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Dear Clare

Foodstuffs Application to WCC for Resource Consent to Tasman St Supermarket (SR 198060)

Issues of Concern to Mt Cook Residents and Mt Cook Mobilised (MCM)

The following comments relate to the documents provided by Foodstuffs in support of their application to WCC, and reflect the concerns and questions raised by affected Mt Cook residents. Some of these comments have been included in letters to you from individual residents, and some were also outlined in our discussion at the meeting chaired by Councillor Foster on 13 August with you and other Council officials. Thank you for the opportunity to have that discussion.

Thank you also for the copies of your two requests to Foodstuffs for further information – their response may help clarify some of the points raised below.

As well as the following comments, the points made in MCM's letter of 8 July to Foodstuffs, copied to Councillors McKinnon, Foster, Pannett and Cook, still stand.

General

- ***Notification and options for affected residents:*** Thank you for your explanation of the situation regarding notification in relation to the Foodstuffs application. We understand that limited notification is not an available option. In our view, there are special circumstances in respect of this application which warrant public notification. The issue is the impact of a development **within** a Suburban Centre on the residents of the immediately adjacent residential area **outside** the boundary of that Centre. The development may largely comply with the District Planning rules applying to Centres, but the effects of the development are considerable and fall on residents in the immediate neighbourhood and more widely in the surrounding suburb. Given the non-availability of limited notification, MCM considers that these cross-boundary impacts comprise a “special circumstance”

that warrants public notification. We ask that officials consider the points in this letter as evidence of those impacts, and determine that public notification should be required.

- ***Impact on local community:*** MCM considers that greater weight needs to be given to the impacts on the local community. On the basis of an overall read of the Application's Assessment of Environmental Effects (AEE) report (Annexure 1), MCM's impression is that the current requirements in the District Plan relating to suburban Centres largely focus on the rules that apply and the impacts within the Suburban Centre. For this reason the application documents also tend to underplay the impact on adjacent residents. This concern is strengthened by the reported comments from the peer reviewer on traffic issues, to the effect that the most important factor to be considered is the effect on the local and regional transport network. MCM would welcome assurance that appropriate weight will be given to immediate local concerns, and considers that public notification based on the special circumstance of impacts across the Suburban Centre boundary will provide that assurance.
- ***Consideration of other concurrent and projected developments:*** At the meeting MCM was advised that the resource consent application for the Progressive supermarket in John St has been lodged with Council. As noted below, this supermarket will compound the traffic and other effects on the Mt Cook community. The application also indicates that Foodstuffs is actively looking for developers to construct apartments on the two green spaces on the supermarket site. The Council should take into account the need for green space and playground areas in Mt Cook. If these additional apartments and a second supermarket are to go ahead at the same time as the Foodstuffs supermarket construction or shortly thereafter, the overall effects should be taken into account in considering each of the separate resource consent applications, rather than fragmenting the overall developments and giving separate and incremental consideration to the effects of each fragment. The effects of these additional developments will include the traffic impact (parking, crossways over high pedestrian-use footpaths, further increases in traffic flows in Tasman, Rugby and Belfast Streets, etc).
- ***Building heights:*** Residents in upper Douglas St are particularly concerned at the height of the proposed supermarket with apartments above. This is out of character with the street, and will shade the houses on the other side of the street. These houses are within an area where changes to pre-1930 houses are restricted, so there is little possibility of redevelopment on the south side of Douglas St. The existing commercial premises are lower than the proposed supermarket. The proposal will be out of keeping with the existing community and surrounding heritage area. More attention should be paid to the impact of unfettered application of Suburban Centre rules, where that impact goes across the boundary of a Suburban Centre into an area of heritage housing, and particularly where that boundary goes down the middle of a street.
- ***Possible changes in Parking and Suburban Centre rules:*** There are pending changes to the Suburban Centre rules (though it is not clear that these will make much difference in this case, except that the parking space threshold is to reduce

from 120 spaces to 70). The proposed Parking Review changes to availability of residents' parking permits and spaces are noted as potentially positive for residents adjacent to the supermarket. They are however only rule changes, and the pressures noted below for additional short-term and longer-stay parking from apartment residents, customers at the supermarket and other facilities, supermarket staff etc will not diminish just because of policy changes in the availability of permits or designated residents' spaces. Will the consideration of the application take into account these pending changes, and particularly the need for potential enforcement in the streets around the supermarket?

