

Statement on PNCC's Plan Change G (Aokautere Subdivision)

From: Chris Teo-Sherrell
Email: teo-sherrell@inspire.net.nz

To: submission@pncc.govt.nz

I wish to speak to the hearing panel concerning my statement.

I made two submissions on the proposed Plan Change on 5/9/2022 and provided further comments about the transport aspects of the proposal on 13/9/2022. The latter were accepted as a late submission.

I still could not gain an advantage in trade competition as a result of those submissions or through this statement.

INTRODUCTION

1. As stated in my primary submission, if lateral expansion of the built-up area of the city is to proceed (an action I don't support) then having a detailed Structure Plan with accompanying Policies and Rules is essential to avoid the uncoordinated, purely profit-driven development that has blighted so many parts of the city.
2. On that basis, I support the overall thrust of Proposed Plan Change G but believe a number of improvements should be made to ensure that the goals of making the area suitable for pedestrians (including public transport users) and riders can be achieved.
3. My relevant background is that I was a PN City Councillor for 9 years from 2007-2016 and, during that time, championed good urban design, safe transport network management and public transport capable of meeting many more people's needs than is currently the case. I have been a Living Streets Aotearoa executive committee member for many years as well as being one of the founding members of the organisation which advocates for pedestrian interests. I am also a long-standing member of Cycle Action Network and have, in the past been, a cycling skills trainer. I predominantly walk and cycle about town but generally use buses for long distance travel and for urban travel in other cities. For rural destinations I occasionally drive.

RECREATIONAL LAND

4. It is pleasing to see the increased requirement for playable green space compared with the original proposal. However, several smaller areas would be preferable to one or two large ones, as proposed, so that people don't have so far to go to get to them (my point 1 on page 3 of submission #68). When such facilities are not nearby, most people drive to them whereas nearby ones are more likely to be reached by walking or riding. The latter

increases the chance for interaction with neighbours and building social capital, as well as minimising noise and air pollution, and enhancing mental and physical health.

5. **I seek that several small flat green spaces be added to the structure plan in place of the one large one that has been added since notification.**

COMMERICAL LAND

6. I have seen no change to the zoning to provide for greater dispersal of commercial activity (as I suggested in point 2 on page 4 of my submission #68). I believe increasing the locations where clean, quiet businesses can operate would make the development more suited to walking and riding. People need destinations within the area not just roads to take them out of it.
7. **I seek that other locations within the Plan Change area be zoned for a restricted range of commercial activity to complement the Neighbourhood Centre.**

SET-BACK DISTANCES

8. Point 6 of my submission (#68) was partly about the set-back distances for dwellings and garages. I understand that my suggestion to decrease the set-back for dwellings to 3m is supported by Council but I have not yet seen any change concerning garage set-backs which Council proposed to be 6m.
9. It is extremely common for vehicles to be parked in driveways such that they stick out over the footpath. This creates a danger for pedestrians, by forcing them onto the roadway. This is particularly inappropriate when it affects children, frail and disabled people. It is also illegal but the law is rarely enforced.
10. The prevalence of large vehicles is increasing, with the most popular new vehicles being Ford Ranger, Toyota Hilux and the like. The 2022 Ford Ranger was up to 5.446m long. Parking it on a driveway without obstructing public space requires at least 6.5m of driveway length because, in addition to space for the vehicle, there must also be room for a person carrying things to walk around the front of the vehicle and for the garage door to be opened.
11. **I seek that the Plan require that garages be set back at least 6.5m from the property boundary.**

PUBLIC TRANSPORT

12. The public transport routes serving the development were poorly specified in the notified Plan. I raised this in my point 7 (submission #68). Discussion at the pre-hearing meetings suggested that there would be two routes, one along each of the urban connectors, Pacific Drive and the new eastern urban connector. This is in keeping with the Regional Council's approach to avoiding, as much as possible, bus routes overlapping or involving loops.

13. It is inappropriate and unnecessary for buses to go through the Neighbourhood Centre. Doing so would detract from the ability to create a village square type of environment that it is desirable to create there. It would also require doubling back to rejoin the eastern urban connector route, something the Regional Council has worked to avoid in its bus services.
14. The Pacific Drive urban connector bus route will pass within 100m of the Neighbourhood Centre while the closest point on the eastern connector route (just prior to crossing the second gully) will be about 400m away, both easy walking distances.
15. **I seek that the bus routes not go through the Neighbourhood Centre.**

TRANSPORT

These comments stem from my point 5 in submission #68 and the additional comments I made concerning the transportation elements of the proposal.

