14 February 2025

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Tēnā koe Sandhira

Re: Response to request for further information on the Ratanui Road Private Plan Change Request

The following information is provided in response to your 16 January 2025 request for further information. Your questions/comments are addressed in turn below.

RFI response

Question 1 – Appropriateness of a controlled activity status for the retirement village:

Proposed Plan Provisions

1. *Controlled Activity Status – Proposed DEV3-P1 Retirement Villages. Please provide more justification as to the appropriateness of a controlled activity status for the retirement village.*

   Reason
   The Landscape Effects Assessment (LA) Section 6.4 page 33, assessed that a retirement village would overall have similar character effects to a typical residential subdivision in terms of the effects of buildings and would be predominantly urban. As there is very little detail in terms of location on the site for a future retirement village or villages and /or typical residential subdivision the effects due to roading, stormwater, earthworks and buffer landscaping would be similar in both development options. It is unclear why it could then be justified that a retirement village could have a controlled activity status, but a residential development would be restricted discretionary.

   The proposed controlled activity rule also includes the matters of discretion relevant to a retirement village as a restricted discretionary activity. We do not consider that there is the necessary level of certainty in the structure plan and in the policy and rule that would support a controlled activity status for the number of matters that would need to be considered (in addition to the matters that are included in this request). We also do not agree that the level of detail provided in the Structure Plan to be commensurate with what would be provided at the time of resource consent.

Response:
Justification for the proposed controlled activity rule was set out in Section 5.5 of the Request. Building on that analysis, the key basis for a controlled activity status for the retirement village is as follows:

- The various externalities associated with a retirement village are well understood;

- The Request and associated technical material demonstrate that a retirement village is imminently appropriate in this location. They show that that the level of effects on the environment (including landscape, visual, ecological, traffic and transport effects) is appropriate and can be managed through consent conditions;
- The methodologies proposed in the technical material provide certainty about how those potential effects will be avoided, remedied or mitigated by the Requestor. For example, through the preparation of a Landscape and Earthworks Plan (landscape and visual) and the creation of a large centralised wetlands on the site either side of the highly modified stream for wetland offsetting (primary function) and stormwater management (secondary function);
- The proposed provisions in the Ratanui Development Area also provide a level of control to ensure any development is in general accordance with the Structure Plan and recommendations in technical assessments which are articulated in DEV3-P1;
- No matters have been identified by technical experts that might result in a potential basis for decline of a resource consent application for a retirement village on the Site (following a successful plan change as proposed); and
- In light of the above, controlled activity status is considered to be effective in controlling development (and a more onerous activity status is not required in that respect), and therefore controlled activity status represents the most efficient (or lightest touch) activity status. Council officers will retain oversight over the consenting process without requiring the retirement village to be subject to a more thorough discretionary assessment.

The evidence base provided with the Request includes a number of technical documents which would be required as part of a resource consent application for a retirement village including the following assessments: planning, landscape, ecological, transport, civil, geotechnical, and a contaminated land assessment. While updated assessments would provide further detail at the time of applying for resource consent (when the proposal has been master planned and subject to detailed design), they provide a sufficient level of information at this stage of this process to demonstrate that the use of the site for a retirement village is appropriate. The Structure Plan and associated provisions are designed to provide an appropriate level of regulatory oversight on the detailed design through the consent process.

With this evidence base largely tailored for a retirement village, I consider that a residential development on the site would be sufficiently different in nature to justify a different planning response. From a transport perspective, a retirement village would have one entry/exit with a network of driveways that would be privately operated and maintained. Traffic movements associated with a retirement village are also likely to be more self-contained within the site compared to a residential development. The form and potential effects of the transport network for a residential development on the other hand is more of an unknown quantity; it would require the design of a public roading network with several points of connectivity through to adjacent sites at yet to be defined locations. From a stormwater perspective, while a retirement village would manage its own stormwater and

open space, residential development would likely require vesting additional assets with Council to manage including stormwater and recreational reserves.

I do however agree that it is likely that the scale of earthworks and size/nature of the proposed landscaping buffers on the site would be similar in nature between a retirement village and residential development. However, those matters are capable of being managed through consent conditions and would not be a barrier to consent being granted.

In my view, there is a large evidence base in support of the proposal, and I do not consider that the level of detail provided in the Structure Plan itself needs to be commensurate with the level of detail provided at time of consent. The purpose of the Structure Plan is to give a framework to guide the development of the site, and the associated policies and rules require a greater level of detail at the consenting stage. This means matters such as roading, stormwater, earthworks and buffer landscaping will continue to be considered and refined by the Requestor but be in general accordance with the Structure Plan. While Council cannot decline the consent as a controlled activity, it will still be able to have significant input into the final form of the development through the process including specifying conditions of consent. Structure plans are generally not intended to show the level of detail that would be expected in a plan set for a consent application.

Nevertheless, I agree that there is an opportunity to further refine the Structure Plan that was lodged with the Request, as well as the associated policies and rules. Appendix 1 from the Request is **attached** to this RFI response as **Attachment 1**. Recommended changes are shown in blue either underlined or with ~~strikethrough~~. (Note that in addition to substantial changes, there are various other minor changes recommended to improve the readability of the proposed provisions.)

The rationale for the recommended changes is provided below in response to other questions, but in summary, the updates to the proposed provisions and the Structure Plan include:

- Clarifying in the introduction that the provisions in the Ratanui Development Area apply in addition to existing district-wide provisions in Part 2 of the District Plan;
- Amending policies to clarify the respective functions of the compensatory flood storage area and the wetland areas, including what outcomes are sought in regard to both functions;
- Amending policies to clarify what outcomes are sought through landscaping and planting, including a direction to minimise use of retaining walls in favour of natural batters where possible;
- Amending rules to require the provision of a Landscape and Earthworks Plan as a permitted activity standard, with escalation to a new non-complying activity rule where a Plan is not provided; and
- Amending the Structure Plan to show indicative extent of the wetland areas, the location and likely extent of a separate compensatory flood storage area, the direction of the primary

access way within the site and where it crosses the stream, and the location of additional boundary planting on the western side of the site.

Question 2 – Policies DEV3-P1 and DEV3-P2:

2. *DEV3-P1 – Retirement Villages and DEV3-P2 – Residential activities and associated subdivision*
    a. *Please review these policies as to whether they provide the appropriate clear and certain direction to be considered in decision-making and whether there are aspects that should either form part of rules or standards*
    b. *The policies both include clauses that seek the provision of a landscaping and earthworks plan, but there is no direction as to why such a plan is required or its purpose and what would be considered through the assessment of an application*
    c. *The introduction states that the rules and standards apply in addition to the rules and standards in other parts of the Plan. However, it does not state the same in respect to the policies. Accordingly, we need to understand how it is intended that these two policies relate to the rest of the Plan's policies.*
    d. *In respect to the landscape plan clauses, please explain why the recommendations included in Section 7 of the LA for the proposed landscape plan have not been fully incorporated into the site-specific provisions.*

Reason
This information is required to understand how the proposed policies are intended to be implemented and how any application would be assessed. We note that the matters addressed in this request may necessitate other amendments to the proposed policies, particularly in providing adequate direction.

Response: I agree that the policies could be amended to provide further clarity about how development should be managed within the Ratanui Development Area.

In regard to (a), I consider that most of the matters set out in these policies sit best at a policy level rather than as a rule or standard. This is because they would be applied more as assessment criteria or matters of control rather than specific metrics/standards to be complied with through a rule. This is because the purpose of a policy is to support and expand on the objective by setting the direction or action required by the plan user (Council, applicant or decision-maker), whereas the purpose of a rule is to set out an enforceable method of implementation.

The one matter I consider that sits best as a rule is the requirement to prepare a Landscape and Earthworks Plan. This requirement should be a rule as it is a method by which an applicant can demonstrate how they have addressed the matters set out in the policies. I have accordingly recommended amendments to Rules DEV3-R1 – DEV3-R4 and added a new escalation rule (codified as DEV3-R5). Providing the Landscape and Earthworks Plan is a requirement to comply with the rules, and where it is not provided, the consent should escalate to a more stringent non-complying activity status.

In regard to (b) and (d), I have recommended amendments to DEV3-P1 and DEV3-P2 to provide further detail on what the Landscape and Earthworks Plan should entail, including to incorporate the matters listed in Section 7 of the Landscape Assessment. These matters were initially left out in the interest of keeping these policies concise, but I agree that providing more detail provides a better framework through which any future development proposal can be assessed.

In regard to (c), I have recommended an amendment to the Introduction section to clarify that Policies DEV3-P1 and DEV3-P2 apply in addition to the rest of the District Plan's policies in other chapters. In the interests of word economy, I have replaced "rules and standards" with "provisions" which is a term that encompasses policies, rules and standards.

