

**Submission from
Michael Mellor, 11 Newport Terrace, Seatoun, Wellington
presented to the Indoor Community Sports Centre hearing, SR 181872,
on 21 November 2008
opposing the granting of Resource Consent**

1. My Background

My name is Michael Mellor. I have been a resident of the Eastern Suburbs for 17 years; I walk, drive and take the bus past the site of the ICSC frequently; I have worked in transport for over 30 years; I am a Chartered Member of the Chartered Institute of Logistics and Transport in New Zealand and a Member of the Institute of Transport Administration; I am Vice-President of Living Streets Aotearoa Inc., a pedestrian advocacy group; and I am the Environmental Sustainability representative on the Wellington Regional Transport Committee.

2. This Submission

This submission builds on my written submission dated 8 October 2008, focussing on Mr Robinson's Urban Development and Transport report dated 10 November 2008. In my conclusion I have modified slightly the mitigating steps proposed in my earlier submission.

3. The Report's assumptions (explicit and implicit):

1. The Cobham Drive/Troy St intersection will continue to be a roundabout

Comment: all references are to improvements to the roundabout rather than improvements to the intersection. Replacing the roundabout with a signalised intersection would resolve many of the issues that the report describes as inherent.

2. Existing and consequential pedestrian and cyclist issues are inherent and cannot be ameliorated.

Comment: see paragraphs 89, 91, 189, 190, for example. Existing and consequent vehicle issues are proposed to be ameliorated - see paragraph 101, for example.

3. Free-flowing traffic is the most important consideration with respect to SH1

Comment: see paragraph 92, for example. SH1 has two nearby signalised intersections, and there are no current proposals to make either of them "free-flowing"

4. Non-provision of pedestrian crossings resolves safety issues

Comment: see paragraphs 93, 94, 95, 107, for example.

5. In the absence of crossing facilities, pedestrians and cyclists will not cross Cobham Drive or Troy St

Comment: examination of the median strip along Cobham Drive shows many well-used pedestrian "desire lines". The building of a major facility adjacent to Cobham Drive will only increase this desire, putting more pedestrians at risk.

6. The ICSC will provide for unconstrained vehicle traffic from opening day, while improvements for other modes may be implemented after opening.

Comment: see paragraphs 84, 104, 106, 109, 110, for example.

7. Vehicle parking has to be on site, but public transport provision some way away is adequate

Comment: see paragraphs 104 and 199, for example.

8. Traffic safety does not include pedestrian and cyclist safety

Comment: there is no mention of pedestrian and cyclist safety in the discussion of the relevant section of the District Plan, despite being mentioned in the rest of the report

9. NZTA will not allow at-grade pedestrian and cyclist crossing of SH1.

Comment: paragraph 90 refers to this as a belief, which appears not to have been checked with NZTA. In my earlier submission I suggest such a crossing, incorporated in a signalised intersection. The idea was suggested to me in private conversation by a senior manager in Transit New Zealand.

10. It is acceptable for traffic to proceed along Troy St, a 50 km/h road, at a speed that makes crossing it unsafe.

Comment: see paragraphs 93 and 107, for example.

4. District Plan criteria

7.3.4.2 Whether the proposed development will ... affect the safe ... movement of traffic on streets

Despite the report having many references to pedestrian and cyclist safety, such as those listed below by paragraph number, there is no mention of that (or any other) aspect of safety in the relevant paragraph (paragraph 178).

Comments on safety elsewhere in the report include:

87: "lack of appropriate and safe connections across Troy Street and Cobham Drive"

89: "Any facilities would be required to be located on the SH1 network and will thus be difficult to implement ... large and multi-lane roundabouts are notoriously dangerous for this mode of travel [cycling]" (Dunlop)

91 "It is considered that the site's location on the State Highway, which acts as a pedestrian barrier does provide some limitations in terms of the ability to provide for pedestrian access for suburbs to the east of the site due to safety concerns surrounding crossing both Tacy Street and also State Highway 1."

93 "The pedestrian facility in its proposed form can be considered dangerous and offers little benefit to users. It relies on pedestrians to use their own personal judgement when crossing the road. This movement could be difficult with the high speed nature of vehicles exiting from the roundabout" (Dunlop)

107 "The proposed pedestrian crossing facility on Troy Street is not considered to be safe. There is inadequate sight distance to safely provide a proposed pedestrian facility. It is recommended that this crossing is removed as there is potential for future accidents to be attributed to the poor design" (Dunlop)

From the above it is clear that there are existing and potential safety issues that a major development like the ICSC will exacerbate, and I submit that the proposal does not meet this criterion until pedestrian and cyclist safety issues are addressed.

7.3.4.3 high standard facilities for public transport, cycling, pedestrian and vehicular movements or has easy access to those facilities or promotes the use of transport modes other than private vehicles

It is hard to see how the proposal achieves any of these. Relevant quotes from the report are below, again listed by paragraph number.

