Dear Yolanda

Please find below Kapiti Coast District Council's Access and Transport submission in the matter of the Gull New Zealand Limited, Amohia Street notified resource consent.

1. Background

1.1 It is understood that Gull have submitted a resource consent to be able to operate an automated service station at 3 Kapiti Road, and that the proposal identifies two accesses to the site, one from Kapiti Road and one from Amohia Street.

1.2 Kapiti Coast District Council is a Road Controlling Authority with responsibility for all local roads in the Kapiti District. As such the Council has a statutory duty to ensure the safe and efficient operation of the local roading network. This submission is being made within the context of these responsibilities.

1.3 The New Zealand Transport Agency (NZTA) are currently the Road Controlling Authority for Old State Highway 1 and the Expressway. However, around 28km of Old State Highway One will form part of the local roading network once responsibility for it passes from NZTA to Kāpiti Coast District Council. This includes the part of Old State Highway One where access is proposed for the Gull site.

2. Existing Situation

2.1 Kapiti Road has a 20m legal road width with a footpath on both sides, with two eastbound lanes and two westbound lanes increasing to three adjacent to the proposed Gull access point. Amohia Street has a 20m carriageway width with two lanes in both directions and a raised central median at the proposed Gull access point.

2.2 At the point at which the Gull site accesses Kapiti Road the road is classified in the Proposed District Plan as a Neighbourhood Access Route. Amohia Street is classified in the Proposed District Plan as a Strategic Arterial Route. Under the NZTA's One Road Network Classification (ONRC) system, the roads are identified as being arterial and regional roads respectively. This is relevant as the ONRC is used as a basis for funding decisions relating to maintenance and renewals and relates to the form and function of the road.

2.3 Current traffic 5 and 7 day average daily flows on Amohia Street and Kapiti Road are shown in table one below:

Road	5 Day	7 Day
Kapiti Road 40m east of Amohia Street (August 19)	9,093	8,239
Kapiti Road 50m west of Hinemoa Street (July 2018)	8,836	7,938
Kapiti Road 100m west of Amohia Street (July 2018)	10,401	9,581
Amohia Street South of Kapiti Road (2018 Annual Average)		12,172
Amohia Street North of Kapiti Road		10,715

Table One: Traffic Flows

2.4 AM and PM peak 5 and 7 day average traffic flows are shown in table two below:

Road	AM 5 Day	PM 5 Day	AM 7 Day	PM 7 Day
Kapiti Road 40m east of Amohia Street (August 19)	835	745	833	723
Kapiti Road 50m west of Hinemoa Street (July 2018)	603	767	490	662
Kapiti Road 100m west of Amohia Street (July 2018)	674	796	557	715

Table Two: Peak Hour Flows

2.5 These figure show some changes to those presented in the applicant's transport assessment. In the applicant's transport assessment November 2017 were used for Kapiti Road west of Amohia Street and August 2018 traffic flows east of Amohia Street. Some reductions in traffic have been seen in Kapiti Road west between November 2017 and July 2018, possibly associated with traffic patterns settling down post opening of the Mackays to Peka Peka Expressways. However, of most relevance to the proposed accesses are the increased traffic on Amohia Street and on the Kapiti Road, particularly in the AM peak.

2.6 With regards to safety, NZTA Road Safety Risk maps have identified Kapiti Road east and west of Amohia Street as medium collective risk and medium for collective risk based on the intersection and road casualties, and the applicants transport assessment identifies 55 crashes between 2013 and 2017. Updated crash numbers between for the last five period (2015 to 2020) show 46 accidents.

3. Future Plans

3.1 As responsibility of 28km of local road will pass to Kapiti Coast District Council as part of the revocation process of Old State Highway 1, this has provided the opportunity to review and make changes to the existing environment. The revocation process requires NZTA to transfer a fit for purpose safe local road to the Council and the proposed works are in response to this requirement.

3.2 Kapiti Coast District Council and the NZTA have been working together to develop proposals for the area immediately adjacent to the proposed Amohia Street access, these include a combination of safety and pedestrian accessibility improvements:

- An at grade crossing connecting the Coastlands Mall to the west with the railway station to the east;
- Narrowing lanes to one in each direction;
- A cycle lane in each direction;
- New bus stops;
- Kerb realignment; and
- Changes to the raised central median.

3.3 These revocation requirements have also been taken into account in this submission.

3.4 Amohia Street will remain an important route in Kapiti, especially in the event that the Expressway closes and, whilst the level of traffic has reduced following the opening of the Expressway, this remains high.

