

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.

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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="radio"/>	I can receive emails and my email address is correct	<input type="radio"/>	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

[Submission attached to email]



Generation Zero considers that the Dominion Road mixed use development should be **approved with the inclusion of our suggested changes** and conditions to ensure implementation. It will positively contribute to well-functioning urban environments through the provision of a mixed use development that increases housing supply on a major public transport route - allowing for a low-emissions lifestyle. Our changes however should further support the project to push housing and transport emissions reductions.

Suggested Changes

We suggest the following changes to further align the project with the purpose of the CRA - in particular that relating to well-functioning urban environments, providing for the wellbeing of current and future generations, environmental impacts including greenhouse gas emissions and supporting the sustainable use of natural and physical resources.

1. Greater action to mitigate the impact of additional vehicle traffic on the road network from the development (an effect noted in the application) - as well as reduce greenhouse gas emissions - by decreasing the number of parking spaces, increasing provision for active transport and other micromobility parking in the project, and ensuring integration between the design and the bus stop right outside. We suggest:
 - a. The removal of all the residential parking spaces would reduce the effect on the road network and remove the need for additional lanes proposed on Prospect Terrace and Grange St. In their place should be a limited number of permanent car sharing service spots (e.g. City Hop).
 - b. Much greater implementation of micromobility infrastructure such as secure covered parking and dedicated pathways into and out of the project site
 - c. Direct and simple covered access to the bus stop outside
2. We oppose the road widening/additional lanes on Prospect Terrace and Grange Road and instead ask for conditions to ensure the project enhances the streetscape for active mode travellers and pedestrians (including wider footpath) so as to help mitigate the noted impacts on neighbourhood amenity from the development. Removing parking spaces as we have noted above reduces the need for road widening for increased traffic volumes.
3. AEE Section 19 Assessment (12.1.2) point vii mentions that the development will “encourage the use of public transport” and “promote walking and cycling”. We ask the

applicant to provide further information on how they will achieve this beyond the development being on a public transport route and the required cycle parking. The initiatives developed by the applicant (such as the removal of car parking spaces we have suggested above) should be formalised and monitored through a condition.

4. All developments must be energy efficient if Aotearoa is to reduce our energy and housing emissions as quickly as required. As such, we suggest this development achieve at least an 8 Homestar rating as per the NZ Green Building Council.
5. We suggest a change to the application to require the construction of the development to have net zero greenhouse gas emissions (through low emissions construction methodology where possible as well as emissions off-sets) and a condition to require the lifecycle of the development (including production of building products) to achieve net zero greenhouse gas emissions.
6. We further note the references in the AEE and Appendix 18 to providing affordable housing options. We ask that a condition be included to ensure the project proceeds in general accordance with providing affordability and this be monitored by Auckland Council.

Discussion

While we support intensification with mixed-use developments along key bus routes, currently there is a high proportion of residential car parking to residential dwellings (1:0.8) which would make this a private vehicle dependent living arrangement, which in turn makes it a high emissions and high congestion living arrangement. Road widening and additional lanes will also contribute to (and are a result of) these negative outcomes and so add to the negative feedback loop between providing high amounts of parking and then needing to mitigate impacts on the transport network which in turn induces more parking need.

The changes we have suggested would enable and encourage a low-carbon lifestyle. In assessing this application we ask the Panel to carefully consider how the project could better align with the significance placed on well-functioning urban environments in the NPS-UD, the quality compact approach to urban form in the Auckland Plan including making efficient use of land, the quality built form and urban environment emphasised in the Regional Policy Statement (B2.2 and B2.3) and Assessment 19 of the CRA. The approach we have suggested would be in line with the Climate Change Commission's (CCC) final advice report, *Ināia tonu nei*, which recommends significant transport mode-shift is required to decarbonise Aotearoa. This mode-shift requires a major push to disincentivise private vehicle use (removal of residential car parks) and a major push to incentivise public and active transport use (the other suggestions included here). This is also supported by the new Ministry of Transport green paper, *Hikina te Kohupara*, on how Aotearoa will need to reduce transport emissions in line with the CCC advice, which also suggests significant modeshift on a scale not seen previously in Aotearoa (but already achieved in comparable cities around the world).

As noted, the removal of the parking spaces and disincentivising private vehicle use would resolve issues around increased vehicle traffic on the road and intersections. We also note there is no minimum parking requirement in the Auckland Unitary Plan (AUP) for residential developments in the project site zone, and in fact the National Policy Statement on Urban Development 2020 (NPS-UD) requires city councils to remove parking minimums from their district plans. This is because both the NPS-UD and the AUP understand that providing car parks are antithetical to climate friendly developments when they are near major public transport such as this project.

Technology required for highly efficient homes and buildings already exists, is widely used overseas, and is being implemented in Aotearoa already. [Ockham Residential's Daisy Apartments](#) from 2018 (3 years ago) has a 10 Homestar rating, Kāinga Ora already committed to developing a [carbon-neutral homes programme of work](#), and the [Alderman Apartments](#) are likely to achieve net positive energy. As such, all developments moving forward - including this one - should be held to a high standard of efficiency, and we recommend net zero lifecycle emissions to be appropriate.

Conclusion

Assessment of Environmental Effects Section 12.1.1 How Project Meets Purpose of the CRA states *'The project is being conceived and designed to make a positive contribution to NZ's efforts to mitigate climate change and transition more quickly to a low-emissions economy; and strengthen environmental, economic and social resilience.'*

We support this intention and as such consider the project should be approved with our changes ensuring these goals are robustly met

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