A. Medium Density Area

16. The inclusion of a medium density housing area and a commercial centre are very positive features of Proposed Plan Change G. The former will cater for people who do not want a lot of land and are comfortable living in closer proximity to others. Just as there has been a shift from 'quarter acre pieces of paradise' to lots of 400-800m² over past decades, this move to providing even smaller sections and houses is a sensible progression as our population expands and the need to use resources well increases. I support it.
17. But to be successful, medium density housing areas need to be designed to foster different behaviours from what has been usual (and usually necessary) previously in low density developments. It needs to be done differently in many aspects not just allowing more dwellings to be constructed on a given area of land. There needs to be a distinct differentiation between the medium density zone and the low density areas.
18. Bus stops located close to the medium density area are important in enabling residents to decrease their motor vehicle ownership and use. These need to be in place and bus services provided from early in the development of the medium density area so that people are not dependent on private cars when they move in. Once habits and expenditures are made, it is hard to get people to change the way they do things. Otherwise we will end up with the situation that currently occurs in medium density development in Auckland where public space (footpaths, berms and anywhere else) is commandeered for parking of private vehicles (see photo below as an example). That is a recipe for failure.



19. With limited private outdoor space in the medium density zone, ample public space with seating, medium to large trees, and play areas is also needed. And noise rules need to be different from those in lower density areas because there is less possibility for attenuation of noise by distance and vegetation.
20. The Neighbourhood Centre is an essential part of any such medium density housing area. Not only will it enable residents to meet many of their daily needs nearby and be able to do so on foot or by bike but it also provides for neutral social space where a sense of community can develop.
21. I cover street design and management below at paragraphs 27 to 133.
22. **I seek that the medium density zone is differentiated from the low density areas by greater provision of amenity in public space to create a people-friendly public realm.**
23. **Further, I seek that noise rules for the medium density zone be different (stricter) than those in low-density areas.**

24. Following on from paragraph 15 above, the Urban Connector branching off the eastern Urban Connector and penetrating the medium density zone, eventually leading to the Neighbourhood Centre, should not be included in the structure plan.
25. These areas should be pedestrian- and rider-oriented with stronger constraints on motor vehicle traffic. On diagram 7A.4D the Urban Connector marked F and oriented approximately N-S in the medium density zone should be changed to a Local Street F while the Urban Connector leading directly into the Neighbourhood Centre should become an Activity Street (type B) with narrower carriageways and lower target operating speeds, consistent with the higher pedestrian activity in these areas. To leave it as notified will encourage people to drive to the Neighbourhood Centre rather than using active transport and detract from the ambience and sense of safety that is needed to make the medium density housing area successful.
26. **I seek that the streets marked, in the notified Plan, as Urban Connector leading from the eastern Urban Connector to the Neighbourhood Centre be included as Local and Activity Streets instead, as described in paragraph 25.**

B. URBAN CONNECTORS

27. Urban Connector A (covering Pacific Drive from Aokautere Dr to Atlantic Drive)(7A.4D1) doesn't provide a safe environment for riding because:
 - a) One of the cycle lanes is right next to the parking zone (making riders susceptible to being 'doored' – a significant cause of serious injury to riders) and neither cycle lane has a buffer between it and the motor traffic lane.
 - b) Pacific Drive slopes down from south to north and motor vehicle speeds along it are frequently higher than even the current speed limit. Although the proposed intersection treatments may help to slow traffic at those points no change, is proposed for many of the intersections and unsafe speeds are likely to continue.
28. Many people, younger and older, are turning to riding again or for the first time, especially now that electric bikes are available. High quality cycleways on Aokautere Dr (from Silkwood Place) and Summerhill Dr will make riding into the city centre feel safe, enticing people to do this. Pacific Drive also needs to have good quality facilities for cyclists so that it isn't the weak link that discourages people from riding into the city using the Aokautere-Summerhill facility.
29. Ideally, for Urban Connector A, parking would be indented to provide more space to create optimal cycle lanes with a buffer on each side of the lane. Given that this part of Pacific Drive already exists it would involve considerable expense to do that and a compromise solution might be for buffers to be marked between the cycle lanes and the motor vehicle lanes. This gives riders some confidence to ride wide in the cycle lanes when passing parked cars and also helps to guide moving motor vehicles away from the cycle lane and to give riders adequate space to feel safe (the 1m passing rule is likely to come into force in 2024).

