

Waka Kotahi NZ Transport Agency Reference: 2019-1274
Kāpiti Coast District Council Reference: RM180138

02 April 2020

Yolanda Morgan – Consultant Planner
Kāpiti Coast District Council
Private Bag 60601
PARAPARAUMU 5254

Sent via email: submissions@Kapiticoast.govt.nz

Dear Yolanda

Publicly Notified Resource Consent Application RM180138: To Establish a 24-Hour Self Service Fuel Station at 3 Kāpiti Road, Paraparaumu

Attached is Waka Kotahi NZ Transport Agency's (Transport Agency) submission on the publicly notified resource consent application by Gull New Zealand Limited.

We welcome the opportunity to discuss the contents of our submission with Council officers and the applicant. It is the Transport Agency's preference to reduce the number of issues of concern prior to a hearing.

Please note, when reviewing Attachment 1 of this letter please also refer to the PDF sent with this letter due to the image quality of the attachment.

If you have any further questions, please do not hesitate to contact Luke Braithwaite on (04) 978 2643, luke.braithwaite@nzta.govt.nz.

Yours sincerely



Luke Braithwaite
Consultant Planner
Consents & Approvals, Transport Services

Wellington Office / Level 5, Majestic Centre, 100 Willis Street
PO Box 5084, Wellington 6140, New Zealand

Cc:

Gull New Zealand Limited
C/- Tracy Hayson (Hayson Knell Ltd)
P.O Box 381
TAURANGA 3140

Sent via email: tracy@haysonknell.co.nz

Pursuant to Section 96, Resource Management Act 1991

Submission on Resource Consent Application RM180138 by Gull New Zealand Limited

To: Kāpiti Coast District Council
Private Bag 60601
PARAPARAUMU 5254
Attention: Yolanda Morgan
Via email: submissions@Kāpiticoast.govt.nz
yolanda.morgan@Kāpiticoast.govt.nz

Copy to Applicant: Gull New Zealand Limited
C/- Tracy Hayson (Hayson Knell Ltd)
Via email: tracy@haysonknell.co.nz

From: Waka Kotahi NZ Transport Agency
PO Box 5084
WELLINGTON 6145
Consentsandapprovals@nzta.govt.nz

1. This is a submission on the Resource Consent Application by Gull New Zealand Limited (RM180138), which proposes:

To establish a 24-hour six pump service station and ancillary paid parking service at 3 Kāpiti Road, Paraparaumu within the Industrial / Service Zone. The development includes alterations and upgrades to site accesses on both Amohia Street (existing State Highway 1) and Kāpiti Road; and gaining access through the adjacent road reserve to the west of the site for exiting vehicles. This development is defined as a major traffic activity under the Kāpiti District Plan and exceeds the standards for signs, vehicle movements, transport and access and earthquake hazards.

These activities are proposed at 3 Kāpiti Road, Paraparaumu and legally described as Part Lot 1 DP 77182 & Section 8 Survey Office Plan 38192 (held in RT: WN56A/909).

2. Waka Kotahi NZ Transport Agency could not gain an advantage in trade competition through this submission.

3. Role of Waka Kotahi NZ Transport Agency:

Waka Kotahi NZ Transport Agency (Transport Agency) is a Crown Entity which provides an integrated approach to transport planning, investment and delivery. Among other duties, the Transport Agency is required to construct, operate and maintain a safe and efficient state highway network. It is also a co-investor in the local transport network.

The Transport Agency uses the Safe System Approach to design the whole transport system to protect people from death and serious injury. The Safe System Approach recognises that drivers make mistakes and are vulnerable in a crash. The state highway must therefore include the safest practicable infrastructure to compensate for those mistakes. The current Government Policy Statement states: "People should not be killed or seriously injured while using the transport network

for everyday activities such as accessing employment, education, housing, leisure, and other social and economic activities. The movement of freight, which is critical for the New Zealand economy, should not result in the loss of life or cause serious injury”.

4. Transport Agency Investment in the Wellington Region

In the Wellington Regional Land Transport Plan 2015–2021 (RLTP) the Transport Agency has allocated around \$3.78 billion total investment including \$127 million to the maintenance, operation and renewal of the state highway network. The Transport Agency is a major investor in infrastructure and transport planning in Wellington and has a significant interest in the ongoing safe and effective operation of the land transport network within the region.

5. State Highway 1 Environment and Context:

The Transport Agency and the Kāpiti Coast District Council are working together to change the status of the main road that runs through Raumati, Paraparaumu and Waikanae, from a state highway to a local road. The Transport Agency will transfer responsibility of the 13.5km section between Poplar Avenue and Peka Peka Link Road to the Kāpiti Coast District Council. Before this happens, the Transport Agency must ensure the corridor is fit for purpose as a local road. This is known as the revocation process. It is anticipated that the status of this road will be changed in 2022; until such time the Transport Agency remains the road controlling authority of State Highway 1 (Amohia Street) through Paraparaumu.

State Highway 1 through Paraparaumu is identified as a Nationally Significant High-Volume Route under the One Network Road Classification and as is designated D0101 for State Highway Purposes in both the Operative Kāpiti Coast District Plan 1999 and the Proposed District Plan (Appeals Version 2018). The road has an average annual daily traffic (AADT) count of 10,387 (in 2018).

