

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):	Anthony George Gilden Diane Lynn Gilden		
Address for service:	12 REGENT DRIVE PARAPARAUMU BEACH	Post Code:	5032
Physical Address:	12 REGENT DRIVE PARAPARAUMU BEACH	Post Code:	5032
Home Ph:	0272308010	Work Ph:	0212462810

Home Fax:		Work Fax:	
Cell:		Email:	DITONY@XTRA.CO.NZ

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:

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:

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):

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 ✓).

→ absolutely disagree with this requirement. We have no relationship with the applicant. Our relationship is with KDC as a rate payer.

Signature

[Handwritten Signature]

Date:

16/8/22.

Signature

[Handwritten Signature]

Date:

16/8/22
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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.

Reason for Submission:

As neighbouring property owners, we feel it is our duty to respond to the resource consent application by Gresham Trust.

We are long term residents of the Kapiti coast, who care about this community, and want to see quality sustainable development that meets the needs of current and future generations.

We have been surprised to receive a document that contains the wording 'non-complying' so often throughout the document. Excuse our ignorance but is this normal process for a developer; 'we know we don't comply, but we will submit an application and try any way'

We have focused in on 9 key topics from the application. These topics are detailed below leading to our conclusion of '**Do Not Approve**'.

My Submission Is:

1. The proposal fails to contribute positively to the character of the Zone

Page 33 acknowledges 'There are no comparable developments constructed, at the same, or very similar, scale of development to this proposal in the Paraparaumu Residential zone'. Under the MDRS we fully accept the form, appearance and amenity of our neighbourhood will change over time, however the aerial photographs and rendered drawings included within the Application make it very clear the proposed development is totally out of character with all surrounding and nearby properties. While the proposed housing may be considered medium density, we feel Council should question the suitability of the scale of the development, and its impact on form, appearance, and amenity value for existing residents.

As noted on page 19 of the Application, 'The proposed subdivision fails to comply to meet the minimum and average lot size, shape factor and block length.' The number of homes that are proposed for 240 Kapiti Road is far more than what would reasonably be expected by existing residents, even allowing for the new NPS-UD lot provisions that would permit a lot in this area to support up to three homes.

In terms of design, the large monolithic building forms of up to 13 units are reminiscent of an era long past. While we accept what makes for good design is in the eye of the beholder, for residents who will look directly at the rear of these buildings every day, we submit they are totally out of character in their form, appearance, and amenity. Put simply, while the design of any one unit is acceptable, in totality, they are ugly. We find it hard to believe that

the design meets Council's Design Guide, or more importantly, its intended purpose. Is this what Council is setting as a standard for development such as this? Even if all individual design requirements are ticked, we ask that Council assess the design holistically against the character of the surrounding area and afford due consideration to existing residents. We submit our expectations of what occurs in our neighbourhood are not of lesser importance.

We consider it disappointing the goal of the developer appears to be squeezing in as many homes as possible onto the site with little to no consideration for the interfaces between this development and the surrounding properties. We submit that a more gradual level of intensification on each of the boundaries other than Kapiti Road would at least soften the transition between the existing homes and the development. Indeed, we consider units designed as small homes with natural outdoor spaces (as opposed to artificial turf) where residents could genuinely enjoy privacy, natural light and small gardens would be more attractive to buyers and would add to the overall amenity of 240 Kapiti Road.

We note hearing commissioners recently found in favour of residents in Glendowie, Auckland who successfully stopped the development of 17 townhouses after arguing the development was out of character for the area. We submit a more extreme situation is evolving with this Application.

2. It is inequitable comparing with 10 Trieste Way, 4 Kapiti Road and 55-57 Maclean Street

On Page 35, there is a comparison between this Application and developments at 10 Trieste Way, 4 Kapiti Road and 55-57 Maclean Street. We consider this comparison is not like for like. These developments are in either Mixed Use or Residential Intensification Town Centre Zones. 240 Kapiti Road is within a General Residential Zone.

3. Other than developer greed, there is no justification for this level of intensification at 240 Kapiti Road

Page 34 states 'As a development, it is considered a medium density housing development but is not located within an area marked for this form of development within the district plan'. The NPS-UD, as reflected in the new Council District Plan, sees many new Zones created for residential intensification and these Zones are aptly located near town centres and/or train stations. Outside of a developer profiteering, we fail to see the justification for such a high-density development in a General Residential Zone.