30. Another alternative would be to position one of the cycle lanes to the kerbside of the parking zone with a 0.5m buffer between them. Most cars carry a single person and so the likelihood of a door opening in front of a rider is greater on the right side of parked cars than on the left side.
31. To facilitate creating 0.5m buffers for each cycle lane, space could be reallocated by making the 2 motor vehicle lanes a combined 6.5m wide instead of 7.5m.
32. This change would help to create a safer transport environment and encourage greater use of active modes.
33. **For the above reasons, I seek that the road space between the kerbs on Urban Connector A be reallocated to provide buffers on the unprotected cycle lanes preferably with the cycle lane adjacent to the parking zone being positioned to the left of the parking zone.**
34. **I also seek that the target operating speed be lowered to 40km/h to make it safer for active travel and a quieter, more pleasant residential environment.**
35. Urban Connector B (covering Pacific Drive south of Atlantic Drive)(7A.4D2) – similar comments apply as were made for Urban Connector A but because this infrastructure doesn't currently exist more options for allocation of space to provide adequate buffers for the cycle lanes are possible.
36. The proposed berms and swales could be narrowed to 0.5m and 2.1m respectively, and narrowing the motor vehicle lanes to a combined 6m should, given the distance this is along the Pacific Drive spur, be ample for the volume of motorised traffic along it. The slight narrowing of the motor vehicle lanes compared with Urban Connector A (6.5m not 7.5m) would be scarcely discernible to drivers and in no way compromise the level of service for them.
37. This would provide 1.4m in total to use for buffers, meaning they would be slightly smaller at 35 cm than the recommended 50cm (one on each side of each lane to separate the lanes from parked cars and from moving motorised traffic). A minor (60cm) increase in the total width of the road reserve (to 21.4m) would enable 50cm buffers to be used instead.
38. **I seek that Urban Connector B be modified to provide for safe cycling facilities by providing buffers on both sides of both cycle lanes as suggested above or by alternative means.**
39. **I also seek that the target operating speed be lowered to 40km/h to contribute to making a safer more pleasant environment for active travel and living.**
40. Urban Connector C (bottom of the gully links)(7A.4D3) and Urban Connector D (up- and down- slope sections of the gully links)(7A.4D4). The primary concern here is the use of a shared path (also a feature of Urban Connectors D, E and F), with no alternative for pedestrians. Shared paths are suboptimal facilities for both pedestrians and riders but especially for pedestrians.

41. In most circumstances in urban settings, walking and cycling don't mix well. For many pedestrians, especially those who are disabled or frail or who suffer cognitive impairments, but also more generally, having riders come close by is an uncomfortable experience that detracts from the pleasure of walking. Sometimes it is quite unsafe and I am aware through my involvement with Living Streets Aotearoa of numerous incidents of pedestrians being startled, abused and even struck by riders on shared paths.
42. Many riders also do not like shared paths because of concern about the unpredictability of pedestrians, especially children and people with dogs. However, they often use them in preference to roadways because they feel unsafe on roads where there are no separated facilities for them and where vehicle speeds and volumes are high.
43. The NZTA Pedestrian Network Guide (PNG) says shared paths should only be used when the number of pedestrians or riders is very low. They are appropriate as paths between towns such as Palmerston North and Feilding but not in built-up environments. Pedestrian numbers are likely to be relatively high in the Plan Change G area due to the medium density housing and retirement village. The presence of the latter will likely mean that a higher than average proportion of walkers will be frail, disabled, or easily startled.
44. Walking is critical to the well-being of older people, both for the broader social contact it enables and for the low-impact exercise it provides. It also provides mobility independence for children enabling them to more fully interact with their peers. Walking is the most common leisure physical activity in NZ and, with the nearby gullies, it is likely to be particularly popular in this area as has been seen in the adjacent Pacific Drive and nearby Summerhill areas.
45. Getting more people walking and riding and using public transport is critical to the city's greenhouse gas emissions reduction plans and so the new area needs to be made very walking and cycling-friendly if this development is to contribute to realising those plans. Shared paths are inconsistent with doing so.
46. On Urban Connector C and D, separation of walkers and riders is all the more necessary because riders can and do achieve quite high speeds on downhill sections.
47. Ideally footpaths should be provided on both sides of the street in developed urban areas like this but if there is some sound reason for keeping this section of road reserve narrow then a separated footpath on one side of the street could be acceptable provided it is separated from riding facilities and suitable crossing points provide safe and comfortable access to it.
48. To achieve a safer environment for walkers and riders, I propose that Urban Connectors C and D be redesigned so that the cross section would be:

0.5m berm + 1.6m footpath + 0.5m berm + 1.8m cycle path + 1m berm + 6m carriageway + 0.5m buffer + 1.8m cycle lane + 0.5m berm, requiring a total of 14.2m,

or alternatively,

0.5m berm + 1.6m footpath + 1m berm + 1.8m cycle lane + 0.5m buffer + 6m carriageway + 0.5m buffer + 1.8m cycle lane + 0.5m berm also totaling 14.2m.

49. Having footpaths on both sides (0.5m berm + 1.6m footpath) would add 2.1m to the above total widths and is recommended.
50. Whatever the design, Urban Connectors C + D should have 'no stopping' restrictions and no bus stops along them given the narrow carriageway, sloping terrain and lack of properties needing to be accessed from them. People who want to walk the paths to be created in the gullies will be able to park cars, or get off buses, on the flat part of the nearby Urban Connectors E and F and walk down into the gullies. This restriction is necessary to ensure that buses and similar-sized vehicles can still pass along the road without compromising the safety of riders or occupants of other motor vehicles.
51. Furthermore, the speed limit here, especially, should be no more than 40km given the sloping and bending nature of the proposed road.
52. In addition, for Urban Connector D, the proposal to position active travelers below the level of the carriageway is very undesirable from both a safety and unpleasantness perspective. They should be at the same height or above the level of the carriageway. If there is a footpath on only one side of the road it should be on the uphill side of the road reserve and obviously connect with that on the Urban Connector C section or street.
53. If riding and/or walking facilities are provided on only one side of Urban Connectors C and D then there need to be formal, raised crossings at the top of the Urban Connector D sections to facilitate safe crossing of the street for the diverse pedestrians and riders that are likely to frequent the area.
54. **I seek that the road reserve space for Urban Connector C + D be reallocated to make a safe environment for walkers and riders in either of the above suggested ways (paragraphs 48 and 49) or by alternative means.**
55. **I also seek that the target operating speed be no more than 40km/h.**
56. **And I seek that no stopping be permitted along Urban Connector C and D.**
57. **Furthermore, if a footpath is provided on only one side of the street (not recommended) of Urban Connector C and D, then it be provided on the uphill side of Urban Connector D and match up with the footpath on Urban Connector C.**
58. **Finally, if a footpath is provided on only one side of Urban Connector C and D, I seek that there be raised pedestrian crossings at the tops of the road lengths designated Urban Connector D.**
59. Urban Connector E (sections of street along the spurs where there is direct view down into the gullies)(7A.4D5) also includes a shared path which as explained above is unsuitable for the number and diversity of pedestrian users that are very likely in this residential location and inconsistent with the guidance in NZTA's PNG.

60. The street space should be reallocated to provide separate walking and riding facilities and could be achieved by reducing the width of the berms, swales and carriageway so that the cross section would be:

0.5 berm + 1.6 footpath +1.0 swale (if no indented parking provided on the gully side of the street as suggested in diagram 7A.4D5) + 1.8 cycle lane + 6.0 carriageway + 1.8 cycle lane +2.1 swale and indented parking +1.6 footpath + 0.5 berm for a total width of 16.9m.

