

ref: McLean/22642

15 February 2022

Tom Anderson
Resource Consents Planner Contractor
Kāpiti Coast District Council

By Email to: tom@incite.co.nz

Dear Tom,

RM210149 – RESPONSE TO SECTION 92 FURTHER INFORMATION REQUEST

In response to your Section 92 Further Information Request dated 26 July 2021, we have reviewed the points raised (set out below) and would like to submit the following further information:

Planning

1. *What was the “official public consultation process” that the Maclean Park Reserve Management Plan went through (as referenced in Section 3.2 of the application documentation)? Did the consultation hold any statutory weight (RMA or otherwise)?*

The Maclean Park Reserve Management Plan (‘Management Plan’ hereafter) was implemented under Section 41 of the Reserves Act 1977. Consultation was undertaken under Section 119 of the Reserves Act 1977. However, Kāpiti Coast District Council went well beyond what was required. Details on the Management Plan process can be found at Section 5.0 of the Management Plan (pages 16 and 17). There were three rounds of consultation: community engagement to understand what people would like to see at the park / what was important to them / how they currently use it. From there we drafted three development plans and all three went out for consultation. Based on feedback from that we ended up with one final development plan that was included in the draft management plan that went out for consultation. We worked very closely with Te Ātiawa and Ngāti Toa – Mahina-a-rangi Baker helped to write the management plan and it is set out as per her planning requirements.

A copy of the Maclean Park Management Plan is attached for ease of reference.

2. *At Section 3.3 of the consent application, it is stated that the proposal will have more than minor adverse effects on 3 and 5 Marine Parade (aligning with the conclusions reached in the Landscape and Visual Effects Assessment, which concludes there being moderate to high adverse visual effects on these properties). It is then stated*

in the consent application that under Section 95B, it is therefore considered that limited notification is not required for this application. Is this statement relying on the permitted baseline that is outlined in the application, therefore allowing the adverse effects on 3 and 5 Marine Parade to be disregarded?

It is noted that a permitted baseline is also relied upon for the effects conclusions at Section 3.3 for other nearby properties, including 1 Manly Street and 1, 6 and 7 Marine Parade.

Can you please provide plans of such a Permitted Baseline building enabling a comparison to be made between what can be constructed on the site without resource consent and what is proposed? Please provide comment from the author of the Landscape and Visual Effects Assessment as to whether such plans impact on the conclusions they reached in their assessment.

This was an error in the application and was missed when preparing the final version of the application. This sentence should be disregarded, as we concur with the conclusion reached by Ms Cray's Landscape and Visual Environmental Assessment. Please find a revised Section 95B assessment in the revised Assessment of Environment Effects.

Given the existing level of built form within Maclean Park, it has been assessed that any new building (no matter the floor area) would exceed the maximum site coverage for Maclean Park and require a resource consent. As such, the permitted baseline has little to no relevance. For this reason no permitted baseline plans have been prepared.

- 3. At Section 4.2.2 (Amenity Effects – Visual) of the application, visual amenity effects are assessed as being less than minor. How does this interact with the more than minor visual effects assessments made on 3 and 5 Marine Parade in Section 3.3 of the application, and the moderate to high adverse visual effects on these properties assessed in the Landscape and Visual Effects Assessment?*

The Amenity Effects – Visual assessment within Section 4.2.2 of the application is a generalised visual assessment which relates to the non-compliances of the District Plan and their effects on the subject site. The assessment that concludes with more than minor effects in Section 3.3 of the application is an assessment of the proposal on the properties at 3, 5 and 7 Marine Parade.

- 4. The Landscape and Visual Effects Assessment references a component of the application as being Container Pods. This is not referenced elsewhere in the application. Do they form part of the application? If so, please update plans accordingly to show their location.*

Container pods do not form part of the application and any reference to these has been removed from all documents.

Transportation

- 5. Objective DO-O14 of the District Plan seeks to improve the efficiency of travel and maximise mode. The Transport Impact Assessment (TIA) included as Appendix 9 to the resource consent application has identified public transport services and stops in close proximity to the visitor centre and concludes that public transport accessibility to the site is good. However the TIA has assumed that all travel to the site will be via private vehicle and not identified the likely proportion of visitors that*

may choose public transport access to the visitor centre, how that may be increased, and the likely resulting effect on parking demand that will result. Has any consideration been given to the proportion of people who may take public transport to the site, and how this may affect conclusions reached in the TIA?