- **Noise and pollution:** There are concerns about noise and pollution (both fumes and lights at night). What are the requirements relating to noise and pollution in the District Plan, and are those which apply in a Suburban Centre appropriate when the effects fall on residents who live just outside the boundary?
- **Controls on supermarket operations:** Will the Council consider controls in respect of hours of operating, truck delivery hours, overnight cleaning and restocking, staff-generated traffic after hours, etc? What limits are considered appropriate? Will the proposed Service Management Plans cover all these issues, and what control does the Council have if there are breaches of those Plans?
- **Quality of apartments:** The apartments on Tasman Street, and some of the bedrooms in the eastern apartments, appear not to meet requirements for natural light [*a building code/building consent issue?*]. The underlying concern is about the quality of accommodation being proposed, and the potential impact this can have on the neighbourhood.
- **Site contamination:** There had been mention when the previous buildings on the site were demolished of there possibly being an underground fuel tank on the site, with some risk of contamination. Has this been resolved, and should this be covered by the resource consent?

Traffic

Appendix 3 in the application documents is a Traffic Effects Assessment (TEA). Most of the concerns of residents are about traffic and associated issues (parking, pedestrian impact etc). The TEA is very detailed and not always easy to follow.

General

- As noted above, the TEA is generally thin on the traffic impacts on residents in the vicinity, as it focuses much more on changes in general traffic flows.
- **Real traffic impact:** In MCM's view, the TEA consistently under-reports the real traffic impact that will occur. This is because it deducts from changes in future traffic flows the traffic generated by the businesses that were on the Foodstuffs site prior to mid 2007. These businesses are stated to have generated about one-third of the traffic that the Supermarket will generate, and the applicant's argument is that to measure the net supermarket impact on traffic, those historical site-generated flows should be deducted from future supermarket-generated

- flows. The flaw is that the historical flows did not exist after 2007. The real impact of the supermarket opening in 2011/12 will be on the flows that exist in 2010/11 – **that** increase is what will be noticed. The real traffic increase from the supermarket should be based on a comparison with the projected flows immediately before it opens, not the flows that existed some four years earlier.
- **Basin Reserve traffic:** Somewhat similarly, there is an assumption that Basin Reserve traffic will ease soon after the supermarket opening due to completion of the Basin flyover. It is unlikely that this will be as soon as assumed in the application due to delays and uncertainty in the timing of flyover construction. Also, the reduction in Basin traffic as a result of the flyover may be less than assumed, due to an increase in northbound traffic coming from Adelaide Rd (see below).
 - **Combined traffic impacts:** As noted above, the WCC should consider the combined effects of the traffic impact of this supermarket with the proposed Progressive supermarket in John St, at the other end of Tasman St. As well as having a cumulative impact on traffic in Tasman St and adding to the complexity of the Tasman/John St intersection, the two supermarkets may have a compounding influence on Tasman St traffic, for example people may travel from one to the other to get bulk foods at the Progressive market and higher end commodities from the Foodstuffs shop (similar complementary effects have been observed in other dual supermarket situations).

