

Joelene Noble

From: ronaldttnelson@gmail.com
Sent: Thursday, 4 December 2008 11:14 a.m.
To: Joelene Noble
Subject: Restoring the Golden Mile - Bus Route & Street Changes

The following details have been submitted from the Restoring the Golden Mile - Bus Route & Street Changes form on the www.Wellington.govt.nz website:

First Name: Ronald
Last Name: Nelson
Street Address: 3/107 Cuba st
Suburb: te aro
City: wellington
Phone: 021 41 70 41

I would like to make an oral submission: Yes

Email: ronaldttnelson@gmail.com

I am making this submission: on behalf of an organisation

Organisation Name: SAVE MANNERS MALL FACEBOOK GROUP

Views on opening Manners Mall to buses: This is completely wrong minded.

Inner city residents need more public spaces. Turing the mall into a road would be a tragic mistake.

What about the shops that depend on foot traffic, NOT bus traffic?

Views on long-term changes to streets: This question needs to be asked in a more specific way.

Views on reducing the speed limit: Great idea. I'll be bringing a police record of my accident by a speeding car several years ago

Views on traffic light placement: This is good news too.

Other comments: Please email me how the proposal will be debated and discussed in the future please.

Ronaldttnelson@gmail.com

Submission form

SUBMISSION
NUMBER

186

Tell us what you think. Wellington City Council would like your feedback on proposals for the area between Taranaki Street and Willis Street and also Courtenay Place. These plans include re-routing buses through Manners Mall, lowering the speed limit in Manners Street and Courtenay Place from 50kmh to 30kmh and putting traffic lights on the three pedestrian crossings in Courtenay Place. Fill out this feedback form and post it back to us by Friday 5 December (no stamp required) or comment online at www.Wellington.govt.nz

All submissions (including name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of the consultation process. All information collected will be held by the Wellington City Council, 101 Wakefield Street, Wellington, with submitters having the right to access and correct personal information.

First name(s) ANN

Last name BAIN

Street address 5 George Street
Stokes Valley Lower HUTT

Phone 563 7139

Email abain @ paradise.net.nz

I am writing this submission (tick box)

as an individual

on behalf of an organisation

Name of organisation Association of Blind Citizens NZ Inc
Wellington Branch.

Would you like to present your submission to the Committee considering the proposal?

Yes if clarification is needed.

No

What do you think about the idea of opening Manners Mall to buses?

As blind and vision impaired people we are usually pedestrians and bus users. We need safe, uncluttered footpaths

If buses are re-routed in Manners Mall we expect to retain wide footpaths, safe kerbs and crossings.

What do you think about the possible long-term changes to Dixon, lower Cuba, Victoria, Wakefield and Mercer streets?

We think that where Victoria Street crosses the Manners Street to Courtenay Place route there may be undue congestion and traffic delay at the lights.

2/8/1

Submission form (continued)

Tell us your views on the proposal to reduce the speed limit from 50kmh to 30kmh in Manners Street and Courtenay Place, including the mall area.

We agree with a reduced speed limit.
The area is predominantly for
pedestrians and shoppers.

What do you think of the proposal to put traffic lights at the three unsignalised pedestrian crossings in Courtenay Place?

It would be extremely helpful for blind and
vision impaired people to have signalised
pedestrian crossings.

Other comments:

We want to be able to walk and
sit in the area, and be safe.

Fold, tape and send this submission form to reach us by **Friday 5 December**.
Feel free to include extra pages if you need to.

FOLD

FreePost Authority Number 2199

**Absolutely
POSITIVELY**

ME HEKE KI PŌNEKE
WELLINGTON CITY COUNCIL **Wellington**

PO BOX 2199, WELLINGTON, NEW ZEALAND



FREEPOST 2199
TARANAKI TO WILLIS/MERCER STREET PRECINCT PROPOSALS (CAB2)
WELLINGTON CITY COUNCIL
PO BOX 2199
WELLINGTON

Submission form

**SUBMISSION
NUMBER**

263

Tell us what you think. Wellington City Council would like your feedback on proposals for the area between Taranaki Street and Willis Street and also Courtenay Place. These plans include re-routing buses through Manners Mall, lowering the speed limit in Manners Street and Courtenay Place from 50kmh to 30kmh and putting traffic lights on the three pedestrian crossings in Courtenay Place. Fill out this feedback form and post it back to us by Friday 5 December (no stamp required) or comment online at www.Wellington.govt.nz

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First name(s) Philippa Noel

Last name Burch

Street address 31 Byron St, Meremara
Wellington

Phone 3845339

Email info@artybees.co.nz

I am writing this submission (tick box)

as an individual

on behalf of an organisation

Name of organisation

Arty Bees Books Ltd.

Would you like to present your submission to the Committee considering the proposal?

Yes as a delegation

No

What do you think about the idea of opening Manners Mall to buses?

We strongly oppose the proposed plans.

See attached submission.

What do you think about the possible long-term changes to Dixon, lower Cuba, Victoria, Wakefield and Mercer streets?

Submission form (continued)

Tell us your views on the proposal to reduce the speed limit from 50kmh to 30kmh in Manners Street and Courtenay Place, including the mall area.

What do you think of the proposal to put traffic lights at the three unsignalised pedestrian crossings in Courtenay Place?

Other comments:

Fold, tape and send this submission form to reach us by **Friday 5 December**.
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Absolutely

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WELLINGTON CITY COUNCIL

Wellington

PO BOX 2199, WELLINGTON, NEW ZEALAND



FREEPOST 2199
TARANAKI TO WILLIS/MERCER STREET PRECINCT PROPOSALS (CAB2)
WELLINGTON CITY COUNCIL
PO BOX 2199
WELLINGTON

Restoring Wellington's Golden Mile

***We provide this feedback on behalf of
Arty Bee's Books Ltd
The Oaks, Manners Street, Wellington 6011.
e-mail:info@artybees.co.nz
Phone: 3845339 or 0274179920]***

***We wish to be heard as a delegation from a
commercial entity in support of this submission,
which opposes the proposed changes to Manners
Mall, Manners Street (East) and Lower Cuba Street.***

Introduction:

Over the last 20 years Arty Bees has become an iconic Wellington business and we believe we add value to the Wellington social fabric beyond that of a simple retail outlet.

