

30 August 2021

The EdenWeLove Society as previous commenters from Grange Road and Prospect Terrace, welcomes the opportunity to provide comments on the further evidence of Todd Langwell on the traffic scenarios proposed as mitigation for the 360 Dominion Road-Mixed use development.

The Panel's minutes No 9 and 10 and the additional information was circulated to the Society members and feedback sought, to be collated into the following comments.

Making sense of this additional information was a consistent theme of the feedback received from the Society's members and is succinctly summarised by one member who said "*I have read and re-read the response from Silk Rd/Foodstuffs and a cynical person would conclude this report is stuffed to the brim with data and assumptions designed to confuse a reader and to conclude a specific outcome in their favour.*"

The consensus from EdenWeLove Society members was that the applicant has changed the modelling assumptions to make the outcomes look better, but continues to compare the new results with the old results: apples with pears, not pears with pears. It is bad science to compare the Scenario D (Optimised and Refined) results with Scenario B as the model parameters are significantly different. If a comparison is to be made then the Scenario B intersection configurations should have been run through the modified model. Only then would a valid comparison be possible. Since the change to the modelling parameters gave better results for Scenario D one would expect that the same would apply to Scenario B and the differences in the revised versions may not be as great as the results presented suggest. By not doing this exercise, it looks like TPC are painting a rosier picture of the outcome than would be reality.

The base model for Scenario D has been modified. This is an acknowledgement that the original modelling was faulty and not to be trusted. The new modelling is also suspect and we challenge the assumptions and supposed analysis.

Their traffic report modelling shows or assumes that the "existing and consented" movements and time taken to travel within their measurement zone on Dominion Road are greater than they would be with the added supermarket and no traffic signalling (Scenario B). This does not make sense. For example, the Thursday PM peak: a southbound vehicle on Dominion Road is alleged to take 554 secs, whereas under scenario B (Supermarket no traffic lights) its only 544 secs. The tables of vehicle movements show similar reductions in numbers. Even if it is assumed that only a very small number of vehicles will be going to the supermarket it is illogical to suggest that the travel time will reduce with addition of extra vehicles. One possible explanation is that the impact of the people who are currently working in the building at 360 Dominion Road has been overestimated. While it is probably true that these workers are currently having some impact on traffic movements on Dominion Road, this may have been overstated in the basic assumptions/modelling. It also appears that perhaps vehicles entering the supermarket disappear from the modelling, whereas in real life as many will be leaving as entering.

How do we end up with a reduced traffic delay in the latest TPC report despite adding a traffic hungry retail supermarket? By leaving current measured traffic data out the report it appears to present a more favourable case that recent traffic report players appear not to have been made aware of relevant background information. The early TPC traffic report dated 19/4/21 submitted by applicant, peer review appendices p 24, 5.5 Table 2, shows actual measured site data and all agree that the existing traffic times for Thursday PM peak between Bellwood Avenue and St Albans Avenue is as follows: -

Northbound 78 seconds Southbound 226 seconds

TPC even report on p37, 6.2.4 Scenario D (with traffic signals added to Dominion Road /Prospect Terrace Intersection - PM Peak that the '*model shows large delays and queue lengths on both Prospect Terrace and Grange Road, extending back to, and past and within the site, to the point where the site would effectively be unable to function.*'

The above measured site data conveniently doesn't appear in any of the subsequent reports that we can find?

Instead the latest TPC Traffic report date 13/8/21 now shows the lowest figures described as a Base Case (including future consented work that doesn't exist at this time) and that adds more than 2-3 times to current traffic journeys. This also is repeated in other tables including Flow's reports as instructed to, where this column is referred as Existing + Consented without the comparison of the existing lower baseline measured traffic. Both these columns show the following results: -

Northbound 303 Seconds Southbound 554 Seconds

Travel times on Dominion Road more than double from the existing which is what we would expect based on actual existing traffic measurement. Even TPC best revised case which is Scenario D (Refined), that includes reduced vehicle numbers from the Beca report dated 13/8/21 p10, Table 5, and also the optimised intersection traffic lights, increases by 2 -3 times current traffic times as follows: -

Northbound 286 seconds Southbound 456 Seconds

The assumptions to refine Scenario D also draw a long straw in terms of patrons being able to pick up more than a bag of shopping on foot or getting off a bus to do shopping. In reality they are more likely to drive from home, within metres of the site without the offsite use of a trolley, or take an Uber (more traffic) to carry their shopping.