I have not identified any conflicts with other policies in the District Plan, and I consider that the proposed policies integrate well with existing policies. For example, the General Residential Zone Policy GRZ-P28 would remain relevant to a future retirement village as it sets out policy direction guiding general amenity and urban design matters which would be assessed alongside the site-specific matters listed in DEV3-P1. Likewise, General Residential Zone policies such as GRZ-P9 and GRZ-P10 are complementary to the site-specific matters listed in DEV3-P2.

Question 3 – Development Area Structure Plan:

Development Area Structure Plan

3. *The Development Area Structure Plan does not include what we consider are key elements, such as the main roading layout, open space network, wetland and stream areas, and other areas to be protected from earthworks. This is particularly the case if a controlled activity rule was to apply to a retirement village development.*

   Reason
   The Development Area Structure Plan Diagram (Figure 1) provides only high-level site-planning directions which do not include some of the key features that are typically represented in and managed through a structure plan (refer to District Plan definition and further explanations[1]). More specifically, Figure 1 does not indicate the roading layout and nature of infrastructure (including transportation links), areas of open space/reserves (apart from marking up the general location of a stormwater management area/wetland), the likely extent of the wetland and stormwater management areas, and/or any other key features for managing the effects of development (such as areas protected from earthworks). This information is considered particularly important given

[1] Structure plan 'means a framework to guide the *development* or redevelopment of a particular area by defining the future *development* and land use patterns, areas of *open space*, the layout and nature of *infrastructure* (including transportation links), and other key features for managing the *effects* of *development*'.

the requested controlled activity status for the future development of the site for a retirement village.

Response: The proposed Structure Plan was developed based on guidance in the District Plan as outlined in Section 4.7.5 of the Request. Other structure plans listed in Part 4 of the District Plan were also considered in order to achieve consistency with them. The level of detail in the Structure Plan is commensurate with other structure plans in the District Plan, and in some instances provides more detail. For example, the Waikanae North Eco Hamlet Structure Plan simply shows "suitable areas" and "less suitable areas", and the Milne Drive Structure Plan only shows a no build area and a height control area.

The Structure Plan does show the public roading layout, but this layout does not appear comprehensive because it is limited to an intersection on Ratanui Road to enter the site. For a retirement village, the rest of the roading network will be private ways linking together within the site, and it is therefore inappropriate to include a private road network in a Structure Plan. The Requestor has no intention or expertise in designing public road networks such as that which would be required for a residential development. This is one of the reasons why a residential development requires a more stringent activity status.

That being said, there are several changes to the Structure Plan that would provide more detail about key features. The Structure Plan has been amended to show an indicative main spine into the site from Ratanui Road as far as the proposed stream crossing point. This will provide more detail about where traffic will move within the site, and how the main road integrates with the stream and proposed stormwater management and wetland areas.

There will also be no public open space under a retirement village scenario as the site will not be open to the public. Under a residential development scenario, there would likely need to be public open space, possibly in the form of a pocket park to be vested in Council.

I agree that it would be useful to show the indicative extent of the proposed compensatory flood storage area and wetlands area on the Structure Plan. This is shown in **Attachment 1** along with an added disclaimer that final design and size of these areas would be confirmed at the consenting stage.

There are no other specific areas proposed to be protected within the site, including areas to be protected from earthworks. However, as outlined in the Landscape Assessment, future development platforms need to be sensitively and effectively integrated into the existing terrain along the edges of the site, particularly at the northern and eastern edges. DEV3-P1 and DEV3-P2 have been updated to reflect this recommendation.

Question 4 – Landscape and visual effects:

Landscape and visual effects

4. *Please identify where and by what means the natural character of the dunes will be protected from earthworks and integrated with land on neighbouring properties, in order to implement DEV3-P1 (f) and DEV-P2 (h).*

   Reason
   Proposed provisions in DEV3-P1 (f) and DEV-P2 (h) mentions a minimum setback from adjacent property boundaries, however there are no rules or standards that would protect the dune areas, and no areas are identified on the Development Area Structure Plan. It is unclear whether the minimum setback referred to in the policies equals the minimum yard standard, and if not, what it is intended to be. Similarly, whether the reference to 'protection or mitigation for adjacent property boundaries' under the same policies relate to the proposed landscape buffers, and if not, what these measures may be. The proposed Development Area Structure Plan does not identify any areas protected from earthworks. For integration with adjoining land and to retain some natural character any protected dunes, in particular high dune areas, within the northern end of the land should be identified on the Development Area Structure Plan as protected from earthworks and extent of the area indicatively identified. Where possible all connecting dunes within adjoining properties and at the road frontage should be battered naturally and retaining walls avoided. There should also be policy direction on how these areas are intended to be managed following any future development.

Response: The setback referred to in the renumbered DEV3-P1.6 and DEV-P2.6 is recommended based on geotechnical advice from Riley Consultants for land stability purposes (see Appendix I of the Request), rather than for protecting the natural character of the dunes as suggested in the Council's RFI. The landscaping buffer will provide a setback for the latter purpose, that is integrating the site with land on neighbouring properties, and will be at least the minimum yard standard required by the District Plan. The appropriate geotechnical setback would need be determined by geotechnical engineers through detailed design once building platforms are identified.

There are no areas identified in the Structure Plan for the protection of dunes, as outlined in the **attached** Memo from Boffa Miskell (**Attachment 2**):

> *The natural character of the Site, including the dunes which would be impacted by the proposed development, was assessed as being of low value due to the level of modification which has occurred across the Site (see Section 6.1 of the LEA). Therefore, it is not considered that protection of these dunes within the Site area is required.* [2]

It follows that there is no policy direction provided in the Plan on the management of protected dune areas. However, Boffa Miskell agree that that there is a need to ensure that ground levels appropriately

[2] Page 1 Boffa Miskell Memo.

integrate with surrounding sites and landforms. I have recommended changes to the renumbered DEV3-P1.6 and DEV3-P2.6 to ensure: "Retaining walls will be minimised in favour of natural batters where practicable." (see **Attachment 1**).

Question 5 – Proposed landscape buffers:

5. *In respect to the proposed buffers, please:*
    a. *provide further details on what is sought to be achieved in respect to landscaping and what is meant by each with respect to heights and types of species envisaged, the intended density of planting and the extent/width of the planted buffer.*
    b. *clarify the difference between the two types of buffers (landscaped and vegetated) and their respective mitigation roles.*
    c. *clarify why the polices refer to one type of buffer only*
    d. *explain the rationale for why landscaped buffers are not proposed along the western boundary of the site which partly sits adjacent to the Rural Lifestyle Zone*

Reason
Proposed DEV3 - P1 and DEV3 - P2 includes provision for a landscaped buffer as well as the provision of landscape plans. The Development Area Structure Plan shows a landscaped buffer and a vegetated buffer. It is unclear exactly what the intended purpose of the landscaping and earthworks plan and what it is to be assessed against (also addressed under plan provisions). It is unclear why a buffer is not proposed along the western boundary with the Rural Lifestyle Zone, given buffers are proposed along other boundaries with the Rural Lifestyle Zone.

Response: As above, there are changes recommended to DEV3-P1 and DEV3-P2 that provide more detail on what is to be achieved through earthworks and landscaping, including stating that there will be a preference for indigenous species typical of the coastal area. The exact species and heights would be confirmed through the Landscape and Earthworks Plan now recommended to be required by rules DEV3-R1 through DEV3-R4. This level of detail is more appropriately addressed at the consenting stage.

In regard to questions (b) and (c), the difference between the landscaped and vegetated buffers is set out by Boffa Miskell in their Memo:[3]

> *The purpose of the 'landscaped buffer' is to seek to deliver an appropriate design response to ensure the integration between the new development and adjacent sites/ land use. The landscaped buffer is not necessarily seeking to fully screen or filter views from neighbouring properties/ viewers, but it instead would ensure that future development across the Site is successfully and sensitively integrated into the landscape and wider context. Therefore, the landscaped buffer may not only be implemented through planting, but could be delivered through appropriate fencing treatments, landscape bunds and earthworks design (or a combination of these) to ensure integration with the wider landform etc. The landscaped buffer would be 5m in width to*

[3] Page 2 Boffa Miskell Memo (Attachment 2).

ensure that any boundary treatment would be established effectively and achieve the desired outcome.

The 'vegetated buffer' has been proposed where it has been identified that more substantial filtering of views into the Site is required, due to proximity to neighbouring residential properties where there are currently unobstructed views into the Site. The 5m wide vegetated buffer is primarily proposed in the southern parts of the Site, where a more 'parkland' type vegetation cover is characteristic within the landscape (i.e. large areas of bush, dense boundary planting of mixed native and exotic species etc).

The vegetated buffer would seek to reflect this existing tree and shrub structure, using a mix of largely native species with varying heights, ranging from shrubs and undergrowth species to trees in the realm of 10 - 20m in height (or greater) at full maturity. Typical species could include…

Detailed design through the resource consent process would seek to identify where screening is required (i.e. dense, solid planting) or where a more open filtering of views would be appropriate (i.e. less dense).

In regard to question (d), the rationale for there being no buffer on the western Rural Lifestyle Zone (RLZ) boundary is that the majority of this boundary is shared with the owner of 65 Ratanui Road with whom the Requestor is purchasing the land off. There is a separate commercial agreement with respect to this landowner.