- We are expanding our retail space to include a second floor at our Manners Street shop when we close the Courtenay Place branch in early 2009.
- We are a longstanding family business with strong ties to the community.
- Our customers range through all ages and socio-economic groups.
- We are open late every night of the week providing a safe inviting place for friends and families to meet before heading off to movies, galleries, restaurants etc.
- Management and staff place a strong emphasis on exemplary customer service and we strive to create a customer-friendly environment. We have always been happy to be an informal information point for tourists and visitors to Wellington.
- We strive to be a child friendly oasis in the middle of town.
- We try to be an extension of the Arts and Education scenes that makes Wellington such a vibrant place to live.
- Every year we donate hundreds of boxes of books to local charities for fundraising purposes. Those charities include: The Downtown Community Ministry, Rotary, Lions, The Salvation Army, St Vincent de Paul, prison literacy groups and many local schools and churches.
- We have supported organisations such as the Somalian Refugee Homework Club as part of their literacy programme. We also support nearly a dozen local school libraries by supplying them with store credit for book purchasing. They are also able to encourage their supporters to bring in books to recycle and add to their charity account.
- We have a long history of involvement with and support of many local institutions and events – supporting Arts and Film Festivals, Science Fiction Conventions, local Poetry Collectives and local Historical Societies. We also provide a retail outlet for many of our local authors who cannot get books distributed / stocked within the mainstream book chains.
- Recycling books enables those who would not otherwise be able to afford new editions to have access to them. Libraries are wonderful, but any book fan will tell you that owning books is better. More than 90% of our stock is recycled, not simply once, but again and again. We encourage our customers to recycle and reuse, rather than throw away
- We are an inherently green business with a long history of striving for ecologically sound methods of operating.
- We have always placed a strong emphasis on co-operating with the police and networking with other retailers in the area to help prevent crime and shoplifting.

Our Submission

We oppose the proposed re-routing of buses through Manners Mall for the following reasons:

In General Terms:

- We oppose the removal of the pedestrian mall and believe that we should be promoting the retention of public spaces in the centre of the city, which are free of vehicular traffic. If there were established trees, planter boxes, etc in Manners Mall, there is no reason it could not function as successfully as Cuba Mall.
- We do not believe that Manners Mall can become a 2-way bus thoroughfare and retain its pedestrian friendly status. There is not physically enough room to provide for 2-way bus traffic and wide pedestrian areas.
- We do not believe that bus routes are business friendly. This view is supported by the discussion document, which stated that there will be benefits to the streets from which buses are being removed.
- Existing retailers, both in the Mall and on the bus routes, have made decisions about suitable premises based on existing bus routes and traffic flows.
- We believe that the Council should not be contemplating such costly changes to the transport system at a time when businesses are already struggling with the economic downturn. There will be significant disruption to retailers during any construction phase.
- In our experience, a large number of the tourists visiting our city walk extensively and they see their ability to get round on foot as a major advantage. We believe that the city should promote this fact and make the pedestrian experience as positive as possible. We do not believe that having the bus routes separated by a block is a major hurdle.
- Wellington promotes itself as a tourist destination and as being supportive of retailers. There is a need for the City to support and encourage retailers, particularly those that are local and iconic.
- The youth who currently "hang out" in Manners Mall will not go away – they will just move to another part of the city. Removing the Mall will not remove the problem.

In Relation to Arty Bees Books:

A two-way bus route on Manners Street (with buses only travelling through what is now Manners Mall)

Summary:

The "Restoring Wellington's Golden Mile" proposed plan calls for the removal of all car parks and loading zones directly outside Arty Bees Books in The Oaks Complex, on Manners Street (east) and the probable removal of all but a few of the parking spaces located directly across the road.

Economic Impact:

- Unlike other retailers, Arty Bees sources over 90% of our stock from the general public and not from wholesale distributors. We require public parking spaces to be directly outside the door and this requirement is a key factor when choosing a store location. We have made the decision to expand our Manners Street shop based on the current bus routes and traffic flows.
- Our customers are not allowed to use Commercial Loading Zones and therefore must rely on public parking. Our business will be adversely impacted by the proposal.

Safety and economic Impact:

- Our customers often bring in large quantities of books and are frequently older / elderly people or parents with young children. Our staff are often called on to help people unload their cars and we are currently able to do this with parking adjacent to the door, even when there is only one staff member on duty in the store. With customers cars parked across the road or down the street this would be impossible.
- Books are extremely heavy, with a smaller box averaging at least 20 to 25 kilos. (To put this into perspective, a smaller box is the equivalent weight of an old-fashioned computer screen or a 16" TV).
- An average family car can carry between 8 to 18 large boxes. The proposed car parking spaces could mean customers or staff having to carry these boxes the length of nearly half a rugby field.

We believe that customers will either take serious risks negotiating traffic in order to avoid carry books this distance, or will simply stay away.

- We have analysed our buying data and on an average week our customers bring in a minimum of 108 bags and 71 boxes of books into our shops.
- Arty Bees has grave concerns for the safety of its staff and customers should the proposed plan go ahead, with the nearest possible public parking located across two lanes of buses; and with a bus stop directly outside the store providing an ongoing and daily hazard.

Social and safety impacts

- We donate hundreds of boxes of books to local charities for fundraising every year.
The books that we donate all have to be physically removed from the shop. For example during the Downtown Community Ministry's collection period for their annual Book Fair, **they collect up to 45 boxes of books every week from Arty Bees**. This is enough boxes to completely fill a standard / large sized business van every week. Carrying them across two busy bus lanes or down the road is not feasible, nor would it be safe.

Environmental and social impacts

- If customers find it difficult to bring in books for their own economic benefit they are even less likely to make the effort to bring in books for charity or for recycling – instead surplus books will end up in landfills.
- We believe that faced with the dilemma of leaving the child alone in the car while they unload, or leaving the child alone in the shop while they unload, many parents will leave their children at home or simply stop coming because it is too difficult.

Relocated bus stops

Summary:

The new proposed northbound bus stop appears likely be placed outside The Oaks building at the corner of Manners and Cuba malls and it will possibly extend down the length of the building including most of our storefront.

We are opposed to this proposal.

Economic impacts:

- Rental rates for the 25 metres of primary frontage / window display is very expensive and a key part of our business success. At busy times, we anticipate our shop frontage being blocked by waiting bus users. There will also be seating, signage, etc on the footpath completely obscuring our shop windows, which are used to display books to the passing public.

Social, cultural and safety impacts for staff, customers and passers by:

- The proposed bus stop and the proposed two-way bus traffic would make the area directly outside our shop more dangerous for our customers, particularly for the elderly or those with small children.
- Bus stops can be unsavoury places, particularly after dark, with loitering drunks, vagrants and other street people making a nuisance of themselves. There can also be soiling of pavements with the resultant unpleasant odours. This is not what we want at our shop entrance.

- We are open late every night of the week providing a safe inviting place for friends and families to meet before heading off to movies, galleries, restaurants etc.
- Busy bus stops are not safe or inviting places. A bus stop with a steep curb will present a hazard to the inebriated and the unwary.

Safety and economic impacts:

- The proposed bus stop is a prime location for street violence especially after dark – we are open late seven days a week with minimal staffing and safety concerns may well lead to our having to employ additional staffing at added expense.
- There is also potential for an increase in theft due to our shop being adjacent to a busy bus stop that could enable thieves to disappear into a crowded street at peak times.

Health and safety impacts for staff and customers:

- Fumes from the buses idling at the bus stop will come straight in the door and any open windows. There will also be increased noise and vibration for the same reason.
- The umbrella shaped design of The Oaks building veranda will trap noise, fumes and exaggerate the vibrations caused by passing buses.