4. Issues / Concerns

4.1 The Resource Management Act (RMA) identifies the meaning of effect as being:

a) any positive or adverse effect; and
b) any temporary or permanent effect; and
c) any past, present, or future effect; and
d) any cumulative effect which arises over time or in combination with other effects—

regardless of the scale, intensity, duration, or frequency of the effect, and also includes—

e) any potential effect of high probability; and
f) any potential effect of low probability which has a high potential impact.

4.2 There are considered to be significant concerns the effects on safety and operation of the road network with both the original plans supplies as part of the application, and those provided as part of the updated transport assessment either of these proposals were to go ahead. Whilst Kapiti Coast District Council are not currently the Road Controlling Authority for Amohia Street, as identified above, responsibility will shortly pass to the Council through the revocation process.

4.3 The issues identified below are considered to be permanent, felt in the present and future, are cumulative when considered with the existing safety issues on the network, and have both high probability and high impact.

Traffic Flows

4.4 The figures presented above have identified an increase in traffic on both Kapiti Road east of Amohia Street and on Amohia Street. This is relevant as an increase in traffic levels will increase the potential for conflict, and means that queue lengths identified in the applicant's transport assessment will be underrepresented in the original and updated transport assessment. The reason queue lengths are an issue are identified below. Additionally, the increase in traffic flows may impact on the operational performance assessment shown in section 10.12 of the applicant's original and updated transport assessments.

4.5 The original and updated transport assessments also identifies potential traffic volumes based on other comparable sites and on passing traffic. However, it is not clear if these are comparable in size to the proposal, and the passer by traffic (upon which trip generation has been based) is less likely on Kapiti Road east. The proposed site is likely to be a destination / generator of traffic, which is not only greater than the existing activities in this area, but is also over the permitted activity for vehicle movements for both roads, which are 200 on Kapiti Road and 100 on Amohia Street contained within the Proposed District Plan. The Road Controlling Authority are not convinced that the site will only generate 360 transactions a day and that the calculations have been made on the basis of the definition of vehicle movements in the Proposed District Plan. The applicants transport assessments state that movements have been worked out on the basis of one movement and in and one movement out.

On this basis trip generation on Amohia Street is expected to be 395, but numbers multiplied by two would not result in an odd number, so there appears to be an anomaly.

4.6 It is also noted that no figures have been provided for price promotions which could double the number of transactions on site, this has the effect of exacerbating the impacts on the safety and operation of the network. Similarly, no traffic figures and turnover rates have been provided in association with the proposed car parking spaces and the traffic movements in the transport assessment seem to have only been based on car movements. This is important as trucks are the equivalent of 6 car movements and truck and trailers equate to 10 car movements, which is relevant when considering traffic movements associated with deliveries.

Queue Lengths

4.7 It is unclear, in the applicant's transport assessments, what the period of time when these queue lengths were undertaken and if they were carried out during a full peak hour. Queue lengths are an issue for a number of reasons including:

- the impact on the railway line, as there is a risk the vehicles will block the level crossing; and
- sufficient space to accommodate vehicles entering and exiting the site / capacity within the Kapiti Road to accommodate queued vehicles without impacting on
    - Kapiti Road East;
    - Hinemoa Street;
    - Ruapehu Street; and
    - The following intersections:
        - Amohia Street / Kapiti Road;
        - Ruapehu Street / Kapiti Road; and
        - Hinemoa Road / Kapiti Road.

4.8 The applicants updated transport assessments identifies that "queue length surveys on *Kapiti Road, as given in Section 5.3 of this report, identified a westbound 95th percentile maximum queue length associated with the traffic signals of five vehicles in the morning peak and eight vehicles in the evening peak. The access to the site is located approximately five vehicle lengths from the traffic signals. The maximum queue length therefore extends past the site, particularly during the evening peak. It is however noted that the predominant movements at the Kapiti Road access are expected to be the left turn into and out of the site*". Also that "*The queue length surveys identified an eastbound 95th percentile maximum queue length associated with the railway crossing of seven vehicles during both the morning and evening peaks. The access to the site is located immediately to the west of the railway crossing, so any queuing will extend past the site. Again, it is noted that the predominant movements at the access are expected to be the left turn into and out of the site, which will be unaffected by the queues associated with the railway crossing."*

4.9 It is not considered this this is the case when there is little discernible difference between east and west bound traffic on Kapiti Road, and northbound vehicles can only turn into the Gull site on Kapiti road, given that the Amohia Street access will be left in / left out only.

4.10 The applicants updated transport statement also identifies that "*Vehicles turning right into the site* (from *Kapiti Road) will also be unaffected,* (by the rail barrier closure) *as these vehicles will wait in the queue until able to enter the site*". It is not considered that there is sufficient space on the network to accommodate these extra queuing

vehicles without impacting on the Kapiti Road / Amohia Street intersection and cycle lane, or causing rat running through the Mobil site.

