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Ms A Mac Sharry
James Kirkpatrick Group Limited
Level 17, 48 Emily Place
Auckland 1010

8 March 2024

Copy via email: **aoife@jkgl.co.nz**

Dear Aoife,

PROPOSED COMMERCIAL DEVELOPMENT, 538 KARANGAHAPE ROAD, AUCKLAND SECTION 92 (BUN60427502) – TRAFFIC ENGINEERING RESPONSE

Following a recent resource consent application for a proposed commercial building on the subject site at 538 Karangahape Road, Auckland Council have issued a Section 92 Request for Further Information. Commute met with Auckland Council and Auckland Transport on 12 February 2024 to discuss the Section 92 requests.

Council's traffic engineering related requests are outlined below, followed by Commute's response to each item. Commute's original traffic assessment is referred to throughout this response (Commute report).

1 AUCKLAND COUNCIL

1.1 CRASH HISTORY STUDY

14. ***The scope of the study area adopted for the crash analysis and the spread of crashes throughout the study area are not entirely clear from the information provided in the TA. While the TA references particular intersections covered in the analysis, it is not clear as to whether the analysis covers a sufficiently wide area, including mid-block sections of road.***

The proposal is expected to result in high concentrations of new vehicle activity at the intersection of Karangahape Road / Gundry Street and high concentrations of pedestrian activity at this intersection and at the new pedestrian building entrances on Karangahape Road and Abbey Street. An appropriate scope for the crash analysis should therefore include:

a. Karangahape Road between (and inclusive of) its intersections with Newton Road and Edinburgh Street, noting that there are no formalised intermediate pedestrian crossing opportunities between these two intersections.

b. Gundry Street, at least as far south as its intersection with Abbey Street

c. Abbey Street, between Newton Road and Gundry Street

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Please provide further detail accordingly and if appropriate, consider scope for mitigation measures, such as additional pedestrian crossing points to cater for desire lines accessing the new development.

Response:

Section 3.6 of the Commute report states the crash history study area, with mid-block or streets being "*all crashes recorded along Abbey Street and Gundry Street as well as Ophir Street between Newton Road and Gundry Street*", and also lists 5 intersections.

It is not considered that the proposal will generate high concentrations of new vehicle activity at the Karangahape Road / Gundry Street intersection, as Section 5.2.4 of the traffic assessment states ("*the actual peak hour and daily trip generation of the site as a whole is expected to be lower than the values calculated above…in the order of 48-96 vph / 96-192 trips per day*"). The assessment does not provide further detail in regard to trip distribution (Rule E27.6.1(1) of the Unitary Plan does not require further assessment), and as such it cannot be speculated which intersection arriving or departing vehicles will use on a daily basis.

It is not expected that there will be a large pedestrian demand to the proposed development originating from the northern side of Karangahape Road, with the new Karangahape Train Station being located on Mercury Lane and East Street to the east of the site, to the south of Karangahape Road (and therefore pedestrians will be on the southern side of Karangahape Road only). In this regard the recent crash history of the pedestrian crossing on the southern side of the Karangahape Road / Edinburgh Street has been searched and no pedestrian related incidents were found to have occurred across Edinburgh Street. In addition, the crash history along Karangahape Road between Newton Road and Edinburgh Street has also been searched for pedestrian crashes, with only 1 crash occurring. The crash involved a pedestrian crossing Karangahape Road at Edinburgh Street at the pedestrian crossing, who was hit by a car running a red light.

The Karangahape Road / Ponsonby Road intersection has had a total of 3 reported pedestrian related crashes in recent years. In all 3 instances, the pedestrians did not use the designated pedestrian crossings at the intersection, the maximum distance of which the crossing was 43 metres away.

It is not considered necessary to provide an additional pedestrian crossing along Karangahape Road between Newton Road and Edinburgh Street, as this is like to have a significant impact on traffic flows along Karangahape Road (specifically at the Karangahape Road / Ponsonby Road intersection). Further, it is not considered that there is or will be a significant demand for pedestrian movements between the site and Hereford Street, which would be the only route of pedestrians that would fully utilise such a pedestrian crossing (pedestrians travelling west or to Ponsonby Road can use the intersection crossing which is approximately 50 metres from the Karangahape Road entrance, or travelling east along Karangahape Road can use the Edinburgh Street crossing which is approximately 160 metres from the Karangahape Road entrance).

Figure 1 shows the primary pedestrian routes expected for staff and visitors of the proposed development.

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Figure 1: Site Walking Routes

Accordingly, it is considered that the existing pedestrian environment in the vicinity of the site is safe, and can be expected to accommodate the proposed development without the need for additional pedestrian mitigation measures.

1.2 TRIP GENERATION

15. ***While traffic generation thresholds of the Unitary Plan do not apply within the Business City Centre Zone, the TA does nonetheless note significant trip generation potential, while the proposed on-site car parking provision will cater for only a small proportion of vehicle demand. The TA does not, however, assess the impact of the lack of parking provision on the adjoining area, nor does it provide detail of travel demand management measures to mitigate against the impact of vehicle trips and corresponding parking demand. Please provide an assessment of parking demand in the wider area and consideration of travel demand management measures to mitigate against potential adverse effects of excess parking demand.***

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Response:

Chapter E27 of the Unitary Plan does not require an additional assessment against car parking provision where the car parking provision is compliant with the Unitary Plan. The Unitary Plan also does not require a Travel Management Plan (in either Chapter E27 or I206 Karangahape Road Precinct) to be provided where car parking provision is compliant with the Unitary Plan.

