

16 August 2018

Foodstuffs North Island Limited

C/- Barker & Associates
PO Box 1986
Shortland Street
Auckland 1140

Attn: Mary Wong
Your Ref: 14142A

Dear Sir/Madam

Resource Consent Application – Further information request

Application number(s): 010.2018.00009962.001
Applicant: Foodstuffs North Island Limited
Address: 980 Te Rapa Road Pukete 3200
Proposed activity(s): Supermarket and fuel facilities

In accordance with section 92 of the Resource Management Act 1991 (RMA), the following information is requested to enable me to make an accurate and informed assessment.

The following information is requested:

Centres Assessment

1. *Please provide additional commentary on the implications of locating the proposed supermarket in the Industrial Zone adjacent to The Base, which effectively increases the size of this retail node within Te Rapa.*

This would effectively enable the equivalent land area within the Business 3 Sub-Regional Centre Zone (2ha) to instead be used for other retail purposes (rather than the proposed supermarket). It is important to understand the effects of the expansion of the size of this retail node on the City Centre (and other centres) and how this effect is considered against the objectives of the Plan to re-establish the primacy of the City Centre.

2. *The Property Economics Limited (PEL) report suggests the proposed supermarket would attract additional expenditure beyond the households within its' core catchment area. This would occur through multi-purpose shopping trips where consumers visit the supermarket because they are already travelling to other retail within Te Rapa. The proposed supermarket core catchment is established within the PEL report on the basis of other Pak N Save supermarket locations.*

Please clarify whether the total retail catchment area of Te Rapa extends beyond the proposed supermarkets core catchment area, and what impact this would have in terms of:

- a. expenditure within the catchment area; and
 - b. any redirection of spending flows from other centres.
3. Please provide an updated assessment that reflects The Base sub regional centre which has a wider catchment than the proposed supermarket core catchment area, and if the sub regional centre catchment were used instead what impact would this have in regard to points 2a. and 2b. above.
4. Please provide additional discussion on the spatial distribution of household (and consequential supermarket expenditure) growth within the core catchment area. This is important to assess the efficiency of the proposed supermarket location in meeting demand growth arising from the catchment area.
5. Please provide additional clarity to understand why the figures presented within the PEL report imply that the level of supermarket demand per household is lower within the core catchment area versus the Hamilton City average.

This appears to be inconsistent with the demographic profiling in Appendix 2 of the PEL report and other statements within the report that suggest the spending per household would be higher.

6. Tables 1 and 2 within the PEL report imply a supermarket floorspace productivity of \$8,760 per m² of floorspace. This is a core figure as it translates supermarket expenditure demand into sustainable floorspace. Please provide additional clarity on the following:
 - a. how this floorspace productivity figure has been derived;
 - b. how this figure fits within the broader New Zealand supermarket context of floorspace productivity;
 - c. why it differs to the Hamilton City average supermarket floorspace productivity of around \$14,000 per m² as implied by the PEL report¹;
 - d. how the calculations of overall sustainable floorspace (current and future) would be affected if a different rate were used; and
 - e. how the modelled redirection of spending flows would be affected if a different floorspace productivity were used (as a result of any consequential change in assumed sales).
7. Tables 1 and 2 within the PEL report imply that the same supermarket floorspace productivity has been used across the 20-year projection period. As the level of sustainable floorspace is sensitive to any changes in this figure, it is therefore important to understand:
 - a. why there has been no increase applied to floorspace productivity through time;
 - b. how the calculations of future sustainable floorspace would be affected if the rate of floorspace productivity were to change through time; and

¹ If the formula in footnote 5 of the PEL report is applied to the figures in Table 2 of the report, then there is an estimated \$713m of sales at Hamilton Supermarkets ($\geq 1,000\text{m}^2$). These supermarkets amount to approximately 51,000m² of floorspace (as outlined in Figure 1). The combination of these figures implies a Hamilton City average supermarket floorspace productivity of \$14,000 per m² of floorspace.

