

SUBMISSION ON A RESOURCE CONSENT APPLICATION THAT IS SUBJECT TO LIMITED NOTIFICATION BY THE KAPITI COAST DISTRICT COUNCIL
Pursuant to section 96 of the Resource Management Act 1991

Application Number:	RM220070
Applicant:	Gresham Trust
Proposal:	For a 139 two storey residential unit development in 18 blocks and associated 311 lot subdivision including 170 carparks and associated earthworks at 240 Kapiti Road, Paraparaumu.
Legal Description(s):	Lot 1 DP 88870

DUE AT COUNCIL OFFICE NO LATER THAN 4:00PM ON FRIDAY 26TH AUGUST 2022

This is a submission on an application from Gresham Trust for a 139 two storey residential unit development in 18 blocks and associated 311 lot subdivision including 170 carparks and associated earthworks at 240 Kapiti Road, Paraparaumu.

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 Gresham Trust (c/- Cuttriss Consultants Limited) as below:

Emma.Mclean@cuttriss.co.nz

Submitter/s Details:

Title:	<input checked="" type="checkbox"/> Mr <input checked="" type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Dr Other:		
My/Our Full Name(s):	Malcolm Robert William & Pamela Dawn WARD, and others		
Address for service:	2 Halsey Grove, Paraparaumu Beach, Paraparaumu	Post Code:	5032
Physical Address:	{Same}	Post Code:	
Home Ph:	027-446 2853	Work Ph:	

Home Fax:	Nil	Work Fax:	Nil
Cell:	027-446 2853	Email:	mrww04@gmail.com

Note: Correspondence will be via email unless otherwise requested.

Submitter/s Position:

<p>Trade Competition</p> <p><input type="checkbox"/> I am a trade competitor for the purposes of section 308B of the Resource Management Act 1991.</p> <p><input checked="" type="checkbox"/> I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.</p>
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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 checked="" type="checkbox"/> I / We oppose the application in full	<input 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:

[See attached pages hereunder](#)

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:

[See attached pages hereunder](#)

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):

That resource consent be declined for the reasons, but not limited to those reasons, set out in our attached submission hereunder.

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)

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)

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 ✓).

Malcolm Ward	24 Aug 2022	Pam Ward	24 Aug 2022
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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.

Our Preamble to this Submission:

We have been the residents of 2 Halsey Grove, Paraparaumu Beach, since moving to the Kapiti Coast in April 2005. This move from a Wellington City suburb was prompted by retirement, improved weather conditions, and a desire to enjoy a more open and relaxed environment.

The purchase of 2 Halsey Grove proved to be a solid choice, with Halsey Grove encapsulated as a cul-de-sac, the 'horse paddock' at 240 Kapiti being a beautiful green area, the beach 1.5km away, and other shopping facilities within 2km – all close, but not too close. This was of course pre '*medium density*' days and required a car to get round.

We accepted that one day the 'horse paddock' would be sold for further residential development, expecting a similar styled 20-30 lot '*low-density*' property subdivision in keeping with the existing subdivisions and area.

Never in our wildest ~~dreams~~ nightmares was a subdivision of 139 dwellings, conceivably 300+ people, and at least 170 vehicles ever envisaged, and with *all the vehicles* passing our house at the Halsey Grove and Regent Drive intersection.

Our biggest disappointment with this proposal is the lack of regard shown by the Applicant, through to Council, for the existing ratepayers affected by this proposed intrusion on our lives – and the potential for major environmental and social problems in the short and long-term future.

It is a shame that Council has seen fit to adopt a 'Limited Notification' stance on the application, something they are entitled to do but in no way restricted so to do – a move that can only be construed to again favour the Developer and their application. There are many more homeowners/ratepayers in the area who are very concerned about the proposal and wanted to also have a voice.

Submission – Proposed 240 Kapiti Road Development

This development proposes the construction of:

- 120 two-bedroom units, ranging from 72m² to 75m² in area
- 19 three-bedroom units, ranging from 106m² to 109m² in area
- 170 car parks
- An internal private two-way road network
- Communal open space.

Ownership Profile:

We believe that this proposed development is unlikely to attract many owner occupiers. Young, upwardly mobile professionals considering purchase will more likely be attracted to properties offering garages and secure off-street parking. The design of the properties, all with upstairs bedrooms and no elevators, will not appeal to older people or those with impaired movement disabilities. Lack of private, secure outdoor space and a general lack of storage will reduce the appeal to people with children.

We also believe that the units are most likely to be acquired by property investors as rental units. On this basis, each unit is likely to be occupied by more than one couple or family unit, largely as a means of making rents more affordable. Couples in tenancy arrangements are likely to have at least one motor vehicle each.

