

10 August 2023

Resource Consents Team
Environmental Consents Division
Hutt City Council
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Lower Hutt 5040

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Attention: Vincent Ashman

Dear Vincent,

30 Benmore Crescent - RM230018 Additional Information

We refer to Council's emails from Zachery Montgomery dated 11 May 2023 and 18 April 2023, requesting additional information in respect of the above application.

Firstly, we address a preliminary matter arising from your review of the application. You have advised that the proposed roading works within Benmore Crescent and Manor Park Road require an additional consent under the Network Utilities Rules (Chapter 13). Specifically, rule 13.3.1.38 relating to the alteration of roads is a discretionary activity. We note that there are no specified standards and terms relating to rule 13.3.1.38.

As a result of the additional consent required, we have prepared an amended application for resource consent, which includes an assessment of rule 13.3.1.38. Further, the amended application also includes additional assessment, information and drawings to address the additional information requested by Council. Nevertheless, we provide the requested information within the amended application and also discuss the additional information as follows.

Luke Benner Consulting Traffic RFI Questions

1. *The assessment provided by Stantec regarding the existing transport environment fails to consider the crash history of the SH2/SH58 interchange. It is my assessment, that the Transportation Assessment Report needs to consider this as almost all traffic coming and going from the proposed development will travel through the interchange. This would then result in Waka Kotahi being [an] affected party.*

Please refer to the attached letter from Stantec dated 21 July 2023 addressing this question.

We confirm that during our consultation with Waka Kotahi in terms of Section 176 RMA, that Waka Kotahi have advised that they have no safety concerns with the current interchange. The Transportation Assessment Report (TAR) by Stantec, that was submitted with the resource consent application, concludes that the interchange would operate with residual capacity taking into account the anticipated future traffic generated from the site. Therefore, the interchange is expected to operate with a good level of safety with the expected future increase in traffic that the roading upgrades are designed to accommodate.

- 2. In order to ensure a clear understanding of the baseline traffic environment, it is not clear if there are other granted resource consents within the vicinity of the proposed development that should be taken into consideration particularly where this may result on higher traffic volumes along Manor Park Road.*

Council, via their resource consents team, has confirmed that there are no unimplemented consents that would create additional traffic volumes along Manor Park Road, that should be taken into consideration by the TAR for this application.

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

- 3. Within the Transportation assessment Report, Stantec have undertaken baseline intersection modelling as well as future state modelling using Sidra. The report details that the traffic generation rates are particularly conservative and have utilised trip generation rates from Waka Kotahi Research Report 453. Can the applicant please provide details of the different land uses tested in the modelling.*

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

- 4. This RFI question relates back to RFI 1, an assessment is required with respect to the future state modelling carried out and how this will affect safety at the SH2/SH58 interchange.*

Please refer to Item #1.

- 5. Can the applicant please provide the completed Level Crossing Safety Impact Assessment Report (LCSIA) & provide assurances that there has been no professional conflict between the Stantec staff who have completed the transport assessment and those that were engaged by KiwiRail to carry out the LCSIA.*

The LCSIA report is attached with the Stantec letter dated 21 July 2023. Similarly, the approach taken by Stantec to manage any potential for a conflict of interest is explained in their letter.

- 6. Based on the proposed changes to the rail level crossing and proposed intersection upgrade of the Benmore Crescent / Manor Park Road intersection, this necessitate the need for a safe system audit to be carried out in line with Waka Kotahi's 2022 guidelines. The safe system audit should be carried out by a suitably qualified third party.*

It is acknowledged that a safety system audit by an independent party may be necessary. Therefore, the applicant proposes that a requirement for a safe system audit to be completed is imposed as a condition of consent. The audit would likely need to be a two-stage audit, firstly at design stage and a second audit post construction.