In addition to this, the Policies outlined in Section E27.3 (4), (5) (a) and (b), and (6B) state:

(4) "*Limit the supply of on-site parking in the Business – City Centre Zone to support the planned growth and intensification and recognise the existing and future accessibility of this location to public transport, and support walking and cycling*"; and

(5) "*Limit the supply of on-site parking for office development in all locations to:*

(a) *minimise the growth of private vehicle trips by commuters travelling during peak periods; and*

(b) *support larger-scale office developments in the Business – City Centre zone…*"

(6B) "*Encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the public transport network by limiting the supply of on-site parking for office activities…*"

It is therefore considered that the proposed parking provision is in accordance with the Unitary Plan rules and policies.

It is noted that the building will be seeking a high Green Star rating, and part of that will involve the provision of a travel plan for future staff of the development.

1.3 WASTE VEHICLE SERVICING

16. The TA refers to a waste vehicle servicing the building after typical operational hours and the Operational Waste Management Plan (OWMP) by Green Gorilla similarly refers to a service vehicle parking in the access lane. However, the specification of waste collection vehicle referred to in the OWMP has a height of 3.9 metres, while the TA refers to height clearances in the basement of between 2.1 metres and 2.5 metres. The AEE and OWMP state the waste vehicle may park in the vehicle access. Please confirm if the truck will be accessing the building / parking partially within the building? If the truck will be entering the building / parking partially within the building, please can both the height of the vehicle and clearance within the part of the building to be accessed by a waste collection truck be reconfirmed. If appropriate, can a shorter waste collection truck be used, and / or can vertical clearance within the building be increased? Please also provide horizontal and vertical vehicle tracking to confirm the ability of a waste collection truck to access the site safely.

Response:

It is understood that the waste collection truck will remain outside of the building during collection, and park across the vehicle crossing for a short period of time where no vehicle trips are expected into or out of the building.

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1.4 WASTE VEHICLE SERVICING

17. In the event of on-street collection will occur (which appears to be dependent on AT providing a loading zone on Gundry Street), please provide a plan showing the loading zone. Please also provide comment how the truck will safely manoeuvre into and out of the loading bay and please provide additional assessment on the safety of the surrounding traffic. Also noting car movement from and into the basement.

Note:

The council's Traffic Engineer is seeking comment from AT to ensure consistency of the proposal with works being undertaken to AT assets, including rebuilding of pedestrian footpaths on Gundry Street and Abbey Street and interface with Karangahape Road Enhancement Project. The latter is noted to include modifications to on-street parking arrangements and the TA places dependency on the provision of a loading space on the western side of Gundry Street to service the development

Response:

After discussions with AT, the provision of a loading space on Gundry Street has not yet been decided on, and as such waste collection will occur as described above in Section 1.3 of this response. Vehicle tracking has been provided in Appendix A to support this arrangement.

1.5 OPERATIONAL HOURS OF WASTE COLLECTION

18. Regarding the operational hours for waste collection, please provide additional comment on 'after hours' times conflicting with demands to use kerbside space for local parking demands.

Response:

As per the response in Section 1.3, the waste truck will park across the vehicle crossing and will not impact any on-street parking.

1.6 WASTE VEHICLE SERVICING

19. In the event the development is constructed before AT provides the loading facility, please confirm how waste will be collected from the building?

Response:

As per the response in Section 1.3.

1.7 LOADING BAY

20. The AEE notes that 1 loading bay is required. The Transport Assessment notes 2 are required (1 for the retail uses and 1 for all other uses). Auckland Transport (AT) state that 2 loading bays are required for this development. On-street loading is relied upon, please comment on the uncertainty regarding the reliance on loading facilities that may be removed by AT in the future. In the event the loading facilities are removed, how will the development be serviced.

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Response:

As discussed in the Commute report, the proposed development comprises of primarily office activity and it is not expected that loading demand for large trucks will be significant outside of the initial moving in period. Once the office activities are operational on the site, daily loading demand is expected to be courier vans only. These courier vans will be able to park on-street either within the Abbey Street loading space (approximately 50 metres walking distance from the elevators on-site), or within the on-street parking available along Gundry Street and Abbey Street (most vans can fit within a standard parking space).

During the meeting with Council and AT, it was discussed about the possibility of reinstating the on-street loading space on the eastern side of Gundry Street, or enforcing a P5 / P10 restriction in one of the newly-created spaces on the western side of Gundry Street in front of the site. It is understood that the final design of the Gundry Street on-street parking arrangement has not yet been confirmed, however.

1.8 NEW ZEALAND STANDARDS

21. NZS 4121-2001 requirement 5.7.2 states that people with disabilities shall not have to pass behind parked cars when moving to an accessible route or when approaching from an entrance. It appears from the site plan that access between parking space #02 and the nearest building entrances would necessitate passing behind a parked car in space #01 (if occupied). It is thus recommend that consideration should be given to an alternative site layout to negate this problem.

