

## **Notice of Requirement by Otago Regional Council for a Designation for Proposed Central City Bus Hub (DIS 2017-1) Great King Street**

**From M Smith 25 October 2017**

### **Table 2 Summary Of Submissions requires corrections.**

1. The reference to the proposal being contrary to parts of the Otago Regional Council Draft Regional Land Transport Strategy 2011 is in-correct.
2. The reference to the proposal being contrary to parts of the Public Transport Plan and 2015-2021 Regional Transport Plan is in correctly referenced and in correct (See below)

#### **Regional Council Draft Regional Land Transport Strategy 2011**

The submission stated that in the document the applicant (Otago Regional Council) stated that *"a centralized terminal is possibly not warranted as numerous services provide easy access through the Octagon in Dunedin."*

#### **Otago Southland Regional Transport Plans 2015 -2021**

The submission acknowledges the Council's intention to moot the idea of making the hubbing network better in developing the Transport Plan. It is also acknowledged that the Council has highlighted difficulties *when the Octagon is partially or fully closed which occurs many times a year.*

The reference to the ban of a left hand turn from the supermarket onto Great King Street should of read, right hand turn.

The submission notes in terms of the Dunedin City Council's involvement for a Central City Transport Hub the project is listed as a low priority, regional priority band 4 of 5 being the lowest priority.

#### **Notice of Requirement/ Need for Designation - Not Appropriate (See also Submission)**

The submission highlights the fact that the proposal (a mass line up of 11 on street bus stops, where the Otago Regional Council does not own or occupy the site, where the bus providers are public companies and where the proposed line up of on street bus stops is on Dunedin City Council road reserve and surrounding private property) does not warrant a designation and the Council should with draw its notice of requirement.

The statement of evidence provided by the consultants (Ms Justice) to the Council provides no compelling reason for a notice of requirement for what amounts to amass of on street bus stops and ancillary furniture and infrastructure on Great King Street. If the proposal was to be incorporated into a self contained building or depot such as surrounding for example Community House or the Farmers Carpark area redeveloped to achieve this and land transferred to the Regional Council, a notice of requirement and therefore designation of such a site may be warranted.

## **Proposal is Contrary to Objective and Policies in the District Plan**

Refer original submission.

It can not be argued by the applicant or be concluded with any credibility that the removal of bus stops that have synergy with Princess Street, the Octagon and George Street that are well located outside of buildings (protected by the District Plan for townscape and heritage values) with very little visual impact on the surrounding footprint improves amenity; whilst the mass on street parking associated with 11 bus stops and ancillary infrastructure improve the amenity of Great King Street.

The Planners conclusions and evidence from Ms Justice that changes in amenity values and positive visual effects are expected to result from the proposed bus hub is not credible.

### **Amenity Effects (Evidence as referenced from above)**

The evidence produced in support of the application attempts to devalue (as an assessment of the wider amenity, environmental and traffic and transport effects) the importance and role of buses servicing Princess Street, the Octagon and George Street.

The evidence further contradicts the assessment in the Notice of Requirement as stated that over estimates amenity gains by removing buses from this area and then claiming that on mass bus parks and ancillary structures will improve amenity in Great King Street.

This is clearly not the case and the proposal for mass on street bus stops and infrastructure would require resource consent in terms of the Second Generation Plan.

### **Relevant Policy Statement and Plans**

The conclusions regarding the proposal as being contrary to policies in Policy Statement and Plans still apply contrary to the conclusions of the evidence prepared by Ms Justice.

Whilst it is encouraging the Council are attempting to improve bus services, in the absence of traffic and commuter surveys and modeling and the displacement and re-routing of more accessible services, it can not be concluded as produced in the evidence of Ms Justice that the proposal provides and improved public transport service..

It is also stated the proposal would enhance the streetscape of Great King Street. This activity attempts to mitigate the adverse impact of 11 bus stops and ancillary infrastructure. The streetscape is not enhanced.

### **Transport Operations and Planning/ Rigorous Assessment Required**

Although not relevant to the assessment and consideration of the proposal, there is no credible data or forecasting ability to support a 44% increase in patronage in the next 10 years due to the bus hub and change of routes.

The evidence stating that, this will mean that the use of private cars to travel to the city centre will be reduced, and accordingly will lower the demand for parking by Mr Carr has no weighting.

If this is the case route re-alignments should be factored in terms of considering this application based on such a conclusion.

