

TO WELLINGTON CITY COUNCIL

SUBMISSION ON PROPOSED PLAN CHANGE 77

I am a local resident with no vested interests in what is proposed. I object to the proposed Plan Change because of its deficiencies & the way in which the Council has conducted itself with regard to this site (*inter alia* see Appendix).

1/ The hypocrisy of the proposal is illustrated by the Council's very recent approval of an adjoining Childcare centre whereas it now states that, on the 55-85 Curtis Street site, Childcare centres & residential activities etc. will be discouraged in order to avoid "reverse sensitivity" to adverse noise, lighting, dust and the discharge effects of any contaminants from the new business area.

2/ Re the Ecological Assessment:

- The site adjoins a significant ecological corridor. The vegetation within the corridor along the Kaiwharawhara Stream valley is regionally significant, as is the Kaiwharawhara Stream itself, the seepage wetlands above the site and the buffer vegetation that extends into the site.
- The glow-worm colony on the seepage wetlands above the site is larger and has better public access than any other in Wellington. Noting that midges & similar food necessary for glow-worms depend on the precise environment which now pertains, the preservation of the present environment, including the seepage wetlands along the western escarpment, is absolutely essential. Quite apart from the serious problems which would arise from noise & dirt resulting from the 'industrialisation' of the site the loss of any known food sources would be disastrous for such a major notable surviving colony.
- Kaiwharawhara Stream is already balanced on a trigger point for adverse effects on ecological values from increased stormwater discharges.

3/ Re the Landscape Assessment:

- It should be noted that the site's landscape values lie in its strong landscape and visual links to the wider valley landform and open space network in the Kaiwharawhara catchment.
- Management of visual effects should preclude large, single level building platforms and large-scale monolithic structures (of the type approved for the Mega Store development) and limit vegetation removal, earthworks and building along the western boundary of the site and removal of vegetation along the eastern boundary of the site.
- Adherence to the NPSET guidelines for retaining a clear corridor beneath high voltage transmission lines should be recognised as precluding any built development, except along the western and eastern boundaries of the site.

4/ Re the Urban Design Advice:

It should be noted that:

- The site is adjacent to a recreational walkway linking Zealandia, Otari-Wilton's Bush and Trelissick Park. The northern end of the site sits level with the road and has high visibility and visual sensitivity.
- The escarpment along the western boundary has landscape, amenity and ecology values worthy of protection. Earthworks within 10m of the western boundary should be a controlled activity. The vegetation on the western boundary should be permitted to be removed if native species are planted to replace it within 6 months to maintain amenity values.

5/ Re the Heritage Assessment:

It should be noted that the location and depth of any archaeological remains in or near the site is unknown.

6/ Re the Economic Assessment:

It should be noted that:

- Between 2000 and 2011 employment in Wellington City in retail trades increased by 590, while employment in manufacturing fell by 1830, in wholesale trade by 1270 and in transport, postal and warehousing by 2480 (Table 1). The only meaningful growth in employment has been in professional services. Established Business 2 areas have seen increased non-retail employment since 2008 (Figure 2). Karori has seen minimal net movement in retail employment.
- It is likely that industry will continue to locate outside of Wellington City. Land uses that offer a better economic return than industrial activities will displace industry from suburban centres. The employment base, and access and distribution needs, of industrial activities are better located on the northern fringe of the city.
- Employment in manufacturing in Karori remained the same in 2011 as in 2000, while employment in wholesale trade and retail trade increased slightly (Table 2).
- New commercial zoned land for retail activities would operate most effectively if located within Karori Town Centre. They would also be better situated to areas of future residential growth.
- The Curtis Street business area would be a "drive to' node". It would introduce internal competition for tenancies for lower quality retail premises in Karori Town Centre and Marsden Village. A mix of small-scale industrial activity, commercial service/office activity and retail activities would be better than a single large scale operation (such as a supermarket or home improvement and building supply store).
- The site would be a second tier location and likely to be quickly abandoned by tenants if better premises within Karori Town Centre or Marsden Village became available. The scale and location of the site are such that it would have no significant adverse effects on other commercial nodes.
- The shops in Northland are closer & more accessible to the site than any similar operation in Karori but are totally ignored in the assessment.

7/ Re the Transport Assessment:

It should be noted that:

- The measuring of traffic-flow was conducted over a very short period.
- The effect of traffic use on different points of possible access to the site has not been properly identified.
- The area to be included within the transport assessment was identified by Wellington City Council as being only that area bounded by Chaytor Street, Old Karori Road and Whitehead Road, and Curtis Street between Whitehead Road and Chaytor Street. No part of Northland is included and the potential transport effects on Karori Road, Marsden Village and a number of side streets with access to the area assessed are not considered.
- The nearest bus stop is on Chaytor Street, about 280m south of the site. The nearest bus stop on the route that passes the site (with a limited service from March to October) is approximately 550m south of the site.
- Curtis Street is classed as a Principal Road in the District Plan. It is approximately 6.2m wide near the site. Whitehead Road is classed as a Local Road. It is 7.2m wide. Chaytor Street is classed as a Principal Road. It is 8.7m wide near the intersection with Curtis Street.
- Highest hourly average daytime traffic flows on Chaytor Street were measured at 477 vehicles northbound. On Whitehead Road the highest hourly average daytime traffic flow was 156 vehicles westbound, while on Curtis Street it was 99 vehicles southbound.
- Business use would generate from 1.74 additional vehicle trips per hour per 100m² of gross floor area for industrial use to 20.62 additional vehicle trips per hour per 100m² gross floor area for service retail in a weekend peak hour.
- There is a reduced level of service at the intersections of Chaytor Street with both Curtis Street and Karori Road at peak times at present. The level of service at these intersections at these times would deteriorate. The level of service at the Curtis Street/Chaytor Street intersection would see an increase in average waiting time per vehicle of 326%.
- Without mitigation, works at the Curtis Street/ Chaytor Street intersection, use of the site for retail activities could increase delays for Curtis Street traffic in the weekend peak hour to five to ten minutes per vehicle, with a consequent increase in traffic using Randwick Road and Northland Road to avoid delays.
- Delays of more than five minutes per vehicle at the Whitehead Road/Curtis Street intersection during the weekend peak hours would also result from retail service development of the site.
- The surrounding road network has little or no ability to provide safe on-street parking for the site. A service retail development would require 5.5 parking spaces per 100m² gross floor area. For a service retail area of 2700 square metres 140 spaces or approximately 2940 square metres of paved area would be required.
- The site has only three places suitable for access into the site: from the southern part of Old Karori Road; from Whitehead Road beside the intersection with Curtis Street; and from Curtis Street south of the same