- 7. It is noted that of the interventions identified to improve safety at the level crossing, only cater for pedestrians at the southern side of the crossing, when there is also a footpath along the northern side of Manor Park Road approaching the level crossing. No crossing facility is proposed from this footpath to the southern side footpath. This results in a heightened risk for pedestrians approaching the crossing along this footpath. Can the applicant please confirm whether a crossing facility will be provided.*

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

We confirm that the revised drawings attached include the provision of dropped kerbs on Manor Park Road on the eastern side of the level crossing so that pedestrians can cross to the southern side to cross the railway line via the new dedicated pedestrian crossing of the railway line. The redundant section of footpath on the northern side of Manor Park Road between the railway and the new dropped kerbs would be removed. These features were shown in the original plans submitted for Resource Consent.

8. *It is proposed to construct a private road within the boundary of the applicant site featuring two 4.2m lanes and being of a similar formation to the rest of Benmore Crescent. The current form of Benmore Crescent is more rural than urban and does not include formed kerb lines. Can the applicant please confirm that the existing public road formation section of Benmore Crescent will be upgraded as part of the subdivision.*

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

We confirm that the revised drawings attached include the provision of a new carriageway on Benmore Crescent with kerb and channel and a footpath on the eastern side. The standard of construction of the public road will match the proposed internal roading for the site. These features were shown in the original plans submitted for Resource Consent.

9. *Applicant is proposing substantial upgrades to the Benmore Cres/Manor Park Road intersection. Can the applicant please provide the concept drawing set including full vehicle tracking drawings.*

The revised drawings attached include a drawing showing the vehicle tracking for a 19m semi-trailer negotiating the new intersection layout.

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

10. *No assessment has been provided by the applicant with respect to the effects the level crossing will have on the modelling at the upgraded Benmore Cres/Manor Park Road intersection especially in considering any increased frequency scenarios of trains on the line and how this might affect queuing. Can the applicant please provide an assessment on this matter.*

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

The SIDRA modelling undertaken by Stantec included the impacts of the level crossing.

11. *Can the applicant provide the data sets used to inform the traffic modelling.*

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

The SIDRA dataset is attached to the Stantec letter.

12. *How have the number of HGV's been estimated for the tenancy areas other than the resource recovery centre.*

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

13. *There has been no mention of construction traffic and any assessment around this. Can the applicant please consider this as part of the transport assessment.*

Please refer to the revised application document, which also includes a draft Construction Traffic Management Plan (CTMP). The draft CTMP provides an overview of how construction traffic effects can be managed so as to minimise the potential adverse effects of construction traffic on the safety of the local roading network. The applicant proposes that mitigation measures outlined in the draft CTMP are incorporated into a condition that is imposed on the resource consent, such that a final detailed CTMP is provided for Council approval prior to construction works commencing.

Lower Hutt City Council Traffic RFI Questions

- A. *The report didn't clarify Stantec's conflict of interests representing an affected party, KiwiRail, and the developer. Please provide clarity on how Stantec has managed this conflict of interest.*

This matter has been addressed under Item #5 above.

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

- B. *The traffic data is required particularly at the connection of Benmore Cres/Manor park Rd to assess the impacts of the proposal.*

This matter has been addressed under Item #11 above.

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

- C. *Please provide data showing a "before – now- and after" – which shows the proposed design/plans for the intersection upgrade which is designed to achieve road safety audit based on Waka Kotahi's guideline.*

The revised design drawings for the intersection upgrade are included with the attached Stantec letter dated 21 July 2023. The need for a safety audit is acknowledge and has been addressed under Item #6 above.

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

- D. *There is no road classification included. More recently, Waka Kotahi determined a new road hierarchy based not only on traffic volumes but introducing the movement and place. Please provide this classification as this could influence how council assesses the effects of the development with regard to the required upgrade and the effect.*

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

- E. *The traffic volumes presented are cars and no data on pedestrian/cycling facilities or numbers are presented. Please provide further information as this needs to be seriously considered as it presents a link from Manor Park Rd to HCC's cycling plan(s). See comment above re ONF.*

Please refer to the attached letter from Stantec dated 21 July 2023 also addressing this question.

