

12 August 2021

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For the attention of: **Kay Panther Knight**

via email: [kay@formeplanning.co.nz]

Kay

**160 Kāpiti Road, Paraparaumu: Consent Application
Response to KCDC s92 Request (Transportation)
Application Reference: 210151**

Background

It is proposed to construct and operate a Countdown Store and two adjacent retail tenancies on land at 160 Kāpiti Road.

An application for the necessary consents was lodged with the Kāpiti Coast District Council (**KCDC**) and was supported by an Integrated Transportation Assessment (**ITA**), dated July 2021.

In a letter dated 27 July 2021, KCDC has responded with a request for further information.

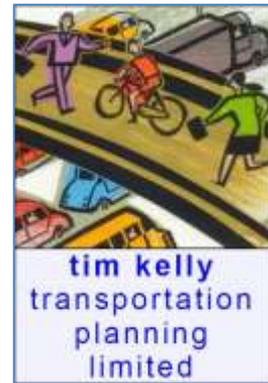
This document responds to the 'roading' matters raised by the KCDC letter. The question numbers below are those from the KCDC letter for ease of reference.

Process

A pre-application version of the ITA (dated February 2021) was issued to KCDC officers on 24 May 2021 with the intent of initiating a dialogue around transportation issues and resolving matters which might otherwise be raised in a s92 process. An email from received from KCDC on 22 June 2021 which raised a number of comments and queries. These were answered in an email dated 1 July 2021, and the application version of the ITA was also updated to address these issues. Despite this exchange of information, many of the questions raised in the s92 letter are the same as those raised by KCDC in the 22 June 2021 email and it appears that KCDC may have assumed that the application version of the ITA was the same as that supplied in May 2021.

KCDC Question 3

Why have the growth rates identified in the report been used for the assessment rather than the 2026 SATURN model? It is understood that the rates proposed in the assessment is based on the 2018 and 2020 date, but this is just on some links. These growth rates (1.4%) seem very low and are generally not expected from background growth.



Response

As described in the ITA Section 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 potentially most sensitive to the effects of the proposed 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, such as trip-timing.

KCDC Question 4

Related to the above the SATURN model also does not take account of the level of growth proposed in the Wellington Regional Growth Framework. The Kāpiti District is expecting significantly more growth than has previously been anticipated, which could make capacity on Kāpiti Road even more problematic. Therefore please confirm what other development assumptions have been made in the SIDRA model for the future year forecast.

Response

It was agreed with KCDC officers at a pre-application meeting in November 2020 that the assessment could only take account of any known and consented development proposals. In this regard, it was agreed that KCDC would supply details of any relevant developments for consideration. No information was received and for this reason no specific allowances were made over and above the growth applied to the background traffic volumes.

KCDC Question 5

Please confirm how the SIDRA model addresses cumulative effects? This includes not only consented but as yet undeveloped sites at Kāpiti Landing.

Response

Refer response to Qu 3 above. Allowance cannot be made for unconsented development as these will be the subject of their own transportation assessments as required by the relevant consent status and district plan rules.

KCDC Question 6

Please confirm what assumptions, if any, have been made in the SIDRA model with regards to mode shift? Just based on traffic flows. Committed development east-west connector etc.

Response

The SIDRA model does not have a mode-split stage and it is not the purpose of such a model to calculate mode-split. If the outlook within Kāpiti is for a greater proportion of future trips to be made by modes other than the private car, then it is possible that the SIDRA traffic forecasts overstate future traffic volumes (and the assessments will be conservative).

It was agreed with KCDC officers at a pre-application meeting in November 2020 that KCDC would advise of any committed infrastructure projects that could be relevant to the assessment, such as the east-west connector. No information was received and for this reason no specific allowances were made. In this regard, it is understood that the effect of the east-west connector would be to remove traffic from the critical part of Kāpiti Road so its exclusion is expected to result in a conservative assessment.

KCDC Question 7

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 [effect] mitigation has on level of service. Please can this be provided? The Transport Assessment refers to mitigation making matters better, but by how much? The level of service should be C and 14% increase in attributable to this proposal (400 to 430 in the peak hour).

Response

Section 4.5 and the tabulation at page 16 of the ITA describe the effect of mitigation on the roundabout LOS. All turning movements would operate at LOS A or B in both of the assessed peak periods.

KCDC Question 8

We currently experience queues back to Langdale Avenue in the eastbound direction which don't appear to have been identified in the SIDRA modelling, please provide more information in this regard.

