues back to Langdale Avenue in the eastbound direction so we are sceptical as to why Kapiti Road is showing as mainly green in 2026 when we know it probably is not green now, and how 400 to 430 movements in the peak hour will not have more of an impact.
- Page 42 of 48 we're not sure why the assumed traffic distribution is 16.6% onto Langdale Avenue and around 1.5% on Expressway South, 31% west on Kapiti Road (with way fewer east), and 15% to Kapiti Landing? Can we see more detail on how this distribution has been derived.
- Page 40, we're not sure that this is a high level of calibration in the model, and the way it has attributed queue lengths may impact on intersection operation / level of service. Are you able to send us a copy of your survey data which has the queue length data?
- It would be good to get an idea of construction traffic numbers as, whilst this is identified as being in the Construction Management Plan, it is unclear if these would breach the permitted activity standards in the plan and if so by how much.
- Why are different rates from different countdowns around NZ used for various purposes throughout the assessment? Seems a bit odd. It may be better to look for trip generation rates for a few comparable sites. We're familiar with the Tawa Countdown but not others. The team are definitely not comfortable with your trip rates, some of it looks to be copied and pasted from another report and already 5 years old. The context of the other sites is not fully explained and our own investigation showed that the Hawera site is a town centre site with the car park likely to be shared/used by shoppers making combined trips (like our Waikanae countdown). NZTA Research Report 453 is indicating a rate of 16.3 and the NZTA Planning Policy Manual app 5b 17.8; so we would need to see a lot more justification for your rates of 10.6 and 9.4.
- Can we have more detailed information on how you have derived your reductions to trip rates to accommodate linked trips, Public Transport, walking / cycling and 30% passer by trips? e.g. evidence from other stores, research documents etc?



**Gary Adams**  
Traffic Engineer  
Kaipūkaha Huarahi

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