Street changes on Manners Street (east), Dixon Street, lower Cuba Street, Wakefield Street and Mercer Street

We oppose the proposed changes on Manners Street (east), Dixon Street, lower Cuba Street, Wakefield Street and Mercer Street.

Economic impact:

- We believe that the Council has given little thought to the social, environmental and economic impact of this proposed plan on the area extending beyond the Manners Street / Cuba Street intersection into Manners Street (east). The Retail Impact Assessment report and the early "consultation" ignored this part of Manners Street. We were not informed or consulted about the proposals prior to the notice in the newspaper. We are an affected business and should have been both informed and consulted as part of any exploratory discussions prior to the proposal being notified.
- The Retail Impact Assessment report identified potential benefits for Dixon, lower Cuba, Wakefield and Mercer streets if the buses are removed. This implies that there will be **negative impacts on those areas where buses are being introduced**. We agree. Businesses in the affected areas have made decisions about premises based on the current bus routes and traffic flows.

- We are opposed to the proposed development of Lower Cuba into an area which could potentially be closed off to traffic for special events like the Cuba Carnival, like Blair and Allen Streets. **If this happened, there would be no customer vehicular access to Arty Bees at these times.**

Environmental Impacts

- Fumes from the buses will almost certainly mean a reliance on costly and ecologically unsound air conditioning units rather than the simple and efficient use of fans and open windows.

In Conclusion

We have just committed to a lease for a minimum of six years in The Oaks on Manners Street with an expansion upstairs from February 2009. This will involve a large investment by both ourselves and our landlord. The available parking directly outside the shop was one of the primary reasons we took the space six years ago and was certainly an important factor in the decision to expand our tenancy and close our Courtenay Place shop. Finding an alternative appropriately sized space (over 700 square meters) anywhere in a comparable part of town with the adjacent parking would be extremely difficult.

There could be long term and permanent loss of business due to a gradual depletion of stock as customers stop bringing in books. This may result in additional staffing being required and increased expenses due to having to find alternative ways of procuring stock and servicing our customers' needs

We are also concerned at the potential effects on our business during the construction phase of the proposed project should it be approved. Undoubtedly there will be adverse effects on our business caused by noise, vibration, dust and access problems.

This proposal should it be approved will have a significant impact on our family business at a time when we will have made a large financial investment in our business.

We make no comment about any of the other proposals in this document.

We wish to be heard in support of our "feedback".

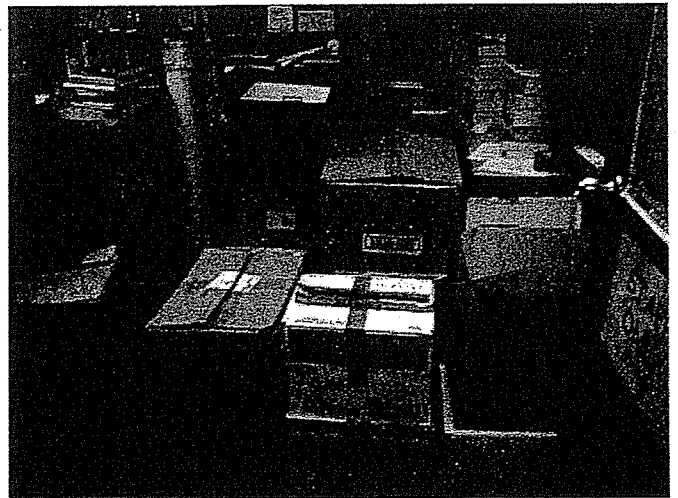
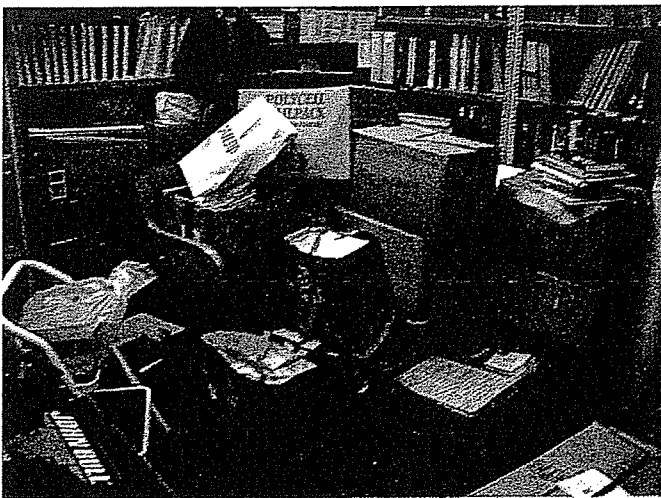
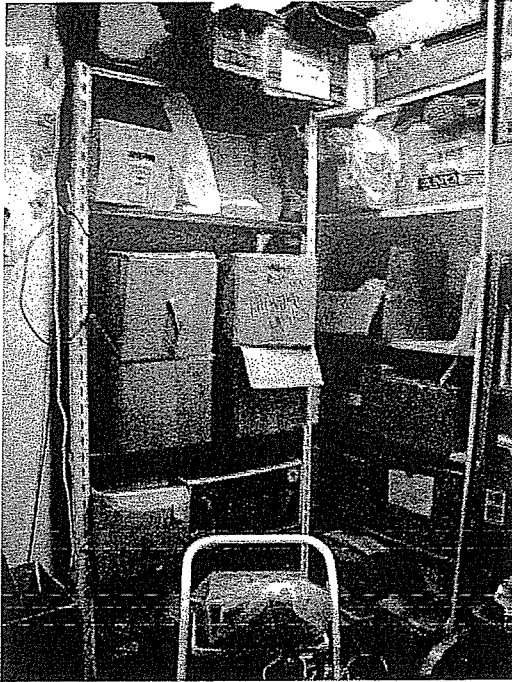
Thank you for this opportunity.