- c. *how the modelled redirection of spending flows would be affected if a different floorspace productivity were used (through any consequential change to future sales).*
8. *The PEL analysis assumes that Te Rapa's share of Hamilton's food and grocery spend will increase from 15% to 18% - i.e. a 20% increase in sales – which is required for the proposed supermarket to be currently sustainable at this location. Please provide clear rationale to support this assumption of how an increase in sales has been arrived at.*
 9. *The PEL analysis has assumed that the proposed supermarkets' location is the most efficient location to meet demand arising across the core catchment area. Please confirm whether this location has been assessed as to its efficiency in meeting demand relative to other locations, such as a number of smaller supermarkets establishing within the Hamilton urban area to serve parts of this catchment demand.*
 10. *The PEL report applies a single projection for the catchment and does not examine the implications of different patterns of household growth – for example, where the northern urban settlements may attract higher shares of total sub-regional growth as a consequence of changes in the transport infrastructure connections around the upper Hamilton/Waikato area. Please provide an updated assessment that considers the implications of different patterns of growth.*
 11. *The PEL report concludes, using the figures currently presented, that the proposed supermarket will not undermine the objectives of the Plan on the basis of the scale of the effects on other centres. Please provide an updated assessment that also considers the direction of the effects in relation to the objectives and policies of the Plan.*

Urban form develops incrementally and cumulatively through time as the combination of many land use decisions, which become significant in aggregate. It is therefore critical to understand whether the proposed supermarket is likely to contribute to a land use pattern that is consistent with achieving the objectives and policies of the Plan or otherwise.

12. *The PEL report has assessed the demand and supply of industrial land in aggregate at the Hamilton City and wider Future Proof Area level. It is important to also consider:*
 - a. *the spatial distribution of demand and supply to identify any shortages that may occur at the sub-city level across the main broad industrial land areas within Hamilton City.*
 - b. *the level and timing of infrastructure servicing on industrial land in the north of Hamilton City.*
13. *Please provide an updated Centre Assessment Report that accurately considers the points raised above (1 – 12), to allow for a full effects assessment to occur and a greater appreciation of the potential effects associated with the proposal.*

Planning

14. *Please confirm whether the proposed pedestrian canopy is setback from all boundaries and provide an updated assessment to address any non-compliances where relevant.*

15. *Please confirm the total GFA of the proposed 'accessory office' and the number of staff this office is intended to service. The Industrial Zone provides for ancillary offices as a permitted activity subject to standards and a wider appreciation of the size and likely staffing associated with this ancillary office is required.*
16. *Please confirm whether the fuel canopy is compliant with the relevant building setbacks from Eagle Way and Maui Street, and provide an updated assessment to address any non-compliances where relevant.*
17. *The application outlines various proposed signage. Additional clarity is required to understand the location of any proposed signage. Please clearly outline the location of any electronic signage, painted signage, free standing signage or other to determine compliance with the relevant standards in City-Wide Chapter 25.10 Signs.*
18. *Please provide a landscaping plan that appropriately considers the rules within City Wide Chapter 25.5 Landscaping and Screening. Any landscaping plan should include species, plant and mature heights, number of species and type of specimen trees and pedestrian connectivity to assist in making an overall assessment of the proposed landscaping and screening in this location.*
19. *Please confirm the permeable surfaces proposed within the 'Site Plan' align with the Operative District Plan (ODP) definition of Permeable Surfaces. Permeable surfaces are important for contributing to onsite and offsite amenity and stormwater management. The Water Impact Assessment outlines references to swales within the car parking area, and confirmation is required to ensure all areas identified as permeable, meet the definition of the ODP.*
20. *Please confirm the total number of staff to be employed onsite, whether onsite carparking is provided to staff and whether there is a charge for this parking.*
21. *Please confirm the hours of operation proposed for the supermarket activity.*
22. *In response to points 1 – 13 outlined above, please provide additional rationale to support the applications S95 conclusions in relation to the submitted CAR assessment. The Rototuna and Nawton Centres are referred to and greater clarity is required to understand the role of the proposed supermarket in avoiding any adverse effects and how this has been quantified.*
23. *The ITA includes consideration, and it appears reliance, on the inclusion of a Special Housing Area (SHA) over a portion of the neighbouring site off Kawera Place. No SHA has been gazetted for this site, nor has any subsequent qualifying development consent application been lodged, therefore no weighting can be given to any potential future land use. Please ensure any updated assessments do not rely upon this potential future land use as a mitigating factor.*
24. *Please provide an additional assessment against Policy 9.2.2bi which seeks demonstration that suitable land is not available within the business centres; and the potential adverse*