However, following receipt of this RFI and further discussions with the project team, there are two other RLZ zoned properties along this boundary at 153 and 155 Mazengarb Road which require further consideration. While both of these properties have existing vegetated screening to the Site, it is proposed that a vegetated buffer is included along this boundary. This would ensure that the treatment of the interface between the RLZ and the General Rural Zone (GRZ) is integrated appropriately to ensure landscape and visual effects are minimised as far as practicable. The Structure Plan has been updated accordingly.

Question 6 – Landscape and visual effects in relation to any indicate site layout:

6. *Please clarify whether the conclusions in the LA regarding landscape and visual effects have been facilitated by or made with reference to any indicative site layouts.*

Reason

The LA supporting the PPC considers that the change in zoning to General Residential is suitable due to the location of the site on the edge of existing residential areas. The LA (page 2) notes that the assessment:

- *has taken account of the existing environment and what could be developed under the current zoning (e.g. 12 residential dwellings and 12 minor dwellings); and*

- *has considered the difference between such a scenario and the potential development under the PPC of up to 153 lots/235 dwellings and 'associated ancillary infrastructure such as landscaping and a new road network as a result of the proposed plan change'.*

The LA does not specifically discuss the difference in effects between the above-mentioned scenarios. It is not clear whether the effects of the potential scenario under the PPC were considered in relation to any particular site layouts (for retirement village or residential subdivision) as somewhat implied in the LA, which states that the new road network and intended landscaping have been taken in account. It is noted that:

- *the proposed DEV3-Figure 1: Ratanui Development Area Structure Plan (PPC Request/Appendix A - Proposed Changes to the District Plan) does not show the intended road layout; and*
- *the PPC additional site-specific provisions (Appendix A) do not include any site-specific standards re extent of the proposed buffer planting or the intended landscape treatments.*

Response: The Memo from Boffa Miskell (**Attachment 2**) addresses this question as follows:[4]

The LEA was not prepared using an indicative site layout. Instead, it was prepared using conceptual modelling for each of the potential development scenarios, based on a series of assumptions i.e. rural residential development, general residential development, and development of a retirement village and what could be anticipated within each zone.

Landscape and visual effects arising from the detailed and developed design proposal (once prepared) would be assessed at the resource consenting stage.

I consider that the methodology followed in the Landscape Effects Assessment was robust and appropriate for a private plan change request. The Assessment undertook modelling of a retirement village scenario and concluded there would Very Low landscape effects and Low visual effects in the surrounding area.[5] Recommendations from the Landscape Assessment have been adopted into the Request. I have recommended changes to DEV3-P1 and DEV3-P2 to incorporate more detail as to what outcomes are sought (see **Attachment 1**).

Question 7 – Photographs of the site from private locations:

7. *Please provide photographs or visual representations to illustrate views of the site from within the identified private locations.*

Reason
The LA notes that the analysis of visual effects on views from private locations was based on observations from site visits and extensive desktop research, but without visiting any of the identified potentially affected properties. Figure 5 and Figure 6 of the LA provide photographs taken from within the site looking towards about half of the identified potentially affected properties (marked on Figure 3). The photographs on Figures 5 and 6 allow high level assumptions to be made regarding the extent/nature of private views from the respective properties. However, the lack of

[4] Page 3 of the Boffa Miskell Memo (Attachment 2).
[5] Page 16 of the Landscape Effects Assessment attached to the Request as Appendix D.

photographs indicating the actual views from within all the identified potentially affected properties makes it difficult to follow the visual effects assessment and its conclusions (LA, pages 20-31).

Response: The Memo from Boffa Miskell (**Attachment 2**) addresses this question as follows[6]:

> *As the application is for a Private Plan Change, this was not undertaken as part of this exercise. This is due to there being no proposed design or layout for either a retirement village or residential development at this stage – the location, form, bulk, appearance etc of the proposed development is still unknown. The LEA sought to provide an understanding of the effects resulting from the change of land use (i.e rural residential to general residential within an area highlighted by KCDC for future residential growth), rather than responding to a specific change in view. Once a proposed layout is designed, a resource consent application will be made which would contain a greater level of detail and appropriate visual representations to represent the change in views from neighbouring private locations.*
>
> *Additional photographs of neighbouring properties taken from within the Site area have been appended to this memorandum for further reference.*

Based on the above, I understand that providing additional photographs of the site would not assist with a more detailed analysis of visual effects given there is no indicative site layout or proposed design for the retirement village. These matters will become known at the consenting stage. Accordingly, it is appropriate for Council to rely on high level assumptions regarding the extent/nature of private views from the potentially affected properties for the purposes of this Request.

Question 8 – Stormwater management and wetland offsetting areas:

Wetlands and the modified stream

8. *Please:*
   a. *better define the extent of the stormwater management and wetland offsetting area and any wetland restoration areas on the Development Area Structure Plan to better represent the likely intended outcome*
   b. *address how DEV3 – P1 (b) and DEV3 P2 (d) will ensure that there is differentiation between wetland offset areas and constructed stormwater management areas, including their identification and management*
   c. *clarify whether it is intended that the stream is integrated into the wetland offset area and /or stormwater management wetland area and whether riparian margin setbacks are intended to apply, and if so, consider whether direction should be provided through DEV3 – P1 (b) and DEV3 P2 (d).*

Reason

[6] Page 3 of the Boffa Miskell Memo (Attachment 2).

Proposed DEV3 – P1 (b) and DEV3 P2 (d) are clauses to create a centralised restoration wetland. The clauses are considered vague and do not describe the intended outcome against which any future application would be assessed. Location "S" on the Development Area Structure Plan does not clarify where the wetlands are to be maintained in respect to the modified stream, or the intended size to be set aside for wetlands (ecological and stormwater). The wetland offset areas and constructed stormwater management areas will require different management regimes as part of any future development, given their different functions. It is also unclear how the future hydrology of the wetlands is likely to function, and the clauses proposed do not provide any direction that this be addressed through a future application.

The modified stream is a tributary of the Waikanae River via the Mazengarb Stream. The Mazengarb Stream is known to provide habitat for at least five indigenous species of fish, including some At Risk declining species. No fishing of the on-site stream was undertaken by the ecologists; therefore it is not certain whether the stream will be totally devoid of fish at all water levels. Although the stream is currently periodically dry it is proposed to be the receiving waterway for gradual release of stormwater from the stormwater wetlands (to maintain hydraulic neutrality requirements for the site). This creates the possibility of longer retention of water in the stormwater management areas and associated mitigation wetlands, which in turn may provide habitat for those species of fish within the Mazengarb Stream colonising the wetlands. There is brief mention of potentially revegetating the riparian margins, but no further details are provided, and the value of this revegetation is considered to be negligible by the applicant (page 23 of the Plan Change Request). It is therefore unclear what the potential adverse effects on the stream and the riparian margin might be, and whether this is a matter intended to be addressed through DEV3 – P1 (b) and DEV3 P2 (d).

Response: In regard to (a) above, as noted in response to question 3 above, the Structure Plan has been updated to show the indicative extent of two large centralised wetland areas, with a disclaimer that these will need to be appropriately sized for any future development, specifically to fulfil their function treating stormwater runoff from the site. The Structure Plan also shows an area that is specifically used for compensatory flood storage only. These changes to the Structure Plan provide a greater level of detail to plan users and decision-makers about the likely size of these areas to achieve an appropriate level of stormwater management and positive biodiversity gains.

In regard to (b) above, I agree that DEV3–P1.1(b) and DEV3-P.1(d) should be amended to clearly show how stormwater management offsetting and stream functions will be provided for and managed, and what outcomes are being sought across the proposed functions (see **Attachment 1**). The purpose of the wetlands is outlined in Section 3.3 of the AEE and page 29 of the Ecological Assessment with regard to ecological outcomes. The purpose of the wetlands for stormwater management is outlined in Section 3.6.2 of the AEE and page 12 of the Civil Engineering Infrastructure Assessment. The key differentiations between these areas are:

- There is a compensatory flood storage area located on the western boundary of the site that is designed for the primary purpose of mitigating the impacts of the development from removing existing floodplain storage on the site; and
- The large, centralised wetlands sit on either side of the highly modified stream and provide dual functions of stormwater management and wetland offsetting.

The term 'restoration' has also been removed from these policies to avoid giving the impression that the works would be to restore an existing wetland that is already in that location, when in fact the offsetting works would recreate and relocate the existing wetlands removed from elsewhere on site.