Philippa Burch and Robynne Leahy

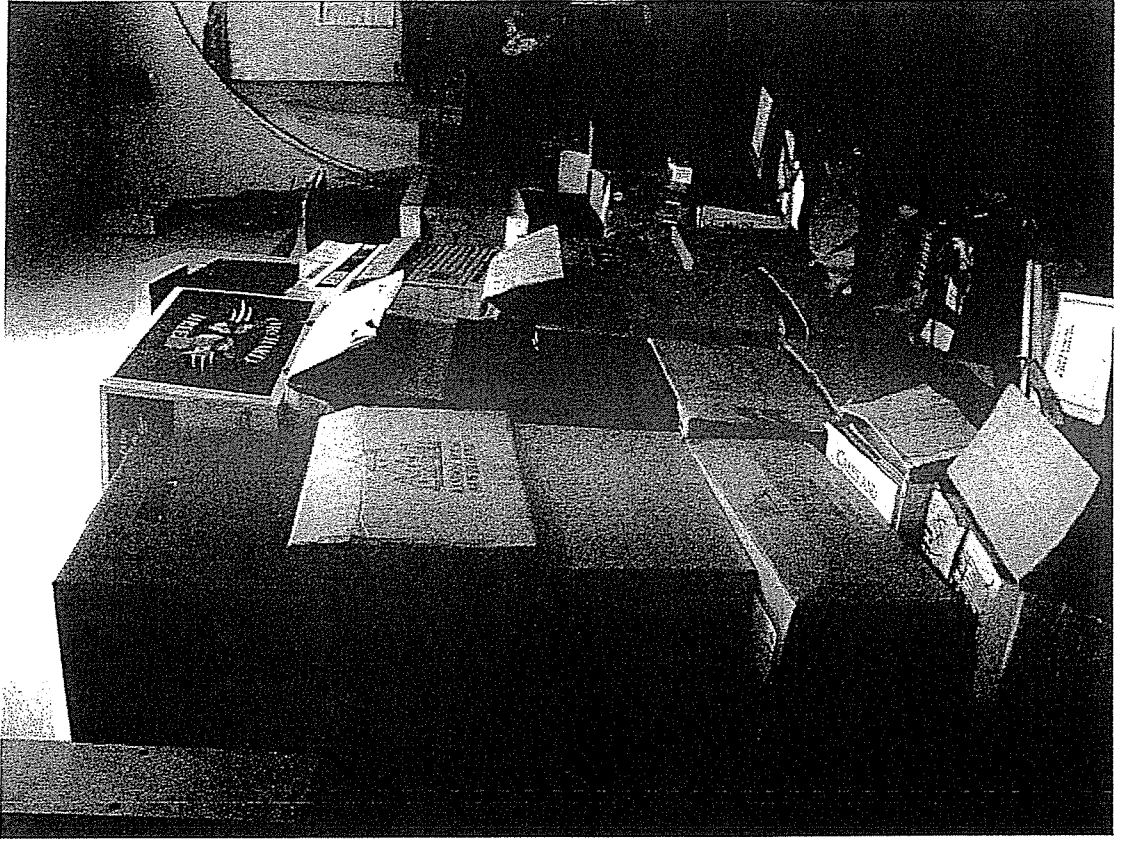
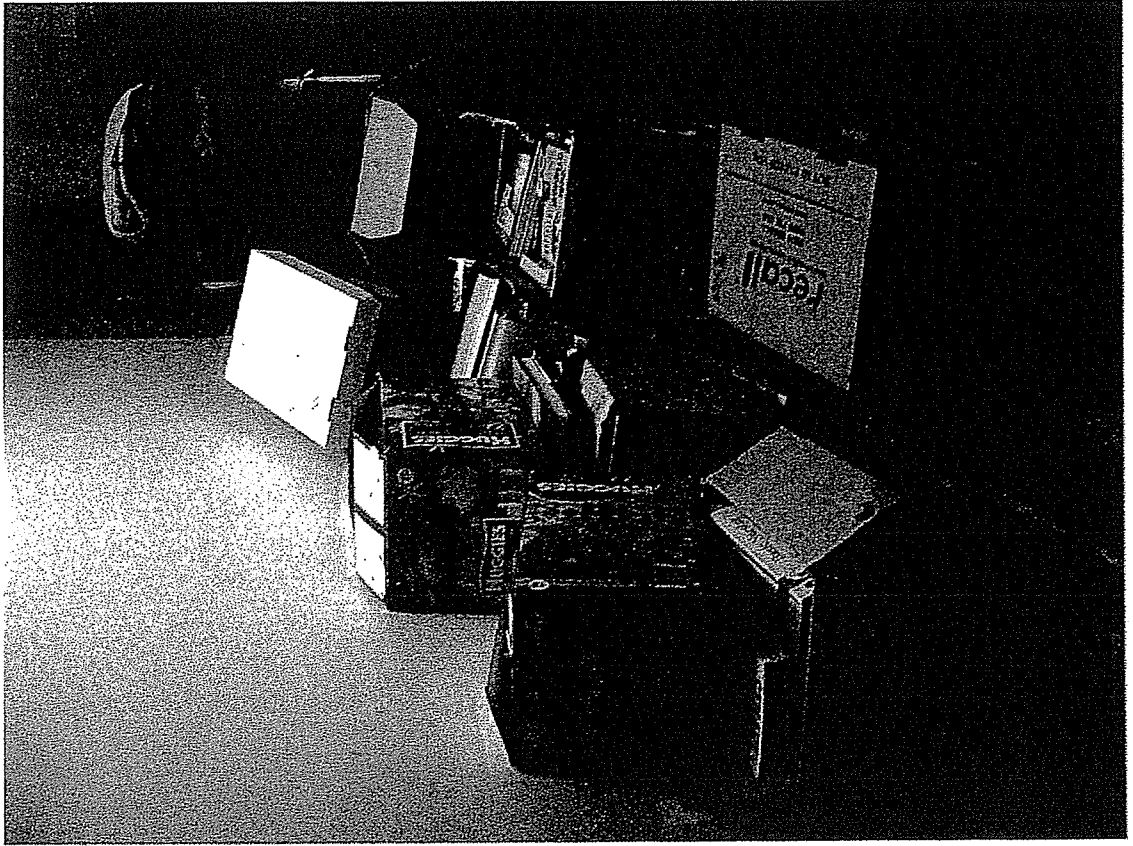
On behalf of

Arty Bee's Books Ltd,
The Oaks, Manners Street
Wellington 6011

**Some of the boxes and bags that came into Arty Bees Books,
The Oaks, Manners Street, the week ending 29th November 2008
(Some had already been dealt with and sent to the shelves)
All of these were carried into the store by customers or staff.**



Outgoing boxes of books at Arty Bees Books, The Oaks, Manners Street, destined for Charity the week ending the 15th November 2008 (left) and the 22nd November 2008 (right). Volunteers carry all these books out of the shop.



SUBMISSION
NUMBER

389

Joelene Noble

From: dan@instinct.co.nz
Sent: Thursday, 4 December 2008 5:30 p.m.
To: Joelene Noble
Subject: Restoring the Golden Mile - Bus Route & Street Changes

The following details have been submitted from the Restoring the Golden Mile - Bus Route & Street Changes form on the www.Wellington.govt.nz website:

First Name: Dan
Last Name: Milward
Street Address: 494 ohariu valley road
Suburb: johnsonville
City: wellington
Phone: 021 449901

I would like to make an oral submission: Yes

Email: dan@instinct.co.nz

I am making this submission: as an individual

Views on opening Manners Mall to buses: I think that the WGTN city council has lost track of what Wellingtonians actually want.

Views on long-term changes to streets: Manners Mall needs to be modernised not made into a bus lane.

This is the hub of our city.

Views on reducing the speed limit: Nothing wrong with that idea in concept.

Views on traffic light placement: Not more traffic lights!!!