Please refer to the revised Transport Impact Assessment dated 15 December 2021.

6. *Please provide comment on the potential linkages or impacts of the proposal on the cycling routes/facilities identified in the Council's Cycleways, Walkways and Bridleways Strategy and on the Wellington Regional Trails site. (<https://www.wellingtonregionaltrails.com/>).*

There are two routes that transect this area of the property – Paraparaumu Loop and the Kāpiti Coastal Cycle Route. The proposal will result in no increased risk on these cycling routes as the proposed development will not result in a significant increase in trips.

7. *Crash data is reported in Section 3.2 of the TIA up to 2019 only. Have any further crashes been reported during 2020 and 2021 and do these change the assessment? Also, please provide comment on the crash history adjacent to the proposed Golf Course and Maclean Street carpark entrances.*

Please refer to Section 3.2 of the revised TIA dated 15 December 2021. It is noted that with the inclusion of 2020 and 2021, the conclusion has not changed.

As outlined in the cover letter, the Golf Course and MacLean Street carparks have been removed from the proposal. The crash data assessment reflects the new proposal including an assessment of Marine Parade south of Ocean Road in the south.

8. *The application notes that the existing golf club access is only 5.5m wide. Please provide additional information that shows provision for pedestrian access, two way vehicle traffic and shy line offset from the adjacent wall within the 5.5m wide access.*

As outlined in the cover letter, given the safety concerns raised with the Golf Course car park this element has been removed from the proposal. An assessment of the new parking along Marine Parade, opposite Ocean Road, is included in the TIA on pages 17 and 18.

9. *What is the design speed for the parking areas, and how will this be reinforced through design elements?*

All proposed car park areas are compact and are not conducive to high speeds. Any turning circles used are for 5km/h.

10. *Figure 4.1 in the TIA shows the existing pedestrian refuge island on Marine Parade is relocated, however Drawing RC-L1.01 in Appendix 8 of the AEE shows the pedestrian refuge as new. Please confirm what is planned for the existing pedestrian refuge.*

The existing refuge is constructed in concrete, which is not conducive to being "relocated". As such, the existing refuge will be broken up and removed and a new refuge constructed in the location shown in the TIA and Drawing RC-L1.01.

11. Section 6.1.1 of the TIA suggests safety improvements for the Golf Course parking area entry/exit, specifically removing an on-street parking space and providing a small speed hump. It is unclear as to whether these suggestions form part of the proposal. Specifically;
- i. The provision of compliant sight distance from the golf club car park accesses rely on the removal of on-street car park spaces. This would require approval of a resolution through Council. Is this process underway?
 - ii. Is a speed hump to be provided at the driveway access? If so where is it proposed to be located and how does it interact with the existing speed hump?
 - iii. How will pedestrians be provided for through the carparks in the golf course parking?
 - iv. Is signage proposed within the car park?

As outlined in the cover letter, given the safety concerns raised with the Golf Course car park this element has been removed from the proposal. An assessment of the new parking along Marine Parade, opposite Ocean Road, is included in the TIA on pages 17 and 18.

12. The parking assessment provided in the TIA does not provide actual parking demand during peak summer periods. Please provide further information to demonstrate what the peak parking demand is during peak summer periods.

Due to Covid restrictions and the timing of the submission it was not possible to undertake a survey in the peak summer months, however first principles were used to determine the likely peak demand and Google Earth imagery was used to provide some degree of certainty with the assessment. This is outlined in Section 3.5 of the TIA.

13. Section 2.2 of the consent application describes that there are 31 spaces in the Marine Parade car park. Appendix C in the TIA shows 32 parking spaces. Tonkin and Taylor have also undertaken an assessment and determined that there are 33 spaces (31 plus two accessible). Please confirm the actual number of carparks currently available.

There are 31 carparks, plus two accessible carparks.



14. *The parking demand assessment has arrived at a number of 47 additional parking spaces in the peak season, derived from the Feb 2019 visitor numbers (average of 94 visitors per day). This is below the maximum concession limit of 160 per day. Please assess the effects of parking for the maximum visitor numbers that could be permitted by existing concessions.*

It is also assumed, at this time, that whilst the visitor numbers for the Kāpiti Island tours will grow on an annual basis, they are expected to remain within the current maximum daily limits as per their concession. Some sensitivity testing has been included to understand possible impact, but it is assumed that this maximum baseline was tested on approval of the concession and therefore is not part of this consent.