Pets:

Many people own pets, such as cats and dogs. The same can be expected of residents occupying the 139 units. Safe enclosure and toileting of pets will be confined either to the interiors of the units, the “park” contained within the site, or on neighbouring streets and gardens. Given the prevalence of AstroTurf throughout the development, including the “park” area, hygiene for pet owners will be an issue of tension to be dealt with by a Residents’ Association. Unfortunately, residents in surrounding properties will not have recourse to this organisation to resolve matters relating to badly managed pets originating from properties within 240 Kapiti Road.

Congestion / Traffic management:

The purpose of this proposed development appears to be to place as many saleable units as possible onto the available space, while complying with airport-related height restrictions.

We believe that potentially over 500 people and possibly more than 300 motor vehicles could be associated with this development.

There are few comparable developments in the greater Wellington region, and none located at such a distance from community facilities. Information provided by Tonkin Taylor suggests that developments of this type generally have 1.2 motor vehicles per residence (compared with 1.5 vehicles per residence for stand-alone dwellings) and mentions a development in Petone to support that claim. The Petone development is in walking distance to many community services, including frequent public transport. 240 Kapiti Road is not, requiring a car trip to reach nearly all services. The allocation of 170 car parks amongst 139 properties works out to 1.22 vehicles per property.

Two couples living in each unit could see the number of associated vehicles reach four per property, not to mention trailers, boats on trailers and other recreational vehicles requiring parking spaces.

That could see vehicle volumes possibly exceed 300, 130 of which would need to be parked on surrounding street frontages (based on a car park count of 170).

A study of architectural drawings prepared by the developer's consultants shows two carparks in front of each 2-bedroom unit. Those units are 4.2m wide, so that's 2.1m width for a carpark. The widths of all parks appear to be of similar size.

- A Kia Rio is 1.7m wide, allowing a gap of 0.2m (200mm) each side for car entry and exit.
- A Toyota Hilux is 1.855m wide, or 0.12m (120mm) each side.
- A Tesla Model 3 is 1.849m wide, about the same as a Hilux.

These are all impossibly narrow gaps to allow entry or egress for a common motor vehicle.

By way of comparison, nearly all car parks at Coastlands Mall are 2.4m wide. That width makes vehicle entry and egress possible (albeit tightly) if drivers park properly in the available spaces. Increasing the width of car parking at 240 Kapiti Road from 2.1m to 2.4m reduces the available car parking by 22 places to 148 parks. No provision has been made for disability parks, which are wider still. New Zealand Standard NZS 4121 requires accessible parking spaces to have a minimum effective size of 3.5m wide by 5.0m long for parallel and angle parking spaces at 90° to the kerb. The 3.5m width comprises a 2.4m wide park with a 1.1m wide access way.

Allowing for two disability modified parking areas further reduces the available car parks to less than 146.

Regrettably, this brings into question the ability for 170 vehicles to be sensibly parked within the confines of the completed development, creating more pressure on surrounding streets for overflow parking. It also creates immediate tension for the Residents' Association to manage.

The impact all this new traffic will have on an already congested Kapiti Rd and surrounding areas cannot be over-stated. For the Applicant to claim such affect will only be 'minor' defies belief, and perhaps questions the credibility of the whole application?

Kapiti Coast District Council's Design Principles:

A way of assessing the impacts of this proposed development is by using KCDC's own "Design Principles" for medium density housing. For the purposes of this assessment, each category has been classified as "Pass", "Fail" or "Possibly":

V: PROVIDE FOR VARIETY AND CHOICE:

- Ground floor uses contribute positively to the street and public realm:

Fail. The proposed blocks of units are boringly slabbish and will be seen as a 6m wall by neighbouring residents and passers-by. Boffa Miskell's peer review supports this view.

- Provide opportunities for residential activities which are successfully integrated with commercial use:

Fail. There is no related commercial use on or near this site, other than the potential for many rental properties contained within the development.

- Provide for a range of dwelling sizes and types:

Fail. The properties all look the same because they are. There is little visual distinction between the two- and three-bedroom units. Boffa Miskell's peer review supports this view.

- Provide clear definition between public and private spaces, and clear building entrances:

Possibly. This is hard to ascertain from the visual designs provided.

I: INTEGRATE WITH PUBLIC REALM AND SURROUNDINGS:

- Improve connectivity to town centres and local public spaces by creating through-site walking and cycling links where possible:

Pass. Site plans show a walkway to Kapiti Road.

- Respond to the surrounding environment and open-up developments to front public spaces and amenities:

Fail. This proposed development does not respond to its surrounding environment. Boffa Miskell's peer review supports this view.