Are we doing this to intentionally slow traffic down and burn more petrol (is the WGTN city council working for petrol companies?) or are we doing this because we don't want fat Wellingtonians to walk to the next set of traffic lights if they feel more comfortable.

We need less traffic lights in the fast becomming nanny state city!!

Other comments: You guys really should find people that know what is going on in the City. You should be ashamed and you certainly can not claim to be Wellingtonians.

SUBMISSION
NUMBER

486

Joelene Noble

From: david@statsresearch.co.nz
Sent: Friday, 5 December 2008 1:31 p.m.
To: Joelene Noble
Subject: Restoring the Golden Mile - Bus Route & Street Changes

The following details have been submitted from the Restoring the Golden Mile - Bus Route & Street Changes form on the www.Wellington.govt.nz website:

First Name: David
Last Name: Harte
Street Address: 139 Cecil Rd
Suburb: Wadestown
City: Wellington
Phone: 473 1760

I would like to make an oral submission: Yes

Email: david@statsresearch.co.nz

I am making this submission: as an individual

Views on opening Manners Mall to buses: I do not like this proposal at all. Manners Mall is too narrow for two way buses. There is a high pedestrian count here, and the resultant space allocated to pedestrians would be too small.

Further, Manners Mall is the only east-west orientated pedestrian area in Wellington. It has very nice afternoon sun and on nice days is a meeting and resting place for many.

Manners St in the 1970s was terrible: noisy, smelly buses fumes and little footpath space. This is not "restoration" it is "degradation".

Views on long-term changes to streets: I do not like the overall proposal. The biggest problem that **MUST BE SOLVED** is the time that it takes buses to traverse the CBD. No convincing evidence has been presented in the proposal to show that the changes will achieve this. This is **MUCH MORE IMPORTANT** than having buses travelling two ways on the one street. The system must work more satisfactorily for the city's residents rather than visitors.

The notion that we have a "Golden Mile" is very small town and outdated. Thirty years ago Wellington was a one main street town like many other provincial towns in NZ. This is no longer the case. For example, 30yrs ago Featherston St was almost purely an office district with no shops, etc. There were very few footpath verandas. Now there is more activity there in the evening than in the Lambton Quay section of the "Golden Mile". Many streets have changed like this in the last 30yrs: Dixon St, Victoria St, Blair St, Allen St, Tory St, etc.

Under the proposal, a number of the footpaths will need to be cut back to allow for two way traffic or turning lanes at intersections, e.g. on Willis St between Manners and Mercer (turning

584

right into Mercer), probably in Manners St at the intersection with Victoria (holding lane for those going east and turning right into Victoria). It appears that under the proposal, pedestrians have a very low priority.

Views on reducing the speed limit: Reducing the speed on Manners St and Courtenay Pl is a good idea.

Views on traffic light placement: OK if it helps to increase bus speeds. I would only allow buses into Courtenay Pl during peak hours. There are sufficient other routes in the area for other vehicles.

Other comments: The problem needs a better proposal than this to be solved. Unlike other cities, including those in America that were cited, Wellington's streets are too narrow to have: a two way bus system, accommodate private vehicles, and still allow a pleasant environment for pedestrians. These needs would be much easier to solve if the one-way system was properly finished, allowing more footpath space, less conflict situations at intersections, and hence fewer phases in traffic light cycles. It would also allow enough road space for a dedicated bus lane through the CBD in both directions.

Submission form

Tell us what you think. Wellington City Council would like your feedback on proposals for the area between Taranaki Street and Willis Street and also Courtenay Place. These plans include re-routing buses through Manners Mall, lowering the speed limit in Manners Street and Courtenay Place from 50kmh to 30kmh and putting traffic lights on the three pedestrian crossings in Courtenay Place. Fill out this feedback form and post it back to us by Friday 5 December (no stamp required) or comment online at www.Wellington.govt.nz

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First name(s)

John William

Last name

Warren

Street address

27 Sutherland Cres. Melrose,
Wellington. 6002

Phone

3898 - 152

Email

I am writing this submission (tick box)

 as an individual on behalf of an organisation

Name of organisation

Would you like to present your submission to the Committee considering the proposal?

 Yes No

What do you think about the idea of opening Manners Mall to buses?

Maybe the idea is a good one to ease the traffic flow. but the loss of a public space, even though full by some to be unsatisfactory ^{not} is a backward step. The introduction of Mall in Wellington brought out still ^{many} possibilities, life enhancing qualities to people.

What do you think about the possible long-term changes to Dixon, lower Cuba, Victoria, Wakefield and Mercer streets?

Allowing for more parking spaces in Dixon St, brings more cars into the city, increasing congestion. Opportunities to bring more cars into the city should not be created.

The value of what we have now should be clearly contrasted, in its loss, with the benefits to be gained by allowing buses through Manners Mall

Submission form (continued)

Tell us your views on the proposal to reduce the speed limit from 50kmh to 30kmh in Manners Street and Courtenay Place, including the mall area.

Yes this is a good idea

What do you think of the proposal to put traffic lights at the three unsignalised pedestrian crossings in Courtenay Place?

The crossing between the St. John and Reading Centre with signals could be a good idea but I have no view about the other two.

Other comments:

Loss of Manners Mall, potentially, is a serious issue and needs to be fully debated amongst Wellingtonians, with all the issues raised, especially, what it means to lose public space,

Fold, tape and send this submission form to reach us by Friday 5 December. Feel free to include extra pages if you need to.

before any decision on March

FOLD

FreePost Authority Number 2199



PO BOX 2199, WELLINGTON, NEW ZEALAND

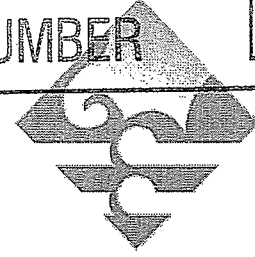


FREEPOST 2199
TARANAKI TO WILLIS/MERCER STREET PRECINCT PROPOSALS (CAB2)
WELLINGTON CITY COUNCIL
PO BOX 2199
WELLINGTON

SUBMISSION
NUMBER

717

Regional Public Health
Better Health For The Greater Wellington Region



Regional Public Health
Private Bag 31-907
Lower Hutt
New Zealand

8 December 2008
Taranaki to Willis/Mercer Street Precinct Proposals
Wellington City Council
PO Box 2199
Wellington

Regional Public Health Submission

Restoring the Golden Mile

Thank you for the opportunity to provide a written submission on Restoring Wellington's Golden Mile. This submission is from Regional Public Health (RPH), a regional service located within the Hutt Valley District Health Board. Our geographical area of service delivery spans Hutt Valley, Capital and Coast, and Wairarapa DHBs. RPH delivers a range of population and some personal health services in the Hutt Valley and Greater Wellington region.