Response:

The entrance is located centrally to the building, across the manoeuvring aisle from the accessible spaces. As such, pedestrians will not be required to walk behind parked vehicles and therefore the arrangement is considered to be satisfactory. Figure 2 demonstrates these pedestrian paths.

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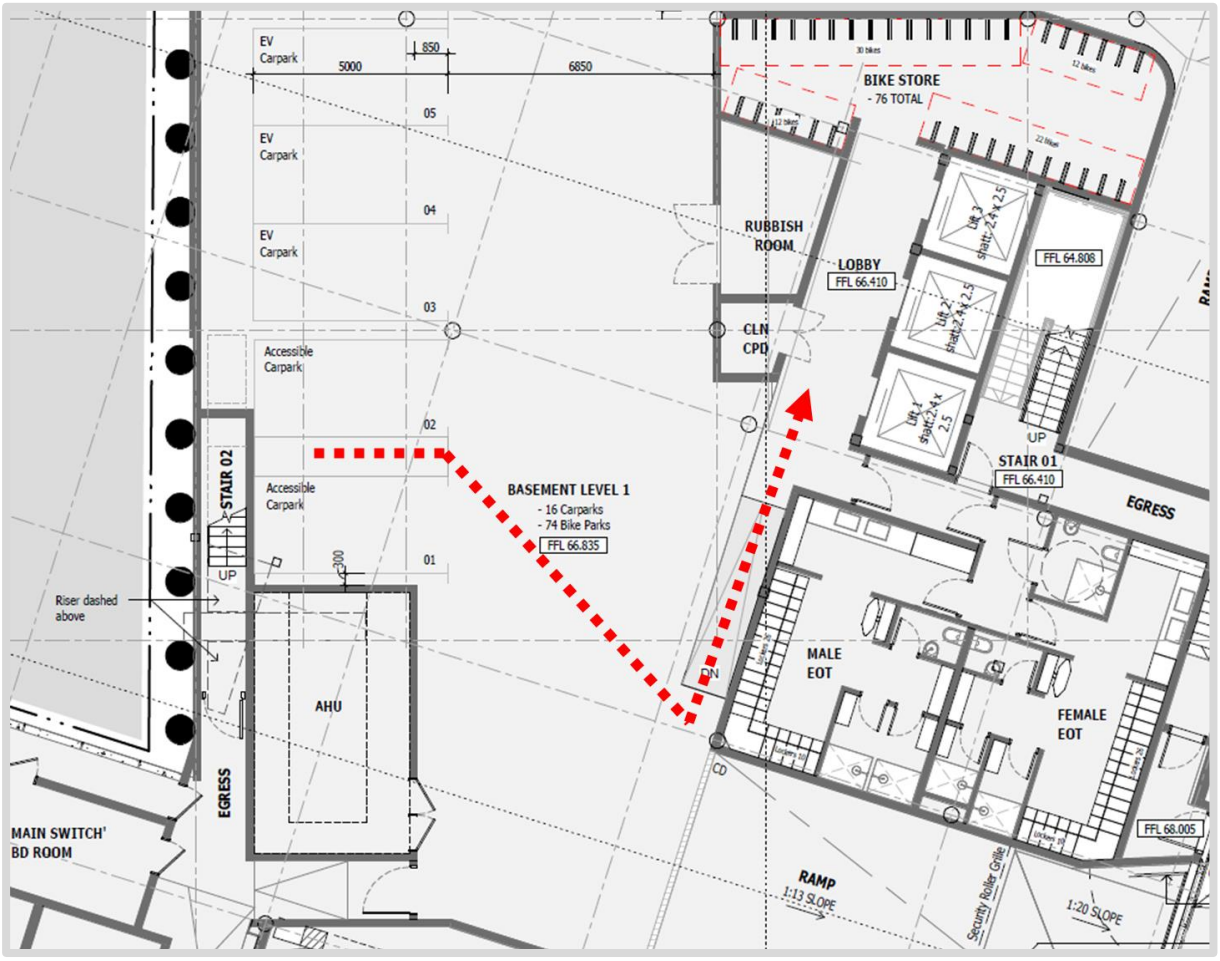
Figure 2: Accessible Parking Spaces Pedestrian Route to Elevators



1.9 VEHICLE TRACKING

22. The vehicle tracking assessment was not provided with the TA Report, please may you provide the tracking assessment in order to enable the Traffic Engineer to determine the adequacy of the car park layout.

Response:

This has now been provided to Council.

1.10 VEHICLE TRACKING

23. Please provide long-sections of the proposed ramp from the vehicle crossing showing safety platform and ramp gradient. It is noted that the proposed roading plan shows that 1:8 gradient is proposed for the safety platform infringing the maximum requirement of 1:20.

Response:

Figure 3 shows a cross-section of the proposed ramp at the site access.