Dr Vaughan Keesing from BlueGreen Ecology provides the following additional comments with regard to the intended outcome of the central wetland areas and stream:

> *The proposed strategy for the integrated wetland and stormwater is to ensure that all stormwater off the developed site that is surface flow enters forebays prior to wetlands. The forebays are both water peak flow attenuation and treatment by deposition and binding of stormwater contaminants. That water then passes into the wetlands which are a combined enhanced area of avoided/retained wetland and offset wetland development. Those areas of offset, avoided/retained wetland, and stormwater storage are to be planted with representative species assemblages reflecting varied hydrology across the stormwater management area. There will be sufficient separation as to be able to identify retained enhanced, offset and stormwater wetlands.*
>
> *There is to be also a compensatory flood storage area that is fed by rising stream levels but which is close enough to the ground water as to be wetland and so planted as representative native wetland.*
>
> *Stormwater runoff from roofs would be initially directed to on-site soakage pits. Stormwater runoff from roofs in excess of the soakpit capacity, and stormwater runoff from hardstand and greenspace across the Site, would be directed to the centralised stormwater management area adjacent to the modified stream. There are no likely contaminants of any concern to either groundwater, or surface water via the wetland vegetation and fauna, from the development entering through either stormwater discharge pathway.*
>
> *We note that the wetlands to be developed will not be directly hydrologically part of the stream and will not be fish habitat (they are not now).*
>
> *The passage of stormwater will be from surfaces to soakage and when full surface flows to forebay and from there into the combined avoided and recreated offset wetlands and from there to the modified stream.*

The above advice has been used to inform recommended changes to the renumbered DEV3-P1.2 and DEV3-P2.3 (see **Attachment 1**).

In regard to question (c) above, while the stream is not intended to be integrated into the wetland areas as outlined by Dr Keesing, I consider that undertaking riparian planting would provide ecological

benefits for the stream, as well as providing amenity and land stability benefits for the surrounding development. The renumbered DEV3-P1.3.a and DEV3-P2.2.a have been updated to ensure that the riparian planting is a part of the Landscape and Earthworks Plan. Overall, it is considered that the potential adverse effects on the stream and riparian margin are negligible, and there is the potential for positive effects through the restoration of this highly modified stream.

Question 9 – Traffic and transport:

> ***Traffic and transport***
>
> *9. Please provide:*
> - *a. Sidra assessments for the Mazengarb Road/ Ratanui Road intersection (roundabout) to ensure sufficient capacity at the intersection.*
> - *b. Sidra assessments for the Otaihanga Road/ Ratanui Road intersection (tee intersection) to ensure sufficient capacity at the intersection.*
> - *c. An updated ITA to include an assessment of the proposed intersection onto Ratanui Road against the provisions of the District Plan. For example, sightlines and intersection separation.*
> - *d. Speed surveys to confirm the assumed 50km/h speeds along Ratanui Road.*
>
> *Reason*
> *The information is required to demonstrate the assumptions made in the ITA and request and so that a full assessment of the potential effects can be undertaken.*

Response: The attached Memo from Stantec (**Attachment 3**) addresses these matters as follows:

a. The Mazengarb Road/Ratanui Road intersection is forecast to continue to operate efficiently into the future with low delays and the roundabout has good available capacity[7];

b. The Otaihanga Road/Ratanui Road intersection is forecast to continue to operate efficiently into the future with good levels of service, with little forecasted impact from additional traffic generated under either the retirement village or residential development options. This result reflects field observations that show the intersection operates well, with good available capacity for turning traffic[8];

c. The District Plan provisions have been assessed in the Memo as being achievable, noting that matters relating to the safety of a new intersection in the proposed location will be further assessed at the subsequent consent and design stages[9]; and

d. With regard to speed surveys, a 70m taper length for the new intersection at the site entrance is considered appropriate, which is based on a 50km/h design speed. This can be refined through future detailed design, and there will be an ability to lengthen it if necessary based on

[7] Pages 1-2 of the Stantec Memo (Attachment 3).
[8] Pages 2-3 of the Stantec Memo (Attachment 3).
[9] Pages 3-7 of the Stantec Memo (Attachment 3).

available speed data at the time. Excellent sightlines will be available, well in excess of Austroads safe intersection sight distance recommendations for a 60km/h design speed[10].

Ngā mihi

Incite

Torrey McDonnell

Principal Planner

torrey@incite.co.nz

[10] Page 2-8 of the Stantec Memo (Attachment 3).

Attachment 1: Proposed Changes to the District Plan (further amendments)

Maps

- Change the zoning of the Site from Rural Lifestyle Zone to General Residential Zone in the area outlined below.

Development Area

- Insert new section titled: 'DEV3 - Ratanui Development Area', with text as <u>underlined</u> below.

<u>DEV3 - Ratanui Development Area</u>

<u>Introduction</u>

The Development Area provides for either a retirement village or residential development at the Site identified in DEV3- Figure 1: Ratanui Development Area Structure Plan.

This Section contains policies, rules and standards relating specifically to the Ratanui Development Area. The provisions ~~rules~~ in this chapter apply in addition to the underlying General Residential Zone provisions ~~rules and standards~~, and the provisions ~~rules and standards~~ contained in the Part 2: District-Wide Matters chapters.

DEV3-P1	**Retirement Villages**

Enable retirement villages in DEV3 – Ratanui Development Area where~~:~~ ~~T~~the development is generally consistent with DEV3- Figure 1: Ratanui Development Area Structure Plan including:

1. providing site access via a T-intersection with a right turn bay in the area indicated in the Structure Plan;
2. creating a flood storage area in the general area indicated in the DEV3- Figure 1: Ratanui Development Area that provides for compensatory flood storage for events up to a 1% AEP event (including allowing for sea level rise and increased rainfall intensity) to mitigate the impacts of the development from removing existing floodplain storage on the Site;
3. creating ~~a~~ large-centralised ~~restoration~~ wetland areas in locations ~~the general area~~ indicated in the DEV3- Figure 1: Ratanui Development Area Structure Plan to provide for stormwater management and for offsetting any loss of wetland habitat on the site ~~to ensure a net positive environmental gain~~. The wetland areas will:
    a. provide flood storage for events up to a 1% AEP event (including allowing for sea level rise and increased rainfall intensity) to mitigate the stormwater impacts of the development on the downstream catchment;
    b. provide stormwater treatment outcomes in accordance with Council's Land Development Minimum Requirements 2022;
    c. provide for the offsetting of wetland loss elsewhere on the site by creating offset wetlands within the centralised wetland area(s) where:
        i. the primary function of the offset areas is to create natural inland wetlands;
        ii. the secondary function of offset areas is to provide flood storage and stormwater treatment functions;
        iii. the offset areas are established and managed to ensure a net positive environmental gain;

iv. the offset areas within the wetlands are clearly identified in plans and will exclude first flush areas designed to be cleaned out when sediment builds up;

4. ensure that development within the Site occurs in such a way that landscape and visual effects are managed, the development is sensitively integrated into the surrounding landscape, and an attractive and biodiverse planting structure is created for the Site including:

    a. appropriate street tree and amenity planting, including riparian planting along the highly modified stream;

    b. planting species and arrangements reflecting predominantly indigenous species which are typical of the coastal area, as well as appropriate exotic amenity plantings;

    c. boundary planting arrangements on the southern extent of the Site that reflect the more 'wooded' character of the rural residential properties along Ratanui Road;

    d. development platforms that are sensitively and effectively integrated into the existing terrain along the edges of the Site, particularly at the northern and eastern edges (retaining walls will be minimised in favour of natural batters where practicable); and

    e. providing an appropriate landscaped and/or planted buffer in areas indicated in the DEV3- Figure 1: Ratanui Development Area Structure Plan to soften the transition from a residential to rural lifestyle land use;

5. ~~preparation of an Earthworks and Landscape Plan as part of any resource consent for the development of the site;~~

6. ~~designing~~ ensure building foundations are designed to resist liquefaction induced settlement; and

7. ~~providing a minimum setback or other protection or mitigation measures for adjacent property boundaries to avoid increasing the~~ ensure any increase in lateral spread hazard and/or effects to neighbouring properties is avoided, including through providing a minimum setback or other protection or mitigation measures for adjacent property boundaries.