The above would appear to show that TPC have not met the Harrison Grierson goal of achieving a genuine lower traffic delay result as they still appear to be nowhere near 78/226 secs?

The current average speed of existing traffic times for Thursday PM peak between Bellwood Avenue and St Albans Avenue is reported as follows:

9.5 km/h or 3.7 mins to travel 600m.

The modelled average speed of existing + consented traffic times for Thursday PM peak between Bellwood and St Albans is reported as follows: -

under 4.0 km/h or 9.2 mins to travel 600m

This suggests that traffic on Dominion Road will already be virtually gridlocked even before the addition of the proposed supermarket development.

The report from Beca's which the "Refined" model is based upon appears to be a deliberate attempt to reduce the number of vehicles in the modelling to make the number of un-released vehicles look better.

One of the reasons they give for reducing the number of vehicle movements is by suggesting a reduction in the trip movements per 100 m² from 15 down to 11 and they give examples of other Auckland supermarkets trip movement numbers to justify this. This is not a fair comparison. It is understood that Countdown Mt Eden is the busiest Countdown supermarket in Auckland and therefore it would seem logical to assume it would have trip movements substantially greater than the other examples given. Furthermore, Harrison Grierson suggested it should be higher at 17.6 trips per 100 m² (page 8 of their report). Also, 11 trips is inconsistent with the number of car parking spaces Foodstuffs is providing for the supermarket.

There also seems to be a greater allowance given for pass by traffic and traffic relocated from Countdown and, while it is true these vehicle movements won't add additional traffic to Dominion Road, there will still be additional traffic movements on Prospect Terrace and Grange Road. It is unclear to us whether this has been allowed for in the modelling.

The concept of people using public transport and other modes of transport, bikes walking etc. appears again and again in all the reports. We believe this is overstated especially in the near future. Very few people going to the Countdown Mt Eden to do their shopping go by bicycle and only people grabbing a small bag of items come by walking or public transport. It seems unlikely that people will do their weekly shop via any of these modes as

carrying a number of heavy shopping bags makes this extremely difficult. There is no mention of Uber as a more likely alternative or the growth in click and collect as obviously these still add vehicle movements.

Also mentioned a number of times in the various reports is the idea that greater congestion will change people's habits, i.e., travel at different times or via different modes, however, it is likely that many of these will simply try an alternative route which will add traffic to side streets in the area. We already see this with peak traffic congestion now. Valley Road is a good example and is already gridlocked nose to tail 200 m or more in the evening and morning peaks as vehicles attempt to avoid congestion on Dominion and Mt Eden roads.

Impact on side roads still seems to be underestimated with all of the various reports suggesting that Prospect Terrace and Grange Road will be able to cope with the extra vehicle movements without any impact. Having traffic lights at the Prospect Terrace/Burnley Terrace/Dominion Road intersection will turn the side streets into a rat run and this is not considered in the report. Based on our local knowledge and experience of the surrounding streets we believe there will be significant queues at the Tarata Street/Valley Road intersection especially during peak times. The extra traffic from Grange Road will add to this and queues exiting Ashton Road onto Valley Road and Grange Road as well as onto Mt Eden Road will result. Any additional vehicles on Burnley Terrace will be problematic as a large portion of this road is very narrow and effectively one way due to parking on the street. None of this appears to have been taken seriously in any of the applicants traffic reports.

The new modelling shows some improvement for traffic on Dominion Road but this is all at the expense of Grange Road and Prospect Terrace. In Prospect Terrace the average wait time doubles from the base case to the Scenario D but goes up more than 8 times for Scenario D (Optimised) and the maximum queue is 7 times longer for the Saturday peak situation. The outcome will be that motorists leaving the complex will choose to turn east from the development increasing the traffic on both Grange Road and Prospect Terrace and using them as rat runs.

