

23 July 2018

Gull NZ Ltd
C/- Wasley Knell Consultants
Po Box 381
Tauranga 3140

Attn: Tracy Hayson

By Email to: tracy@wasleyknell.co.nz

Dear Tracey

Further Information Request – Resource Consent Application

Application number:	RM180138
Applicant:	Gull New Zealand Ltd
Location:	Amohia Street and Kapiti Road, Paraparaumu
Proposed activity(s):	Establish and operate a 24 hour service station that does not comply with the permitted activity standards for earthworks, signs, vehicle movements and access.

With respect to the above application, I have now reviewed your application, inspected the site and discussed the information provided with other Council staff who are involved in the consideration of this proposal.

The following further information is needed to help me better understand your proposal, including its effect on the environment and the ways any adverse effects might be mitigated. You will note that the information requested is primarily related to the traffic effects related to the proposed activity.

Requested information

1. The traffic data supplied in the transport assessment identifies the AADT flows and the am/pm peak flows on Amohia Street and Kapiti Road. **Council's Roding Team have requested advice on how the data was obtained from Council and why an assessment of flows for Kapiti Rod to the east of Amohia Street are assumed to be 60% of the flows to the west of Amohia Street.** The Roding Team has advised that *"traffic flows in our modelling report show higher volumes along Kapiti Road between Amohia Street and Hinemoa Street than that shown in the traffic assessment both now and in the future (we show 726 in am peak in 2021 and they show 494 in the am peak in 2017), as well as an increase in queueing vehicles. This may lead to an underestimate of potential service station users. Council can place a traffic count loop in Kapiti Road at a cost to the applicant of \$160 to provide up to date and accurate counts."*
2. **Please undertake investigative works to identify peak hour congestion as well as traffic levels and a traffic movement assessment in and out of adjacent sites.**

3. The Roding Team has advised that *“the proposal will increase the potential for conflict along Kapiti Road as well as possible interference with the operation of the level crossing. I note that the impact on queue lengths resulting from the traffic from this proposal has not been addressed in the application and no assessment has been made of traffic entering or leaving the vehicle crossing that they intend to use as well as other junctions and multi-lane intersections that may be impacted by the proposals. This includes (but is not limited to) Hinemoa Street, the access to the railway station / station car parks on Amohia Street, the Kapiti Road / Amohia Street intersection. Local (Kapiti line) Passenger trains have 20 minute (approximate) frequency and is likely to increase in the future. This is in addition to other train services such as freight and Capital Connection and Wellington to Auckland services.”* **Please provide an appropriate assessment which addresses the above matter.**
4. **Please explain how the existing service stations identified in the transport assessment are comparable.** The Roding Team requests clarification on this issue and made reference to the issues of size of the stations and their locations in relation to the railway and/or highway.
5. **Please advise the basis for the assumption in the transport assessment that 2% of the passing traffic would use the service station.** We are of the view that whilst the site may be remote, signage to the service station will be on Old State Highway 1 and the activity has the potential to encourage traffic to transfer from other stations depending on fuel prices and offers being made at the time.
6. With respect to pedestrian movement in the vicinity of the site, although many people do use the underpass as identified in the transport assessment, a significant number of pedestrians and cyclists cross at grade and it is noted that the revocation objectives and plans intend to encourage an increase in the pedestrian activity crossing at the Amohia Street / Kapiti Road intersection as well as the proposed crossing facility to the west of the Jaycars entrance. This will mean an increase in pedestrian activity in and around Amohia Street and the rail station access. The revocation objectives and plans also encourage cycling in the vicinity with the installation of cycle lanes along Amohia Street. There is a school nearby and some will cross at grade at the Kapiti Road / Amohia Street intersection to travel to school. **Please, therefore, provide an assessment, based on pedestrian surveys, of the current activity and expected changes which will occur as a result of the revocation proposals.**
7. Please provide a safety assessment to demonstrate the effects that the movements of both the delivery trucks and service station users will have, but in particular with respect to the effect on vulnerable road users. In this regard, the following comments from Council's Roding Team may assist your assessment:
 - *Manoeuvring from site to road in this vicinity has been a safety issue in the past;*
 - *Rat running is a potential if roads are busy;*
 - *Potential conflicts between vehicles entering and exiting the proposed site and the Mobil Service Station;*
 - *The swept paths shown on drawings 276-02 for the left turn into the site from Amohia Street show the delivery vehicles overrunning the raised median between the north and southbound lanes on Amohia Street, as well as running in and along and then crossing a cycle lane (and at an oblique angle), this is not acceptable to us on safety grounds;*
 - *The slip lane shown on the map is to provide access to and from an existing business as well as a bus stop not for access to a new site, the level of conflict this would create between left turners leaving Jaycars, buses exiting the bus stop and vehicles entering the service station creates a level of risk that we would not support. Moreover the movements and conflicts between vehicles accessing the petrol station vs buses accessing the bus stop and traffic travelling past the site so close to the intersection is likely to result in traffic backing up across the*

