

Nelson City Council PPC 28 - Submission to RMA Commissioners

Peter Taylor – personal submission

- I am a registered osteopath and registered psychotherapist
- I am a former staff member of the Otago Regional Council where I was Director of Strategic Communication and Education for 12 years
- I am a former Head of the School of Social Sciences at NMIT
- I have been a regular user of the Maitai walkways, swimming holes and cycle tracks for 25 years
- I regularly refer patients with physical injuries or pain and those in psychological distress to use this area for their rehabilitation.
- I highly value this areas deep amenity and recreational values
- I have read much of the information lodged in relation to PPC28, and I have looked at the most recent Structure Plan in Mr Milne's evidence. I understand in a general sense what type of development is proposed.

Maitai/Kaka vulnerable amenity characteristics negated by PPC28 traffic increases

- Loss of peaceful and quiet character – an area to improve ones health
- Loss of a spacious clear air environment free of intense suburban disturbances
- Loss of open flat recreation areas safely accessible for young and old
- Degraded water quality from road runoff
- Degraded air quality from traffic, wood burners
- Decrease in safety via road access from increased traffic
 - Single lane Biggs bridge ; Nile St homes driveway risk to cyclists
- Increasing traffic congestion into 3 vulnerable school locations & NMIT

PPC28 data on road effects is problematic

Many ambiguities and uncertainties arise from the lodgement of Schedule X which require more information including: -

- Shallow analysis determining that a shared path is acceptable over separated cycleways, cycle lanes and footpaths.
- How cycle and pedestrian facilities will be constructed at the western end of the Maitai Valley Rd where there is only 7.6m of carriageway before the edge of the Maitai riverbank drops away, over a 100m length.
- How cycle facilities will be provided over Jickells Bridge, which is only 7.2m wide.
- How cycle facilities will be provided beside the cricket pitch and toward Gibbs Bridge where the carriageway is narrow and there is already compressed parking during sporting events.

Unreliable or missing traffic /transport assessments

- There is missing, or inconsistent, or uncertain data in PPC28 concerning transport and traffic including the following:
- A mode shift plan and transport emissions impact assessment are required to indicate how the PPC28 would achieve low vehicle emissions, and to demonstrate how walk/cycle and public transport accessibility would be the more attractive, preferred transport mode for the residents of the of the proposed suburb
- An evaluation of expected walk/cycle and public transport users from 750 dwellings should take into account the dwelling locations within the proposed suburb, their elevations and the route/mode choices/journey times to central Nelson as these factors will affect public transport usage options, if indeed any public transport options are ever made available.

Traffic flows uncertain - more investigation required

- PPC28 suggests a minimal 7 vehicle trips per day/per household = +/- 5250 car trips daily
- NZTA assessment of 9.5 vehicle trips per day = +/-7125 car trips daily
- The average of these two estimates (6187 vehicle trips daily). This figure would substantially increase should a linking road be constructed over Bayview Road to the Maitai as mooted.
- PPC28 minimises the likely adverse effects from traffic flows through lack of evidence presented to the contrary and uncertain figures
- Traffic effects are potentially a massive problem arising from this proposal requiring further detailed research and assessment

Traffic effects on amenity values

Taonga (treasured) environment – huge effort and finances delivered to improve catchment water quality, ecology, landscape and amenity values

The effects of these values - spirit uplifting, mind calming, body healing, heart repairing , joy restoring , hope reinstating.

What a terrible contradiction – should this subdivision proceed it would destroy the very characteristics currently being improved through huge investments of funds and human resources

Adverse effects from traffic on adjoining areas

- Traffic increases of about 6-7000 extra vehicles will cause major congestion on the Nile St – Collingwood intersection and in connecting streets - Collingwood St, Brougham St, Van Diemen St, Waimea road
- Such increases would cause significant loss of amenity in areas with high recreational use/values such as Branford Park, Maitai Cricket Ground, Centre of NZ walkway, Waahi Taakaro Reserve, swimming holes, walking and nearby cycling tracks
- PPC28 raises the potential need for Gibbs Bridge to be replaced and other requires other major roading/infrastructure upgrades. The applicant has not assessed the impact of these and should do so before further consideration is provided.

Adverse traffic effects on adjoining areas (2)

- Hillside dwellings across the valley, above Nile St, will have a substantial increase in traffic noise and degraded air quality, not to mention Raphine Way.
- The heavy vehicle traffic required to develop a satellite suburb would cause significant safety, noise, and air pollution impacts for immediately adjacent and nearby residents. i.e. Nile St, Collingwood St,
- Substantial traffic flow increases on Collingwood St, Brougham St, Upper Trafalgar St, Van Dieman St and Waimea Road would lower road safety factors and cause congestion.
- Being narrow, Brougham St and parts of Van Dieman St are already unsafe - vehicles currently stop to allow one way passage to safely pass parked vehicles.

Adverse traffic effects on adjoining areas (3)

- Ordinary and heavy vehicle traffic increases on linking roads such as Nile St, Collingwood St, Milton St, Brougham St and others nearby will increase surface and edge deterioration and related road safety issues. No assessment of increased road damage and maintenance and how these improvements would be financed has been provided.
- Over many years of construction, extra heavy vehicle traffic will increase the risks to cyclists, motorcyclists and pedestrians. No
- There has been no assessment provided of all these factors. PPC28 should account for the effect of these changes on nearby residents and area users, and on the infrastructural changes that will be required to remedy PPC28 problems before any further consideration is provided.