61. However, the cycle lanes should also have buffers between them and the motor vehicle lanes (adding a total of 1m, making 17.9m) and between them and the parking zone adding a further 0.5m (if parking is only on one side) making a total of 18.4m.
62. If parking is provided for on both sides an additional 1.1m would need to be added to the swale/parking zone and a further 0.5m for buffering between the cycle lane and that additional parking making a total of 20.0m. This would still be narrower than Urban Connector A but enable it to better serve a similar function.
63. There seems little sense in having parking on only one side of the Urban Connector E as the lengths of street covered are short and it creates an inconsistency with Urban Connector F. Further, it may just encourage drivers to look into the gullies rather than keeping focused on the road, so creating an additional danger.
64. The target operating speed should, once again be 40km/h for safety and livability reasons.
65. **So I seek, that the street space in Urban Connector E be reallocated as described above (particularly paragraph 60 and 62), or alternatively, to provide for separation of pedestrians from riders and for adequate separation of riders from motor vehicles (both parked and moving).**
66. **I also seek that that the target operating speed be 40km/h.**
67. Urban Connector F (mostly along the spurs and not immediately adjacent to the gullies)(7A.4D6) is basically the same as Urban Connector E except that parking is proposed on both sides of the street. The same comments apply to these sections of streets as to those made about Urban Connector C.
68. I therefore propose that the space on Urban Connector F be reallocated as follows:
- 0.5 berm + 1.6 footpath +2.1m swale and indented parking +0.5m buffer + 1.8 cycle lane + 0.5m buffer + 6.0 carriageway + 0.5m buffer + 1.8 cycle lane + 0.5m buffer + 2.1m swale and indented parking +1.6 footpath + 0.5 berm for a total width of 20.0m.
69. **I seek reallocation of the street space for Urban Connector F as described above or by alternative reallocation to enable facilities to be provided separately for pedestrians and riders so that both are safe and feel safe and comfortable.**
70. **I also seek that the target operating speed be 40km/h.**

C. LOCAL STREETS

71. Local streets occur in both low density and medium density parts of the Plan Change area. There should be a distinction between them in recognition of the different density of people in each area. In the medium density area footpaths should be wider, and motor vehicle speeds should be lower, than in low density areas. In no case should the target speed be higher than 30km/h due to the well-established crash and injury relationships with speed and the benefits of lower speeds for liveability.
72. In the medium density zone, with the higher density of people, including children, priority should be given to active modes of movement rather than to motor vehicles. This can be achieved through:
 - a) narrower roads with lower speeds and good provision for active modes
 - b) footpaths made continuous across intersections to change the priority of users
 - c) intersections raised to slow motor vehicle traffic
 - d) small turning radii at intersections to slow motor traffic and decrease crossing distances where footpaths are not continuous across intersections.
73. These design features would serve to keep motor vehicle speeds low and deter unnecessary motor traffic – both of which are needed to encourage active mode use and create a public realm that feels safe for people of all ages to use.
74. It would seem most sensible to me to have a maximum speed of 20km/h in the medium density zone and 30km/h in the low density zone enabling roadways to be safely shared by motorists and riders.
75. Local Street A (7A.4D10) occurs in both low and medium density areas. I support the design for use in low density areas with two exceptions:
 - a) the berms could be narrowed to 0.5m, unless there is a particular reason for them being as wide as shown, and
 - b) footpaths could be narrowed to 1.6m wide.
76. However, in the medium density zone I think Local Street A should be redesignated as Local Street F with two modifications:
 - a) the berms could be narrowed to 0.5m, unless there is a particular reason for them being as wide as shown, and
 - b) a berm, 0.6m wide, should be located between the carriageway and the footpath where currently there is no berm.

77. This redesignation will help differentiate the medium density area from the low density area and reinforce that different road use behaviour is expected.
78. **I seek that the Local Street A (as slightly modified in accordance with paragraph 75 be used in low density areas and that the target operating speed be 30km/h.**
79. **I also seek that, in the medium density zone, Local Street A be replaced by Local Street F (as slightly modified in accordance with paragraph 76) and that the target operating speed be 20km/h.**
80. **Further, I seek that measures such as those described in paragraph 72 be used to help drivers keep below the respective target operating speed and create a safe environment for pedestrians and riders.**
81. Local Street B (adjacent to gully edges in low density areas only)(7A.4D11) - I support the target operating speed of 30km/h and the design except that:
- a) the berms and the swales, where there is to be no parking, could be narrowed to 0.5 and 1-2m respectively and
 - b) the width of the footpaths could be decreased to 1.6m.
82. Local Street C (shared surfaces at the ends of the promontories)(7A.4D12) – I mostly support the design for these but suggest that the berm and footpath could be decreased to 0.5m and 1.6m respectively.
83. Also, it is appropriate to maintain a separated footpath for those people who feel uncomfortable or who are unable to safely use a shared space. This should go right around the end of the cul-de-sacs and join up with the footpaths on the section of street leading to the sections designed as Local Street C. To do this, the 2.5m rain garden without parking should be replaced by a 0.9m wide rain garden and 1.6m footpath.
84. The target operating speed should be that recommended for shared spaces at 10km/h.
85. **I seek that the footpath shown on Local Street C is decreased to 1.6m width and the berm is decreased to 0.5m width.**
86. **I also seek that the rain garden (no parking) be replaced by a berm 0.5m wide, a footpath 1.6m wide and a rain garden 0.9m wide (so coupled with the changes proposed in paragraph 85 this would result in no change in the total width).**
87. **I also seek that the target operating speed on Local Street C be 10km/h.**
88. Local Street D (7A.4D13) occurs in just two locations - one in the middle of the medium density zone and the other a little south of Atlantic Drive / Pacific Drive. The latter is apparently adjacent to a wetland feature or some other form of reserve and housing is intended to be on only one side of the street.