Entry and exit issues

- **Potential danger point in Tasman St:** The largest proportion of the supermarket's customer entry and exit traffic flow is expected by the applicant to be in Tasman St, where the exit and entry ramp is steep. At the top, the first 5 metres of the ramp (one car length) is 1 in 10, then it steepens to 1 in 5 for 8 metres, and then 1 in 8. Even 1 in 10 is very steep, though it is apparently allowed in the district plan. This ramp entry is also relatively narrow given the nature of its purpose – 6 metres for the combined entry and exit traffic, with no separating barrier. There is no mention of splays for visibility, though there appear to be some on the Level G floor plan. There are extreme risks involved in a combination of high traffic count, a narrow and extremely steep ramp, considerable pedestrian traffic (many are school children) crossing at the top of the ramp, exiting from a basement carpark into bright afternoon sunshine at peak hours (sunstrike?), and a pedestrian entry to the supermarket right beside the top of the ramp where people may congregate, wait for pickups etc.
- Rules that may be acceptable for a private or low use business driveway seem to be totally inappropriate for the Tasman St supermarket entry and exit situation.
- The application notes that other access points to the supermarket exceed the 6 metres limit, and residents have expressed concern about this situation for the safety of pedestrians. Equally, there is concern about the Tasman St exit, which at 6 metres seems narrow for that situation. What are the risks and benefits of accessways more or less than a width of 6 metres?

- ***Carpark traffic flow:*** The application does not appear to provide information on the traffic flow within the carpark, but on the face of the Level B plan, exiting vehicles may swing well out in making a sharp left turn onto a steep upward ramp to the Tasman St exit, coming head on to entry traffic rolling down the same steep ramp.
- ***Rugby St:*** The entry and exit in Rugby St is projected by the applicant to have a smaller volume of traffic, but that exit is particularly tricky for traffic heading across Rugby to Sussex St. The TEA does not seem to take into account the possibility of supermarket-bound traffic coming eastward down Rugby Street and turning right into the supermarket, crossing both the traffic going west on Rugby St and the traffic emerging from the supermarket and heading to Sussex St. (See also below on pedestrian issues at this intersection)
- ***Lower Douglas St:*** The exit in lower Douglas St also has some serious issues. Vehicles emerge onto a very steep downward ramp with the exit/entry to Myrtle St at the bottom of that steep section. That steep section is also a two way road (to service the apartments at 11-13 and 14 Douglas St) but is only one lane wide. In addition there is considerable foot traffic by school children and others using the east-west Douglas St route, and it cannot be assumed that all will use the rebuilt route on the south side of Douglas St. The shorter (and hence more favoured) pedestrian route on the north side crosses the supermarket exit point, with very little visibility available to the drivers of emerging cars.
- ***Trucks on Tasman St:*** There is no assessment of the impact of the Tasman St truck exit and entry garage doors on the risks to pedestrians, including their effect on visibility available to the truck drivers.
- ***Monitoring, post-construction:*** Page 19 of the TEA. There are proposals to monitor the entry and exits after the supermarket opens for the truck movements in Tasman St, and in Rugby and Douglas Streets for cars. There should be a similar exercise for Tasman St for cars, which is projected as the largest volume of traffic and particularly in the light of the concerns expressed above about the steepness of the entry/exit ramp.
- The scope of the action proposed to follow these monitoring exercises is inadequate. The proposal is that only if “specified” problems are found will any mitigating action be taken. Mitigating action should be required if **any** problems are found.
- Page 47 Table 9 of the TEA has an obvious error – the data for the apartment parking exit and the supermarket car exit have been transposed between upper and lower Douglas St.

Traffic Flows

- ***Sussex St traffic merging:*** MCM doubts that the merging of supermarket traffic into Sussex St will be as straightforward as the TEA claims. Residents’ experience is that there are not many gaps in the Basin traffic flows for cars coming from Rugby St, especially for cars heading to the Mt Victoria tunnel and needing to cross 3 lanes of traffic in a short distance – casual observation of traffic performing this manoeuvre suggests that a bulldozing approach to lane changing is the most common technique. And as noted above the timing and

impact of any gains in the Sussex St traffic flow from flyover completion is uncertain.