effects on the primary, function, vitality, and amenity of the centres within the business hierarchy are avoided.

- 25. Please provide additional clarity as to the alternative options that were considered prior to settling on the current location. Please confirm whether any consideration was given to land within The Base sub regional centre for the proposed supermarket. A key part of Assessment Criterion H2d) includes whether suitable land is available within the proposed catchment.*
- 26. Please provide an assessment against the relevant objectives and policies for City-Wide Chapter 25.5 Landscaping and Screening.*
- 27. Please provide an assessment against the relevant objectives and policies for City-Wide Chapter 25.13 Three Waters.*
- 28. Please provide an updated assessment against the relevant objectives and policies for City-Wide Chapter 25.14 Transportation that accurately reflects the matters raised in the below transportation section, including Policy 25.14.2.1a land use integration.*
- 29. Please provide a full assessment against all relevant assessment criteria in Volume 2 Appendix 1.3.3. A full assessment is required to fully consider the application against the relevant assessment criteria in the Plan.*
- 30. Please provide an updated visual perspective that is inclusive of all proposed signage, landscaping and is inclusive of the proposed fuelling facility.*
- 31. Please provide a cross section of the proposed pedestrian access to the site and how this is being appropriately designed to avoid any potential conflicts with vehicles.*
- 32. Please provide additional clarity on the proposed fencing of the service area, including materials and how this is viewed from Maui Street and the relationship with the adjoining pedestrian connection from Maui Street.*
- 33. Please clarify the location of trolley parks on the Site Plan.*

Noise

- 34. No specific assessment has been provided against City-Wide Chapter 25.8 Noise and Vibration. Please provide additional commentary to satisfy compliance with these standards, this does not necessarily mean an acoustic assessment provided by a SQEP, but at least an assessment that hopefully provides adequate assurance that the applicable noise-related rules will be met.*

Engineering

Geotechnical

- 35. Please provide an updated Geotechnical Report that considers the following:
 - a) proposed earthworks, particularly cut and fill on the site, where the report makes reference to the detailed earthworks not being known at the time of report development (but is now known).**

- b) *whether the proposed development will incorporate any swales that could have the potential to create a free face leading to a lateral spreading risk and any proposed mitigation.*
- c) *whether any non-engineered fill is proposed, and the type of fill for the proposed building foundations.*
- d) *further assessment to determine how much settlement is expected in the location of the stormwater main that is to be retained in its current location and what deflections the asset can tolerate.*
- e) *please provide additional clarity to the comment in section 8.9 Foundations that the existing services are removed and relocated due to the risk of ground settlement under ultimate limit state loading.*

It is noted that the updated site subsoil to Class D in the Babbage classification will have ramifications for the structural engineers. Also based on the liquefaction assessment in the Babbage Report, foundations are recommended to be designed in accordance with liquefiable soils.