Public transport and the Nelson CBD

- There are no existing public transport routes in the vicinity and none are planned. The omitted transport and traffic flow faults in PPC28 will exponentially increase pressure on parking in the Nelson CBD and existing link roads which are not designed for large increases in traffic.
- This greenfield suburb would weaken NCC attempts to intensify the inner city, making it more pleasant and vibrant, and denigrate the quality of life for those on the CBD's second level suburban link roads and connecting streets.

Highway connections from SH 6

- Waka Kotahi NZTA and the applicant have mooted the possibility for the Kaka /Maitai Valley road as a potential alternative route from SH 6 and suggest this could be developed into a main connecting route.
- This major strategic transport decision would have massive detrimental effects on existing connecting road networks and the communities living on or near them and these should be integrated and addressed in PPC28.
- No assessment of the impacts of Kaka-Maitai Valley becoming a permanent transport route for through traffic from SH6 has been completed.

Additional traffic from Bayview Road as it stands

- There is no assurance that the Bayview - SH6 intersection will be improved.
- Difficulty and delays for Bayview traffic exiting onto SH6 may mean it is quicker, safer and easier for Bayview and other adjoining Atawahai residents to travel south via the Maitai.
- Integrated traffic planning to assess the effects of any adverse traffic effects generated by PPC28 on adjoining areas should be

SH 6 road increases adverse effects by magnitude

- The route in and out of the proposed satellite suburb passes schools, an Institute of Technology, kindergartens, a small shopping area served by angle parking, and long established communities
- The area is entirely unsuitable as a major bypass for SH 6 or as a major network highway.
- If the Maitai Valley Road and its connecting streets were to be used as an alternative route for state highway traffic, the adverse effects of PPC28 would be worsened by an order of magnitude.
- The full traffic effects of both PPC28 and a major connecting route through it must to be publicly addressed before either of these proposals are given any permission to proceed .

Overstated figures used for active mode trip rates

- Active mode trip rates of 20% cycling and 12% walking appear exaggerated i.e. not based on real world observations or supported by data.
- Observations of Nile St and other adjoining areas such as Brook Valley show very few people walking or cycle commuting
- This is also true for Nelsons western suburbs of Richmond and Stoke from where a top grade paved and mostly flat and cycle-walkway railway reserve can be accessed. It has not so far reduced traffic congestion on adjacent Waimea Road.
- The elevations within PPC28 are a deterrent to cycling and walking

Active mode inflations

- Based on the low use of existing commuter cycleways in Nelson and the distance involved (5-7km to Nelson assets e.g. schools) it is unlikely that active commuter transport modes will be substantially taken up by residents from PPC28.
- Distance places PPC28 suburb within cycling distance for the very keen; however, the same proximity of other suburbs to Nelson CBD has not correlated to increased uptake in active transport modes.
- PPC28 needs to reflect evidenced transport data before further consideration is given

Active transport mode lack of planning alignment

- The 2021 Nelson Future Access Study (NFA) is a Waka Kotahi & NCC 's most detailed programme for transport in Nelson ever.
- It recommends a strong focus on shifting journeys away from private vehicles by encouraging the alternative modes of transport, and focussing on integrated land use and transport.
- Parts of PPC28 does not align with the NFA study
- It recommends a 'primary' cycle route is required along Nile St from the Collingwood St roundabout to the Nile St / Maitai Rd intersection.

Active mode uncertainties (2)

A “primary cycle route” provides high level separation from traffic lanes and pedestrians, with little traffic conflict at intersections. This level of safety would likely require the following major road modifications:

- Removal of angle parking outside NMIT and Nelson Central school.
- Removal of trees located between angle parks between Collingwood St and Domett St.
- Removal of car parks where the carriageway is narrow immediately east of the Nile St / Tasman St roundabout.
- Modifications to the Nile St / Collingwood St and Nile St / Tasman St roundabouts to improve safety for pedestrian and cyclists.
- Widening of the Nile St bridge by Domett St, which is currently only 8.5m wide
- Removal of parking between Tory St and Maitai Rd or the removal of trees to provide separated cycle facilities.
- The current pathway requires cyclists to give way at each private crossing and does not meet service levels for a primary cycle facility.
- PPC28 does not address the effects of these major modifications on affected parties or the wider community of Maitai Valley users

Adverse effects from traffic / roading consequences

- Constructing and mitigating the effects of the previous items would incur significant costs. PPC28 does not address how this would be achieved. The scale of the project requires public consultation before any further consideration is given.
- The potential for massive infrastructure expenses to fall on ratepayers and the project risks of the primary walk-cycleway should be identified and included as part of the PPCR28 economic impact assessments of the development.
- Without surety that PPC28 will deliver multi-modal transport options, there cannot be surety that PPC28 will deliver a well-functioning urban environment.

Adverse effects from traffic / transport consequences (2)

- The potential for immensely degrading environmental effects (air and noise) and the deterioration of the social and living conditions experienced by eastern Nelson residents caused by substantial increases in traffic from PPC28's satellite suburb must be thoroughly investigated and considered by the public before any approval to proceed is given.
- PPC28 appears to seek to integrate city road/traffic planning measures into its needs rather than integrate its needs into those of the existing affected residents and the wider Nelson community of Maitai Valley recreation area users.