

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)	Koefoed Family Trust		
*First name	Harald Lucien Bruce & Loren Kendal		
*Last name	Koefoed		
Postal address	[REDACTED]		
*Home phone / Mobile phone	[REDACTED]	*Work phone	[REDACTED]
*Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]		

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

Dear Panel,

Dominion Road Mixed-use Development

Thank you for the opportunity to comment on the Dominion Road Mixed-use Development application.

The application as applied for should be rejected because the adverse effects on the environment of the proposed development are considerable and irreversible.

There are significant adverse effects on the safe, efficient, and effective operation of the transport network

For the reasons set out in Stantec's independent assessment of the ITA, the proposed development would result in more than minor adverse effects on the safe, efficient and effective operation of the transport network.

In particular, we note the following adverse effects on the environment:

1. Adverse effect on the adjacent and surrounding walking environment:

The proposed development would have a more than minor adverse effect on the adjacent and surrounding walking environment. The road expansion (widening of Grange Road and Prospect Terrace to create extra lanes), the extra private vehicle trips generated by the development, and the intensification of these increased

vehicle movements across four proposed crossings would significantly increase pedestrian exposure to traffic and safety risk.

This adverse effect is not mitigated.

2. Adverse effect on the adjacent and surrounding cycling environment:

The proposed development would have a more than minor adverse effect on the adjacent and surrounding cycling environment. The road expansion (widening of Grange Road and Prospect Terrace to create extra lanes), the extra trips generated by the development, and the intensification of these increased vehicle movements across four proposed crossings would significantly increase cyclist exposure to traffic and safety risk.

This adverse effect is not mitigated.

3. Adverse effect on journey times for buses and general traffic traveling along Dominion Road - notable additional delays

The proposed development would have a more than minor adverse effect on bus and general traffic journey times along Dominion Road by introducing notable additional delays for both public transport and private traffic.

This adverse effect is not mitigated.

4. Adverse effect on the safe operation of the transport network by significantly increasing risk of right turning vehicle crashes on Dominion Road at the two intersections (and others):

The proposed development would have a more than minor adverse effect on the safe operation of the transport network by significantly increasing right turning volumes from Dominion Road to Prospect Terrace and Grange Road, which would significantly increase the likelihood of right turning vehicle crashes on Dominion Road at the two intersections resulting in deaths and serious injuries.

This adverse effect is not mitigated.

5. Adverse effect on reduction of transport climate change emissions

The proposed development would have a more than minor adverse effect on the reduction of transport emissions (the imperative to meet steep targets for cuts to transport emissions - see Climate Change Commission report dated 31 May 2021) due to it:

- (1) only being viable with road expansion - a measure which encourages car usage and is contrary to achieving low emissions;
- (2) providing a large number (277) of car parking spaces, encouraging the use of cars;
- (3) discouraging the use of buses as a result of the notable delays to buses it would cause;
- (4) discouraging the use of CO₂-neutral alternative modes of transport as a result of the additional congestion and safety concerns for pedestrians, cyclists and two-wheelers it would introduce;
- (5) causing increased congestion – congestion increases carbon emissions i.e. emissions are lower in free-flowing traffic;

This adverse effect is not mitigated.

The proposed development is contrary to several relevant objectives and policies

1. AT's Vision Zero and MOTs Road to Zero strategies

The proposed development is incompatible with AT's "Vision Zero" strategy and MOT's "Road to Zero" strategy, both of which aim to reduce the number of deaths and serious injuries on our roads.

Contrary to those strategies, the proposed development can be expected to result in an increase in death and serious injury traffic accidents as a result of (a) the adverse effects it would have on pedestrian safety and cyclist safety, and (b) the high likelihood of an increase in the number of right turning vehicle crashes on Dominion Road at the intersections with Prospect Terrace and Grange Road.

As the Stantec report confirms, one crash involving a northbound vehicle turning right into Prospect Terrace and a southbound moped along Dominion Road has occurred since the publication of the ITA. The crash occurred during a heavily congested weekday PM peak period. The proposed development would increase congestion and significantly increase right turning volumes from Dominion Road into Prospect Terrace and Grange Road (see Table 5 of Stantec report, page 14) and is highly likely to generate an increase in death and serious injury traffic accidents.

2. Government objective to accelerate action to reduce transport emissions

The proposed development is contrary to the Government's objective to reduce climate emissions and the action the public wants taken on climate change (as shown by public opinion surveys).

The Government has an urgent objective to reduce climate emissions, an important objective in the fast-track legislation – far more so than housing supply. Four of the nine examples of how a project might be adjudged to result in a public benefit are environmental imperatives, specifically climate imperatives.

The Climate Commission's path to net zero carbon shows people will need to take more trips by bikes, scooters, walking and buses. Following the Climate Commission's report, which was endorsed by Prime Minister Ardern, Auckland Council is backing faster moves to cut the use of private vehicles.

Transitioning to a low emissions economy requires action to be targeted at expanding public and active (walking, cycling) transport rather than road expansion.

Contrary to the Government's objective to reduce climate emissions, the proposed development is a car/private vehicle centric development that requires road expansion to carry the increase in traffic volumes that it would generate and is providing a large number of car parking spaces which will encourage car usage. It would discourage the use of buses (due to notable delays it will cause to bus journeys) and CO2-neutral alternative modes of transport (due to increased congestion and adverse safety impacts).

3. Regional transport planning policies to improve walkability and reduce reliance on private vehicle trips.

The proposed mitigation measures for the modelled increase in traffic delays at the Prospect Terrace and Grange Road intersections with Dominion Road - widening Grange Road and Prospect Terrace to create extra lanes - are designed to prioritise vehicular traffic over pedestrian movements. Prioritising vehicular traffic over pedestrian movements does not align with regional transport planning policies to improve walkability and reduce reliance on private vehicle trips.

4. AT's road network objectives – cut car use, increase public transport use and the use of alternative modes

As a heavily car centric development, that discourages the use of buses (due to delays) and alternative modes (due to safety concerns), the proposed development is contrary to AT's objective to reduce private car usage and promote CO2-neutral mobility by prioritising sustainable and environmentally friendly transport modes, such as two wheeler riding, walking and public transport ahead of cars.

5. AT's road network objectives –Arterial Roads

The proposed development would adversely impact the sustainability of Dominion Road as a key arterial road by increasing travel times and congestion along Dominion Road and consuming scarce arterial network capacity for supermarket traffic, in an area where there are already two supermarkets.

The application as applied for should be rejected because the adverse effects on the environment of the proposed development are considerable and irreversible, and are contrary to current climate change and transport objectives and policies.

Yours faithfully,

Bruce & Loren Koefoed