This is reinforced in the Applicants TCP report dated 19/4/21 on p37, 6.2.4 Scenario D with traffic signals added to Dominion Road /Prospect Terrace Intersection -PM Peak that the *'model shows large delays and queue lengths on both Prospect Terrace and Grange Road, extending back to, and past and within the site, to the point where the site would effectively be unable to function.'*

Regardless of the assumptions in the modelling the outcomes show that the impact of the traffic generated is still significant and is not mitigated by the proposed interventions. The Scenario D options are still reliant on third party input for the implication of the mitigation in relation to the traffic generation as a result of this development.

Scenario D (Optimised) assumes that there will be no right turn from Dominion Road southbound into Burnley Terrace. Instead, the modellers have transferred the right turn traffic that would have gone into Burnley Terrace into King Edward Street. They clearly have no appreciation of the street layout in this neighbourhood. Burnley Terrace is a through street from Dominion Road to Sandringham Road with only one side street (Marlborough Street) coming into it on the northside at the Dominion Road end. With no right turn from Dominion Road directly into Burnley Terrace motorist will most likely access it via Marlborough Street from Bellwood Avenue as this is the nearest right turn from Dominion Road before Burnley Terrace. Turning right at King Edward Street to get to Burnley Terrace would not be sensible as it would require motorists to shift south to Paice Avenue and then make two right turns, first on to Sandringham Road and then onto Burnley Terrace, both across traffic and could add up to 2 km to the journey. It would be unlikely that the King Edward Street/Paice Avenue option would be adopted because of the narrowness of the most western section of Paice Avenue which is not easy to navigate.

The traffic light option at the Prospect Terrace intersection assumes that there will be a three-way pedestrian crossing with the existing pedestrian crossing relocated northward, but there is no discussion about what happens to the existing bus stop which is shown to have the new pedestrian crossing over it. Again, this suggests that the proposal has not been thoroughly thought through.

Scenario E is the one where the Prospect Terrace intersection remains unchanged (despite having considerably more traffic volumes) and Grange Road is signalised. Leaving Prospect Terrace with a single lane exit onto Dominion Road is short-sighted particularly with the additional vehicular movements from the supermarket and

new residents in the apartments, the latter being only able to exit the complex on to Prospect Terrace. If this were to be what happens it would be easy to see motorists resorting to going east before going west or using the drive through the supermarket carpark to get to Grange Road so they can use the right turn signal on the Grange Road traffic lights. This situation has not been considered in the modelling.

The significant adverse safety impact remains for pedestrians at the Grange Road/Dominion Road intersection.

Only one intersection can be signalised: with both signalised there would be excessive queuing and delays. In the new proposal, there'll only be a single lane out of Grange Road. This will mean traffic turning right into Dominion Road will hold-up left turning traffic, causing increased queuing and delay. Scenario D of the ITA was, according to the ITA, unviable and unsafe due to this excessive queuing and delay. The new proposal for a single lane out of Grange Road will increase the queuing and delay.

TPC have taken a proposal that is unviable and unsafe, made it worse by removing a lane, which will increase queuing and delay and then changed the assumptions in the model so that they can claim it is viable and safe.

As we know, modelling is only as good as the assumptions and data that goes into the model. Beca's review concludes that the TPC assumptions are conservative and that the outcomes will likely not be as bad as the results show. As above, we have identified failings in these assumptions so have no confidence in the validity of the modelling.

Beca have also pointed out that the ratio of parking to floor area of the supermarket will result in less spaces than would be normal (1:23 sq. m. v 1:18 sq. m). Whilst the EdenWeLove Society does not want to have increases in traffic generated by the supermarket, our concern is that the amount of parking provided is adequate otherwise Prospect Terrace and Grange Road are going to be disrupted by customers queuing for parking spaces with the consequential impact that this will have on vehicle movement in our streets. This is also made worse by the loss of up to 11 angle carparks on street used by local business and hard fought for at the time. How will local business take advantage of free carparking supposedly offered by supermarket when the applicant is underestimating their own carparking capacity, and the supermarket gated security restricts free access to free convenient carparking to local evening hospitality businesses outside retail hours.

Todd Langwell's evidence states in 102 The Scenario D (Refined) model *"that a) Indicates an improvement in the journey times for buses northbound during the PM peak compared to the base case, which is a better outcome than Scenario B..."* but fails to highlight that there is only a 1 second decrease compared to Scenario D (Optimised) and is worse than the Scenario B outcome for southbound buses when the peak direction at this time of day is southbound.