DEV3-P2	**Residential Activities and associated subdivision**
Enable residential activities and associated subdivision in DEV3 – Ratanui Development area where~~:~~ ~~I~~the development is generally consistent with DEV3- Figure 1: Ratanui Development Area Structure Plan including:	

1. providing primary site access via a T-intersection with a right turn bay in the area indicated in the Structure Plan as well as providing additional connectivity to adjacent sites;

2. considering the need for community facilities or reserves within the Site;

3. creating a flood storage area in the general area indicated in the DEV3- Figure 1: Ratanui Development Area that provides for compensatory flood storage for events up to a 1% AEP event (including allowing for sea level rise and increased rainfall intensity) to mitigate the impacts of the development from removing existing floodplain storage on the Site;

4. creating ~~a~~ large-centralised ~~restoration~~ wetland areas in locations ~~the general area~~ indicated in the DEV3- Figure 1: Ratanui Development Area Structure Plan to provide for stormwater management and for offsetting any loss of wetland habitat on the site ~~to ensure a net positive environmental gain~~ The wetland areas will:

    a. provide flood storage for events up to a 1% AEP event (including allowing for sea level rise and increased rainfall intensity) to mitigate the stormwater impacts of the development on the downstream catchment;

    b. provide stormwater treatment outcomes in accordance with Council's Land Development Minimum Requirements 2022;

    c. provide for the offsetting of wetland loss elsewhere on the site by creating offset wetlands within the centralised wetland area(s) where:

        i. the primary function of the offset areas is to create natural inland wetlands;

        ii. the secondary function of offset areas is to provide flood storage and stormwater treatment functions;

        iii. the offset areas are established and managed to ensure a net positive environmental gain;

        iv. the offset areas within the wetland areas are clearly identified in plans and will exclude first flush areas designed to be cleaned out when sediment builds up;

5. providing a Landscape and Earthworks Plan that ensures development within the Site occurs in such a way that landscape and visual effects are managed, the development is sensitively integrated into the surrounding landscape, and an attractive and biodiverse planting structure is created for the Site. This Plan shall include:

    a. appropriate street tree and amenity planting, including riparian planting along the highly modified stream;

b. planting species and arrangements reflecting predominantly indigenous species which are typical of the coastal area, as well as appropriate exotic amenity plantings;

c. boundary planting arrangements on the southern extent of the Site that reflect the more 'wooded' character of the rural residential properties along Ratanui Road;

d. development platforms that are sensitively and effectively integrated into the existing terrain along the edges of the Site, particularly at the northern and eastern edges (retaining walls will be minimised in favour of natural batters where practicable); and

e. providing an appropriate landscaped and/or planted buffer in areas indicated in the DEV3- Figure 1: Ratanui Development Area Structure Plan to soften the transition from a residential to rural lifestyle land use;

~~a. providing an appropriate landscaped buffer in areas indicated in the Structure Plan to soften the transition from a residential to rural lifestyle land use;~~

~~b. preparing an Earthworks and Landscape Plan as part of any resource consent for the development of the site;~~

6. ~~designing~~ ensure building foundations are designed to resist liquefaction induced settlement; and

7. ~~providing a minimum setback or other protection or mitigation measures for adjacent property boundaries to avoid increasing the~~ ensure any increase in lateral spread hazard and/or effects to neighbouring properties is avoided, including through providing a minimum setback or other protection or mitigation measures for adjacent property boundaries.

DEV3-R1	**Retirement Villages within the Ratanui Development Area**	
Controlled Activity	1. Where a Landscape and Earthworks Plan is provided by a suitably qualified and experienced landscape architect addressing the matters listed in DEV3-P1.2. **Note:** for the avoidance of doubt GRZ-R41 does not apply to	**Matters of control** 1. The degree to which the development is in general accordance with DEV3- Figure 1: Ratanui Development Area Structure Plan. 2. The matters in policy DEV3-P1. 3. The matters of discretion in GRZ-R41.

	retirement villages within DEV3 – Ratanui Development Area.	

DEV3-R2	Subdivision within the Ratanui Development Area	
Restricted Discretionary Activity	1. Where a Landscape and Earthworks Plan is provided by a suitably qualified and experienced landscape architect addressing the matters listed in DEV3-P2.2.	**Matters of discretion** 1. The degree to which the development is in general accordance with DEV3- Figure 1: Ratanui Development Area Structure Plan. 2. The matters in policy DEV3-P2.

DEV3-R3	Residential Activities within the Ratanui Development Area where there are four or more residential units per site	
Restricted Discretionary Activity	1. Where a Landscape and Earthworks Plan is provided by a suitably qualified and experienced landscape architect addressing the matters listed in DEV3-P2.2	**Matters of discretion** 1. The degree to which the development is in general accordance with DEV3- Figure 1: Ratanui Development Area Structure Plan. 2. The matters in policy DEV3-P2.

DEV3-R3	Residential Activities within the Ratanui Development Area where there are four or more residential units per site	
Discretionary Activity	1. Where a Landscape and Earthworks Plan is provided by a suitably qualified and experienced landscape architect addressing the matters listed in DEV3-P2.2	**Matters of discretion** 1. The degree to which the development is in general accordance with DEV3- Figure 1: Ratanui Development Area Structure Plan. 2. The matters in policy DEV3-P2.

DEV3-R4	Any activity that is listed as a controlled or restricted discretionary activity that does not comply with one or more of the activity standards
Discretionary Activity	

DEV3- Figure 1: Ratanui Development Area Structure Plan

INCITE
resource and environmental management

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STRUCTURE PLAN LEGEND	
SITE BOUNDARIES	
LANDSCAPE BUFFER	
VEGETATED BUFFER	
EXISTING HIGHLY MODIFIED STREAM	
INDICATIVE ACCESS *	
INDICATIVE PRIVATE DRIVEWAY *	
INDICATIVE EXTENT OF CENTRAL RESTORATION WETLAND AND STORMWATER MANAGEMENT AREA *	
INDICATIVE SIDE BATTERS ALONG HIGHLY MODIFIED STREAM *	
INDICATIVE COMPENSATORY FLOOD STORAGE AREA *	

* FINAL EXTENT OF THESE AREAS TO BE CONFIRMED THROUGH RESOURCE CONSENT PROCESS

1 STRUCTURE PLAN -1
1 : 1500

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Wellington
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Wellington 6140

Auckland
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Boffa Miskell

Memorandum

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Attention:	Hayden Beaton
Company:	Welhom Developments Limited
Date:	13 February 2025
From:	Alexandra Gardiner, Senior Landscape Architect, Boffa Miskell Limited
Message Ref:	Ratanui Road Private Plan Change – Request for Information response
Project No:	BM240785

Introduction

In November 2024, Boffa Miskell Ltd (BML) prepared a Landscape Effects Assessment (LEA) for a proposed private plan change application (Ratanui Road Private Plan Change Request). The plan change application was submitted to Kapiti Coast District Council (KCDC) in November 2024 and has been in a pre-notification further information request and response phase since that time.

As part of this process, the LVEA has been peer reviewed on behalf of KCDC, and matters have been identified which require further information from BML to validate the assessment of effects. The following memorandum provides a response to each of those points raised that are of relevance to the landscape assessment.

Response to LEA Review

The following sets out our response to the comments received following the peer review of the LEA. Four specific matters were identified which required further work or clarification. These are as follows:

Question 4: Please identify where and by what means the natural character of the dunes will be protected from earthworks and integrated with land on neighbouring properties, in order to implement DEV3-P1 (f) and DEV-P2 (h).

Response:

The natural character of the Site, including the dunes which would be impacted by the proposed development, was assessed as being of low value due to the level of modification which has occurred across the Site (see Section 6.1 of the LEA). Therefore, it is not considered that protection of these dunes within the Site area is required.

However, in Section 7 of the LEA a suite of recommendations have been included to seek to ensure that any future development is thoughtfully integrated into the Site. This included the following: *Sensitive earthworks designed to ensure that the development platforms are sensitively and effectively integrated into the existing terrain along the edges of the Site*. These recommendations have now been included in the proposed plan provisions, where appropriate (refer to **Attachment 1** of Incite's response).

Geotechnical investigations have determined that a setback is required from the largest dunes at the northern edge of the Site. The benefit of this required setback, in combination with the landscape buffer as proposed in the Structure Plan, will ensure that there is enough space along the edges of the Site to develop a landscape response which suitably integrates the new development into the surrounding landscape.

It is agreed that there is a need to ensure that ground levels appropriately integrate with surrounding sites and landforms. Changes are therefore recommended to DEV3-P1.c and DEV3-P2.c to ensure: “Retaining walls will be minimised in favour of natural batters where practicable.”

Question 5: In respect to the proposed buffers, please:

a. **provide further details on what is sought to be achieved in respect to landscaping and what is meant by each with respect to heights and types of species envisaged, the intended density of planting and the extent/width of the planted buffer.**
b. **clarify the difference between the two types of buffers (landscaped and vegetated) and their respective mitigation roles.**
c. **clarify why the polices refer to one type of buffer only**
d. **explain the rationale for why landscaped buffers are not proposed along the western boundary of the site which partly sits adjacent to the Rural Lifestyle Zone**

Response:

a. The proposed landscape and vegetated buffers are seeking to visually soften future built form in views from neighbouring rural lifestyle properties and sensitively integrate the proposed residential environment into the wider landscape context. Further requested details regarding the buffer width, height and types of species, and density of planting for each buffer are presented in the answer to point b, below.

b. Two types of buffers have been proposed: a landscaped buffer, and a vegetated buffer. The following outlines the differences between the two:

   The purpose of the ‘landscaped buffer’ is to seek to deliver an appropriate design response to ensure the integration between the new development and adjacent sites/ land use. The landscaped buffer is not necessarily seeking to fully screen or filter views from neighbouring properties/ viewers, but it instead would ensure that future development across the Site is successfully and sensitively integrated into the landscape and wider context. Therefore, the landscaped buffer may not only be implemented through planting, but could be delivered through appropriate fencing treatments, landscape bunds and earthworks design (or a combination of these) to ensure integration with the wider landform etc. The landscaped buffer would be 5m in width to ensure that any boundary treatment would be established effectively and achieve the desired outcome.