RPH will be pleased to provide further advice or clarification on any of the points raised in this submission. We would welcome the opportunity to make an oral presentation to the committee considering the proposal. The contact point for this submission is:

Jemma Diedrichs
Public Health Advisor
Regional Public Health
Private Bag 31-907
Lower Hutt
Telephone: (04) 384 1550
Email: jemma.diedrichs@huttvalleydhb.org.nz

General Comments

Regional Public Health supports the intention to create street and public space improvements, a better functioning public transport system, support business vitality and enhance pedestrian environments along the Golden Mile.

The transformation of the Golden Mile through more streamlined public transport routes and improved public spaces, alongside the implementation of the Wellington City Council Walking and Cycling plans is critical to Wellington City becoming a safe walking and cycling city and to enable a modal shift toward walking, cycling and public transport. These plans will directly enable the implementation and success of the Ngauranga to Airport Corridor Plan and contribute to national and regional goals regarding active and public transport, reduced private vehicle usage and reductions in vehicle emissions. Wellington City Council's Cycling Policy specifically outlined "the rollout of the Golden Mile as an opportunity to create an extensive network of shared bus/cycle lanes" (WCC cycling policy).

We believe that the proposal could go further to ensure the success of these goals. We have used your question format to guide our feedback, and provide specific recommendations to strengthen the proposal. We believe that, if incorporated into the plan, our recommendations will have a substantial positive impact on business vitality, community spirit, health and wellbeing and Wellington's reputation as a sustainable tourist destination that is easy, safe and enjoyable to explore.

Summary of Key Recommendations

- We **recommend** that Manners Street to Taranaki Street is only open to public transport, pedestrians and cyclists and that this roadway is **not open** to private vehicles.
- We **encourage** the development of a "public transport mall" rather than simply recreating a street in the current Manners Mall area.
- We **recommend** that all sections of the Golden Mile are developed with future transition to light rail and bus lanes in mind.
- We **recommend** when allocating road space and street design, priority is placed on ease of pedestrian movement and facilities for pedestrians.
- We **strongly support** a reduction in the speed limit from 50kmh to 30kmh for the length of the Golden Mile.
- We **recommend** that the pedestrian crossings on Courtenay Place remain unsignalised.
- We **recommend** that the proposal explicitly cater for cyclists, i.e by providing tangential cycle lane access to the Golden Mile, cycle lanes along the length of the Golden Mile and through the provision of cycle facilities.

1. Opening Manners Mall to buses

RPH supports the opening of Manners Mall to buses only on the condition that in reallocating road space and in street design, pedestrians are the first planning priority.

We do not support the proposal to open up Manners Street west for all traffic to travel towards Victoria Street. This will contradict the main aim of this proposal of reducing traffic congestion within this area. Disallowing private vehicles on key sections of the Golden Mile would be a positive step towards reducing traffic congestion, improving safety, meeting environmental goals to reduce carbon emissions and increasing the vibrancy of the city.

RPH commends the WCC proposal for street tree planting and encourages WCC to add more street furniture, lighting and cycle facilities around the Golden Mile to promote and encourage active transport.

1.1 We believe increased emphasis must be made to prioritise walking and cycling as preferred transport modes throughout Wellington City. Getting there - on foot, by cycle¹, acknowledges a national requirement to ensure walking and cycling "can flourish as modes of transport and that our transport systems support and encourage their use". WCC has an exciting opportunity to pursue a longer term vision and rather than planning for short term restoration of sections of the Golden Mile, take a leading stance and aim to remove all general traffic from within the Golden Mile, and create a walking, cycling and public transport focused central city.

1.2 We would like to see a proposal which explicitly specifies how national and regional active transport goals will be supported. The plans do not detail how cycling will be supported and significant reductions in footpath widths may hinder pedestrian safety. The importance of cycling facilities around key public transport hubs and at key points along the Golden Mile is critical to encouraging cycling and reducing reliance on motor vehicles, as are traffic calming measures along these networks.

1.3 Manners Mall is one of the major linking areas for Wellington city with a high number of foot and cycle traffic daily for commuting and recreational use. To ensure this popularity continues it is crucial to prioritise these modes in design stages. Research shows that although there is no maximum width for footpaths, in areas of high pedestrian flow, the quality of the walking experience will deteriorate unless sufficient width is provided and pedestrian congestion will encourage people to step into the carriageway, creating significant safety issues.²

1.4 Street furniture, lighting equipment and planting have a major impact on the appearance, appeal and safety of a street. We realise that issues have been raised about anti-social behaviour occurring around the current street furniture in Manners Mall. We are concerned that these issues may result in little or no provision for street furniture in the new layout. We recommend that the Council ensure that street furniture continues to be provided along the length of the Golden Mile along with effective lighting, planting of trees and other measures. These can encourage social cohesion and provide more opportunities for social interaction, which may assist in reducing current social issues. Street furniture also enables longer walking distances to be broken down into shorter travel distances allowing people from the very young, to older persons and people with a disability to access facilities and services on the Golden Mile.

¹ Ministry of Transport, *Getting there - on foot, by cycle - A strategy to advance walking and cycling in New Zealand transport*, February 2005

² Department of Transport (UK), *Manual for Streets*, 2007

1.5 In reallocating road space we believe that a minimal amount must be assigned to buses and that design features such as 'gateways' and 'narrowing' (visual or actual), should mark that the space is shared equally with pedestrians. Visual narrowing through planting and features, deflecting the vehicle path through curb extensions and traffic islands and pedestrian crossings (both formal and informal) will assist in the safe and efficient flow of public transport as well as for other users of the Golden Mile. We would encourage a "public transport mall", as is in centres such as Melbourne, rather than simply recreating a street.

1.6 Designs of streets need to satisfy the wide range of requirements for pedestrians and cyclists. Curbside height must be addressed for all new footpath proposals e.g. newly proposed bus stops and crossings along Manners Street must be flat and flush with the curb on either side of the road to ensure the needs of older people and people with disabilities are met. Curbside heights at bus stops need to remain level with bus entrance floors to ensure that people with wheelchairs and prams are able to get on and off the bus.

1.7 RPH recommends that WCC does not open up Manners Street west to general traffic and instead takes a lead role in reducing general traffic along the length of the Golden Mile. The aim of restoring the Golden Mile is to simplify this area for public use. We believe that allowing private motor vehicles to use this section of the Golden Mile will increase traffic congestion, add time delays for public transport, and decrease pedestrian and cycle safety.

2. Long-term changes to Dixon, lower Cuba, Victoria, Wakefield and Mercer Streets

RPH supports the proposed footpath enhancements for Dixon, lower Cuba, Willis and Mercer streets however; we would encourage the Council to also incorporate cycling facilities in these areas.

RPH is concerned about the 95 additional car parks being proposed within these areas and encourages the WCC to review these due to their potential to increase traffic congestion.

2.1 RPH would encourage the Council to incorporate changes that enhance the cycling environment. Wellington City Council's Cycling Policy specifically outlines "...the rollout of the Golden Mile as an opportunity to create an extensive network of shared bus/cycle lanes".