- intersection of Old State Highway 1 (Amohia St) and Kapiti Road (and downstream) increasing the possibility of traffic rat running through the intersection;
- The delivery vehicles exiting the services station onto Kapiti Road would need to use all three westbound lanes on the road (and possibly overrun into the eastbound lane) where queuing is already problematic thus increasing the potential for conflict. The same issues arise for cars except that they would need to use the straight ahead lane as well as the left lane. There is also likely to be an increase in cycle traffic along Kapiti Road as cycle spaces are moved from the front to the back of the station;
 - Swept path analysis on drawing 276-03 shows vehicles exiting the station overrunning on the flush median and landscaping proposed as part of revocation;
 - Drawing 276-2 shows delivery vehicles crossing the landscaping which is proposed as part of the revocation process whilst drawing 276-01 shows delivery vehicles utilising a lane that will not exist in the future;
 - No swept path is shown for delivery vehicles turning left from Kapiti Road onto Amohia Street, and this movement will conflict with left turning cars as the vehicle will have to use the centre lane to enable a left turn movement. **Please provide a swept path analysis for this intersection for this left turn movement;**
 - Cars turning left onto Amohia Street will create an increase in conflict with cycle lane users, southbound traffic and the entry to the station;
 - The Amohia Street / Kapiti Road junction is identified by the NZTA as the highest crash rate in our area and both the intersection and Amohia Street are identified by NZTA as being high risk areas;
 - The proposed car park has a number of safety concerns for us including:
 - Conflict between car park users, delivery vehicles and service station users;
 - The swept path of the exiting delivery vehicles appear to show it overrunning the car parking spaces;
 - **It is unclear what the spaces next to space 26 are – Please Advise;**
 - Conflicts between service station delivery vehicles and users and pedestrians exiting the car parking spaces;
 - Car parking should be provided for the service station on the basis that there will be service requirements for the on-site infrastructure;
 - Whilst the transport assessment states that they will provide disabled spaces I do not agree with the assessment that they do not need to. If they are providing leased spaces as part of the proposal these should include disabled spaces in accordance with the building code and district plan;
 - Sight lines - The transport assessment advises 75 metre to the east and 65 metre to the west sight lines on Kapiti Road, as well as over 100 metres along Old State Highway 1. Are the site distances along Old State Highway 1 compliant with the District Plan which requires 113 metres and can they provide a diagram showing what they mean by the sight distances? **Please provide a diagram as set out above.** There is a need to ensure that this meets the District Plan requirements and must be in accordance with diagram A3 in Chapter 11.
 - Access spacing - the close proximity of accesses is likely to result in conflicts with traffic entering and leaving adjacent sites. The District Plan requires that the access be 30m from an intersection and 160 metres between accesses, the proposed access way is only 10 metres between Jaycars and the entry and another 10 metres to the exit.
 - Access / traffic flow within the site – it is unclear how traffic is supposed to flow through the car park and service station, it appears that traffic can enter and leave either facility from either Old State Highway 1/Amohia Street or Kapiti Road this has the potential for internal conflicts between traffic, exacerbated by vehicles

*manoeuvring in and out of the car parks vs vehicles using the petrol station vs pedestrians (and cyclists) who may short cut through the site or may be walking from parked cars to the rail station or bus stop. **Please advise how will this be addressed.***

- *There is no way that the proposal will be able to prevent a right turn movement into and out of the site from Kapiti Road as there is no room for a raised median, Kiwirail would need to approve and a raised median would prevent service station delivery vehicles from exiting the site, thus increasing the potential for conflicts further.*

Providing the information

Please provide this information in writing within 15 working days¹ being 14 August, 2018. If you will not be able to provide the information by that date, please contact me before then to arrange an alternative timeframe. We will not work on your application any further until either you provide this information, or you state that you refuse to provide it.

Refusing to provide the information

If you refuse to provide the information, or if you do not submit the information to us within 15 days (or by another other agreed timeframe), the RMA requires that we publicly notify your application.²

If this happens, you will be required to pay the notification fee of \$4,590.00 in full before we proceed with the notification of your application.³

Next steps

Once you have provided the requested information, I will review what you have provided to make sure it adequately addresses all of the points of this request. The time for you to respond to this letter will be excluded from the timeframe⁴.

Following receipt of the requested information, I will be in a better position to make a judgement as to whether the application will need to be notified, although the information provided and the assessments which have been undertaken of the proposal to date have led me to an interim leaning toward public notification of the proposal as a result of the traffic implications and resulting adverse effects which are likely to arise from the proposed activity on this site.

If you are not sure how to respond or have any questions, please contact me on (04)2964782 or email me at wayne.gair@kapiticoast.govt.nz and quote the application number.



Wayne Gair
Principal Resource Consents Planner

¹ Section 92A(1) of the RMA

² Section 95C of the RMA

³ Section 36(7) of the RMA

⁴ Section 88C(2) of the RMA