   The ‘vegetated buffer’ has been proposed where it has been identified that more substantial filtering of views into the Site is required, due to proximity to neighbouring residential properties where there are currently unobstructed views into the Site. The 5m wide vegetated buffer is primarily proposed in the southern parts of the Site, where a more ‘parkland’ type vegetation cover is characteristic within the landscape (i.e. large areas of bush, dense boundary planting of mixed native and exotic species etc). The vegetated buffer would seek to reflect this existing tree and shrub structure, using a mix of largely native species with varying heights, ranging from shrubs and undergrowth species to trees in the realm of 10 - 20m in height (or greater) at full maturity. Typical species could include:

Botanical Name	**Common Name**
Coprosma repens	Coprosma
Veronica stricta var. stricta	Koromiko/ Hebe stricta
Pittosporum tenuifolium	Kohuhu/ Black Matipo
Cordyline australis	Ti Kouka
Brachyglottis repanda	Rangiora
Griselinia littoralis	Kapuka/ Grisilinia
Myoporum laetum	Ngaio
Sophora microphylla	Kowhai
Melicytus spp	Mahoe
Phormium spp.	flax
Austroderia toetoe	Toetoe

Detailed design through the resource consent process would seek to identify where screening is required (i.e. dense, solid planting) or where a more open filtering of views would be appropriate (i.e. less dense).

c. DEV3-P1 and DEV3-P2 have been updated to reference both buffer types (refer to **Attachment 1** of Incite's response).

d. No buffer is proposed on the western Rural Lifestyle Zone (RLZ) boundary as the majority of this boundary is shared with the owner of 65 Ratanui Road from whom the Requestor is purchasing the land. There is a separate commercial agreement with respect to this landowner. Approval from the owners of 65 Ratanui Road for the zoning and development of the land was given through a commercial agreement to subdivide and sell the land, as such they are not adversely affected. Any boundary treatments will be addressed through this commercial agreement rather than through the Structure Plan.

   There are two other RLZ zoned properties along this boundary at 153 and 155 Mazengarb Road. Both of these properties have existing vegetated screening to the Site, as such no further boundary treatment was considered necessary.

   However, following receipt of this RFI and further discussions with the project team, it is proposed that a vegetated buffer is included along a section of the western boundary (as it borders properties at 153 and 155 Mazengarb Road - see updated Structure Plan attached to Incite's response). This would ensure that the treatment of the interface between the RLZ and the General Residential Zone (GRZ) is integrated appropriately to ensure landscape and visual effects are minimised as far as practicable.

Question 6: Please clarify whether the conclusions in the LA regarding landscape and visual effects have been facilitated by or made with reference to any indicative site layouts.

The LEA was not prepared using an indicative site layout. Instead, it was prepared using conceptual modelling for each of the potential development scenarios, based on a series of assumptions i.e. rural residential development, general residential development, and development of a retirement village and what could be anticipated within each zone.

Landscape and visual effects arising from the detailed and developed design proposal (once prepared) would be assessed at the resource consenting stage.

Question 7: Please provide photographs or visual representations to illustrate views of the site from within the identified private locations.

As the application is for a Private Plan Change, this was not undertaken as part of this exercise. This is due to there being no proposed design or layout for either a retirement village or residential development at this stage – the location, form, bulk, appearance etc of the proposed development is still unknown. The LEA sought to provide an understanding of the effects resulting from the change of land use (i.e rural residential to general residential within an area highlighted by KCDC for future residential growth), rather than responding to a specific change in view. Once a proposed layout is designed, a resource consent application will be made which would contain a greater level of detail and appropriate visual representations to represent the change in views from neighbouring private locations.

Additional photographs of neighbouring properties taken from within the Site area have been appended to this memorandum for further reference.

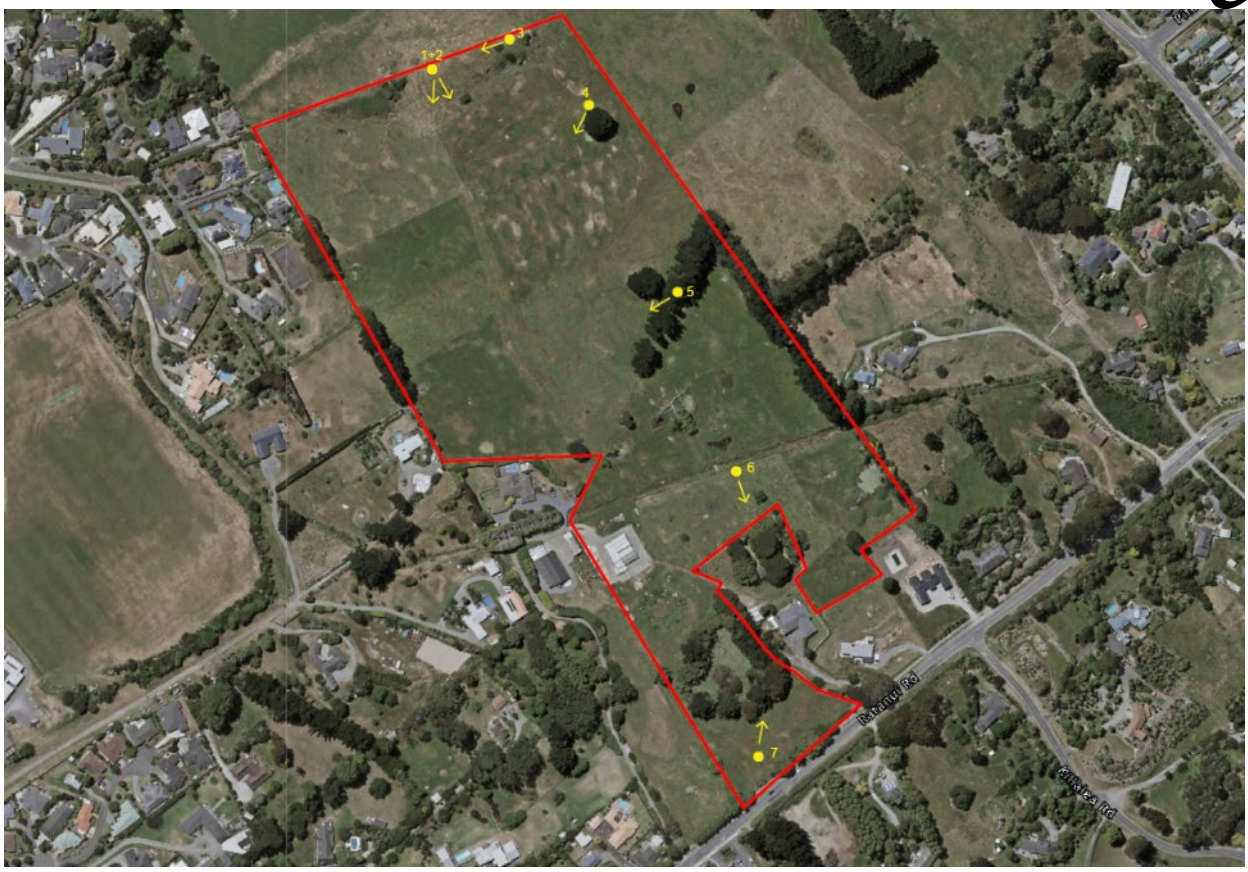

Image 1: *Photograph Locations and Direction of View*

Photograph 1: *View from northern extent of site looking south west towards neighbouring residential properties*

Photograph 2: *View from northern extent of site looking south towards neighbouring residential properties*

Photograph 3: *View from northern extent of site looking west towards neighbouring residential properties*

Photograph 4: *View from north eastern extent of site looking west towards neighbouring residential properties*

Photograph 5: *View from central eastern extent of site looking west towards neighbouring residential properties*

Photograph 6: *View from southern extent of site looking south towards neighbouring residential property*

Photograph 7: *View from southern boundary of site looking north towards neighbouring residential property*

Stantec New Zealand
Level 3, 2 Hazeldean Road
Addington, Christchurch 8024
NEW ZEALAND
Mail to: PO Box 13052, Christchurch 8140

10 February 2025

Project/File: 310205437

Hayden Beaton
Welhom Developments Limited

Dear Hayden,

Reference: KCDC Request for Further Information - Transport Responses

The following transport-related requests have been received from KCDC in relation to the proposed rezoning by Welhom Developments Limited at 65 and 73 Ratanui Road.

Traffic and transport

9. Please provide:
   a. Sidra assessments for the Mazengarb Road/ Ratanui Road intersection (roundabout) to ensure sufficient capacity at the intersection.
   b. Sidra assessments for the Otaihanga Road/ Ratanui Road intersection (tee intersection) to ensure sufficient capacity at the intersection.

   c. An updated ITA to include an assessment of the proposed intersection onto Ratanui Road against the provisions of the District Plan. For example, sightlines and intersection separation.
   d. Speed surveys to confirm the assumed 50km/h speeds along Ratanui Road.