Transportation

General

- 36. *Please confirm the lapse date of the existing consented baseline referred to and relied upon within the submitted Broad Integrated Traffic Assessment, and how this is not considered to be fanciful in relation to giving effect to the land use consents prior to the lapse date.*
- 37. *Please provide a clear comparison of the traffic levels provided for by the Operative District Plan Industrial Zone, the consented baseline referred to in point 36 above, and the proposed traffic levels of the Pak'nSave supermarket and fuel facilities.*
- 38. *The modelling provided with the submitted ITA only considers 2021, a Broad Integrated Transport Assessment (ITA) is required to consider a 20-year assessment period, i.e. modelling is required at approximately 2038 (the nearest WRTM model year is 2041). Council understands that there are no future years available in the VISSM model, but it will be possible for the applicant to test the affected intersections and site accesses with Sidra modelling by applying a percentage increase to passing traffic to allow for growth. Traffic volumes extracted from the WRTM indicate the traffic increases by 10-20%. Please provide modelling and assessment of transport effects that considers a 20-year assessment period. This could be based on sensitivity testing of Sidra modelling at the affected intersections and site accesses.*

Te Rapa Road/ The Base Parade/ Eagle Way intersection

- 39. *Modelling provided for the Te Rapa Road/ The Base Parade/ Eagle Way intersection indicates increased delay and queue lengths of 81m (average) and 308m (maximum) on Te Rapa Road (South). Please provide an assessment of the potential impact on the mid-block left-turn entry to The Base and identify any mitigation necessary to address these effects.*
- 40. *Modelling provided for the Te Rapa Road/ The Base Parade/ Eagle Way intersection indicates increased delay for the left-turns out of The Base Parade. Please provide options to mitigate*

the increase in delay for the left-turns out of The Base Parade which are not currently addressed by the proposal.

Karewa Place/ Eagle Way/ Maui Street intersection

- 41. Future signalisation of the Eagle Way/ Karewa Place / Maui Street intersection may affect timing at Te Rapa Road/The Base Parade/ Eagle Way intersection. Please provide the proposed traffic signal phasing for Karewa Place/ Eagle Way/ Maui St intersection, including how it will be coordinated with the adjacent signalised intersection.*
- 42. The 20-year assessment period requested above will have an effect on Karewa Place/ Eagle Way/ Maui Street intersection in terms of signalisation. Council understand that an assessment for Karewa Place/ Eagle Way/ Maui Street intersection will be provided as requested above. Please provide greater clarity around the timing of signalisation of the Kawera Place / Eagle Way / Maui Street intersection.*
- 43. Please confirm whether a flush median or solid median will be provided on Eagle Way from the vehicle access for the site towards the Karewa Place/ Eagle Way/ Maui St intersection. Council's preference is for a solid median as it helps control right turns in and out of the Eagle Way access to the site.*
- 44. Additional clarity is required to illustrate the impact of the additional development traffic at the Karewa Place/ Eagle Way/ Maui Street intersection. Please provide additional Sidra modelling and assessment of efficiency effects at the Karewa Place/ Eagle Way/ Maui Street intersection for the following scenarios:*
 - baseline scenario that includes full development of the wider Porters site, i.e. makes no reduction for trips associated with the SHA proposal;*
 - 2021 scenario with full development of the wider Porters site plus traffic generated by this proposal; and*
 - 20-year future scenario with full development of the wider Porters site plus traffic generated by this proposal.*
- 45. Please provide an independent preliminary design road safety audit for the proposed Eagle Way/ Karewa Place/ Maui Street intersection. The safety audit should focus on:*
 - Interaction of the Couplands Bakery exit both in the priority controlled and signalised options;*
 - The available sight distance for vehicle turning from Eagle Way into Karewa Place; and*
 - The risk of vehicles turning left from Karewa Place into Eagle Way shadowing following vehicles resulting in crashes for vehicles turning right-out of Eagle Way.*
- 46. Please provide further assessment around the potential conflict between vehicles queuing to turn right into Eagle Way approaching from Maui Street, vehicles turning right into the Maui Street access and vehicles turning right out of the Maui Street access and identify options to mitigate any effects.*

Wairere Drive/ Pukete Road intersection

47. Please provide modelling and assessment of effects for the Wairere Drive/ Pukete Road intersection, including discussion of queue lengths and potential impacts on the proposed signalised intersection at Karewa Place / Wairere Drive.