We located a document on-line and prepared for KCDC that indicates the planned walkable catchment areas for intensification, 240 Kapiti Road is out of that zone. [Property Economics Intensification Assessment](#)

4. Transport safety concerns have been dismissed

To propose a single access via Halsey Grove for this volume of residents is unacceptable. We have lived in this area for almost 20 years; we know what the access is really like from Cedar Drive through to Regent Drive. At the Cedar Drive entrance from Kapiti Road drivers encounter a right-hand, dog-leg bend that then crosses over the left-hand turn into Cedar

Drive, a right-hand turn into Halsey Grove, and a sweeping left-hand bend continuing into Regent Drive.

Due to visibility issues, this stretch of road already becomes dangerous should any cars be parked on the street near the Cedar Drive dogleg or Halsey Grove entrance points due to the road not being straight, and the proximity of the Cedar Drive and Halsey Grove junctions. The volume of cars proposed, plus guests that will add to the volume, is a very real concern. This is only something that those who live in the area can confidently comment on.

Pages 20 and 40 acknowledge this submission should be classed as a major traffic activity. 'Vehicle movements expected by this development exceed the permitted standard of 100vpd, and therefore results in the proposed development being classed as a major traffic activity'. Page 40 states 'The vehicle movements, parking and the overall design and construction of the road will not meet all the standards required under the Operative District Plan in relation to the number of vehicle movements, sight distances and number of car parks.

We challenge the Page 33 traffic assessment as minor. This assessment is too low and contradicts the wording on pages 20 and 40.

5. Parking expectations are unreasonable

Page 41 states 'Should additional demand occur, it can be accommodated within the adjacent residential kerbside parking resource without materially impacting the existing on-street permanent parking amenity in the local streets'. Halsey Grove has parking for perhaps seven cars; additional demand would need to be absorbed by Regent and Cedar Drives. The surrounding streets are not designed to absorb overflow from an additional 139 homes.

As page 20 states 'Off-street parking is required for all residential developments at two car parks per residential unit'. This is the standard existing residents who built their homes in the area were held to. Regardless of the type of development, why should new housing in this same area now not be held to this same standard? For these reasons, and the safety concerns stated above, we refute this assessment of materiality and impact.

6. Environmental responsibilities and expectations have been disregarded

Page 20 states 'All new buildings are required to provide a rainwater storage tank and/or greywater system pursuant to INF-MENU-R27. The proposed development will not be providing either water saving option. We submit this is unacceptable at a time when responsible societies are expected to accept their environmental obligations.

We submit the Government is encouraging the adoption of electric cars but there appears to be no provision in the development for vehicle charging. Cycling is increasingly being encouraged in communities but with no garaging, there is nowhere to reasonably store bikes.

7. We find it difficult to believe all impacts of a development such as this are no greater than 'minor'

As a general comment, given the volume of non-complying activity, it is not credible all impacts are 'minor', 'less than minor', 'neutral'. We understand the motivations for this but submit the impacts on nearby residents are not in all cases left of 'minor'; at least one moderate rating would have given the document more credibility.

8. Duty of care to existing residents

As a general comment, this process is new to us and other residents, and this proposed change in our neighbourhood is not insignificant. The Application is more than 60 double sided pages, there are multiple supporting documents on your website, and this is coupled with a time of considerable change to relevant legislation and District Plans.

We are not residents of a wealthy Auckland suburb, and many do not have the means to engage professional assistance. Without professional support it needs to be acknowledged it is difficult for existing residents to challenge this Application of this magnitude.

We submit Council has a duty of care to guide and protect existing ratepayers and to date, we feel let down by the process.

9. We wish to protect our privacy

The submission form states we are required to serve a copy to Gresham Trust. We do not agree with this request. Our relationship is with the Kapiti Coast District Council as rate payers. We have no relationship with the Gresham Trust and are therefore not comfortable providing our personal email address and contact details with this party. We will not be forwarding our submission form to the Gresham Trust.

Decision Sought:

We ask that Council do not approve this Application in its current form as it so obviously does not comply with the District Plan and is out of character with the surrounding area.