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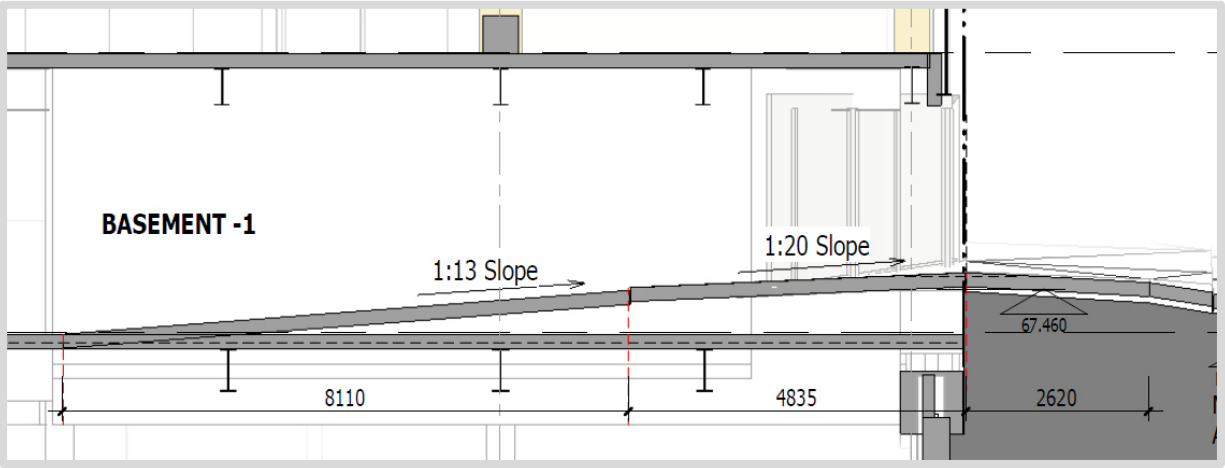
Figure 3: Proposed Access Cross-Section



It is noted that the 1:20 section at the site boundary has increased in length from the 4.4 metres in the Commute Report to now be 4.8 metres long. The architectural drawing package has been updated to reflect this change.

1.11 HEIGHT CLEARANCE

24. The Traffic Assessment states that "[t]here are three parking spaces within the Basement 2 car park which have a slightly reduced height clearance of 2.1 metres (Spaces 27, 28, 29). As these parking spaces do not comply with the 2.3 metre requirement of the Unitary Plan, an assessment has been undertaken against the criteria outlined in Rule E27.8.2 (8), and is provided in Table 4." The AEE states the proposal complies with vertical clearance. Please confirm this point and if necessary apply for the infringement and provide an assessment.

Response:

The spaces which do not comply with the 2.3 metre height clearance will still have a 2.1 metre height clearance, which is considered to be sufficient to park passenger vehicles in (as the Unitary Plan requires a 2.1 metre height clearance for residential developments per Rule E27.6.3.5 (1) (a)).

The rest of the car park is compliant with Rule E27.6.3.5 (1) (b), providing 2.3m height clearance.

The assessment provided in Table 4 of the Commute report is considered to be satisfactory to demonstrate that the three spaces with reduced height clearance are suitable for parking staff vehicles.

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2 AUCKLAND TRANSPORT

2.1 SITE ACCESS VISIBILITY

25. The transport assessment notes a vehicle trip generation of over 2000 vehicles per day to the site. There is no back berm present between the property boundary and the public footpath. Based on the high trip generation rate and the lack of back berm, AT is concerned that pedestrian and vehicle intervisible is affected. The traffic assessment notes that a pedestrian visibility splay is provided on the northern side of the proposed vehicle crossing to assist in achieving pedestrian and vehicle intervisibility. The splay is proposed at 2.9m x 1.1m. Based on the proposed trip generation rates, the proximity of the crossing to an intersection and non-compliance with the required vehicles waiting platform, the size of the pedestrian visibility splay provided is considered insufficient to address pedestrian safety concerns. Please provide additional information in accordance with E27.8.2(8)(a) on how pedestrian and vehicle intervisibility at the proposed vehicle crossing can be avoided, remedied or mitigated.

Advice note: The NZTA Pedestrian Planning and Design Guideline recommends a 5m x 2m pedestrian visibility splay for vehicles crossings generating more than 200 vehicles trips per day. This development will exceed the 200-trip number.

Response:

The trip generation states that while the development if assessed under the RTA Guide would generate around 2,100 vpd, the fact that the site is limited in parking by the Unitary Plan's maximum parking requirement means that the site is expected to generate in the order of 96-192 trips per day.

The NZTA Pedestrian Planning and Design Guideline states that these larger splays should be installed in areas with "*high pedestrian flows and more than 200 expected daily vehicle access manoeuvres*". As discussed above, the expected daily vehicle access manoeuvres are less than 200, and the expected pedestrian flows across the vehicle access are not considered to be in the 'high' category ('high' pedestrian flows are considered to be in more concentrated areas such as near train stations or busy intersections and roads in metropolitan areas such as Karangahape Road, not along Gundry Street).

The AS/NZS 2890.1:2004 shows a 2.5m x 2.0m visibility splay being provided at the site entrance. It should be noted that the splay is not specified in the standards as being a physical splay in the building, however it does imply that the 2.5m x 2.0m visibility splay can be achieved at the site boundary. Figure 4 below shows an exiting vehicle in a realistic position at the site access (with a 300mm kerb and 300mm vehicle body clearance to the kerb), and as can be seen a 2.5m x 2.0m visibility splay can be achieved. This is considered to be satisfactory to achieve a safe intervisibility window between pedestrians and vehicles.