There is concern from the EdenWeLove Society that relying on the pedestrian crossing to the vehicle entrance to the Countdown Mt Eden carpark on Valley Road as a good example to try to replicate is not a good idea from a safety perspective. The raised footpath with pedestrian markings at this location is dangerous from a pedestrian point of view as although the raised table slows the cars down there is much confusion about right of way. Cars do not stop for pedestrians on this as they have nowhere to go when turning in and cannot see when going out and so cars wait on the pedestrian crossing to turn. Children in particular get very confused by this.

We disagree with Todd Langwell's statement in Para 89 – That *"I therefore conclude that, as the Countdown access is considered acceptable, the proposed access arrangement on Prospect Terrace can, with enhancements, be designed to mitigate any adverse effects on pedestrian safety and amenity"*. We do not believe that using this as a safety device at the entrances and exits from the development will significantly improve pedestrian safety. What is actually required is better sightlines and pedestrian refuges.

Looking at the drawings, it appears that there are to be two separate raised pedestrian crossings separated by about the same distance as the wheel base of the rubbish truck used to show the truck tracking from Dominion Road southbound into Grange Road. EdenWeLove question whether this is sensible. The single turning lane out of Grange Road removes the need for an island refuge but the proposed intersection layout does not provide for a pedestrian refuge on the pedestrian crossing over the three lanes across Prospect Terrace. It appears that pedestrian safety is not a high priority in the road layout design.

The truck turning circle into the loading ramp from Prospect Terrace appears to be tight. The outer tracking appears to hit the column support on the eastern side of the ramp. We note that Beca have only drawn truck tracking for the Grange Road intersection from each direction but only from the southbound direction for the Prospect Terrace situation. Is this because it would not work, as it would require the truck to be in the middle lane and turn in front of vehicles in the eastern lane?

The plans show the street parking removed on Dominion Road southbound and the lanes moved east. This requires the lanes to 'bend' which is very uncomfortable manoeuvring as the righthand turn into Prospect Terrace is head on with Dominion Road southbound traffic. This is a further safety issue.

Our conclusion is that the applicant assumptions are incomplete and that the traffic report is based in the realm of a black art with wide ranging assumptive crystal ball gazing. This is evidenced in the production and expense to date of 4 independent Traffic Reports for the same proposal problem, while the applicants reporting thus far lacks substantiated evidence.

There appears to be little agreement on detail and approach and presentation of data even from applicant funded peer review. The applicant report summary conclusions appear to misconstrue their own assumptive data.

The applicant assumptive data conclusions appear misconstrued. The tone of the reporting easily converts from 'less than minor' to 'more than significant or major' effects and impacts.

No matter how you cut it, 546 extra traffic movements is still 546 extra traffic movements into an already congested location with a poor traffic safety record. The traffic flow queue length is still unacceptable. Any minor reduction in assumptive data that the applicant peer review offers is cancelled by their own disclaimers. The applicant peer review by Harrison Grierson admits there is *'not feedback loop to alter the assumptions around altered traffic behaviour that is not counted'*

The applicant report is dismissive rather than supportive of the community concerns suggesting their aspirational bottom line takes precedent over a well negotiated compromise that is a win-win for everyone rather than a win for the applicant and loss for local community amenity. The tone of reporting uses includes assumptive statements such as *'result is acceptable'* to justify an incremental degradation of the local amenity and to worsen existing traffic congestion.

The applicant needs to take responsibility for their own impacts to achieve their own aspirational bottom line. Traffic queueing build up generated in assumptive data needs to be addressed directly on the business site and not on streets as this is unacceptable and should not ever happen at any similar retail establishment.

The additional traffic issues raised are unchanged by adding or relocating traffic lights. The applicant proposal effectively shifts the same problem to a different location on an already congested Dominion Road

EdenWeLove reiterate that the traffic reports and evidence to date still have not addressed the impact of Auckland Light Rail (ALR). This is a potential effect that has been ignored in the application. Whilst it is appreciated that the nature of the ALR is unknown it is not foreign concept and the consultation process for it is well underway. A majority of mooted proposals by ALR are calling for a no right hand turn on Dominion Rd due to raised tracks along centre of Dominion Road. The traffic impacts of this type of future scenario are not addressed in future proofing proposal.

Denise Civil
For EdenWeLove Society Inc