15. *Cycle parking racks are proposed east of Pod B is along the edge of the path. Please confirm what the available path width will be when bicycles are parked in these racks. Further, will the cycle rack spacing allow for parking of a bicycle on each side of the each rack?*

The architectural and landscape plans are indicative, and their final set out will be confirmed in the detail design phase. They will be set out to ensure that standard bikes do not impinge onto the pedestrian path width at all. Even a cargo bike, which can be up to 2500 long, will be able to park against the racks and extend further into the landscape so as they do not block the path.

16. *Will rain gardens in the Marine Parade car park be traversable? If not then adjacent parking spaces would require an additional 300mm width to be compliant with ASNZS2890.1.*

The parking is designed to allow 600mm overhang (where 4.8m long spaces are shown). The planting along kerb line in rain gardens will be of low height (100-200mm height). Wheel stops or permeable kerb will be at the edge of the paved surface to prevent overrun of wheels.

17. *Section 4.2.3 of the consent application suggests time restricted parking in public off-road carparks in Maclean Park. Please confirm whether or not this is included in the proposal and the details proposed.*

Time restricted car parks do not form part of this proposal.

18. *Section 4.2.3 in the consent application states that the spaces associated with the golf course will be charged for and available for visitors to the island only. Given the availability of free, unrestricted parking on surrounding streets, what measures will be in place to encourage customers to park in the paid parking spaces?*

As outlined above, the golf course carpark has been removed from the proposal and therefore visitors will utilise the free, unrestricted parking within MacLean Park, or the surrounding streets as is present practice.

19. *There is no off-road connection between the proposed northern and southern car parks at the golf course. This may result in vehicles using the road to move between the two car parks. This presents safety concerns when compounded with the non-compliant access width and sight visibility issues identified above in Matters 8 and 12 above. Please advise as to how this arrangement might work.*

20. *Please provide swept paths to demonstrate that the proposed shuttle bus can manoeuvre within the Golf Course carpark to exit in a forward direction.*

21. *The Golf Course carpark extension shown in Appendix 6 of the consent application is a blind aisle 17 parking spaces long with no turn around area. Please provide further detail on how this is considered to comply with ASNZS2890.1 Section 2.4.2 (c).*

22. *Please confirm how the spaces associated with this activity can be demarcated from the golf course and administered so that they are available solely for the use specified in the resource consent application.*

As outlined, the golf course carpark has been removed from the proposal.

23. *Drawing 1 in Appendix 6 of the consent application shows the proposed carpark layout at the corner of Maclean Street and Kapiti Road. This is different to that shown in Figure 5.2 of the TIA. Please confirm the layout proposed.*

The MacLean Street/Kapiti Road car park no longer forms part of the application.

24. *Section 4.2.3 of the consent application states that "if the activity that the building represents was to be built on a green field site with no existing activities it would be required to provide 3 parking spaces, based on the GFA". However the TIA appears to only assess for 2 additional parking spaces and associated trips. Does this*

difference result in any change to the conclusions with regard to parking provision and intersection modelling?

Please refer to Section 5.1.2 – the requirement is 3 x space per 100m² GFA. As the GFA is 112.5m² then this equates to 4 spaces being required.

25. The golf course carpark extension will mean that this carpark entrance services 44 parking spaces. Please provide an assessment of the operation of this access on Kapiti Road.

As outlined, the golf course carpark has been removed from the proposal.

26. For completeness, please provide the SIDRA analysis outputs referenced in the TIA.

Refer to our response for Point 25 above.

27. Please advise the expected traffic related effects from construction and how these will be managed.

At the construction phase there is not expected to be any significant movement of material onto or off the site. It is anticipated that machinery will be delivered to the site via the existing vehicle crossing into the carpark at the beginning of the works and removed at the end. Operators will also arrive and depart via the same access location. The building is also being constructed off-site, and therefore aside from the delivery of the building segments, there will not be any prolonged construction traffic associated with the building.

A Construction Traffic Management Plan for the works might reasonably include methods to ensure dirt is not tracked onto the road network highway, the number and type of vehicle movements, whether any turning restrictions are needed and restriction to daylight hours.

The applicant volunteers a consent condition requiring a Construction Traffic Management Plan prior to the commencement of works.

28. Please provide tracking curves of the shuttle bus entering and exiting the designated parking space and confirm that a suitable aisle width is maintained for access past the shuttle and into adjacent carparks while the shuttle is parked.