The Transport Agency’s submission considers the future roading environment that will occur following the revocation works anticipated to occur in April 2021. The “Kāpiti Lights / Train Station Revocation Works” for construction plan is appended as Attachment 1 of this submission identifying the future Amohia Street road alignment. The Kāpiti Coast District Council concurrently seeks to develop the road reserve to the west of the applicant’s site into a ‘transport hub’ precinct for trains and busses. This is intended to be a central transport hub for Paraparaumu and provide good public transport to reduce car reliance as the population of the Kāpiti Coast increases. This will improve connectivity from the transport hub to the community including Kāpiti Lights, Coastlands and the wider residential areas. It is noted that the proposal may operate prior to these works should consent be obtained as such consideration has also been given to the existing Amohia Street road alignment.

The Transport Agency has jurisdiction over state highways and as such this submission is limited in its consideration to the effects insofar as they relate to and on State Highway 1 (Amohia Street). No assessment of effects has been undertaken on Kāpiti Road as the Transport Agency has no jurisdiction over this road.

6. The Transport Agency's submission is:

- (i) The Transport Agency **opposes** the proposed service station development, application RM180138, in its current form.
- (ii) The Transport Agency is particularly concerned with the following matters:
 - a) It has not been demonstrated whether additional turning movements through the four-way intersection of Kāpiti Road and Amohia Street intersection, as a result of the service station and onsite carparking, would affect the intersections level of service; consideration needs to be given to the potential of U-turns occurring on Amohia Street, and the safety implications of this; and whether or not there is potential for queues backing up through the intersection because of the distance of the Amohia Street site access to the intersection.
 - b) The potential impacts at the Amohia Street accesses and the Amohia Street/Kāpiti Road intersection as a result of higher vehicle generation when there is a fuel price drop offered at the service station.
 - c) The conflicts at the Amohia Street entry with vehicles turning left out of the access serving no. 8 Amohia Street, prior to the revocation works (post revocation works these left out movements will not occur).
 - d) It is anticipated there will be 198 vehicles accessing the service station via Amohia Street each day, and an unstipulated volume associated with the 24 onsite carparks. Post revocation works, these vehicles will need to cross over the cycle lane and access the slip lane to the site access. There is the potential for cumulative adverse safety effects for cyclists, as all transport hub traffic and vehicles accessing the neighbouring site, 8 Amohia Street, will be making the same manoeuvre. The cumulative safety effects need to be assessed and considered based on likely vehicle numbers using the slip lane to access both neighbouring accesses either side of the fuel stop access (including busses going into the transport hub).
 - e) There is also potential for nose to tail crashes because of the proximity of all access off the slip lane and this potential needs to be assessed in light of the proposed increase in vehicle movements associated with the service station and onsite parking activity.
 - f) Vehicles exiting through the transport hub have the potential to conflict with pedestrian movements. The Proposed District Plan (Appeals Version 2018) permitted activity standards do not allow for service station accesses to cross a footpath with 1000 or more pedestrians crossing an access per hour; notably the industry accepted standard RTS13¹ identifies that

¹ <https://www.nzta.govt.nz/assets/resources/road-traffic-standards/docs/rts-13.pdf>

pedestrian movements crossing an access that exceed 500 pedestrians per hour is generally unsuitable for service stations. It is not fanciful that pedestrian volumes through the transport hub could increase from the anticipated 414 pedestrians per hour and exceed 500 pedestrians per hour in the relatively near future. The suitability of the use of the transport hub for egress needs to be considered as well as alternative egress arrangements.

- g) The proposed signage has the potential to have adverse glare or distraction effects on State Highway 1 for passing motorists. Currently the application does not provide an assessment of the lighting impacts; this needs to be assessed against the relevant lighting standard AS/NZ4282 for “Control of the obtrusive effects of outdoor lighting”.
- h) The site layout is not overly intuitive or legible for petrol station users navigating the site because of the three points of entry/exit and relative location of fuel pumps. Poor internal circulation may lead to on site conflicts between vehicles which could create backups at the Amohia Street entrance, potentially affecting the slip lane access to the transport hub and the Kāpiti Road and Amohia Street intersection. Additionally, tracking for fuel tankers through the site may cause congestion if this occurs during times when the service station is busy with customers and vehicles are occupying the refuelling bays, again with the potential for backups at the Amohia Street entrance.
- (iii) Because of the outstanding safety concerns, the Transport Agency is not satisfied that the Objectives and Policies of the Kāpiti Coast Operative District Plan (1991) relating to road safety and efficiency would be satisfied.
- (iv) Because of the outstanding safety concerns, the Transport Agency is not satisfied that the Objectives and Policies of the Proposed District Plan Appeals Version (2018) relating to road integration, connectivity and safety would be satisfied.
- (v) Overall the Transport Agency considers the proposal is potentially associated with both minor and more than minor adverse safety effects at the site access and egress locations and on the road environment and public areas surrounding the site, including the Amohia Street/Kāpiti Road intersection.

8. Relief Sought:

- (i) The Transport Agency seeks for the Council to **decline** resource consent for application RM180138 in its current form; and/or
- (ii) For the applicant to undertake further investigations and assessments, and work with the Transport Agency in order to address the matters raised in this submission.

Note: Any alternative access arrangements may have effects on the Kāpiti Road access, which the Transport Agency does not have jurisdiction to address. It is acknowledged that all matters of traffic safety need to be satisfied and those relating to Kāpiti Road need to be assessed by the local authority – Kāpiti Coast District Council.

- (iii) Any other relief that would address the potential safety effects in the state highway environment;

The Transport Agency **does** wish to be heard in support of this submission.

Dated at Wellington this **2nd day of April 2020**



Kathryn Barrett
Principal Planner (Acting), Transport Services

Pursuant to an authority **delegated** by the Transport Agency

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Transport Agency reference 2019-1274