intersection. The Curtis Street option is less suitable than the others.

- Industrial or bulk retail activities are typically serviced by 17m semi-trailer vehicles, not by the 8-tonne rigid axle trucks used in District Plan turning calculations. Semi-trailer vehicles could not safely turn at the Old Karori Road or Whitehead Road intersections with Curtis Street at present.
- Development of the site for retail activities would require mitigation works at the intersections. The traffic effects would be difficult, if not impossible to mitigate so that limiting the size of the development would be more effective.

The Appendix illustrates the bias of Council officers in their approach to this matter & shows that little or nothing has been learned from the Council's earlier failed attempts to carry out the will of the site's owner at the expense of residents & ratepayers. (For what it is worth, this is also illustrated by a number of other favours granted to the property owner such as the Council's continuing to mow the owner's private grass.)

The Appendix, however, best illustrates the level of competence of Wellington City Council's elected members, their concern about their task & the way in which they set out to represent Wellingtonians.

It is significant in this context as an illustration of Wellington City Council's approach to the important function of approving proposed Plan Changes such as their latest two proposed Plan Changes for 55-85 Curtis Street.

I wish to be heard.

SIGNED
MICHAEL GIBSON
7 Putnam Street
Northland
Wellington 6012
Tel 4757545

APPENDIX

From: michaelpcgibson@hotmail.com
To: jo.coughlan@wcc.govt.nz; johnm@wgtncrls.co.nz
Subject: FW: Deadline for submissions = March 11th
Date: Fri, 1 Mar 2013 09:45:14 +1300

Dear Ward Councillors - this is becoming an interesting exercise in the way in which the Western Ward is being represented!!!!

Can you help on this one, please?

With kind regards,
Michael Gibson

From: michaelpcgibson@hotmail.com
To: jo.coughlan@wcc.govt.nz; johnm@wgtncrls.co.nz
Subject: Deadline for submissions = March 11th
Date: Thu, 28 Feb 2013 08:41:01 +1300

Dear Ward Councillors - were you told that supermarkets were prohibited by a covenant on the Curtis Street site which is situated bang in the middle of your constituency? If not, why were you not told of this before you voted to get submissions on the regulations which should apply to supermarkets on that site?

Michael Gibson

From: michaelpcgibson@hotmail.com
To: john.morrison@wcc.govt.nz; jo.coughlan@wcc.govt.nz
Subject: To my Ward Councillors - why not?
Date: Tue, 26 Feb 2013 11:20:09 +1300

Dear Ward Councillors - if either of you were not informed about the covenant restriction re supermarkets please ask "Why not?" - I should be very grateful to hear the answer. See below.

Please let me know in time for me to consider the answer before the deadline for submissions expires!

With kind regards,
Michael Gibson

From: michaelpcgibson@hotmail.com
To: john.morrison@wcc.govt.nz; jo.coughlan@wcc.govt.nz
Subject: Public Notice required
Date: Fri, 22 Feb 2013 07:57:40 +1300

Dear Ward Councillors - for your information I have just made it clear to Cr Foster that officers' keeping quiet about any cosy arrangement being made between the owner & Foodstuffs to lift the 'embargo' on supermarket activities at 55-85 Curtis Street would not be a "good or considered reason" for not telling you about the matter.....

I look forward to hearing from you.

Michael Gibson

From: michaelpcgibson@hotmail.com
To: john.morrison@wcc.govt.nz; jo.coughlan@wcc.govt.nz
Subject: FYI - Public Notice required
Date: Thu, 21 Feb 2013 13:53:25 +1300

Dear Ward Councillors - I draw your attention to the email below which I have just sent to the Council's CEO.

I trust that the Council's Committee Clerk will inform you properly about this

morning's Meeting, from which you were both absent, & that she is prompt in giving you the tabled material.

In the meantime I mention that I said that at least one of the three Ward Councillors knew about the restrictive covenant re 55-85 Curtis Street & was laughing up their sleeve that the officers had gaily issued the Plan Change material without properly informing elected members.

If either of you were not informed then please ask "Why not?" - I should be very grateful to hear the answer.

With kind regards,
Michael Gibson

Dear Mr Poole - a Public Notice is required to say that there is a covenant preventing supermarkets or supermarket activities at 55-85 Curtis Street. This would save the public from spending time, energy & money regarding the Council's Public Notice of December 11th last year asking for comment on conditions for building supermarkets on the site.

Please arrange for such a Public Notice as soon as possible - even though it should (as I contended at this morning's Committee Meeting) immediately withdraw its proposed Plan Change altogether.

Please respond to this request.

*With kind regards,
Michael Gibson*