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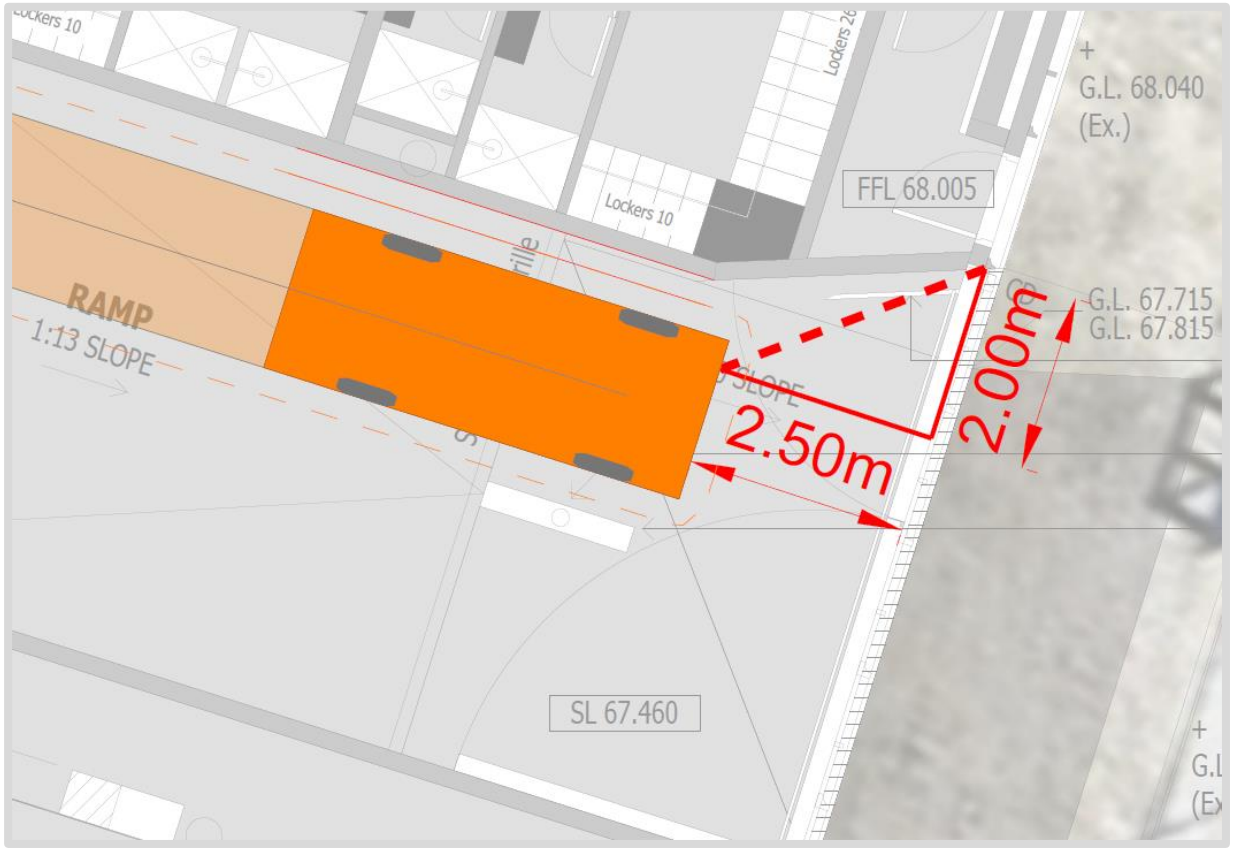
Figure 4: AS/NZS 2890.1:2004 Visibility Splay at Site Access



In regard to the proposed waiting platform, which measures 4.4 metres in length and slopes down toward the site boundary, it is noted that an 85th percentile vehicle will be able to have its wheels fully positioned on the 1:20 (5%) gradient while remaining within the site boundary (front of body to rear wheels measures 3.72 metres as per Figure E27.6.3.3.2 of the Unitary Plan). It is understood that the intent of the Unitary Plan rule to provide 6.0 metres is for heavy vehicles with longer wheelbases, and as no heavy vehicles will be accessing the site, the 4.4 metre long platform is considered to be appropriate such that it would not impact pedestrian intervisibility.

A speed hump in the exiting lane may assist with ensuring that exiting vehicles are doing so at low speeds, and the combination of the above is considered to be a satisfactory outcome for safety at the access.

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2.2 PEDESTRIAN SAFETY

26. There are concerns with pedestrian amenity and safety effects as a result of the prolonged closure of the footpath on Gundry Street and Abbey Street adjacent to the site. To better understand the effects of the proposed development, please provide an assessment of the effects on pedestrian safety and amenity during the construction phase considering objective E27.2.(5) "Pedestrian safety and amenity along public footpaths is prioritised". Please also provide measures to avoid, remedy or mitigation any adverse effects identified in this regard.

Advice note: it is noted that this footpath has been closed for almost two years due to planned works on the site which are not progressing. This consent, if granted, will further extend the period for which this path (and parking spaces) will be closed. The applicant is recommended to explore measures to mitigate these effects. It is recommended that the applicant provide safe pedestrian passage along their street frontage through the use of gantries or similar measures.