The application does not seek land use consent for any specific activity on the site. Therefore, the application does not specifically assess what cycling / pedestrian facilities are needed on site. Nevertheless, the TAR identified that such facilities would be needed, but can only be assessed once the future activities on the site are determined. However, the design of the upgraded Benmore Crescent, Manor Park Road intersection and new level crossing provides for such facilities on the site in manner that the site can be connected to the Manor Park rail station and the Hutt River Trail via the new footpath and level crossing for pedestrians and cyclists.

Lower Hutt City Council Engineering RFI Questions

- I. *Please provide amended engineering drawings to include stormwater management facilities utilising swales flanking the main road of the site, and in the southern area for truck parking.*


Please refer to the revised civil engineering drawing set attached.

Four swales are now proposed to treat stormwater run-off from the proposed internal road and other hard surface of the tenancy areas.

We trust this additional information and attached plans are satisfactory and addresses the information requested by Council.

If you have any questions regarding this information please contact me to discuss on 472 2261.

Yours faithfully
Spencer Holmes Limited



David Gibson
Associate - Planning

adg@spencerholmes.co.nz

Enc: Stantec Letter and Drawings
Spencer Holmes Drawings

21 July 2023

Project/File: 310204837

Dave Gibson

Spencer Holmes Limited
Level 10, 57 Willis Street
Wellington 6011

Kia ora Dave,

Reference: Benmore Crescent Request for Further Information - Transportation Responses

Rosco Ice Cream Limited has submitted a Resource Consent application (RM230018) to undertake earthworks and construction of roading and civil infrastructure within development land located between State Highway 2 (“SH2”) and the Hutt Rail Line, in Manor Park. Stantec prepared the Transportation Assessment Report (“TAR”) dated 15 December 2022 that was submitted with the application.

Hutt City Council (“Council”) commissioned a peer review of the TAR undertaken by Luke Benner Consulting (“LBC”), as well as reviewing it internally.

A response to each of the matters raised in both the LBC peer review and Council’s internal review is provided in turn below, noting for ease of reference the relevant RFI wording is included in italics in each case.

LBC Peer Review RFIs

1. *The assessment provided by Stantec regarding the existing transport environment fails to consider the crash history of the SH2/SH58 interchange. It is my assessment, that the Transportation Assessment Report needs to consider this as almost all traffic coming and going from the proposed development will travel through the interchange. This would then result in Waka Kotahi being and affected party.*

We note that the assessment of any impacts at the SH2/SH58 interchange are addressed directly with Waka Kotahi via the Section 176 approval. Notwithstanding, engagement with Waka Kotahi to date confirms they do not have any safety concerns regarding the operation of the current interchange, as recorded in the email correspondence with Kathryn St Amand (which in turns draws from Errol Ritson’s analysis and spreadsheet) included as **Attachment 1**.

Further, a review of the crash history at the interchange provided by Waka Kotahi indicates a total of 16 crashes over the approximately 5-year period since it opened in April 2017. Of these crashes, two resulted in minor injury with the balance being damage only, which is characteristic of the slower speed environment at the interchange. There is no identified safety issue that requires attention in respect of this proposal. The information presented separately to Waka Kotahi for the Section 176 approval process indicates that the interchange operates with significant residual capacity which lends to a continued good safety performance.

2. *In order to ensure a clear understanding of the baseline traffic environment, it is not clear if there are other granted resource consents within the vicinity of the proposed development that*

Reference: Benmore Crescent Request for Further Information - Transportation Responses

should be taken into consideration particularly where this may result on higher traffic volumes along Manor Park Road.

Council's planning team has confirmed there are no existing resource consents for the area accessed via Manor Park Road / Benmore Crescent that would have a material impact on the assessment of baseline traffic flows adopted in the TAR.

- 3. Within the Transportation assessment Report, Stantec have undertaken baseline intersection modelling as well as future state modelling using Sidra. The report details that the traffic generation rates are particularly conservative and have utilised trip generation rates from Waka Kotahi Research Report 453. Can the applicant please provide details of the different land uses tested in the modelling.*

The traffic generation rates adopted for the development site draw from an 'average' of those trip rates identified within the industry recognised Waka Kotahi Research Report 453 'Trips and Parking Related to Land Use'. Specifically, an average across those activities listed in Table 7.4 for 'Warehousing', 'Contracting', and 'Manufacturing', along with trip rates from established Waste Management sites in Wellington as detailed in Chapter 7 of the TAR.

