

Comment on the Dominion Road Mixed-use Development Application

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Claire House Aged Care		
*First name	Glenda		
*Last name	Kingsbeer		
Postal address	91 Prospect Terrace		
*Home phone / Mobile phone	██████████	*Work phone	██████████
*Email (a valid email address enables us to communicate efficiently with you)	████████████████████		

All sections of this form with an asterisk (*) are mandatory.

2. *We will email you draft conditions of consent for your comment

<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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3. Please provide your comments on this Application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages

7/06/2021

Panel of the Alternative Environmental Court

Private Bag 63002,

Waterloo Quay, Wellington 6140

I write in appreciation of the opportunity to present my pressing concerns on the proposed development on the site at 360 Dominion Road (88 Prospect Terrace and 113 Grange Road.) in accordance with the *Covid-19 Recovery (Fast-track Consenting) Act 2020*.

I am writing as a Prospect Terrace land and business owner adjacent to the proposed development. I have owned and operated Claire House Aged Care Facility on Prospect Terrace for the past 36 years. Claire house is a registered provider of aged care contracted to the Ministry of Health and the A.D.H.B and is situated on [REDACTED] and [REDACTED]. Mt Eden. These five properties are residential care homes adjacent to the development and will all be affected by this proposal.

This development in its current capacity, would significantly change road safety on Prospect Terrace and impact adversely on the elderly residents living and entrusted into my care. Risk management and safety is the primary overarching force behind the care of the elderly. This proposed plan would detrimentally affect this status; undermining the ability to maintain a safe road environment. Residents would not have the ability to access Prospect Terrace safely because of the increased volume of traffic brought into Prospect Terrace by the development. This would be due to the 240 supermarket carparks along with an additional 120 apartment vehicles all entering and exiting Prospect Terrace. All vehicle entry accessing the site is on Prospect Terrace, adjacent to Claire House and one of two exits again adjacent to Claire House. The large heavy vehicle way is immediately opposite Claire House and will create a dominance of vehicles and trucks over each 24-hour period. All traffic from these

entry/exit ways will be concentrated immediately in front of the gates of Claire House Aged Care.

Parking:

Prospect Terrace is 11 meters wide, with existing car parks on either side of the road. Parking is constant on Prospect Terrace, this is increased by daily shoppers, commuters, and evening diners. Parking is further increased with events at Eden Park during the evenings and the weekends. The short fall in proposed extra car parks for the development is also of concern. There are only 80 carparks available for the 121 apartments and no allocated staff parking at the supermarket predicting further increased parking on Prospect Terrace and Grange Roads.

Greatly increased traffic congestion on Prospect Terrace and Grange Road:

There is immediate concern for the ability of traffic to move in the required nature. Delivery trucks and vehicles will be operating together on Prospect Terrace as well as parked cars on each side of the road. Traffic jams and delays will be caused by queuing of vehicles along Prospect Terrace to and from the vehicle ways, trying to enter/exit Dominion Road. Increased potential for accidents caused by the predictable incremental volume of traffic (Site development Trip generation figures - traffic 100% incremental to Prospect Terrace) in a concentrated area and directly outside Claire House, that this development will generate and encourage, would be considered inevitable.

Extra-large vehicle way on Prospect Terrace.

As quoted directly from Barker & Associates Ltd report: *This proposal is not compliant with the AUP (op) traffic standards regarding the residential loading vertical clearance and oversized vehicle crossing widths of the combined supermarket service access and residential car parking access/exit on Prospect terrace along with the supermarket customer and commercial car parking accesses/exits on Prospect Terrace and Grange Road.*

This direct admission to noncompliance is contradictory to the development's subsequent claims of further positively developing Dominion Road under Covid Fast Track Legislation. No positive development can be executed with deliberate, and

wilfully blind noncompliance. This entry/exit way is directly opposite Claire House aged care and would compromise resident safety and quality of life dramatically due to the vehicles and delivery trucks transporting in and out of the vehicle way and the daily build-up of traffic congestion right outside their gate.

This will affect the residents' ability to safely access their home at Claire House. This vehicle way will be extra wide at 13 meters, to accommodate for truck size and heavy vehicle deliveries. This proposed vehicle crossing width is wider than permitted in the Unitary plan. The supermarket will be a 24-hour operation with deliveries occurring throughout the same period.

Current observations and monitoring of the deliveries from the existing Countdown supermarket 200 meters away from the proposal, is that bread trucks deliver early morning from 4 am on with large delivery trucks still delivering stock through to 10 pm at night. The expectation that the New World supermarket deliveries would be similar, if not more, due to the proposed larger size of the supermarket and consequently considered an accurate assessment of the food delivery functionality.