Response:

While further detail for this will be provided during the updated Construction Traffic Management Plan, it is considered that the existing pedestrian environment is not unsafe for the volume of pedestrians currently using the route through Abbey and Gundry Streets. There are generously wide footpaths along the southern side of Abbey Street and the eastern side of Gundry Street which can comfortably accommodate pedestrians, which is not considered to be a significant inconvenience for pedestrians who likely are familiar with the walking environment in the vicinity of the site.

In light of the easy safe alternative pedestrian routes around the site the provision of gantries or similar measures is unnecessary in this particular case. It is also noted that the Gundry Street footpath and parking has been concreted as part of the earlier construction process and it is not considered efficient to remove the hoardings, reinstate any footpaths and then for them to be reclosed soon after being opened when this current proposal will be built.

Figure 5 shows five alternate pedestrian routes between Newton Road and Karangahape Road.

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Figure 5: Alternate Pedestrian Routes between Newton Road and Karangahape Road

2.3 GUNDRY STREET PARKING

27. The proposed vehicle crossing is across multiple existing on-street parking spaces on Gundry Street. Parking in this area is in high demand and there is a concern with the proposed loss of these spaces. It is also noted that the site has 4 existing vehicle crossings that will be made redundant through this proposal.

a. Please confirm if the car parking spaces proposed to be removed as a result of the new vehicle crossing will be reinstated.

b. If these spaces will not be reinstated, please provide an assessment in accordance with Objective E27.2(3) Policy E27.3.3(f) of the effects of the loss of on-street parking arrangement on the western side of Gundry Street.

Advice note: all four redundant vehicle crossings will need to be reinstated by the applicant to the kerb, channel and footpath. The No Stopping at Any Time line markings

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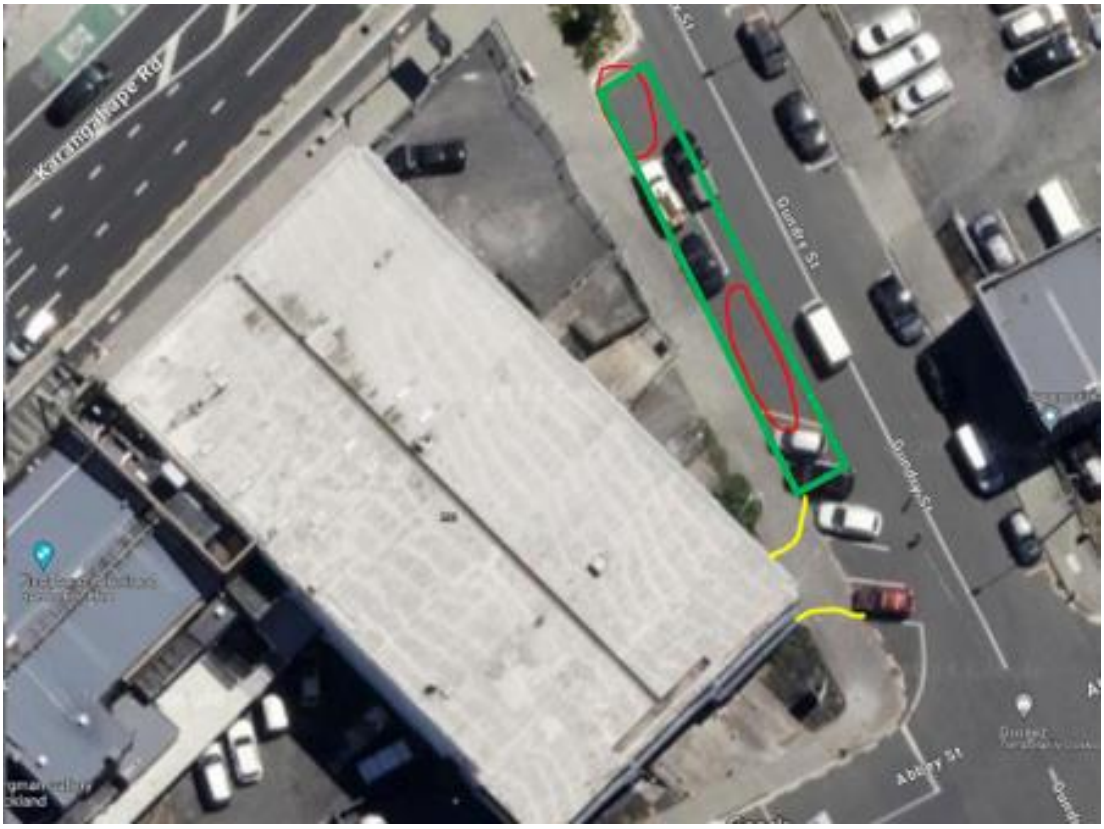
in front of the redundant Abbey Street vehicle crossings will need to be removed by the applicant. It is recommended that these reinstatement requirements are accepted as a condition of consent with the design detail considered at subsequent design stages. Anticipated required changes to the western side of Gundry Street (along the site's frontage) include:

- ***The removal of angled parking spaces to allow for the vehicle crossing,***
- ***Reinstatement of both redundant vehicle crossings on Gundry Street,***
- ***Provision of angled parking from the northern kerb buildout to the proposed vehicle crossing without adversely effecting visibility for vehicles leaving the site.***
- ***It is likely that the applicant is requested to remove the existing motorbike parking bay.***

The image below illustrates a concept of how the reconfiguration could work, with the green bar indicating AT's preferred space for paid angled parking. Please note this figure is for reference only to guide a design by the applicant, and it does not indicate that a similar design will be approved in future.