2.2 Currently the proposed changes include an additional 95 on-street car parks. RPH recommends that the proposal explicitly show how cycle lanes are to be developed along these streets and the recommended public transport route. The Wellington City Council Cycling Plan states that the cycling network for commuting and recreational cyclists around Wellington is providing "good quality, continuous, cycle-friendly routes along each of the main transport routes to the city".

2.3 To ensure cyclists are safely catered for, RPH recommends that cycle lanes are positioned between the footpath and the proposed angle parks to prevent safety issues arising from parked vehicles, and that there are safe 'bollard separated' cycle lanes along the Golden Mile public transport route. This will ensure that reversing cars and buses do not pose a major safety issue to cyclists and pedestrians.

3. Reducing the Speed Limit

Regional Public Health strongly supports the proposal to reduce the speed limit from 50kmh to 30kmh in Manners Street and Courtenay Place.

3.1 Reducing the speed limit will help to increase safety for pedestrians and cyclists. Not only will speed reductions decrease the likelihood of vehicles hitting cyclists but will also increase the survival rate of non-motorists if there is a crash. Streets with high traffic speeds can make pedestrians feel unsafe. Designers should seek to control vehicle speeds to ensure that pedestrian activity is not unsafe or displaced. Lowering speeds can be done naturally through good design practice as mentioned in paragraph 1.5 (above) as well as through supportive regulation.

3.2 Stopping thoroughfare of private vehicles will also contribute to improvements in safety and efficiency of the public transport system. Reducing the speed limit will ensure safer pedestrian crossing and will contribute to improved traffic flow as the need for severe or sudden braking will be limited.

4. Signalising Pedestrian Crossings

Regional Public Health does not support the signalising of the three unsignalised pedestrian crossings in Courtenay Place.

4.1 We believe that traffic lights will lead to an increase in 'jay walking' due to longer waits for crossing, decreased pedestrian safety, and will impede pedestrian flow for the sake of public transport flow. We also believe that more 'informal' crossings, and unsignalised pedestrian crossings raise driver awareness, and interaction with other road users, which supports a 'shared space' approach.

4.2 We support an efficient public transport route along the Golden Mile, but believe that public transport efficiencies and increased personal safety are better gained through removing private vehicle access from Manners Street to Courtenay Place and through lowering the speed limit to 30kmh. By removing cars within these areas, there will be fewer road users, less congestion and pedestrian wait times at crossings will not be increased.

Conclusion

Thank you for the opportunity to provide a written submission on Restoring Wellington's Golden Mile. We commend the Wellington City Council on its plans for the Golden Mile and believe that these proposals provide a significant opportunity to enhance this streetscape for the benefit and enjoyment of residents and visitors to the city. We look forward to the opportunity to make an oral submission.

Yours sincerely,



Dr Stephen Palmer
Regional Leader



Peter Gush
Service Manager

Background

This submission is made by Kent Duston in my capacity as a private citizen. I wish to speak to its submission, and can be contacted as below:

Kent Duston
117 Pirie Street
Mt Victoria, Wellington 6011
e-mail kent@mtvictoria.org.nz
Phone 021 536 873

Submission

Consultation Approach

I would like at the outset to note that this is the fourth submission I have provided on pedestrian-related issues in the last two years. The previous submissions have been:

- The Regional Land Transport Strategy
- The Ngauranga to Airport Corridor Plan
- The WCC Walking Policy
- The 2008 Draft Annual Plan

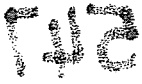
I note that the key messages in all my submission documents have been consistent; that Wellington kills and injures an inordinate number of pedestrians; that there is an entrenched anti-pedestrian culture in the Wellington City Council that actively contributes to these deaths and injuries and persistently refuses to take action on them; and that the solutions to these problems are simple, effective and cheap.

Despite these submissions, the Wellington City Council has made very few material improvements in the areas highlighted in the documents. The road environment is still as dangerous for pedestrians as it was two years ago; no additional funding has been allocated to address even the most egregious engineering problems; there has been little evidence of the cultural, organisational or personnel changes amongst officers that would lead to a reduction in the anti-pedestrian culture within the WCC.

This lack of tangible outcome calls into question the purpose and effectiveness of the Council's consultation processes. I note that in the 2008 DAP documents, more than 60% of Wellingtonians regarded the WCC's consultation processes as inadequate; I further note that the WCC apparently has no plans to improve this state of affairs.

On the basis that (a) the majority of Wellingtonians regard the process as ineffective, and (b) the Council persistently refuses to act on recommendations that would save lives, I can only conclude that the actual function of the "consultation" on the Golden Mile proposal is window-dressing. In other words, it is my contention that the process is only intended to meet the Council's obligations under the Local Government Act, rather than to make substantive changes to the proposal.

Accordingly, my first recommendation is that the Council come clean about the purpose of this "consultation" and inform Wellingtonians that the plans as presented are intended to be the final version, and there is minimal scope for



amendment as a result of public input. While this would breach the Council's obligations under the Local Government Act, it would at least display a degree of honesty in its dealings with citizens.

Substantive Issues

There are a number of issues that are apparent upon reading the documents supplied by the Council. These are:

1. **Measurability** – The proposed plan does not contain a single measurable objective. In what appears to be all cases, the statements about the alleged improvements are stated in non-specific language with no quantifiable measures. For instance, it is stated that a primary objective of the plan is to improve bus travel times, yet – despite the Council apparently conducting traffic modeling – no statement is made as to what these improved times might be. Will they result in a few seconds improvement, or whole minutes? Apparently the Council doesn't know, and is not inclined to find out, even though the answer to this question may well influence whether Wellingtonians are prepared to support the proposal. And with no measurable objectives, it will be impossible for ratepayers to know if the goals have been met, and for Councillors and officers to learn from the experience.
2. **Factual Bias** – The proposed plan includes statements regarding the reversion of pedestrian malls to roads, yet these numbers are not backed by attribution, any evidence of proper research, or competing viewpoints – in other words, the statements cannot be regarded as factual. This is very disappointing, as the most cursory research throws up international examples that contradict the Council's position. For officers to put forward unattributed one-sided statements as fact simply undermines the credibility of the documents, and leads to the conclusion that many of the statements in the papers are of dubious value.
3. **Financial Costs** – The documents make some exceptionally bland statements about costs being covered by money already tagged for roading improvements. Irrespective of the source of the funding, I think it is important that Wellingtonians know how much money is being talked about – is it millions? Tens of millions? – and what other projects would be delayed or cancelled as a result of this proposal. These trade-offs are very material for the liveability of the city for a great many residents, and they should be made in open view, not hidden away behind the kinds of motherhood statements made in the documents. If Wellingtonians are being expected to fund these developments, they are entitled to know the estimated costs and the trade-offs they would entail.
4. **Economic Modeling** – As is usual with too many Council proposals, there is no attempt to build any kind of economic cost/benefit for the expenditure. It is impossible to tell from the papers presented whether the outcomes will ever justify the costs, or whether the benefits from this project are better or worse than competing areas of investment within the Council's budget.
5. **Inconsistency** – One of the major drivers of this proposal is stated as being the desire to improve bus transit times through the Golden Mile. It is difficult to take this seriously when the Council has failed to implement a single proposal to exclude private cars from the bus routes. As is obvious to even the most uninformed observer, a key cause of congestion along the Golden Mile is the preponderance of cars during rush hours, particularly at the traffic lights, as they continually obstruct buses. If the Council was serious about solving the transit time issue, they would be targeting the unnecessary car traffic, not penalising pedestrians.