Traffic Report:

The extent of the vehicle congestion and queuing of cars and trucks, was seemingly missed in the recent traffic report completed by TPC. This failure further highlights just how large and significant the additional traffic on the residential side street will be.

I am a member of Edenwelope, neighbourhood Society and my concerns are shared by the many homeowners living on Prospect Terrace and Grange Road. We have contracted Stantec, design and consulting company to complete an independent traffic report on our behalf to be presented with our submissions, accompanied by many photos of existing traffic volume and difficulties already experienced on the side roads. (Calculated 100 percent – increase on Prospect Terrace, 70 percent– increase on Grange Road)

Safety island and road width on Prospect Tce:

With an intensified busy street, an additional intended “safety island” on Prospect Terrace, approx. 50 meters from Dominion Road and again outside Claire House, will

have no benefit to the public, contrary to the proposal, but rather it's detriment will be immense.

Pedestrians will be required to "step onto" a "safety island," an exercise that cannot be fully executed without risk, with an expected 100% increase in vehicle movement on Prospect Terrace.

One can only assume that this island brings with it an increased risk of accidents occurring. The vehicle flow will be constant and the potential for leaning or swaying truck bodies coupled with the chaos of vehicles passing and cars queued up to and past the safety Island and Claire House; will create a dangerous precedence on a 11-meter road. Sufficient lane width is required for delivery vehicles, so that they are separated from opposing traffic on two lane roads. The proposal is for three lanes in total – one lane off Dominion Road into Prospect and two lanes out of Prospect into Dominion Road, one left turning and one right turning. Already there is queuing at peak hours currently on Prospect Terrace, with cars trying to turn left into Dominion Road while forming a second lane to do so.

Pedestrian access along Prospect Terrace will be perilous and of great concern to the elderly residents who may no longer be able to safely access the community around them. The constant use of the vehicle way opposite Claire House, with cars/trucks entering the New World Supermarket and the 121 apartments dwellers over a 24-hour basis, will increase vehicle volume on Prospect Terrace alarmingly. The supermarket is a 24-hour business with delivery trucks expected in and out of the vehicle way over the same 24-hour period.

Ambulances on Prospect Tce:

Another major concern is the ability for ambulances to enter Prospect Terrace due to increased traffic congestion trying to negotiate in and out of Prospect from Dominion Road which will prove an onerous manoeuvre. The use of ambulances is critical. The current proposal with 100 percent increase in traffic on Prospect Terrace would halter the fast response needed by the ambulance in critical situations. It is prudent here to note that although an ambulance may use their sirens and lights, a highly congested

area with additional vehicle queuing along Prospect Terrace from the supermarket, will slow the response rate of the ambulance immensely.

Currently there are four existing speed safety bumps down Prospect Terrace. Vehicles using the speed bumps slow down and give way to the oncoming vehicle indicating customary traffic control due to the width of Prospect Terrace. This alternate route (even without safety speed bumps in the future) would also disrupt ambulance efficiency due to the size of oncoming commercial vehicles and the inevitable congestion of traffic on Prospect Terrace.

Alternative plan:

Professional recommendation to Edenwelve association is for an alternative proposal to the development that introduces an entryway on Dominion Road into the supermarket, via existing main entry/ traffic lights.

This alternative plan also shows 2 subsequent entrance and exits with 2 singular lane entrances on Prospect Terrace and exists on Grange Road. The single traffic entrance from Dominion Road and the entrance on Prospect Terrace would further avoid circuitous commercial traffic on the suburban side streets. This alternative plan calls for the reduction of the supermarket by 50% - this would further reduce traffic congestion and promote the subsequent safety of the public and notably Claire House Aged Care.

The alternative plan would also create a generous walkway on the eastern side of the development of 6.0m wide, in preference to an imposing blank wall, creating an inviting neighbourhood amenity and access way, while retaining the more commercial aspects of the original development in the centre of the project. An inviting neighbourhood is critical to the development of Prospect Terrace, Grange Road and Dominion Road to further entice the public to come and enjoy the functional and appealing individuality that this area has to offer.