179 "on the path of several bus routes - however the proposal does have a number of issues with regard to the pedestrian and cyclist facilities for movements from the eastern suburbs in particular. The project does not actively promote walking and cycling from these areas due to the limited facilities that are available and the difficulty of providing connecting facilities across SH1 The development also proposes the provision of large numbers of car parks which will be free to users; it is likely that the provision of such facilities will encourage users to drive as the primary means of getting to the facility. This will do little to promote public transport or non-motorised access as specified by this rule (Dunlop)

180 "It is clear that the site has existing constraints when considering pedestrian and cycling links however overall options for overcoming these constraints are limited and inherent to the location of the facility."

5. District Plan policies

6.2.8.1 Seek to improve access for all people, particularly people travelling by public transport, cycle or foot and for those with mobility restrictions

The following quotes indicate that provision for people travelling by public transport, cycle and foot is seen as secondary to access by private car:

199 "the linkages of the site, whilst not being ideal particularly from a pedestrian and cycling access perspective to the north and east of the site, have been maximised to ensure all modes of transport would be catered for ... the site is in close proximity to bus stops on Rongatai [sic] Road which connects with the entire public transport network for the city as a whole. The development is therefore considered to be in accordance with the above policy subject to the full adoption of conditions ... to maximise the connectivity of the site for all forms of transport"

I can see no such conditions.

93 "I do agree with the TIA in that it is unrealistic for pedestrians to cross near Salek Street as it is too far away to expect pedestrians to use. So while it is agreed with the TIA that a pedestrian facility [across Troy St] may help to facilitate more trips, a safer facility is definitely required" (Dunlop)

To which the report's response is:

94 "It is recommended that this crossing [Troy St] be omitted in its entirety".

No pedestrian facility at all is provided, let alone a safer one.

95 "options for upgrading pedestrian linkages to address the existing deficiencies are limited ... due to the existing road environment and the distance to the eastern suburbs that there will be few patrons that access the centre using this route. As the crossing proposed on Troy St is considered to be unacceptable, pedestrians are likely to use the existing pedestrian crossing that lies opposite Salek Street on Rongotai Road"

106 "Walking and cycling is not sufficiently provided for travel from the eastern suburbs. While it is appreciated that this is difficult to achieve and that there are likely to be few patrons accessing the ICSC from this path, these modes of transport are not promoted along this corridor to the ICSC". (Dunlop)

109 "Concern exists over the lack of active travel demand management mechanisms that have been identified to encourage sustainable transport solutions and reduce impacts on the transport network. Consideration should be given to the control of parking provision on site and encouraging ICSC users to choose sustainable forms of transport, through adequate information to clubs, schools, and on site (eg bus timetables, walking and cycling route information)" (Dunlop)

6. Other comments

The report says:

100 "the development maximises its connectivity to all modes of transport use"

180 "The proposed facility is considered to maximise its connectivity potential"

199 " The development is therefore considered to ... maximise the connectivity of the site for all forms of transport"

It is difficult to see how "all modes" and "all forms" can be considered to include pedestrians, cyclists and public transport users, given the comments elsewhere in the report.

114 "local road improvements and access linkages (traffic calming, pedestrian/cycle facilities, traffic management and island modifications) are completed prior to the ICSC, with the exception of the Troy Street crossing which is considered unsafe"

The proposed pedestrian/cycle facilities are minimalist.

5. Conclusion

I oppose the granting of resource consent because the proposal fails to meet the requirements of the District Plan, as outlined above.

If resource consent is granted, I submit that it should be on condition that:

- the Cobham Drive/Troy St roundabout is removed and replaced by traffic lights, with:
 - pedestrian and cyclist crossing facilities across Cobham Drive both east and west of Troy St and across Troy St, with effective shelter for waiting pedestrians and cyclists, including in the median strips; and
 - priority for buses; and
 - priority for fire appliances leaving Kilbirnie Fire Station; and
 - bus stops and a wider footpath on the Troy St frontage of the ICSC.
- the bus stops nearest the ICSC are upgraded with adequate seating, effective shelter, good lighting and real-time information displays, the information being repeated at displays within the ICSC;
- pedestrian routes between the ICSC and these bus stops are accessible and clearly marked, with priority for pedestrians throughout;
- bus route 91, the Airport Flyer, is altered to run between the airport and Kilbirnie via Rongotai Rd, stopping only at the stops nearest the ICSC, with the frequency increased to every 15 minutes and a service to Johnsonville and Porirua introduced (Coutts St to be served by a local bus);
- at events, priority seating is provided for those who do not come by private car;
- all transport smart cards valid in the region (eg Snapper) are usable for payment for all facilities and services at the ICSC, with the same discount as applies on public transport.

Michael Mellor
11 Newport Terrace
Seatoun
Wellington
mmellor1@gmail.com
027 684 1213