89. The street section in the medium density zone, with its close proximity to the grass play area, should have a footpath on both sides of the street so people don't need to stand on the roadway watching / supervising activity. The footpaths should be 1.8m wide on both sides given the density of people in this area.
90. In contrast, the street section in the low density area is primarily serving as an accessway to dwellings opposite the wetland/reserve. There, a 1.6m wide footpath on one side of the street only is adequate.
91. In both cases I support the streets being one-way and the target operating speed being 10km/h.
92. **I seek that the design of Local Street D in the medium density area be modified to include 1.8m wide footpaths on both sides of the streets with a target operating speed on the roadway of 10km/h.**
93. **I also seek the design of Local Street D in the low density area be slightly modified by narrowing the footpath to 1.6m and setting the target operating speed at 10km/h.**
94. Local Street E (7A.4D14) only occurs in the medium density zone beside what I understand to be a wetland feature opposite the playing area. I think this would be better as a one way street (3.6m wide) much as for the nearby Local Street D in the medium density zone.
95. Having a boardwalk 3m wide on the wetland side of the street will result in it being used by riders and, as explained previously, this will make it less suitable for pedestrians. This is one of the places where pedestrian numbers can be expected to be highest due to the nearby medium density dwellings, including the retirement village, and the high amenity proposed for this area, making a shared path highly inappropriate.
96. Therefore I suggest it should be decreased to be a 1.8m wide boardwalk rather than a 3m wide one on the wetland side of the street and that the target operating speed on the street be 10km/h. The boardwalk could have short wider areas where people might stop to talk or observe.
97. These changes would enable the core part of the medium density zone to be very people-centered providing high amenity (with wetland and playing area) and being a safe area for children and pedestrians.
98. **I seek that Local Street E be modified to be as recommended for Local Street D in the medium density area (i.e. 3.6m wide, separated provision for pedestrians on both sides of the street, 10km/h target operating speed) but with the proposed 3m boardwalk on the wetland side of Local Street E being replaced by a 1.8m one (with occasional short but wider sections).**
99. Local Street F (7A.4D15) occurs in both low and medium density areas and the target speed should be different in them because of the number of pedestrians and riders that are likely to be present in the two areas. Footpath widths could also be different.

100. I see no merit in having both A and F designs in both the medium and low density areas. Instead it would make more sense to me to have type A in the low density areas and type F (slightly modified - see next paragraph) in the medium density areas as sought in paragraph 79.
101. Local Street F in the medium density area should have a berm between the carriageway and the footpath. It is extremely unpleasant to have to walk right next to moving motor vehicles. A 0.6m berm could be created between carriageway and footpath by decreasing the width of the proposed berms at the edge of the road reserve to 0.5m each.
102. Within the medium density zone the target operating speed should be 20km/h for Local Street F.
103. **I seek that Local Street F in low density areas be redesignated as Local Street A (and modified as in paragraph 78, i.e. berms 0.5m, footpath 1.6m wide) and have a target operating speed of 30km/h.**
104. **I also seek that in medium density areas, Local Street F be modified by decreasing berm widths to 0.5m at the edge of the road reserve, creating a berm between the carriageway and the footpath and having a target operating speed of 20km/h.**
105. **Further, I seek that in the medium density zone Local Street A be replaced by Local Street F.**