Covid Fast Track Legislation and it is contradictory purpose:

If consideration is to be given to Covid economic recovery it should be with correct recognition around the balance of employment opportunities of the proposal versus compromising existing employment. Consideration should be given to the frontline

aged care workers whose commitment under unprecedented and extreme circumstances to keep our elderly protected and safe from covid 19 was outstanding. These 50 workers could now face the possibility of losing their employment at Claire House if Prospect Terrace is deemed unsafe due to disproportionate traffic flow, further adding danger and disruption that could discourage the elderly from living on Prospect Terrace. Concerns have already been received from family members living in the area who are very fearful of the road safety issues of the proposal. This in turn places my business, its employees, and the long-established reputation of Claire House at risk.

This is in direct contradiction to the Government's purpose to *“urgently promote employment to support New Zealand’s recovery from the economic and social impacts of COVID-19.”*

Claire House is also a work placement facility for AUT students and students from other education agencies whereby trainee health care givers gain experience and skills with the intent to further increase their opportunity for future employment because of the knowledge and experience they gain from their placement at Claire House.

The acceptance of the proposal in its current state can only be expected to undermine the very purpose of the legislation set out by Government to promote employment. Calculated and contrary risks contributing to employment losses and lost employment opportunities are anticipatory should Prospect Terrace be deemed no longer traffic safe to continue providing residential aged care, culminating in the subsequent demise of Claire House. The specialty boutique sized supermarket of Farro, has a staff anticipation of its existence being swallowed by two large supermarkets in the area. These staffing employment losses although smaller of 35 staff are worthy of consideration when added to Claire House and off set against the 130 new jobs that a large supermarket would bring. This directly contradicts that purpose of the Covid Fast Track Legislation as discussed above.

Critique of Barker & Associates Ltd report:

The Barker & Associates Ltd assessment report considers that the development will be in keeping with the emerging scale of mixed use and residential intensification along the Dominion Road corridor and will not generate adverse effects on neighbors. It

goes on to add overall, it is considered that any adverse effects in terms of building dominance, shading and privacy will be less than minor.

My response and reaction to this is less than submissive. This assessment that any adverse effects will be less than minor is without any consideration of the intensified adverse effects the development will have on the residential side streets of Prospect Terrace and Grange Rd. The Heritage family appeal that Mt Eden Villas have sustained over many generations on these side streets is vastly different to Dominion Road and the report fails to acknowledge this historical difference and the character of Mount Eden. Prospect Terrace and Grange Road will be reduced to chaotic traffic lanes, vehicle volumes far exceeding that of normal numbers of vehicles, too great to be considered reasonable, or acceptable.

TPC's assessment considers that these infringements will not give rise to any adverse traffic or safety effects.

This residential loading vertical clearance, oversized vehicle crossing, residential car parking access/exit on Prospect Terrace, the vehicles of supermarket customers and commercial car parking accesses/exits of Prospect Terrace - are directly opposite Claire House where notably 62 elderly residents reside, 57 rest home and 5 supportive living residents. To suggest that adverse effects with respect to traffic safety, access and parking related matters will be less than minor on Prospect Terrace as portrayed in this report, is more than majorly misrepresented and is direct negligence. As with more traffic comes more risk; this simply cannot be mitigated or overlooked as "minor."

It is of my view that degrees of absurd irony are presented in the report as quoted: *the proposed arrangement of accesses to the development separates out pedestrian and vehicle access by placing the vehicle access **on the side roads** and places a strong focus on pedestrian activity in the vicinity of the pedestrian signals on the Dominion Road frontage.*

The side roads are residential streets where families and residential care homes are located, a fact that appears to be dismissed and negligently avoided in this report. The residential side roads and the commerciality of Dominion Road can work in harmony with their differences, but this does require sufficient structure for each to retain their individuality. Once again, there is no consideration of this in Barker & Associates Ltd

report, which reads with a commercial bias for Dominion Road while undervaluing the side roads of Prospect Terrace and Grange Road.

This strategic avoidance makes way for vehicle accesses to a supermarket and not only to a monolithic apartment complex (10.3 over height per the Unitary Plan) but a monolithic viewpoint from the Barker & Associates Ltd who blithely consider this to be acceptable and of “minor” inconvenience.

I wish to conclude by stating that I am in support of a development that enhances and strengthens the community and neighbourhood. This strength would be further enriched by lifestyle apartments of a proportionate community size, including a variety of accommodation and hospitality options, along with pedestrian gardened walkways for all to utilize and enjoy.

Thank you for taking the time to read my response to the development proposal.

A handwritten signature in blue ink that reads "G. C. Kingsbeer". The signature is written in a cursive style with a large initial 'G' and 'C'.

Glenda Kingsbeer.

Owner/ operator of Claire House Aged Care.