- 4. This RFI question relates back to RFI 1, an assessment is required with respect to the future state modelling carried out and how this will affect safety at the SH2/SH58 interchange.*

Refer response to Item #1.

- 5. Can the applicant please provide the completed Level Crossing Safety Impact Assessment Report (LCSIA) & provide assurances that there has been no professional conflict between the Stantec staff who have completed the transport assessment and those that were engaged by KiwiRail to carry out the LCSIA.*

The assessment of the development Site traffic impacts on the adjacent Manor Park Road level crossing have been addressed directly with KiwiRail. Nevertheless, the LCSIA report is included as **Attachment 2**.

The Level Crossing Safety Impact Assessment ("LCSIA") was undertaken by Stantec staff unrelated to the consenting assessment team so as to avoid any potential overlap of personnel. Further, the analysis and conclusions provided in the LCSIA report were independently reviewed in the 'So Far As Is Reasonably Practical' ("SFAIRP") report prepared by Phil McQueen Ltd, that was appended to the TAR, and accepted by KiwiRail.

- 6. Based on the proposed changes to the rail level crossing and proposed intersection upgrade of the Benmore Crescent/ Manor Park Road intersection, this necessitate the need for a safe system audit to be carried out in line with Waka Kotahi's 2022 guidelines. The safe system audit should be carried out by a suitably qualified third party.*

It is acknowledged that the roading changes within the road reserve to improve the Benmore Crescent / Manor Park Road intersection and adjacent level crossing may require a road safety audit. It is expected this will occur as a matter of course as directed by HCC, and that this requirement would be addressed as a condition of consent.

- 7. It is noted that of the interventions identified to improve safety at the level crossing, only cater for pedestrians at the southern side of the crossing, when there is also a footpath along the northern side of Manor Park Road approaching the level crossing. No crossing facility is*

Reference: Benmore Crescent Request for Further Information - Transportation Responses

proposed from this footpath to the southern side footpath. This results in a heightened risk for pedestrians approaching the crossing along this footpath. Can the applicant please confirm whether a crossing facility will be provided.

The roading improvement works include the installation of drop kerb crossings on either side of the Manor Park Road carriageway, just west of the Mary Huse Grove intersection, to provide for pedestrians to cross the road and connect with the new formal pedestrian path over the level crossing. The redundant portion of footpath on the northern side of the carriageway is to be removed. These details are shown within Sheet C301 of the 'for construction' drawing set included as **Attachment 3**.

8. *It is proposed to construct a private road within the boundary of the applicant site featuring two 4.2m lanes and being of a similar formation to the rest of Benmore Crescent. The current form of Benmore Crescent is more rural than urban and does not include formed kerb lines. Can the applicant please confirm that the existing public road formation section of Benmore Crescent will be upgraded as part of the subdivision.*

The existing formed section of Benmore Crescent will be upgraded to an equivalent standard as the proposed road extension through the Site (i.e. 2 x 4.2m wide traffic, kerb and channel, and a 1.5m wide footpath on the eastern side of the carriageway). These details are shown within Sheet C102 of the 'for construction' drawing set included as Attachment 3.

9. *Applicant is proposing substantial upgrades to the Benmore Cres/Manor Park Road intersection. Can the applicant please provide the concept drawing set including full vehicle tracking drawings.*

The full concept drawing set including vehicle tracking for a 19m semi-trailer, is included in Sheet C190 of the 'for construction' drawing set included as Attachment 3.

10. *No assessment has been provided by the applicant with respect to the effects the level crossing will have on the modelling at the upgraded Benmore Cres/Manor Park Road intersection especially in considering any increased frequency scenarios of trains on the line and how this might affect queuing. Can the applicant please provide an assessment on this matter.*

Assessment of the level crossing's influence on the upgraded Benmore Crescent / Manor Park Road intersection operation has been undertaken as part of the SIDRA analysis described at Chapter 8 of the TAR, and shows no material change in Level of Service even with increased train frequencies.

