

# District Plan Submission Form

(for plan changes, variations and notices of requirement)

Please print clearly Full name: <b>ANDREW GEORGE BLACKLER</b>	For office use only Submission No
Organisation: (if the submission is on behalf of an organisation)	<div style="border: 1px solid black; padding: 5px;">                     CITY DEVELOPMENT                      27 MAY 2009                      AUCKLAND CITY                 </div>
Agent: (if applicable)	
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This is a submission on the following plan modification (state plan modification name and number):  
**Plan modification 08 - Westfield St Lukes**

Please tick the section of the district plan your submission relates to:

<input checked="" type="checkbox"/> 1999 Operative Isthmus Section	<input type="checkbox"/> Transitional Operative District Plan (former Auckland District Scheme)
<input type="checkbox"/> 1996 Operative Hauraki Gulf Islands Section	<input type="checkbox"/> 1997 Proposed Central Area Section
	<input type="checkbox"/> 2004 Operative Central Area Section

Please use a separate form for each separate matter for submission

The specific provision of the plan modification that my submission relates to is:

**Public Safety**  
**Traffic Volumes**  
**Loss of street character**  
**Inconsistency with public transport initiatives**  
**Notification process and conflict of interest**  
**Inconsistency with government initiative of "feet first", encouraging primary school children to walk to school.**

continued on reverse

I / We support  / oppose  / seek amendments  to the plan modification. The reasons for my / our views are;  
Note: if you generally support the plan modification but seek some amendments to it you should tick both the "support" and the "seek amendments" box. If you oppose the modification but seek amendments as an alternative to its decline, you should tick both the "oppose" and the "seek amendments" box.

please see attached.

I / We seek the following decision from the council (give precise details):

Note: the decision requested from council should only relate to the content of the plan modification. Any matters raised which do not directly relate to the plan modification will be treated as being not "on" the plan modification or "outside the scope" of the plan modification and will not be considered

decline  / accept  / accept with amendments

please see attached.

I have attached additional information  Yes  No

I / We wish to be heard at the council planning hearing

Yes  No

I / We would be prepared to present a joint case at the hearing with any others making a similar submission

Yes  No

Signed 

Date 25/5/09.

Note: if your submission is to a notice of requirement the RMA requires you to serve a copy on the person who lodged the notice of requirement as soon as reasonably practicable

Addition to Submission form of Andrew Blackler in regards to the Plan Modification 08- Westfield St Lukes

**(1) the specific provisions of the plan modification that my submission relates to:**

- Public Safety
- Traffic Volumes
- Loss of Street Character
- Inconsistency with Public Transport Initiatives
- Notification Process

**(2) the reasons for my submission are:**

**Public Safety.** The application takes no reasonable steps to address the safety of pedestrians in neighbouring residentially zoned areas. Specifically, opening up Exeter Road to Aroha Avenue will promote commuters to divert from main arterial routes (already heavily congested) and use Exeter Road, Aroha Avenue and adjoining streets (specifically Kenneth Ave, Leslie Avenue, Sainsbury Road and Gribblehurst Park). Of specific concern is that times of heaviest congestion when these alternate routes may be used are specifically at times when these streets are likely to be used by children walking to school and kindergarten (noting the proximity of Sandringham Kindergarten, Mt Albert Primary and Edendale Primary). We actively encourage our children to walk to school (consistent with the government 'feet first' initiative) and do not wish to add to congested roads by driving our children to and from school. Increased traffic flow through Aroha Avenue would prompt us to drive our kids in fear of their safety. I would have graver concerns for the safety for my wife and our youngest child when he begins at Sandringham Kindergarten in Kenneth Avenue. The council has only recently removed a no-parking zone from Aroha Avenue and had promised to review that decision a year following. I do not believe the council has had the opportunity to conduct that review.

**Traffic Volumes.** The assessment of traffic volume and congestion is dated and now obsolete following the recent extension of SH20. Further to that, I would suggest that the timing of the application and relevant testing was cynically done so as to be concluded prior to the SH20 extension being opened. There is a notable increase witnessed in the last week since the Sandringham Road access to SH20 was opened reflecting airport-city bound traffic using the SH16/St Lukes/Sandringham/SH20 connection. With public submissions and consultation still continuing on the resolution of the western ringroad and therefore more stress on the above airport connection, it is inappropriate for the council to consider such a proposal of increasing the size of St Lukes, the carparking facilities (promoting more congestion) and opening of neighbouring residential roads without fully reviewing the impact the SH20 development has on the St Lukes Road and the surrounding streets. More specifically, I am particularly concerned with the proposal to open Aroha Avenue to through traffic from Exeter Road. This carpark level is advertised and recognised as the most appropriate access to the cinema at St Lukes. With movies commencing as late as 9.20pm (currently) we would see Aroha Avenue (a residentially zoned road) used as an exit for cinema viewers. Currently Exeter Road exits onto Morningside Drive and is zoned for businesses and not as affected by late

night traffic. Whilst our preference is for the Aroha Avenue extension to not go ahead, if it were to go ahead we would expect as a bare minimum that the council place restrictions on when movies may conclude (e.g. no later than 8pm). Similarly, only allowing access to Aroha Avenue via Exeter Road at certain times of the day (addressing the issues raised above) would be somewhat of a halfway step, however our preference is for Aroha Avenue to remain a quiet residentially orientated street rather than an entry/exit to St Lukes and a thoroughfare to commuters circumventing the at times heavily congested St Lukes road.

**Inconsistency with Public Transport Initiatives.** It was indeed interesting to see the report from Booz and Co. that highlighted there has been no increase in the proportion of Westfield St Lukes shoppers using public transport from 1999 to 2008. This is despite the fact there has been considerably more bus services added to the main nearby arterial routes and more significantly a massive local council focus rail services in that time. It is hard to see how adding more free car parks to St Lukes is going to promote the use of public transport. The relative success of the public transport initiatives of the council with regards commuters to the CBD has been largely supported by the lack of availability and cost of parking in the CBD. Additional free parking at St Lukes only seeks to undermine public transport initiatives and will add to traffic congestion in the area.

**(3) the decision we seek from the council:**

In addition to declining the plan modification we would like the council to consider that The Westfield St Lukes Mall has in the last 10 years continued to expand, both upward and across St Lukes Road. There seems to be little long term planning being done by the shopping centre in the context of its accessibility both today and in the future. Indeed, when we purchased our property in 2001 we were told that the plans St Lukes had to expand toward Aroha Avenue had been withdrawn and had instead chosen to expand across St Lukes Road. Some 8 years later, the proposal has resurfaced, largely due to poor planning in regards to traffic congestion and parking. Thus, we would like the council to request the mall support public transport initiatives by considering the following:

- seek to introduce fees for parking and therefore disincentivising the use of private transportation
- offer public transport deals, where those who travel to St Lukes via public transport are entitled to discounts
- shuttle services to and from the Morningside Drive train station.

Failure to use this opportunity to address St Lukes' lack of meaningful engagement with public transport (see Booz and Co comparison with 1999 statistics comparison) will only see more congestion in this area and only result in a further submission in later years from the mall for further expansion to address lack of parking (again) and to address congestion (again). The general public is being asked to get behind public transport initiatives and it is inappropriate to allow this member of the community to undermine these initiatives.