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**Sent:** Thursday, 21 May 2009 20:05  
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**Subject:** District Plan submission

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Submission details  
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Plan modification: Plan Modification 8: St Lukes Redevelopment

1. The specific provision of the plan modification that my submission relates to is: Elements of urban design, amenity impact and effect on the surrounding transportation network, specifically local roads, more fully described in the following section.

2. I/we : Generally support but seek amendments

3. The reasons for my / our views are: Traffic

1. The key concern pertaining to traffic is the proposed Exeter Road extension and specifically, the link with Aroha Avenue to the east. The Concept Plan shows two-way traffic with two entries into the centre proper from the Exeter Rd extension. It is my opinion that this arrangement will result in the Aroha Avenue end becoming the default access for people wishing to avoid queues into the centre.

2. Whilst the proposal seeks a pedestrian oriented environment, there is no clear explanation of how through-traffic will be discouraged. If this is the case, how does it sit with the suggestion that the Exeter Rd / Morningside Dr intersection will become the main/principal entry into the site, and one which the applicant admits will need upgrading to achieve greater capacity?

3. There should also be further clarification regarding service vehicle use of the extension - will heavy vehicles be traveling through residential streets to the east to use this access?

4. I would question whether the proposal has been considered without the possibility of a) vehicle use of the Exeter Road extension and b) restrictions on access and egress from the Aroha Avenue end (e.g. one way traffic only or no access from Aroha Avenue). These options would be preferable to reduce the amount of traffic accessing the centre from residential streets.

5. It is not clear why the extension is tied to a threshold of GLA.

6. The Transport Impact Assessment identifies a five-fold increase in peak vehicle traffic using Aroha Avenue. This has clear implications for traffic safety. The TIA also suggests that potential traffic calming measures will be considered after monitoring, however I suggest that these should be a key element of the development proposals to ensure traffic speeds (and hopefully its attractiveness as a through-route) will be minimised. The detrimental effects on amenity are discussed further below.

7. It is clear that Aroha Avenue will be subjected to considerably more traffic associated with the centre but also the proposed link will (without clear and appropriate measures to restrict through use) also become attractive to vehicles traveling across town and wanting to avoid busy local intersections and main roads.

8. The parking surveys relied on by the TIA are nearly 4 years old and in this regard, I suggest they are not appropriate for a current and comprehensive assessment. Indeed, the TIA notes an increase in parking numbers on the site since the surveys were undertaken. It is not clear whether these surveys took into account the informal overspill parking that takes place to the immediate north of the existing parking structure, surrounded by residential properties.

9. Further, there is no reference to the popular practice of St Lukes' customers parking in the Mega Centre opposite. These, and on-street parking, are evidence that the existing centre cannot accommodate all of its parking demand. The potential for this to be exacerbated by the proposed development needs to be addressed in some detail.

10. The TIA also relies on out of Auckland parking surveys to ascertain an appropriate occupancy rate. I suggest these examples do not accurately reflect the high levels of car ownership and use in Auckland. Why was the most recent retail development in Auckland, Sylvia Park, not surveyed as an example? This would have been highly appropriate, especially given its similar popularity.

11. The TIA (para 11.7) suggests that on-street parking will reduce following the proposed re-development. This seems nonsensical and I would suggest some evidence of such a phenomenon needs to be provided. Further, I question the ability of parking control to discourage or avoid on-street customer parking versus legitimate (and appropriate) parking by local residents and their visitors.

12. The TIA suggests that constraints on on-site parking will encourage customers to seek alternative means of transport to and from the centre. I suggest it is more likely that they will park on residential streets surrounding St Lukes, as currently occurs.

13. I suggest significant contributions towards public transport should be provided (with details upfront) to ensure that there are alternative and viable means of transport to the private vehicle.

14. I support the proposals for new and improved pedestrian connectivity to and from the centre.

#### Amenity

1. The above concerns regarding traffic and parking have a corresponding detrimental effect on the amenity for residents of neighbouring streets, particularly the increase in traffic and likely customer parking on Aroha Avenue. These issues already occur and the proposed new entrance will only allow exacerbation and extension of the amenity impact towards the east, into the "established residential" area recognised by the Character Assessment.

#### Urban Design

1. I have concerns that the range of "other uses" will result in a range of amenity impacts on the surrounding residents. Further, there should be an explanation of "transitional mixed uses" as shown on the Concept Plan. The default office use leaves too much uncertainty as regards the sensitive residential interface to the north-east of the proposed re-development.

2. The relationship of the car park and the proposed buffer zone to the adjacent residential properties located between Cornwallis Street and Aroha Avenue needs to be carefully considered, in order to avoid security and visual intrusion.

3. The proposed rooftop car park results in a number of amenity issues of its own (noise, overlooking, glare and air quality impact) and certainly does not create a harmonious interface with the proposed site and residential activity.

4. It is not clear how the proposed introduction of residential activity as a permitted use within the Concept Plan area will actually work in practice. It seems a strange addition to an existing retail development that is seeking to extend its intensity.

5. The proposed bulk in the north-eastern corner is entirely out of character with the established residential uses along Aroha Avenue. It is likely that there will be adverse effects on the privacy, sunlight and general amenity for neighbours.

I ask that Council accept the plan modification but only with the following amendments/clarifications:

1. Re-consider the Exeter Rd extension in terms of its link with Aroha Avenue and in respect of vehicular use. Clarify service vehicle access at the Aroha Avenue end of the proposed road.

2. Construction of the Exeter Rd extension should be a fully discretionary activity in the Concept Plan and Aroha Avenue residents should be directly notified for consultation.

3. Clarify "transitional mixed uses" and provide greater certainty for the types of uses at the sensitive residential interface in the north-eastern corner of the site.

4. Provide detailed information regarding the proposed developer contributions towards public transport.

4. I / We seek the following decision from the council: Accept the plan modification with amendments
5. I / We wish to be heard at the council planning hearing: No
6. I / We would be prepared to present a joint case at the hearing with any others making a similar submission: No

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