Response

The model relates to average conditions within peak hours, so it is possible that more extensive queuing can occur for shorter periods within the peak hours. Also, there is a need to distinguish between stationary or transient queuing (when vehicles are moving slowly) – the SIDRA model appears to be forecasting intersection conditions which are consistent with the traffic demands in this area.

KCDC Question 9

It is unclear why the assumed traffic distribution is 16.6% onto Langdale Avenue and around 1.5% on Expressway South, 31% west on Kāpiti Road (with way fewer east) and 15% to Kāpiti Landing? Can you provide more detail on how this distribution has been derived?

Response

This is based on the likely origin/destination of the Countdown shoppers, as described in the ITA Section 4.2. A high percentage from the Expressway South is not expected because the catchment is only parts of southern Raumati, Paekakariki etc. In contrast, Langdale Avenue serves a much higher percentage of residences and potential customers. Kāpiti East is low because this would continue to be serviced by the established Countdown at Coastlands. A spreadsheet can be supplied if required but the adopted distribution is broadly consistent with the retail study.

KCDC Question 10

Please identify 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 District Plan and if so by how much.

Response

It is unclear which permitted activity standards are being referred to regarding construction traffic. The permitted activity trip generation threshold for this site to Kāpiti Road is 100 vehicles/day pursuant to Rule TR-R2. 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.

KCDC Question 11

Please advise why are different rates from different Countdown Supermarkets around New Zealand used for various purposes throughout the assessment? It would be better to provide trip generation rates for a few comparable sites. We're familiar with the Tawa Countdown but not others. The context of the other sites and trip rates needs to be explained further. As an example of the assessment using sites that may not be comparable to the proposed development, it appears as though 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 further justification for the rates of 10.6 and 9.4.

Response

These trip rates were advised to KCDC at the pre-application meeting in Nov 2020 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 was to use rates relating specifically to other Countdown stores with a similar retail offer. Notwithstanding this, and as described in the ITA Annexure C, we have undertaken further analyses of additional stores that we consider to be helpful with 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 the 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 (Kāpiti Landings).

KCDC Question 12

Can more detailed information on how you derived the reductions to trip rates to accommodate linked trips, public transport, walking/cycling and 30% passer-by trips please be provided? For example, evidence from other stores, research documents etc.

Response

The adopted 30% pass-by rate is a standard value used for retail. Other values are estimates but are nonetheless considered reasonable in the context of the proposed store.

KCDC Question 13

Has the SIDRA model taken into account the effects of platooning on the roundabout from the downstream lights?

Response

Yes - the SIDRA model used intentionally links together 11 intersections along Kāpiti Road so that the potential interactions between the intersections could be taken into account.

KCDC Question 14

Please provide details/designs for the roundabout improvements, site frontage works – central median, pedestrian crossing and bus stops.

Response

We have undertaken site investigations to determine that these works are feasible within the available road reserve. Since these are reliant upon agreement from both KCDC and GWRC (as public transport authority), the necessary approvals in principle are sought before investing time in the detailed design work.

KCDC Question 15

Please identify how rat running through the adjacent car park areas (west of the site) will be discouraged?

Response

It is unclear which parking area(s) this is making a reference to. The internal design of the Countdown car park will not be an attractive alternative to through traffic using the adjacent section of Kāpiti Road.

KCDC Question 16

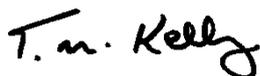
Please confirm if the vehicle movements and parking demand includes the trade element of the store.

Response

Yes. The table on p14 of the ITA gives trip rates for both the Countdown and trade retail elements and the associated description makes reference to the combined development. Section 4.7 of the ITA specifically references the parking demand and supply for the Countdown and trade retail elements of the development.

For completeness, the questions and responses supplied to KCDC in the email of July 1 2021 are provided at **Annexure A**.

Yours sincerely,



Tim Kelly

Tim Kelly Transportation Planning Limited
(Phone: 027-284-0332, E-mail: tim@tktpl.co.nz)

ANNEXURE A: QUESTIONS & RESPONSES FROM 1 JULY 2021 EMAIL

From: Tim Kelly <tim@tktpl.co.nz>
Sent: Thursday, 1 July 2021 9:09 am
To: Gary Adams <Gary.Adams@kapiticoast.govt.nz>
Cc: Kay Panther Knight <kay@formeplanning.co.nz>
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.

Refer 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.

You may recall that a pre-app 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?)

Yes - 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.

This 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.