D. ACTIVITY STREETS

106. The Activity Streets are in and about the Neighbourhood Centre. (Point 4 on p5 of my submission #68). This is likely to be the busiest part of the whole development and low speeds are essential for both safety and creating the sort of atmosphere needed for a successful neighbourhood centre.
107. Activity Street A (7A.4D7) runs from Pacific Drive to the first local street A in the medium density zone. I support the design of it except:
- a) the target operating speed of 30km/h should be lowered to 20 km/h and matched by decreasing the width of the motor vehicle lanes to a combined 6m, and
 - b) the footpath on the commercial side could be decreased to 2.8m and the raingarden/parking zone could be decreased to 2.1m each. This would enable reallocation of 1.0m to provide buffering of the cycle lanes between them and the parked cars. With cars frequently arriving, parking parallel to the carriageway, and then leaving there will be lots of door opening and the risk of riders being doored will be relatively high.
108. **I seek that that the road space be reallocated as suggested in paragraph 107 to provide safe and comfortable facilities for cyclists and to help create the visual cues to help drivers abide by a 20km/h speed limit.**

109. Activity Street B (7A.4D8)(the location is not well defined on Map 7A.4D but comparison of 7A.4D and 7A.4C suggests it goes from the end of the area marked as Activity Street C to the start of what is currently marked as the Urban Connector on the east side of the Neighbourhood Centre where Local Street D begins).
110. The only difference between Activity Street B and Activity Street A is the wider footpath on the south side of Activity Street B. This is because commercial development is proposed for both sides of the street there in contrast to Activity Street A where there is a private dwelling on the south side of the street¹.
111. As for Activity Street A, and for the same reasons, I think
- a) the target operating speed should be 20km/h,
 - b) the motor vehicle lanes reduced to a combined 6.0m
 - c) the parking/raingardens decreased to 2.1m
 - d) the footpaths be decreased to 2.9m, and
 - e) 0.5m wide buffers be created between the parking/raingardens and each cycle lanes for the same reasons as explained for Activity Street A above.
112. **I seek that that the road space on Activity Street B be reallocated in accordance with paragraph 111 to provide safe and comfortable facilities for riders and to help create the visual cues to help drivers abide by a 20km/h speed limit.**
113. **I also seek that what was marked as Urban Connector in the notified Plan leading to and from the Neighbourhood Centre should be replaced by a continuation of Activity Street B but with both footpaths decreased to 1.8m wide for reasons explained in paragraph 25.**
114. Activity Street C (7A.4D9) is the very heart of the Neighbourhood Centre and a target operating speed of 30km/h is completely inappropriate. There is expected to be a lot of pedestrian activity here with people crossing between different sides of the area to access different premises. The speed limit should be not more than 10km/h as is the case in most car parks of malls and supermarkets.
115. The green island between the parallel and perpendicular parking is likely to be poorly utilised, being insufficiently large for anything more than a table or two and a tree. It is likely to be used just as a thoroughfare and rapidly deteriorate in condition. Without an adequately sized vehicle-excluded area the whole of Activity Street C is likely to act as a parking lot rather than a village square. This would be a very poor outcome and would threaten the commercial viability of the centre.

1 But note that the Activity Street A part of Map 7A.4C is incorrectly drawn showing the commercial space on the south side and also showing a side street coming out of the Activity Street A).

116. I propose replacing the two lots of parallel parking and one-way circulation roadway outside the Anchor Store (please refer to Map 7A.4C) with increased green area and vehicle-excluded hard surface. Increased perpendicular parking will then be available at the edge of the extended 'green space' partly compensating for the loss of parallel parking. Further parking could be provided along the proposed extension (paragraph 113) of Activity Street B. Deliveries will still be able to be made behind the Anchor Store.
117. **I seek that Activity Street C be redesigned in general accordance with what I have suggested above (10km/h, enlarging the greenspace and repositioning parking) to help create a real neighbourhood social and commercial centre rather than just serving as a parking lot.**

E. PERI-URBAN ROAD

118. The Periurban Road (7A.4D16) appears alright as it is. This is the sort of situation where a shared path is acceptable as it is likely that there will be relatively little use of it or the roadway and that, as long as the target operating speed for the roadway is no more than 50km/h, faster riders will prefer to ride on the roadway.