The carparking layout has been revised, resulting in a single swept path from the entry into the pick-up/drop-off zone. An aisle width of 3.5m has been maintained for exiting vehicles to pass a vehicle parked in the pick-up/drop-off zone.

29. Please confirm how the visitor centre will be serviced (such as delivery of merchandise and removal of refuse).

It is intended that deliveries or refuse collection would use the pick-up/drop-off parking space.

30. Page 16 in the TIA notes a space is provided in the visitor centre carpark to accommodate drop off/pick up vehicles including taxis and ubers etc. This is not currently shown on the plans, please confirm where this is.

This formed part of the original application, however, has since been revised to utilise a shuttle bus/drop off, pick up within the carpark provided.

31. Please confirm the proposed width of the path around the western edge of the carpark and how this route will be promoted to path users (including cyclists) to ensure that they use the route rather than proceeding into the carpark to access Marine Parade.

The proposed path will be at least 3m in width and links in with the existing shared path to the north and south.

32. The consent application describes a moveable post and rope barrier at the beach entrance to separate pedestrian and boat launches. Please provide further detail on how vehicles and pedestrians will be made aware of their responsibilities and how members of the public are not discouraged from travelling along the path and over the bridge.

Please refer to the revised Wraights Landscape Plans L1.00 and L1.01 for the location of the post and rope barrier. The purpose of the barrier is to provide further separation between vehicles and pedestrians beyond the extent of the existing bund. By extending the area of separation by a visually permeable barrier, sight lines between vehicles and pedestrians entering the beach to ensure the safe transition from Maclean Park to Paraparaumu Beach. With its east-west placement, this barrier does not act as a discourager to pedestrians from travelling along the path and using the bridge.

Development Engineering

33. The proposed earthworks plan for the golf course car park shows that the lowest point on the site would be at the entrance of the car park. The proposed sump appears to be at a proposed ground level of 3.5m. Please either relocate the sump to the lowest point of the site, or advise how stormwater will be collected from the lowest point of the site and directed to the sump.

As outlined, the golf course carpark has been removed from the proposal.

34. Please provide the ground water level at golf course car park site.

As outlined, the golf course carpark has been removed from the proposal.

35. Is the proposed cut from the golf course car park being used on the site for fill or transported elsewhere?

As outlined, the golf course carpark has been removed from the proposal.

36. As an additional paved area is proposed to be added to the existing car park at 343 Kapiti Road, please provide details as to how stormwater will be managed on site at this location.

The MacLean Street/Kapiti Road car park no longer forms part of the application.

Landscape and Visual Matters

37. *It would be useful if Section 1.1 of the LVEA (Report Methodology) could make explicit reference to Appendices C and D, which provide the details of the assessment methodology.*

The revised LVEA specifically references the methodology and ranking scale at Section 1.2 (page 1).

38. *The LVEA submitted with the application was issued 24 June 2021. KCDC's PDP was made operative 30 June. It would be desirable to update the report accordingly.*

The report has been updated accordingly. Please find a copy of the revised report attached.

39. *The Maclean Park Management Plan references within the LVEA are outdated. The relevant objectives are 8.4.1, 8.5.1 and 8.6.1 in the 2017 plan, not 1.4, 1.5.1 and 1.6.1 as stated in the LVEA. Please ensure the relevant objectives are reviewed, and the LVEA updated as necessary.*

The report has been updated accordingly. Please find a copy of the revised report attached.

We trust the above information satisfies your queries in full. If any further clarification is required, please don't hesitate to get in touch. We would appreciate consideration of draft conditions prior to the decision being issued.

Yours faithfully,



Emma McLean
Senior Planner
CUTTRISS CONSULTANTS LTD

Attachments:

1. Maclean Park Management Plan 2017
2. Building Encroachment Plan, prepared by Cuttriss Consultants Ltd, Rev B, dated 02/22
3. Architectural plans, prepared by Athfield Architects Limited and Landscaping Plan prepared by Wraight and Associates Limited
4. Parking plans, prepared by Beca Limited
5. Stormwater Disposal Report, prepared by Cuttriss Consultants Limited
6. Landscape and Visual Effects Assessment, prepared by Beca Limited
7. Transport Impact Assessment, prepared by Beca Limited
8. District Plan Overlay Plans, prepared by Cuttriss Consultants Ltd