Reason
The information is required to demonstrate the assumptions made in the ITA and request and so that a full assessment of the potential effects can be undertaken.

The following responses are provided.

Request 9.a. Mazengarb Road / Ratanui Road Intersection

KCDC has provided November 2023 traffic counts for Mazengarb Road, north and south of the roundabout, and Ratanui Road, east of the roundabout. The evening peak hour (4:00pm-5:00pm) is busier in terms of the total number of vehicles on the three approaches than the morning peak hour (8:00am-9:00am), and is therefore the period adopted for the analysis requested.

The following PM peak traffic flow information has been extracted from the counts provided by KCDC:

- Ratanui Road, 289vph westbound, 339vph eastbound
- Mazengarb Road (South), 525vph northbound, 369vph southbound
- Mazengarb Road (North), 353vph southbound, 449vph northbound

Reference: KCDC Request for Further Information - Transport Responses

Turning movements at the intersection have been estimated, with approach and departure lane volumes matching those recorded. All traffic volumes have then been increased by 30% to allow for possible future growth, consistent with the analysis presented in the ITA. A further 125vph (81vph eastbound and 44vph westbound on Ratanui Road) have been added to allow for traffic generated by a potential residential development of the site (as estimated in the ITA). An intersection traffic model has then been developed using SIDRA, with results as reported below.

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h]	HV] %	Arrival Flows [Total veh/h]	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh]	Dist] m	Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed km/h
South: Mazengarb S															
2	T1	All MCs	479	5.0	479	5.0	0.667	5.5	LOS A	7.1	51.5	0.66	0.56	0.66	44.6
3	R2	All MCs	303	5.0	303	5.0	0.667	8.2	LOS A	7.1	51.5	0.66	0.56	0.66	44.1
Approach			782	5.0	782	5.0	0.667	6.6	LOS A	7.1	51.5	0.66	0.56	0.66	44.4
East: Ratanui															
4	L2	All MCs	291	5.0	291	5.0	0.444	6.5	LOS A	3.3	24.2	0.61	0.62	0.61	44.2
6	R2	All MCs	153	5.0	153	5.0	0.444	8.5	LOS A	3.3	24.2	0.61	0.62	0.61	44.1
Approach			443	5.0	443	5.0	0.444	7.2	LOS A	3.3	24.2	0.61	0.62	0.61	44.1
North: Mazengarb N															
7	L2	All MCs	261	5.0	261	5.0	0.541	7.5	LOS A	4.4	32.4	0.72	0.64	0.73	44.2
8	T1	All MCs	246	5.0	246	5.0	0.541	6.8	LOS A	4.4	32.4	0.72	0.64	0.73	44.6
Approach			507	5.0	507	5.0	0.541	7.2	LOS A	4.4	32.4	0.72	0.64	0.73	44.4
All Vehicles			1733	5.0	1733	5.0	0.667	6.9	LOS A	7.1	51.5	0.66	0.60	0.67	44.3

Figure 1: Mazengarb Road / Ratanui Road Intersection Forecast Future Performance

The above SIDRA output shows that the intersection is forecast to continue to operate efficiently into the future with low delays. This result reflects field observations that show the roundabout has good available capacity.

Request 9.b. Otaihanga Road / Ratanui Road Intersection

At this intersection, the AM peak (8:00am-9:00am) is the critical period for analysis when higher volumes are exiting the minor Otaihanga Road leg.

The following AM peak traffic count information has been provided by KCDC for the eastern and northern sections of Otaihanga Road, for 2024 and 2021 respectively.

- Otaihanga Road (East), 276vph westbound, 277vph eastbound
- Otaihanga Road (North), 117vph southbound, 50vph northbound

Turning movements at the intersection have been estimated based on an approximately two thirds / one third split favouring travel to and from the west, and again approach and departure lane volumes match those recorded. All traffic volumes have been increased by 30% to allow for future growth, consistent with the analysis presented in the ITA, and a further 55vph (41vph eastbound and 14vph westbound) have been added to allow for traffic generated by a potential residential development of the site.

For the SIDRA model developed in this instance, standard gap acceptance parameters have been adopted, as for the modelling reported for the site access in the ITA. SIDRA outputs for the future

Reference: KCDC Request for Further Information - Transport Responses

scenarios without development of the site and with a residential development of the site are presented below. The change in performance of the intersection as a result of the extra traffic is negligible. Overall, the intersection is forecast to continue to operate efficiently into the future with good levels of service, with little forecast impact by the traffic additions of the development options. Again, this result reflects field observations that show the intersection operates well with good available capacity for turning traffic.

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h	HV] %	Arrival Flows [Total veh/h	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh	Dist] m	Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed km/h
East: Otaihanga E															
5	T1	All MCs	356	5.0	356	5.0	0.188	0.0	LOS A	0.0	0.0	0.00	0.00	0.00	59.9
6	R2	All MCs	27	3.0	27	3.0	0.028	7.0	LOS A	0.1	0.7	0.40	0.62	0.40	48.0
Approach			383	4.9	383	4.9	0.188	0.5	NA	0.1	0.7	0.03	0.04	0.03	58.9
North: Otaihanga N															
7	L2	All MCs	55	3.0	55	3.0	0.343	7.9	LOS A	1.6	11.3	0.65	0.88	0.82	44.5
9	R2	All MCs	109	3.0	109	3.0	0.343	14.5	LOS B	1.6	11.3	0.65	0.88	0.82	44.4
Approach			164	3.0	164	3.0	0.343	12.3	LOS B	1.6	11.3	0.65	0.88	0.82	44.4
West: Ratanui															
10	L2	All MCs	55	3.0	55	3.0	0.048	5.8	LOS A	0.2	1.2	0.10	0.52	0.10	49.1
11	T1	All MCs	328	5.0	328	5.0	0.174	0.0	LOS A	0.0	0.0	0.00	0.00	0.00	59.9
Approach			383	4.7	383	4.7	0.174	0.9	LOS A	0.2	1.2	0.01	0.07	0.01	58.1
All Vehicles			931	4.5	931	4.5	0.343	2.7	NA	1.6	11.3	0.13	0.20	0.16	55.4

Figure 2: Otaihanga Road / Ratanui Road Intersection Forecast Future Performance without Development of Site

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h	HV] %	Arrival Flows [Total veh/h	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh	Dist] m	Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed km/h
East: Otaihanga E															
5	T1	All MCs	371	5.0	371	5.0	0.196	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	59.9
6	R2	All MCs	27	3.0	27	3.0	0.029	7.2	LOS A	0.1	0.8	0.43	0.64	0.43	47.8
Approach			398	4.9	398	4.9	0.196	0.5	NA	0.1	0.8	0.03	0.04	0.03	58.9
North: Otaihanga N															
7	L2	All MCs	55	3.0	55	3.0	0.375	8.7	LOS A	1.7	12.5	0.68	0.93	0.90	43.8
9	R2	All MCs	109	3.0	109	3.0	0.375	16.1	LOS C	1.7	12.5	0.68	0.93	0.90	43.7
Approach			164	3.0	164	3.0	0.375	13.6	LOS B	1.7	12.5	0.68	0.93	0.90	43.7
West: Ratanui															
10	L2	All MCs	55	3.0	55	3.0	0.048	5.8	LOS A	0.2	1.2	0.10	0.52	0.10	49.1
11	T1	All MCs	372	5.0	372	5.0	0.197	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	59.9
Approach			426	4.7	426	4.7	0.197	0.8	LOS A	0.2	1.2	0.01	0.07	0.01	58.2
All Vehicles			988	4.5	988	4.5	0.375	2.8	NA	1.7	12.5	0.13	0.20	0.17	55.4

Figure 3: Otaihanga Road / Ratanui Road Intersection Forecast Future Performance with Development of Site

Request 9.c. New Intersection on Ratanui Road

The District Plan provides ‘site access’ requirements under TR-R3 and ‘new road’ requirements under TR-R9. We understand that TR-R3 would apply to a new private access onto Ratanui Road, for example a new access serving a retirement village development, while TR-R9 would apply to a new public road, for example a new public road serving a residential development of the site. Further assessment against each is provided below.

TR-R3 Site Access Requirements

The table in Appendix B of the ITA outlined the requirements of TR-R3, with comment on the appropriateness of the rules applying to development of the site. It was concluded that all aspects of TR-R3 could be satisfied at the consent stage. To provide further assessment as requested, the table below provides comment against each aspect of TR-R3 and likely compliance of a retirement village access.