AT has requested that the applicant agree to the reinstatement mentioned above, with a concept deign being submitted. This would assist in streamlining the EPA process.

Response:

It is confirmed that the angled car parking spaces along the eastern side of the site on Gundry Street will be reinstated, and existing vehicle crossings now redundant will be reinstated to footpath and kerb and channel.

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The No Stopping at All Times (NSAAT) lines will also be removed in front of these redundant vehicle crossings, resulting in the creation of at least one on-street parking space on Abbey Street.

Figure A2 in Appendix A shows the previous on-street parking arrangement on Gundry Street, and Figure A3 shows a conceptual design of Gundry Street in the vicinity of the site, with how the finished on-street parking arrangement may look like. The design results in 8 on-street parking spaces being provided, which is a net increase of one parking space compared with the previous arrangement. Waste loading will occur in front of the proposed vehicle crossing on Gundry Street.

It is noted that the previous 60-degree angled parking spaces were approximately 3.5 metres deep from the kerb, where the current Unitary Plan requires 4.2 metres. The result is the northbound lane on Gundry Street would reduce in width to 3.1 metres, which is considered to still be acceptable.

If you have any further queries, please do not hesitate to contact us.

Commute Transportation Consultants

Tom Guernier

Senior Transport Engineer

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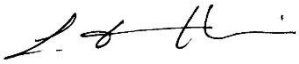
Leo Hills



Director

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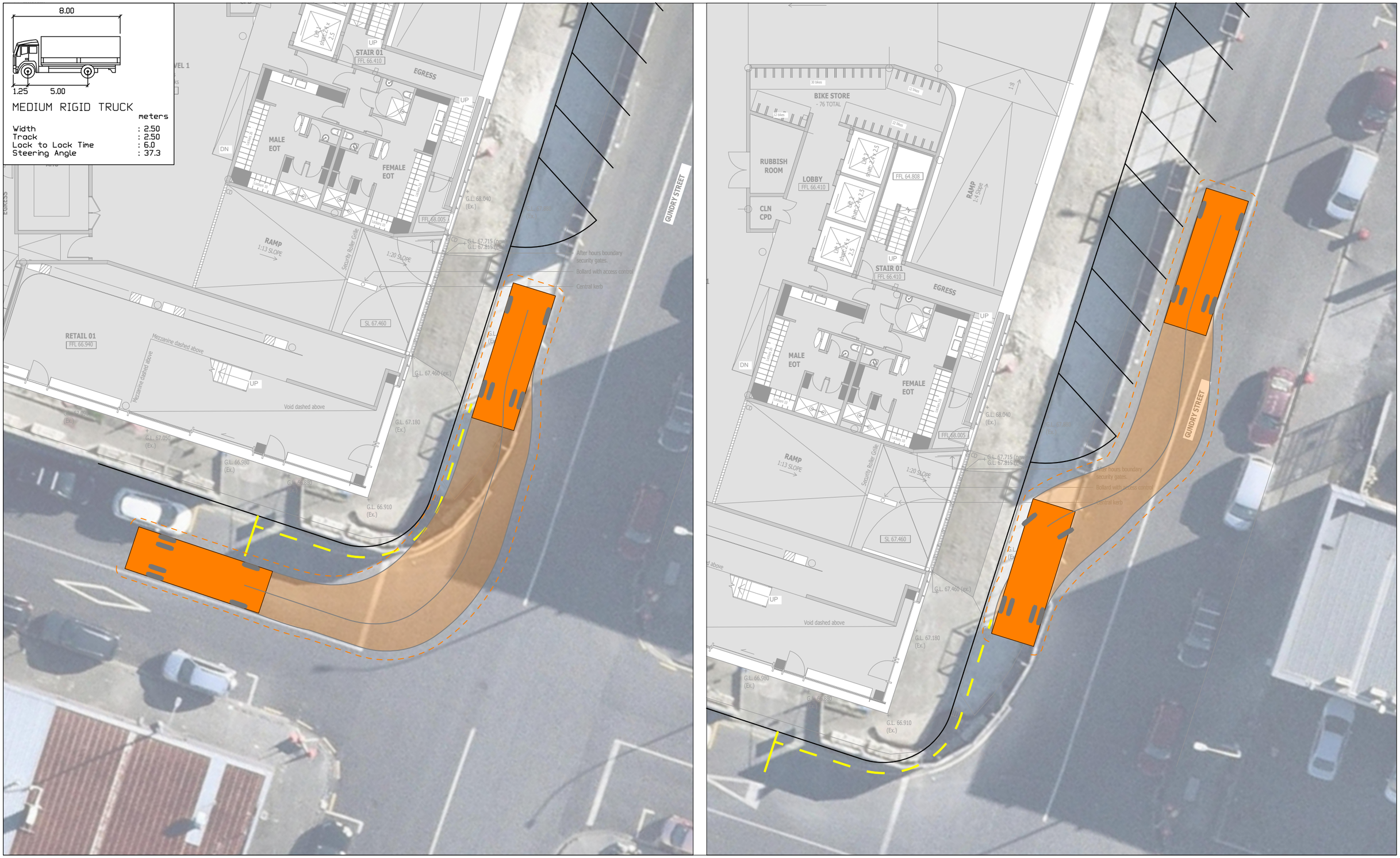
APPENDIX A – GUNDRY STREET VEHICLE TRACKING AND LAYOUTS