F. SH 57 / AOKAUTERE DRIVE

119. This relates to the 6th and 8th points made in my additional submission (SO 43) on transport matters.
120. There are three aspects of the proposed Plan Change concerning SH57 (Aokautere Drive) that are of concern.
121. Firstly, the provision of crossing points for pedestrians. These are needed at both the Pacific-Aokautere intersection and Johnstone-Aokautere intersection given how busy this road already is and the popularity of walking in the area, especially between the Pacific Drive/Aokautere and Summerhill subdivisions with their associated gully reserves and walkways.
122. The Pacific-Aokautere intersection should be controlled by traffic lights and pedestrian crossings should be provided across all legs of the intersection. There has been a substandard approach to provision of pedestrian crossings at controlled intersections in Palmerston North over the years. Examples include the Princess-Ferguson and Princess-Grey 3-way intersections where there are pedestrian crossings across only 1-leg of each.
123. The Johnstone-Aokautere intersection should also be traffic light controlled with pedestrian crossings incorporated.
124. One other crossing point has been proposed between Adderstone Reserve and Silkwood Place and one already exists between International Pacific Union and the Summerhill shopping centre. If there are lights where Pacific, Johnstone and Old West intersect Aokautere Drive and these are synchronised, there should be sufficient pauses in traffic flow to enable pedestrians to cross safely at these additional places provided adequate width and height) refuge space is provided in the middle of the road. Alternatively, these

crossing points could be served by pedestrian-activated traffic lights as has recently been installed outside Pak and Save on Ferguson Street.

125. Secondly, the proposal for a shared path along SH57 is quite inappropriate. Not only are the number of pedestrians and cyclists expected to be considerably higher than would make a shared facility appropriate but also the speed of riders along Aokautere Drive is high, it being part of a sports cycling route from the city along Fitzherbert East Road and back to the city via SH3 as well as the longer route using the Pahiatua Track. It is also likely to attract a significant number of commuter riders once the Summerhill-Aokautere cycle way is implemented, at least some of whom will be riding electric bikes capable of sustained higher speeds.
126. As I understand it, the protected cycleway along both sides of Aokautere Drive, that is part of NZTA's Transport Choices programme, is likely to go as far as Silkwood Place. It would be awkward and dangerous for it to then turn into a shared path on only one side of the road.
127. There is already a footpath on the north side of Aokautere Drive from Ruapehu to Titirangi as well as a short section on the south side from Johnstone to a little before Pari Reserve.
128. Both sides of Aokautere Drive are likely to be well used by walkers. It is part of recreational loops (Johnstone – Adderstone Reserve or Pacific Drive on the south side and Ruapehu – Cashmere/Waicola on the north) as well as being the most direct route to the Summerhill shops for people on the lower part of Johnstone Drive and for people living on Titirangi, Waicola, part of Cashmere and Silkwood).
129. There is a 3-4m high embankment on the south side of Aokautere Drive between Pari and Adderstone Reserves (a distance of about 150m) and there is currently not space for a separate footpath and cycleway on the south side of the road reserve at that point. I suggest that either the footpath be routed along the top of the embankment or the embankment be shaved back to provide space for the separated facilities at grade with the roadway.
130. Thirdly, and overarching both the above matters concerning Aokautere Drive is that of speed. Despite being a State Highway this will be in the midst of a built up residential area complete with nearby or adjacent primary and tertiary schools, retirement village(s), shopping areas etc. The speed limit should be no more than 50km/h and any engineering modifications required to achieve compliance with this speed should be implemented. From Old West Rd to Johnstone Drive is 1.07km so travelling this at a constant 50km/h instead of 60km/h will take an additional 13 seconds (77 compared with 64 seconds), something so small as to be irrelevant. The difference would be even smaller when slowing or stopping for traffic lights and turning and slower traffic is considered.
131. **I seek that separate pedestrian and riding facilities are provided on both sides of Aokautere Drive from Johnstone Drive to Pacific Drive.**
132. **I also seek that pedestrian crossing points are provided at the all legs of the intersections of Johnstone, Pacific and Old West with Aokautere Drive as well as**

additional crossing points between Adderstone Reserve and Silkwood Place and between IPU and the Summerhill shopping area.

133. **I seek that occupation of dwellings in Plan Change G area not be permitted until the speed limit on Aokautere Drive is decreased to 50km/h.**

G. Other Transport Matters

134. I continue to support control of the Summerhill (hill section) – Ruapehu, Old-West – Summerhill – Aokautere, Ruapehu – Aokautere, Pacific – Aokautere and Johnstone – Aokautere intersections as explained in my submission SO43.

SUMMARY:

135. In summary, I am seeking modifications be made to various aspects of proposed Plan Change G, particularly about matters which affect the safety and comfort of active mode travellers (and bus users given they are nearly always active mode users on their way to and from bus stops) and also about matters which affect the ambience, amenity and distinctiveness of the Medium Density zone and the Neighbourhood Centre.

Thank you.