- **Lower Douglas St and Adelaide Rd:** The exit in lower Douglas St has the smallest expected increase in traffic flow as a result of the supermarket. However, the TEA rather skims over the fact that **all** this traffic is expected to turn south into Adelaide Rd, ie it has to cross both directions of Adelaide Rd's traffic. (There is no reason to use this supermarket exit if one is heading north, as the Rugby St exit is the more obvious choice. Also the traffic movement numbers on the sketch plans in the TEA appear to confirm that all the supermarket-generated traffic leaving Douglas St will turn south on Adelaide Rd.) The TEA's SIDRA estimates of increases in delays for traffic exiting Douglas St appear to be based (though it is not explicit) on existing flow patterns, which are much more likely to be turning north into Adelaide Rd, with less delay than for south-turning traffic. We consider that because of the change in the Douglas St traffic patterns after the supermarket opens, delays for all traffic entering Adelaide Rd from Douglas and Myrtle Sts therefore are likely to be much greater than the estimates in the TEA. This could be further aggravated with the completion of the Basin flyover – the freeing up of traffic flows around the Basin will attract much more traffic coming from the southern/eastern suburbs to use the northbound Adelaide Rd route in order to avoid congestion elsewhere eg Wallace/Taranaki Sts.
- **Traffic lights at Douglas St:** There is a suggestion of putting traffic lights at the Douglas St exit to ameliorate delays for traffic exiting Douglas St. How does the Council see this fitting with the long term view of Adelaide Road as a major traffic corridor – lights at Douglas St might block southbound Adelaide Road traffic back up into the Basin Reserve traffic flows?
- **Supermarket carpark “rat run”:** What control will there be to prevent southbound traffic using the carpark as a direct through route from Tasman St to Douglas St and Adelaide Rd, thereby avoiding congestion in Kent Tce and the Basin Reserve? This risk will be aggravated if traffic lights are put at the Douglas St/Adelaide Rd intersection.
- **Peak supermarket traffic flow:** The expected traffic flow into and out of the supermarket at the peak is expected to be 500 vehicle movements per hour – some 8 movements per minute. From the TEA, it looks as if the peak traffic flow in Tasman St will increase by 30 % or possibly much more (possibly up to 300 extra traffic movements, compared with an observed historical flow of 467 – Table 2 of TEA, page 32). If the supermarket attracts shoppers from Vogeltown and Brooklyn as it expects, these will come via Hutchison Road or Bidwill St, and add to the Wallace Street/John/Tasman Streets congestion.
- **Tasman St traffic flows:** The increased traffic flows in Tasman St, together with the effects of turning truck and other traffic in and out of the supermarket, will significantly increase the difficulties of driving and cycling in a relatively narrow street with the existing humps. The increase will effectively turn Tasman St back into a main traffic route, when (with the humps) it has been designed away from that.
- **Paramics modelling:** Page 40 of the TEA. The PARAMICS modelling shows a decrease in the time traffic will take to get between Adelaide Rd and Taranaki St

as a result of the supermarket. This seems counterintuitive, and no explanation is given. This makes us wonder about the accuracy of other conclusions from this modelling.

- ***Wider traffic implications:*** We are pleased to see that further information has been requested about traffic impacts. The east-west traffic flows through Mt Cook using Bidwill Street are of particular concern to MCM, and these concerns (narrowness, visibility etc) were outlined to Council at our meeting. These will be aggravated if as Foodstuffs indicate, they expect to get a flow of customers from Brooklyn or other south-western suburbs. Bidwill Street has serious limitations for the major traffic route it is increasingly becoming.