- Consider the existing environment (built and natural) when designing to the anticipated level of residential intensification:

Fail. The proposed development comprises blocks of multi-level apartments with no associated gardens or amenity plantings – in complete contrast to surrounding dwellings. Boffa Miskell's peer review supports this view.

- Consider the potential for development on neighbouring sites:

Fail. The proposed development only considers development at 240 Kapiti Road. Boffa Miskell's peer review supports this view.

- Provide for passive surveillance of the public domain through windows and building orientation:

Possibly. Some of the blocks of apartments may offer vistas of public spaces other than paved roads and car parks.

A: PROVIDE APPROPRIATE BUILT FORM AND DESIGN:

- Achieve bulk, massing, and scale appropriate to the anticipated design patterns of the surrounding neighbourhood:

Fail. The proposed development has no consideration of its surrounding neighbourhood. Boffa Miskell's peer review supports this view.

- Use design features such as modulation, articulation, building materials and colour to integrate the built form into the surrounding area and provide visual interest:

Fail. The architect's impression of the planned blocks of apartments shows no attempt to provide visual interest or integration with the surrounding area. Boffa Miskell's peer review supports this view.

- Ensure built form and design enables accessibility that provides for the day-to-day living and needs of future residents:

Fail. No provision has been made for residents or visitors with mobility impairments. Boffa Miskell's peer review supports this view.

S: CREATE A COMFORTABLE AND SAFE ENVIRONMENT:

- Provide accessible external and internal design that caters for people of all ages and abilities:

Fail. No provision has been made for residents or visitors with mobility impairments. Boffa Miskell's peer review supports this view.

- Provide amenity through a balance of green, private, and communal spaces:

Fail. AstroTurf can be coloured green. Private external spaces are minimal. Boffa Miskell's peer review supports this view.

- Orientate outdoor living spaces and buildings to maximise solar benefits:

Fail. The proposed blocks of units are positioned to align with the site's boundaries and road accessways. Any solar benefits are coincidental, rather than planned. Outdoor living spaces are largely confined to spaces between the blocks of apartments and the site's boundary fences. Boffa Miskell's peer review supports this view.

- Provide for housing that serves the needs of different communities, ages, budgets and lifestyles.

Fail. The only variation in housing types are two- and three- bedroom models. The only difference in budgets will be the difference in prices between two- and three-bedroom units. All units are unsuitable for people with movement impairment. Older people and people with young families are unlikely to be interested in living here. Boffa Miskell's peer review supports this view.

There are many other criteria that could be used to assess the value and impacts of this proposed development, such as social services, schools, traffic flows, distances, and supporting infrastructure. It is disappointing that Council Officers have taken a view driven by the narrow focus they believe is dictated solely by the Resource Management Act and, apart from wastewater run off considerations, largely constrained to issues within the proposed development's boundaries. It is disappointing that a wider perspective has not been taken for a development of this scale, dictated instead by information provided by consultants employed by the developer.

Carbon footprint/ Environmental impacts:

This proposed development removes 2ha of green space and replaces it with the same area of roofs, pavement, and AstroTurf. Amongst other environmental impacts, this will create a significantly higher impact associated with surface water runoff. A 5mm downpour over the site will result in 50,000 litres of water, almost all of which will need to be contained in a stormwater system. Daily rainfalls of 60mm are not uncommon in this area. That means 600,000 litres of stormwater needing to be removed.

Water run-off after heavy rain events is an issue for low-lying areas of the Kapiti Coast region. The impacts of these will be exacerbated by rising sea levels. 240 Kapiti Road already experiences water ponding issues after heavy rain events.

The large, paved areas and roofs as a percentage of the site will increase this area's thermal impact.

Given moves by central government to promote the use of electric vehicles, no provision has been made for charging points for these.

Many Kapiti Coast residents use bicycles, with increasing usage of more expensive electric models. There is no secure storage provided for bicycles, other than an internal cupboard under the stairs.

Construction at this site proposes large-scale use of steel, dried and manufactured timber products, concrete, and other products containing cement. The intensity of this development will therefore have a significantly higher carbon footprint than less intensive construction methods.

Summary

While the nature of Council Officers operating under the provisions of the Resource Management Act and "tick box" project analysis is understood, an unfortunate reality of this is the interests of property developers being given precedence over the interests of affected communities. There is no requirement for Councils, the authority that should act in the interests of communities, to require social impact reports and active community engagement for proposed developments of scale. New constructions, regardless of the intensity of dwellings, need to align closely and sustainably with a community's values and future vision. While KCDC has agreed design principles, presumably intended to be applied to medium-density housing development proposals, these do not appear to have been applied in this case. This is disappointing.