It could also be highlighted in this regard that the Waverly/Bellknowes Bus Service adopted by the Otago Regional Council has removed services from the City Rise and has a bus stop separation of almost 1 kilometre (700 metres) between two bus stops. One in the exchange the next beyond York Place).

Furthermore the positive spin on this application for mass on street bus stops that should be considered as a resource consent application not a notice of requirement is important as providing Otago Regional Council with Requiring Authority Status over bus services and stops which are generally permissible in the District Plan and with controls over Bus would set an un-necessary precedent and would result in the ORC having to much un-fettered land use control on transport development and infrastructure.

It is a known fact that where a bus stop was placed backward, with restricted views of George Street, the Otago Regional Council claimed the placement was deliberate because of the effects of the wind.

The un-acceptable separation distance between the bus stops highlighted above, misplacement of bus stops and consultation merely for design inputs of the proposed hub morphing from concept in Transport Plans to the chosen site in the notice of requirement reflect the need to consider more fully the long implications of this proposal.

#### **Transportation and Traffic Infrastructure (see also Summary points 1 and 2).**

It is accepted that engineering solutions and traffic management will mitigate many adverse pedestrian and traffic affects at the proposed location in Great King Street.

In the wider context the proposed 11 on street bus stops, and re-routing of services are likely to lead to the following:

1. Less direct and efficient accessibility to the Octagon, Central City, St Pauls Cathedral, Cafes and Restaurants, Bars, Municipal Chambers, Visitor Centre, Cinemas, Dunedin City Council and Library. (Particularly restricting access for the elderly and disabled).
2. Adverse Impacts on Traffic and Transport. Presently in Dunedin there are two compromised and problematic central city interactions outside of this proposal. They are as follows:

1. Manse Street/ Princess Street/ Stafford Street intersection
2. George Street/London Street/Pitt Street/Frederick Street intersection.

The proposal though not considered by the evidence of Mr Metherel to have a significant impact on surrounding intersections is likely to compromise and detract further from the efficient functioning and level of service (already characterized as only level c) of the intersections of Burlington Street/ Moray Place and Lower Stuart Street- Moray Place/Great King Street.

The restriction on right turning traffic onto Moray Place from Great King Street (services connections to the Central City, Octagon, Moray Place, York Place, Filleul Street, Princes Street, Upper Stuart Street, Hill Suburbs and George Street back to the main retail blocks and north Dunedin is also un-acceptable).

## Summary

1. The conclusion of TDG that changes in intersection performance forecast they will not result in people changing their routes and therefore will not have wider transport network effects is not considered credible (note the proposed restriction from turning right from Great King Street to Moray Place).
2. It is encouraging that the evidence provided by Mr Metherel forecasts few changes to wider surrounding intersections feeding into the Great King Street vicinity. (It is still considered, however, that the Burlington Street/Moray Place and Moray Place - Lower Stuart Street – Great King Street routes function and efficiency will be compromised further and adversely impacted by the proposal).
3. While Great King Street Retain its function as a public road, its present level of service will be compromised ( a defacto road stopping is likely with acceptance of future designations via any outline plans further restricting public vehicle use).
4. The restriction of right turning traffic from Great King Street onto Moray Place is un-acceptable.
5. It is considered that the proposal is un-equivocally contrary to the amenity Policies and in balance many transport policies in the District Plan.
6. Awareness of the change to bus stops in Dunedin City and consultation regarding the proposed Bus Hub has been in-adequate.
7. It is considered a notice of requirement is not acceptable considering the proposal is for what is in effect 11 on street bus stops and ancillary activities.
8. It is considered a notice of requirement is an attempt to override requirements in the District Plan and more notably the direction of the 2<sup>nd</sup> Generation Plan that would require resource consent for a Passenger Transport Hub.
9. It is considered the acceptance of the notice of requirement would set a precedent for developing bus stops and other infrastructure on routes in Dunedin City over-riding the resource consent process and local government (DCC) bylaws to regulate and control such activity.
10. I do support the evidence by Ms Cambridge concerning the positive impacts of good urban design and landscaping, however 11 on street bus stops and ancillary infrastructure will detract and detrimentally impact the central city amenity and Great King Street.
11. The Environmental and long term impact of the proposal has not been adequately considered for a heritage city. The on street buses provide no synergy or linkage with private transport, public transport, taxis, other bus services or modes of transport.
12. Consistent with submissions on Regional Council Transport Strategy Documents and Plans, the development of a well thought out multi-modal integrated bus interchange contained within an enclosed building in the Central City that enhances and works with the current and possibly new bus services would be supported.