Te Rapa Road/ Avalon Drive/ Wairere Drive intersection

48. While the overall performance of the Te Rapa Road/ Avalon Drive/ Wairere Drive intersection improves, the level of service appears to deteriorate on the Te Rapa Road (north) and Avalon Drive approaches. Please provide further assessment of these effects and identify options to mitigate these effects.

Karewa Place/ Wairere Drive intersection

49. Please provide examples of other similarly spaced signalised intersections on high speed major arterials and provide a summary of their crash history for comparison against the predicted crash rate for the proposed new Karewa Place/ Wairere Drive intersection.

50. Please confirm the proposed form of control on the left-turn slip lanes at the Karewa Place/ Wairere Drive intersection (currently a mixture of zebra crossing bars with a Give Way triangle is shown). It should be noted that Council does not support zebra crossings on left-turn lanes due to pedestrian safety concerns.

51. The queuing space is shown as 118m, but the VISSM modelling shows a maximum queue length of 215m and an average queue length of 24m and 90m using Sidra. This leads to a significant risk of queues extending beyond the right-turn bay, and potentially resulting in high speed rear-end crashes. Please provide an assessment of the suitability of the queuing space proposed.

52. Closely spaced signalised intersections can result in drivers "looking through" one set of signals to the next and miss-interpret the intersection. Please provide an assessment for Karewa Place/ Wairere Drive intersection visibility and compliance with road signals for east bound traffic along Wairere Drive.

53. Please provide an assessment of the predicted death, serious injury and injury crash rate for the proposed new Karewa Place/ Wairere Drive intersection.

54. On-road cycle lanes are provided on Wairere Drive but no cycle turning facilities are indicated on the proposed Karewa Place/ Wairere Drive intersection layout. Please confirm how cyclists wishing to turn-right into Karewa Place will be provided for.

55. Please provide a plan showing the proposed directional signage to be provided in advance of the Karewa Place/ Wairere Drive intersection. The signage plan should identify any new signs, the location of existing signs and identify what changes will be required to the existing signs (location and/or messaging).

56. Please provide the proposed traffic signal phasing for Karewa Place/ Wairere Drive intersection, including how it will be coordinated with the adjacent signalised intersections.

57. Please provide an independent preliminary design road safety audit for the proposed Karewa Place/ Wairere Drive intersection. The safety audit should focus on:
- Location of, and messages provided on the advance directional signage;
 - Risk of high-speed rear end crashes; and
 - Potential confusion resulting from closely spaced traffic signals in a high-speed environment.
58. As per NZTA's Economic Evaluation Manual, please provide an estimate of the number of accidents that could be expected by an intersection of this nature and traffic volumes. An estimate should be validated by assessing the crash history at other existing signalised intersections in New Zealand of this nature and in this speed environment. Please quantify the expected crashes and the social cost as a result of the proposed Karewa Place / Wairere Drive intersection.

Church Road / Maui Street intersection

59. Currently this intersection is not set up in terms of phasing for additional traffic from southern approach on Maui Street. Please provide an efficiency and safety effects assessment for the current suboptimal phasing setup and identify any mitigation necessary to address these effects.