Revision notes:		
Rev:	Date:	Notes:

Drawn by: TG J002706	**Project:** 538 Karangahape Road, Newton Proposed Commercial Development	**Date:** 27 February 2024	commute TRANSPORTATION CONSULTANTS	**Figure:** A1
Client:	**Drawing Title:** Vehicle Tracking Gundry Street - 8.0m Waste Vehicle	**Scale @ A3:** 1:200 **Revision:** A		

Revision notes:

Rev:	Date:	Notes:

Drawn by:
TG
J002706

Client:

Project:
538 Karangahape Road, Newton
Proposed Commercial Development

Drawing Title:
Previous Road Layout (2020)
Gundry Street

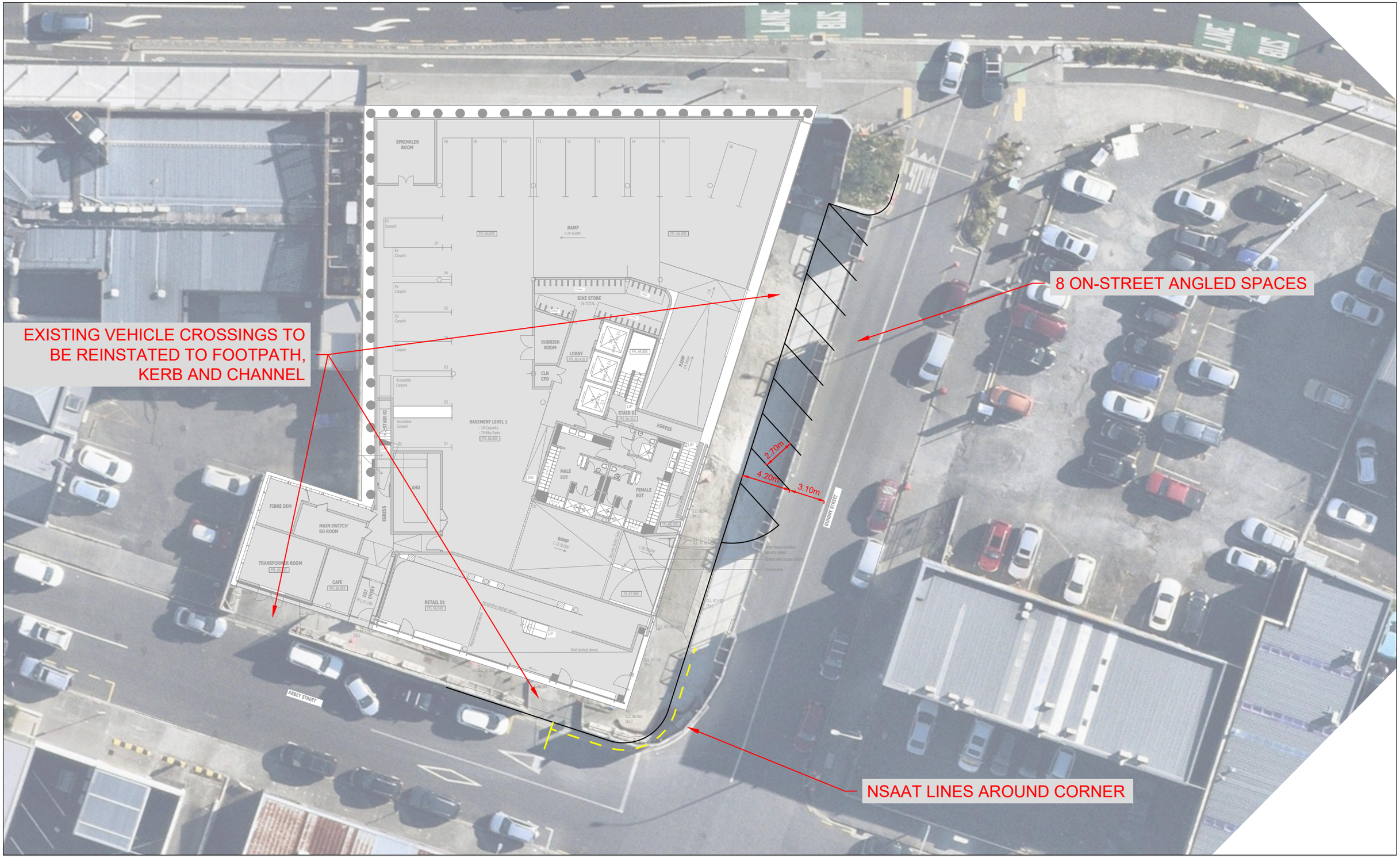
Date:
27 February 2024

Scale @ A3:
1:300

Revision:
A

commute
TRANSPORTATION CONSULTANTS

Figure:
A2



Revision notes:

Rev:	Date:	Notes:

Drawn by:
TG
J002706

Client:

Project:
538 Karangahape Road, Newton
Proposed Commercial Development

Drawing Title:
Concept Road Layout
Gundry Street

Date:
27 February 2024

Scale @ A3:
1:300

Revision:
A

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Figure:
A3