11. *Can the applicant provide the data sets used to inform the traffic modelling.*

The modelled flows 'with development trips added' used for testing the upgraded Benmore Street / Manor Park Road intersection layout, are included as **Attachment 4**.

12. *How have the number of HGV's been estimated for the tenancy areas other than the resource recovery centre.*

The HGV volumes for the tenancy areas have been derived using a combination of surveyed vehicle classifications from the established business park at #410 Eastern Hutt Road and data provided by Waste Management NZ (collected at their existing facilities in Seaview), as set out in Chapter 7 of the TAR.

13. *There has been no mention of construction traffic and any assessment around this. Can the applicant please consider this as part of the transport assessment.*

Reference: Benmore Crescent Request for Further Information - Transportation Responses

Spencer Holmes Limited has prepared a draft Construction Traffic Management Plan (“CTMP”) that addresses how the impacts arising from overall construction traffic activity at the Site are to be suitably managed. As recommended, this CTMP can be developed further with contractor input for certification by Council prior to the works commencing.

The effects of construction traffic generated by the subsequent development of individual lots can be assessed and managed through site-specific Construction Traffic Management Plans.

Council’s Internal Traffic Team RFIs

In addition to the matters raised in the TAR peer review, the Council’s internal traffic team has raised some further RFIs (as recorded in the email from Zachery Montgomery at Council and David Gibson the development teams project Planner dated 18 April 2023). These requests along with a response are set out below.

- *The report didn’t clarify Stantec’s conflict of interests representing an affected party, KiwiRail, and the developer. Please provide clarity on how Stantec has managed this conflict of interest.*

Refer response #5 above for clarification around how conflict of interest has been appropriately nullified.

- *The traffic data is required particularly at the connection of Benmore Cres/Manor park Rd to assess the impacts of the proposal.*

See response #11 above and the forecast development traffic additions at the intersection included in Attachment 3.

- *Please provide data showing a “before – now- and after” – which shows the proposed design/plans for the intersection upgrade which is designed to achieve road safety audit based on Waka Kotahi’s guidelines.*

As per responses #9 and #5 above, full details of the proposed upgrade works at the intersection are included as Attachment 2, noting that a Road Safety Audit (in line with Waka Kotahi guidance) can be undertaken.

- *There is no road classification included. More recently, Waka Kotahi determined a new road hierarchy based not only on traffic volumes but introducing the movement and place. Please provide this classification as this could influence how council assesses the effects of the development with regard to the required upgrade and the effects.*

The proposed upgraded alignment of Benmore Crescent has been developed to a standard that could be classified as similar to a Primary Collector Route function under the One Network, noting the ‘cul-de-sac’ nature means it would not carry any through-traffic.

- *The traffic volumes presented are cars and no data on pedestrian/cycling facilities or numbers are presented. Please provide further information as this needs to be seriously considered as it presents a link from Manor Park Rd to HCC’s cycling plan(s). See comment above re ONF.*

Reference: Benmore Crescent Request for Further Information - Transportation Responses

Further detail on the expected pedestrian and cycling numbers generated by the individual lot activities will be provided at the subsequent consenting stage, when more information about the quantum of active mode travel demands is known. Notwithstanding, the TAR identifies that provision for pedestrians and cyclists to connect and route internally within the Site is provided by way of the new upgraded alignment of Benmore Crescent, and that the proposed improvements on Manor Park Road which include a new footpath and dedicated pedestrian path over the level crossing, on the southern side of the road, provides for safe connection between the Site and Manor Park rail station as well as to the shared Hutt River Trail.

We trust this response adequately addresses the further information requests sought by Council.

Ngā mihi,

STANTEC NEW ZEALAND



Jamie Whittaker
Principal Transportation Planner



Mark Georgeson
Private Sector Growth Leader

- Attachment: Attachment 1: Email correspondence with Waka Kotahi
Attachment 2: LCSIA Report
Attachment 3: Construction Drawing Set for Roading Improvements
Attachment 4: Forecast Traffic Volumes at the Benmore Crescent / Manor Park Road intersection