Turning Movements

4.11 The queue lengths will largely be determined by the delay at the railway line, the delay at the traffic lights and turning movements associated with all accesses on the road. Of particular relevance is the proposed Kapiti Road entrance, which is all movements. This does not comply with rule 11E.1.8(4) of the Proposed District Plan as there is a flush central median and the road layout does not enable dedicated right turns into the proposed site. The applicants updated traffic assessment also only considers cumulative effects of existing and future traffic volume in the operational performance in section 10.12 and not cumulative effects of queuing and turning.

4.12 Similarly, the proposed access onto Kapiti Road does not comply with rule 11E.1.3((11) of the Proposed District Plan which requires a minimum distance between an intersection and the access, to address queueing issues. This would be exacerbated when the railway barriers are lowered. There may also increase northbound right turning traffic on Amohia Street, which may extend beyond the point at which one lane diverges into two.

Sight Distance

4.13 The sight distance for Amohia Street does not comply with the access site distance standards in the plan for a State Highways in accordance with Rule 11E.1.3.9. This rule is in place to provide for the safety of all road users by ensuring that vehicles passing and exiting / entering sites have the ability to see each other in time and act accordingly. Whilst State Highway status will be revoked this will road will still perform an important local function, and will remain a heavily trafficked Strategic Arterial and regional route that will act as the main road through the District should there be an event on the Expressway.

4.14 There are sightline issues with the proposed use of the exit into the existing train station drop off. The existing Pohutukawa trees, buses (up to three at a time), vehicles using the Greater Wellington Regional Council (GWRC) kiss and ride/drop off, proposed bus stops, street furniture as well as the people waiting for buses will significantly impact on sightlines for drivers exiting the gull station. There are no plans to remove these trees as they form part of the landscaping associated with the revocation plans for Old State Highway One.

4.15 In terms of crime prevention through environmental design we have concerns over the safety and sightlines to the proposed petrol station forecourt. The existing pohutukawas restrict view into the proposed sight, meaning at certain times there will be little or insufficient passive surveillance from main road or the train station, potentially making it unsafe for petrol station users.
Revocation Plans

4.16 Whilst the proposed design take into account NZTA revocation plans they only take into account the NZTA 100% funded part of the project, Category 1, and this consists of what happens between the kerbs and road carriage. This project also contains category 2 and 3. Which involves Council Town Centres project and the following:

- Category 2 or 3 changes to allow for bus stops and bus waiting areas. It is not intended that the existing exit onto the Train station drop off area will be maintained.

- The Town Centres project (Category 3) is as much about making a quality town centre bus 'depot' and transport centre that support multi modal transport interchange and supports alternative modes of transport. It is not just about achieving an at grade connection to the train station, the reasons this is an issue is identified in the potential conflicts with other road users section of this submission.
- The quality and characteristics of the public space and infrastructure (shelters, seating, signage etc) that supports bus, cycling (excluding low powered electric vehicles) infrastructure plays a key role in uptake/patronage and customer satisfaction. The proposed gull petrol station has a negative impact on the quality of this areas as Kāpiti's primary transport centre. Successful public transport networks must be accessible and attractive to create a culture shift and change public perception,
- When designing facilities for bus passengers, designers should keep in mind the requirements of the following groups:
    - The elderly
    - The mobility, vision and hearing impaired;
    - People with young children, strollers and prams;
    - People with large or heavy luggage or shopping.
- Well designed bus stops should be designed to have a consistency in design and provision, making it easy to identify, safe, comfortable, attractive and easy to use; and
- When considering bus stops, it is important to take into account the 'whole journey', that is the door-to-door journey of the passenger, from origin to destination. There is little point in installing accessible bus infrastructure if the approaches to stops are inaccessible.

<u>Potential Conflicts With Other Road Users</u>

4.17 Related to the turning movements and traffic levels is the potential effects of conflicting vehicle movements and conflicts with other road users. Of particular concern are:

- conflicting movements between traffic entering and exiting the proposed site and those entering and leaving the Mobil garage, and the impact this will have on the Kapiti Road / Amohia Street intersection and the level crossing;
- conflicting movements between this site and the accesses of adjacent sites, particularly 12 Amohia Street;
- the proposed access on Amohia Street does not meet the minimum separation distance within rule 11E.1.11, which requires access spacing of 160m is requires on strategic arterial routes carrying more than 10,000 vehicles per day. This is in place to manage road safety and reduce potential for conflict;
- the potential conflict between, and safety concerns associated with, vehicles exiting the site at a point at which a pedestrian crossing is to be constructed is significant;
- the potential for conflict is high due to the expected increase in pedestrian activity across Amohia Street associated with this pedestrian crossing between the Coastal Shopping Mall and the railway station as part of revocation;
- this area, currently used as a car park, is also proposed as a kiss and ride and to have improved pedestrian area. The complicated interaction of these activities would create a level of safety concern that Council finds untenable;
- the proposed exit onto Amohia Street is immediately adjacent to bus stops thus causing conflict between site users and buses manoeuvring onto Amohia Street;
- there have already been incidences of vehicle versus pedestrian crashes on this site and these are likely to increase with a significant increase in traffic accessing the site;

