

27 July 2021

Kapiti Retail Holdings Limited  
C/- Forme Planning Limited  
PO Box 24463  
Royal Oak  
Auckland 1345

By email to: [kay@formeplanning.co.nz](mailto:kay@formeplanning.co.nz)

Dear Kay Panther Knight

### **Further Information Request – Resource Consent Application**

Application number(s):	210151
Applicant:	Kapiti Retail Holdings Limited
Location:	160 Kapiti Road, Paraparaumu
Proposed activity(s):	Undertake earthworks that do not meet the permitted activity standards for the construction and operation of a retail activities within the Industrial/Service Zone that does not meet the permitted activity standards for vehicle movements, signs, access design and landscaping

Further to my letter of 12 July 2021, I have now reviewed your application and inspected the site.

The following further information is needed to help me better understand your proposal, including its effect on the environment and the ways any adverse effects might be mitigated.

### **Requested information**

#### *Resource Management*

1. Can the easement for stormwater drainage please be shown on the site plan? If car parking is located in this area, please undertake consultation with Council's Stormwater Team to ensure that this part of the easement can be used for car parking and provide a record of this consultation.
2. As the application involves earthworks, it was circulated to local iwi Ātiawa ki Whakarongotai Charitable Trust (the Trust) for comment. A copy of the response received has been provided to you. The Trust has raised concerns with the proposed works and

requires additional information to form a position on the application. Can the information outlined in the memo please be provided for Council to provide the Trust; or, alternatively consultation be undertaken between the Applicant and the Trust and a response provided to Council.

### *Roading*

3. Why have the growth rates identified in the report been used for the assessment rather than the 2026 SATURN model? It is understood that the growth rate proposed in the assessment is based on the 2018 and 2020 date, but this is just on some links. These growth rates (1.4%) seem very low and are generally not expected from background growth.
4. Related to the above the SATURN model also does not take account of the level of growth proposed in the Wellington Regional Growth Framework. The Kapiti District is expecting significantly more growth than has previously been anticipated, which could make capacity on Kapiti Road even more problematic. Therefore, please confirm what other development assumptions have been made in the SIDRA model for the future year forecast.
5. Please confirm how the SIDRA model addresses cumulative effects? This includes not only consented but as yet undeveloped sites at Kapiti Landing.
6. Please confirm what assumptions, if any, have been made in the SIDRA model with regards to mode shift? Just based on traffic flows. Committed development, east west connector etc.
7. We are concerned about the level of service F on the Friendship Place roundabout and it would be good to see the output showing what mitigation has on level of service. Please can this be provided? The Transport Assessment refers to mitigation making matters better, but by how much? The level of service should be C and 14% increase on this roundabout is attributed to this proposal (400 to 430 in the peak hour).
8. We currently experience queues back to Langdale Avenue in the eastbound direction which don't appear to have been identified in the SIDRA modelling, please provide more information in this regard.
9. It is unclear why the assumed traffic distribution is 16.6% onto Langdale Avenue and around 1.5% on Expressway South, 31% west on Kapiti Road (with way fewer east), and 15% to Kapiti Landing? Can you provide more detail on how this distribution has been derived?

We are unclear on whether this is a high level of calibration in the model, and the way it has attributed queue lengths may impact on intersection operation/level of service. Are you able to send us a copy of your survey data which has the queue length data?

10. Please identify construction traffic numbers as, whilst this is identified as being in the Construction Management Plan, it is unclear if these would breach the permitted activity standards in the District Plan and if so by how much.
11. Please advise why are different rates from different Countdown Supermarkets around New Zealand used for various purposes throughout the assessment? It would be better to provide trip generation rates for a few comparable sites. We're familiar with the Tawa Countdown but not others. The context of the other sites and trip rates needs to be explained further. As an example of the assessment using sites that may not be comparable to the proposed development, it appears as though the Hawera site is a town centre site with the car park likely to be shared/used by shoppers making combined trips (like our Waikanae countdown). NZTA Research Report 453 is indicating a rate of 16.3

and the NZTA Planning Policy Manual app 5b 17.8; so, we would need further justification for the rates of 10.6 and 9.4.

12. Can more detailed information on how you have derived the reductions to trip rates to accommodate linked trips, public transport, walking/cycling and 30% passer-by trips please be provided? For example, evidence from other stores, research documents etc.
13. Has the SIDRA model taken into account the effects of platooning on the roundabout from the downstream lights?
14. Please provide details/designs for the roundabout improvements, site frontage works – central median, pedestrian crossing and bus stops.
15. Please identify how rat running through the adjacent car park areas (west of the site) will be discouraged?
16. Please confirm if the vehicle movements and parking demand includes the trade element of the store.

#### *Open Space/Biodiversity*

17. There are two existing Pohutukawa trees on Kapiti Road which are affected by the new driveway proposal. These are established trees which form part of a wider collection of Pohutukawa of consistent height and form along Kapiti Road. They are a Council owned asset which will require approval to modify. To support this we require an assessment of the trees is provided by a suitably qualified arboricultural consultant to:
  - a) provide a financial estimate of value for these trees for which compensation may be sought if removed.
  - b) provide an assessment of feasibility, methodology and cost for the trees to be relocated within the public road frontage in line with the landscape concept plan at the applicants cost.

#### *Development Control*

18. With the increase in use of the site, Council requires individual water connections for each tenancy. Can the infrastructure plan please be updated to show individual water connections for the three tenancies proposed under this consent?

#### **Providing the information**

Please provide this information in writing within 15 working days<sup>1</sup> 17 August 2021. If you will not be able to provide the information by that date, please contact me before then to arrange an alternative timeframe. We will not work on your application any further until either you provide this information, or you state that you refuse to provide it.

#### **Refusing to provide the information**

If you refuse to provide the information, or if you do not submit the information to us within 15 days (or by another other agreed timeframe), the RMA requires that we publicly notify your application.<sup>2</sup>

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<sup>1</sup> Section 92A(1) of the RMA

<sup>2</sup> Section 95C of the RMA

**Next steps**

Once you have provided the requested information, I will review what you have provided to make sure it adequately addresses all of the points of this request.

In my previous letter I described the statutory timeframe for our decision on your application, which counts (and sets limits) on the number of days we can work on consent applications.

The time for you to respond to this letter will be excluded from the timeframe<sup>3</sup>, and the original forecast date for our decision may now be later than I previously advised.

I will be able to give you an updated forecast on a date for this once you have provided the information requested above, or we have discussed the application again.

If you are not sure how to respond or have any questions, please contact me on 027 326 5344 or email me at [marnie@incite.co.nz](mailto:marnie@incite.co.nz) and quote the application number.

Yours sincerely



Marnie Rydon  
**Consultant Planner**

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