Site layout and access

60. Please confirm the number of exit lanes at the Maui Street vehicle crossing and whether this is accurately reflected in the Sidra modelling (ITA, Table 14 which separately reports the left and right movements).
61. Please provide further information on the proposed form of the vehicle crossings and how a continuous footpath will be provided. Council's preference is for pedestrian priority to be retained.
62. The ITA identifies that Sidra modelling of the Te Rapa Road access is unable to show the interaction of the nearby signalised intersection. Please provide further analysis and assessment of the potential effects, for example through use of linked intersection in Sidra or further analysis of the VISSM outputs.
63. Please provide further assessment of the safety and efficiency effects of 271 vehicles / hour turning left into Pak'nSave from the high volume, high speed southbound through lane on Te Rapa Road.
64. Please provide further assessment of the safety and efficiency effects of 277 vehicles / hour turning left out of Pak'nSave onto the high volume, high speed southbound through lane on Te Rapa Road.
65. Please provide a more detailed assessment of the queuing space required by Rule 25.14.4.2n). Assuming 100 spaces per access, the District Plan requires 18m be provided and only 5-10m is provided to the nearest car park or internal intersection. Council has concern about the potential for offsite effects as vehicles entering the site are delayed by those manoeuvring at car parks or internal intersections. The existing layout of the parking and

internal movements of the Pak N Save car park has the potential to generate offsite effects that need to be appropriately mitigated.

66. *Please confirm how the Eagle Way access and adjacent internal intersection will be designed and managed to avoid delays for entering vehicles that result in off-site effects.*
67. *The vehicle tracking for the fuel delivery vehicle occupies the full width of the vehicle crossing and aisle when entering from Eagle Way and departing to the Maui Street extension and requires the vehicle to track across both southbound lanes. This appears likely to result in offsite effects including queues as a result of blocked vehicle crossings and delays as the fuel delivery vehicles wait for sufficient gaps in the aisle and vehicle crossings. Please provide vehicle tracking for the fuel delivery vehicle that demonstrates how this potential effect will be addressed and how any offsite effects are mitigated.*
68. *Please provide vehicle tracking for the fuel delivery vehicle turning left-out of the site to the proposed Maui Street extension. This should demonstrate how the vehicle can depart the site without tracking into the southbound lane.*
69. *Please confirm the number and location of cycle parking spaces onsite. Any proposed shortfall of cycle parking will require additional rationale to justify this outcome within the context of the Plan. Given the size of the proposed supermarket and the wider connectivity to large residential areas, appropriate provision shall be made to assist in sustainable transportation modes of both staff and customers.*
70. *Please confirm the number and location of motorcycle parking spaces.*
71. *Please confirm whether the pedestrian connection from Maui Street is raised from the level of the car park.*

Three Waters

Stormwater

72. *Please provide an updated Water Impact Assessment that fully considers the relevant standards in City-Wide Chapter 25.13 Three Waters. The Sub-Catchment Integrated Catchment Management Plan being prepared as part of a wider subdivision on the site is still in the review phase. The Water Impact Assessment needs to be clear how all relevant matters are being considered, including stormwater quantity.*

Next Steps

Within 15 working days from the date of this request you must either:

1. Provide the information requested, or
2. Advise Council in writing of the alternative date that you will provide the information by, or
3. Advise council in writing that you refuse to provide the information requested.

A response is due from you no later than: 13 September 2018

Please be advised that the statutory timeframes for processing your application have been put on hold until the further information requested has been received.

When all of the information requested has been provided I will review it to make sure it adequately addresses all of the points of this request. Please note that if council has to seek clarification on matters in the further information you provide, then this will be considered as information required under this letter. As such the application will remain on hold.

If you do not provide, or refuse to provide the information, council is required to notify your application under section 95(C) RMA. If this happens, you will be required to pay the notification fee as per Planning Guidance fees and charges (less any deposit already paid) in full before we proceed with the notification of your application.

Once all the information requested is received and assessed a determination will be made on whether the application will be processed on a notified or non-notified basis.

Please note that if you are dealing directly with other units in Council in regard to the further information, the further information must still be sent to me.

If you are not sure how to respond, please call me on 07 959 9059 and we can discuss your options.

Yours sincerely,



Sam Le Heron
Senior Planner

Council Building
Garden Place, Hamilton
Phone: 07 959 9059
Email: sam.leheron@hcc.govt.nz
Website: www.hamilton.govt.nz

On behalf of:
Fraser McNutt
Planning Guidance Unit Manager