- the potential for conflict between vehicles and cyclists due to turning movements and the tracking of vehicles along the cycle lane for some length or across the cycle lane to gain access to the site for southbound vehicles on Amohia Street;
- the access on Kapiti Road is also on a route to school and this age group is considered to be a vulnerable road user;
- While the current peak pedestrian volume is currently “up to 414ped/h’ the increase in bus and train services, regional growth means these numbers are likely to increase to be greater than 500 pedestrians/hour at certain times of the day in the very near future. NZTA’s Guidelines for service stations RTS 13
- Category 3: Greater than 500 pedestrians/hour are generally unsuitable for service stations. High pedestrian flows may cause delays, frustration and on-road queuing problems to motorists wishing to access the site. In some circumstances a service station development may be feasible at high pedestrian flows, provided there is adequate space for vehicles entering the development to safely wait on the roadway while giving way to pedestrians. We do not consider this is the case for the proposed site; and
- Given the proximity to both a train and bus stops as well as Paraparaumu town centre service station traffic have a high risk of conflict with various type of pedestrians, e.g. school children, the older pedestrian and commuters at peak times as well as rare or occasional events, e.g. crowds attending concerts, fixtures, etc.

Impact on the Railway Line

4.18 The comments above identify the concern that the traffic flows, queue lengths and turning movements associated with the proposal will have implications for the safe operation of the railway line. It is also noted that there appears to no comparable gull site operating where site accesses are located in such close proximity to railway lines / level crossings / and the primary existing access and future rail station access at the pedestrian crossing.

Vehicle Tracking

4.19 There are a number of concerns associated with the vehicles tracking provided by the applicant:

- There is not sufficient space available for fuel tankers to turn left out of the site onto Kapiti Road, as it requires all three westbound lanes. This is an issue at this location due to the combination of queuing as a result of the railway line, yellow hatched box and very limited space between the access and the intersection. In turn this will cause queuing issues on Ruapehu Street and for vehicles exiting the railway car parking and local businesses;
- The tracking curves also shows the truck overhanging both the left turning and right turning lanes out of Kapiti Road. This increases potential conflict with the railway line and westbound traffic from Ruapehu Street;
- as can be seen from the plans provided with the original transport assessment, southbound fuel tankers turning into the Amohia Street entrance either have to run along the cycle lane or cross in front of a westbound cyclist at the intersection to avoid the cycle lane, both of these options are of significant concern on road safety grounds;
- cars would have to track along the cycle lane on very close proximity to the intersection where all vehicles / road users will be turning / manoeuvring into correct lanes;

- plans provided with the original transport assessment show the fuel tanker would track over the raised central median on Amohia Street when turning right from Kapiti Road onto Amohia Street;
- both the original and updated plans show exit onto Kapiti Road fuel tankers will take up the whole width of the access which conflicts with right or left turning traffic entering the site from Kapiti Road;
- the updated plans shows the fuel tanker being extremely close to the fuel pump;
- no assessment has been made by the applicant of the level of compliance with rule 11E.1.8 and Diagram A4 of the PDP, and it is expected that the proposals do not comply;
- the original and updated plans show that the fuel tanker appears to be tracking over the proposed car parking spaces and onto the right hand side of the access, which will cause conflict with vehicles entering the site;
- it is not clear how fuel tankers will be parked to fuel the storage tanks such that they do not block / park on the access in accordance with rule 11E.1.8(14); and
- the original plans show larger cars / trucks appear to encroach on the central median when turning left out of the site onto Amohia Street, therefore this encroachment would be greater with a fuel tanker.

Access

4.20 Currently the exit from the site onto Amohia Street that is being proposed by the applicant has been permanently blocked to traffic to provide for a safe pedestrian exit point from the station. GWRC, the NZTA and Kapiti Coast District Council has no plans for this to be reopened as there is adequate vehicle access currently provided to the rail station facilities both now and as part of revocation plans.

Signage

4.21 The signage does not comply with the standards in the proposed District Plan and there concerns over its scale and location and the implications this has on road safety, particularly the potential to distract road users.

5. Conclusion

5.1 Given the concerns presented above, which will lead to considerable impacts on the safety and operation of the road network, refusal of this application is to being advocated.

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