Requirement	Comment on Likely Compliance
TR-R3 Site access and loading 1. Access - every site must provide either: a. vehicular access over land or by mutual right of way or service lane for parking and/or loading and shall be in accordance with TR-Diagram – 2 (ground clearance templates);	Vehicle access over land can be provided with appropriate ground clearance ensured.
2. Vehicle access and pedestrian access - all vehicle accesses and pedestrian accesses must be designed, constructed and maintained to ensure that: a. they are able to be used in all weather conditions; b. they have no adverse impact on the roadside drainage system; and c. surface water and detritus (including gravel and silt) does not migrate onto the highway pavement.	These requirements can be met and will be demonstrated by the civil engineers for the resource consent to follow.
3. Vehicle access - all vehicle accesses must meet the following: a. be a minimum of 3.5 metres wide, except for as set out in TR-Table 1. b. be a maximum of 9 metres wide, except in the Beach Residential Zone at Waikanae Beach where the maximum shall be 6.0 metres wide.	Detailed design of the vehicle access has not yet been advanced. A retirement village access could have a width of between 8m and 10m at the road boundary. Any assessment of effects from a marginal width above 9m would be provided with the consent application.

4. Vehicle access- sites containing non-residential activities and which provide more than six car parks, shall provide two-way vehicle accesses which must be a minimum of 6m wide.	Detailed design of the vehicle access has not been advanced. A retirement village access would allow for two-way vehicle movement.
7. Vehicle access spacing- Where a site is located near an intersection having volumes less than 1,000 vehicles in any peak hour; the minimum distance between the crossing point and the roadway edge or kerb line must be: a. 9m measured from the intersecting point of the kerb lines or road edge lines or 4.5m from the tangent point of the kerb lines or road edge whichever is greater; and b. 12m where a Stop or Give Way control exists on the roadway measured from the intersecting point of the kerb lines or road edge lines.	The proposed access location is onto Ratanui Road approximately 150m from the nearest intersection of Killalea Place
8. Vehicle Access spacing for major traffic activities - no crossing point must be located closer to any intersection than the distance specified in TR-Table 2 - Access Distance Dimensions. Distances are measured in metres (m) to the intersecting kerb line. -Vehicle access on a Local Community Connector to be at least 15m from a Local Community Connector or Neighbourhood Access intersection	The proposed access location onto Ratanui Road is approximately 150m from Killalea Place
9. Vehicle access sight distances - the required minimum sight distance between the vehicle access and the road must be in accordance with TR-Diagram - 3 and TR-Table 3 - Sight Distance Dimensions - Table 3: Minimum sight distance for private access on 'other roads' with 60 km/h speed limit: 60m.	Sightlines in excess of 200m are available on Ratanui Road given its straight and flat alignment.
12. Manoeuvring a. Private residential access - unless the driveway accesses directly from a Neighbourhood Access Route, sufficient	The two-way formation of the retirement village access and inset position of a gate will be such that

manoeuvring space must be provided on-site to ensure no reversing onto the road is necessary. b. Commercial properties- must ensure that all buildings and parking areas are designed so that sufficient manoeuvring space is provided on-site to ensure no reversing onto the road is necessary.	no reversing would be needed to or from Ratanui Road.

TR-R9 New Roads

As shown by the extract below from the District Plan, new roads serving residential subdivisions have a Controlled Activity status. Comment on the 'Matters of Control' relating to intersection location and design is provided below.

TR-R9	New *roads* including where they are to serve a *subdivision* (including *boundary adjustments*).	**Amended** 01 Sep 23 PC2
Controlled Activity	**Standards** 1. All *roads* in the *Centres Zones* must have foot paths on both sides of the *road carriageway*. 2. Cycle paths must be provided either as on-street cycle lanes, off-street shared paths or off-street dedicated cycle paths.	**Matters of Control** 1. The route of the *road*. 2. The design and construction of the *road*, including safety, traffic engineering, *landscaping* and *noise* mitigation measures. 3. The degree of consistency with the *Transport Network Hierarchy*. 4. The imposition of *financial contributions* in accordance with the FC - Financial Contributions chapter. 5. The provision of grassed swales to direct *road*-run-off (instead of concrete kerb and channel) in *Residential Zone* areas, where grassed swales would be in keeping with the surrounding *environment* and functional. 6. The provision of footpaths in *Residential Zone* areas, where footpaths are not part of the surrounding *environment*. 7. The degree of consistency with: a. *Council's Land Development Minimum Requirements*; b. *Council's* Best Practice and Subdivision Guide; c. NZS4404.2010 Land Development and Subdivision Infrastructure; d. AUSTROADS Guide to Traffic Engineering Practice Part 14 Bicycles and Part 6A Guide to Road Design -Pedestrian and Cycle Paths; and e. **New Zealand Transport Agency** Cycle Network & Route Planning Guide 2004.

Matter of Control 2 is a broad matter which would cover any matters relating to the safety of a new intersection on Ratanui Road.

Relating to visibility at the intersection, the Austroads 'safe intersection sight distance' recommendation for a 60km/h design speed is 123m. The available sightlines in the location of the proposed access are in excess of 200m in each direction, ensuring that drivers will be able to judge gaps in passing traffic streams and turn to and from the site safely.

Relating to intersection separation, there is approximately 150m from the proposed access location to Killalea Place. 150m represents approximately 9 seconds of travel time at 60km/h, which is more than sufficient to ensure turning movements are well separated and there is no driver confusion. A right turn bay at the proposed access location will end well before Killalea Place, as demonstrated in Figure 9-1 of the ITA, ensuring there is no impact on the Killalea Place intersection. The 150m separation between two local roads meeting a collector-type road is considered entirely appropriate in an urban setting.

In the KCDC Land Development Minimum Requirements, the following extract from *Schedule 3 Altered requirements to Section 3 NZS4404:2010 Roads*, is relevant. An intersection formation would be expected to serve a residential development of the site, as intended by this provision.

Reference: KCDC Request for Further Information - Transport Responses

(vi) Any developments over 10 dwellings must have the vehicle access designed as an intersection, and not a driveway, unless otherwise approved by Council.

NZS4404 standards for intersections are copied below.

3.3.7 Intersection and alignment design

The angle of intersection should be 90º, although a minimum angle of 70º can be used when justified by other constraints. Carriageway alignment may be offset within the street reserve to achieve the required target operating speed for the road.

All road intersections in 'live and play' areas below arterial class should have a kerb radius at intersections of 4 m to 6 m. An alternative and reduced kerb radius may be considered to enhance pedestrian facility in low speed environments, and shall be subject to the approval of the TA.

All intersections in 'make and grow' areas should have a minimum kerb radius of 13.5 m with corner splays of 6 m, or subject to specific design.

Intersections in all other 50 km/h or lower speed environments shall have the lot corners splayed by a minimum of 4 m along both boundaries, although these may be dispensed with in low target operating speed situations provided that there is adequate provision for pedestrians and utility services. Corner boundary splays shall be subject to specific design in higher speed environments, to ensure safe visibility at intersections.

Reference can also be made to Austroads guides.

Intersections between connector/collector roads or intersections of connector/collector roads with arterials shall be a minimum distance of 150 m apart, centre line to centre line.

An intersection angle of 90 degrees will be achievable. Kerb radii will be a matter for the engineering design stage. Boundary splays would be a matter for the subdivision consent stage. There is a reference to Austroads guides, which have been referred to for the sightline assessment above. There is a 150m minimum distance requirement for intersections between connector / collector roads. We understand that this would not strictly apply to the local road intersections along Ratanui Road, although it supports our assessment that the 150m separation achieved to Killalea Place is appropriate.

These and any other relevant matters relating to the safety of a new intersection in the proposed location will be further assessed at the subsequent consent and design stages.

Request 9.d. Ratanui Road Vehicle Speeds

The feasibility concept design presented in Figure 9-1 of the ITA retains the existing alignment of the westbound traffic lane. The eastbound lane diverges around the right turn bay. A 70m taper length is indicated, which is based on a 50km/h design speed.

The design parameters, including vehicle speeds on Ratanui Road, will be further reviewed at consent stage. If a 60km/h design speed is shown to be appropriate, an 80m taper length would be required. The figure below shows indicatively an 80m diverge taper. The start of this taper extends across the preschool entry driveway but not to an extent that would impact its operation. Likewise, the taper would start after the preschool exit driveway, so it would also not impact its operation.

Reference: **KCDC Request for Further Information - Transport Responses**

Figure 4: Indicative Taper for 60km/h Design Speed (Orange)

If required, the 70m taper can be further considered through future design refinement, and the above shows that there will be an ability to lengthen it if appropriate based on available speed data at the time.

Also related to vehicle speeds, we reiterate that excellent sightlines will be available, well in excess of Austroads safe intersection sight distance recommendations for a 60km/h design speed.

In summarising the above information, we conclude that:

- the Mazengarb Road / Ratanui Road intersection will continue to operate efficiently with traffic additions from development of the rezoned Site;
- the Otaihanga Road / Ratanui Road intersection will continue to operate well, with good available capacity for turning traffic;
- the proposed new access to the Site on Ratanui Road can be located and designed to meet District Plan expectations, and any non-compliances will be minor and assessed at the time of resource consent; and
- vehicle speeds on Ratanui Road will be confirmed at the time of resource consent, and the access designed developed to suit the speed environment.

We trust that our responses are clear but would be happy to discuss further if necessary.

Yours sincerely

Stantec New Zealand

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Mark Georgeson
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