Pedestrians

- ***Access crossings over footpaths:*** The AEE (page 5) gives some weight to the reduction in the number of vehicular access crossings over footpaths into the supermarket site, compared with the number existing when small businesses occupied the site in 2007. This suffers from the same problem as the general traffic impact estimates – it ignores the four years when none of these crossings were operative, and also ignores the fact that the number of vehicles that will use this fewer number of crossings is much greater than any historical aggregate usage. And as noted above, other developments are envisaged for the site which will increase the number of crossings and vehicle traffic across footpaths.
- ***Tasman St, second pedestrian crossing:*** There should be a another pedestrian crossing in Tasman St at the southern end of the supermarket site (at upper Douglas St or at the child care centre?) to cater for the supermarket foot traffic coming from Massey/Tasman St, and also to allow those who wish to avoid the cross-footpath supermarket vehicular traffic to get to the western side of Tasman St, away from the supermarket. The fact that there are three vehicle entry/exit accessways from the supermarket with a high combined truck and customer vehicle flow on Tasman St is itself a risk to pedestrians.
- ***Rugby St, pedestrian crossing:*** At the Rugby/Sussex intersection, there needs to be a pedestrian crossing over Rugby St to Sussex St (presumably in two stages through the proposed traffic islands). That will further complicate the traffic flows at that entry and exit. The pedestrian crossing is necessary (indeed it may be necessary now) because of the increasing foot traffic that will be heading towards the CBD from Adelaide Rd, Belfast St, and the supermarket, and also because of the supermarket-generated increase in traffic flows in Rugby St.
- ***Tasman St and Buckle St intersection:*** The increased traffic in Tasman St will add to the pressures and impatience of drivers at the Buckle/Tory/Tasman intersection, which is already dangerous for Mt Cook School children crossing Buckle at the same time as traffic exiting left from Tasman into Buckle (and turning right from Tory when cars run the lights).
- ***Crossing lower Douglas St:*** The pedestrians using the proposed walking route from King and Myrtle Streets to the supermarket or through it to Rugby St will have to cross Douglas St at the bottom of the steep carpark exit ramp, which seems dangerous. We also note that it is not clear to us exactly where the

Douglas St pedestrian access to the walking route through the supermarket is placed, in relation to the vehicle exit.

Parking

- ***Apartment parking:*** There is inadequate parking (a provision of 20 spaces off upper Douglas St for the eastern apartments) for occupiers of the 41 bedrooms in the apartments above the supermarket. Those on this eastern side are two or three bedroom units, and their occupants presumably will have more than 20 cars; those in the Tasman St units will also probably have some cars. This will place too much pressure on the residents' parking zones in surrounding streets (Douglas, Myrtle, Tasman, and Ranfurly) to the detriment of existing residents, particularly in Douglas St where the apartments will more than double the existing population in the street. Trucks and vans visiting the existing commercial premises in upper Douglas St sometimes park in the middle of the street already.
- ***Parking on the street:*** There will be some shoppers at the supermarket who will not like going into a basement car park, and who will look for a nearby park in surrounding streets – gambling that they will get away with a short stay in a residents' zone. In addition there will be visitors to the other retail businesses in the complex, visitors to the apartments above the supermarket, and potentially visitors to the other apartment developments envisaged for the site. All these will further add to street parking pressures.

Trucks

- ***Truck movements:*** Delivery truck movements to the supermarket are mainly before 11 am in the mornings, and the peak delivery time is in the morning rush hour, just when other vehicular and pedestrian traffic is at the highest, and when children are being dropped off at the Te Kainganui Childcare Centre. The scheduling of deliveries should be changed/controlled. The delivery truck exit opposite the childcare centre will have large vehicles turning into a relatively narrow street where there is some short stay parking, with parents unloading children. MCM believes this creates a dangerous situation for families and difficult driving for truck drivers. Should the Service Management Plan be required to place constraints on the delivery times, size of trucks, etc?
- ***Other commercial vehicle movements:*** Deliveries to the apartments and the retail premises on the site will have to occur. The application suggests that no facilities are provided be made for these movements, but this does not alter the fact that they are necessary. In MCM's view there should be a requirement for appropriate facilities for these truck movements and access.
- ***Construction impact:*** The documents have little detail on construction-related impacts eg number and location of truck movements – considerable excavation appears likely. Will these be considered at later building consent stages, and will residents have an opportunity to comment then?

Conclusion

Mt Cook Mobilised reiterates its request that public notification of the application be required. We consider that taken as a whole the impact on the surrounding community as outlined in the points made in this letter comprise a “special circumstance” which justifies public notification.

We also look forward to further discussion with the Council’s officers to explore what action might be taken to mitigate the specific concerns we are putting forward.

Yours sincerely

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