6. **Irrationality** – The underlying approach of this proposal – and the stated policy of the Council – assumes that there is a significant economic differential between the various transport modes. This is not supported by the facts, is well outside mainstream economic theory, and runs counter to the New Zealand Transport Strategy. In other words, there is no objective reason why the Wellington City Council holds this view, and it calls much of the resultant traffic planning into question.
7. **Hypocrisy** – The major stated aim of this proposal is to improve public transport transit times through the CBD. If the Council was really interested in this goal, it would have implemented bus lanes down the entire length of the route and excluded cars during peak hours – and I note that the Council voted down the proposal for bus lanes in Courtenay Place. It is therefore apparent that the Council is not serious about this objective, as it has not taken the most obvious steps to improve the transit times, and claiming that it is therefore necessary to destroy pedestrian amenity to do so smacks of the worst kind of hypocrisy.

Due to these significant and structural limitations with the way the Council has chosen to approach the project and the public consultation, the whole process is in danger of turning into a fashion show – a discussion about the aesthetics of Manners Mall, based solely on opinion and personal preference, rather than an objective discussion of the merits (or otherwise) of significant changes to the inner city's transport network, anchored in the facts. In my professional view, it is a sloppy and lazy piece of work, and reflects poorly on the abilities of the Council to hold a sensible discussion about the future of the city.

Detailed Issues

Irrespective of the many structural flaws in the plan, there are some specific areas of concern with the proposal as it stands. These are as follows:

Courtenay Place Pedestrian Crossings

I note that the Council intends to replace the current pedestrian crossings with signalised crossings. Having asked questions of officers about the context of these crossings, it is apparent that the Council still has the view that ratepayers in vehicles have more value than ratepayers on foot; as there is no intention to allocate the share of the traffic light phase equitably. It is my view that:

1. If the pedestrian crossings are to be replaced by lights, the cycles need to be allocated fairly to vehicle traffic and pedestrians;
2. The time allocation to each mode should be based on traffic and pedestrian surveys, not left to the whims and bias of traffic engineers;
3. Pedestrians should be fully involved in detailed consultation on the implications of signalisation, and this consultation should extend to inner city and Mt Victoria residents as well as walking advocacy groups, given that these people are the heaviest users of the crossings and will be most affected by any changes;
4. The consultation process should not start from the pre-determined outcome that the crossings will be signalised, but should look at all possible alternatives, including engineering changes;
5. The Council needs to take effective and proactive steps to improve road safety around the crossings.

I note that there is currently no road policing strategy in the Wellington CBD, according to Senior Sergeant Richard Hocking from NZ Police, so very few penalties are applied to drivers running red lights. I am deeply concerned that any signalisation will lead to an increase in pedestrian injuries and fatalities if the

Council adopts its usual anti-pedestrian approach, and the Police continue with their policy of ignoring traffic offending in the CBD. The scenario I envisage is:

- The Council signalises the crossings with its usual emphasis on keeping pedestrians out of the way of the much more important cars and buses, and allocates a short phase to pedestrians;
- The unconscionable delays and short cycles become well known to regular pedestrians in the area, so they largely ignore the crossings and jaywalk instead;
- When the pedestrians are people who are out late in the Courtenay Precinct, some of whom may be impaired in their judgement by alcohol, the crash risk from jaywalking will hugely increase;
- Because all the onus for traffic safety will rest with pedestrians rather than motorists, the deaths and injuries will be blamed on the victims, rather than on the Council for its poor engineering decisions.

This seems an invidious state of affairs. At the moment, pedestrians have right of way across Courtenay Place, and the onus to give way rests with motorists. The Council's plan reverses this for no gain in safety, transit times or amenity, and this – in my view – symbolises the anti-pedestrian stance of the Council.

If the Council were even remotely interested in pedestrian safety in the Courtenay Precinct, they would exclude private cars from the area after (say) 7pm, the only effect of which would be a decline in the number of boy racers in the area. I note that there is no such proposal on the table, which tends to emphasise the fact that pedestrians are very much an afterthought.

Cuba Street Layout

While there are some merits to re-routing the buses through Manners Mall, I am deeply opposed to a pedestrian space being lost with no replacement. Accordingly, it is my recommendation that lower Cuba Street between Manners Street and Wakefield Street be closed to traffic and turned into a pedestrian mall – as an extension of Cuba Mall – rather than allocated to unnecessary car parking. The reasons for this are as follows:

- There is no requirement for additional car parking in the area, given that the Tournament parking building in Wakefield Street is very seldom at capacity, according to its management;
- Many other parks are being created as part of this project, and the Council has offered no figures that demonstrate additional street parking requirements in Cuba Street;
- The use of lower Cuba Street as a pedestrian mall would increase the linkage between Cuba Mall and the Michael Fowler/Civic Square precinct;
- There are already cafes and bars operating in the street, and their business and amenity would be improved significantly by excluding cars and allowing street-side tables and chairs;
- Pedestrian amenity would be noticeably improved.

I note that Council officers have calculated that the extra on-street car parking would bring in additional revenues of \$350,000 per annum, and I would suggest this is the primary reason for not turning lower Cuba Street into a pedestrian mall – those pesky pedestrians won't contribute a single dollar to the Council's coffers by simply wandering around!

Taranaki Intersection

I note that the Taranaki/Courtenay intersection is one of Wellington's pedestrian injury black-spots. This is largely because of the anti-pedestrian engineering, which (for example) provides three seconds of phase for pedestrians to cross five lanes of road. In addition, traffic in the area is very badly behaved, near misses are a common occurrence, and there is no enforcement by NZ Police.

As is to be expected from a Council roading proposal, no money has been allocated to any engineering changes to upgrade or improve this intersection from a pedestrian perspective. This needs to change – otherwise the Council risks sending the message that the convenience of car drivers and bus passengers is more important than the lives of pedestrians.

Accordingly, it is my very strong recommendation that the costs of pedestrian safety and amenity improvements on this intersection are integrated into this project, and that these changes are proceeded with as a matter of urgency.

Conclusion

While the overall objectives of this proposal are laudable, it shows evidence of a lack of measurable objectives, ineffective consultation, and the entrenchment of the anti-pedestrian bias that the Council has exhibited over many years. It is my view that the needs of pedestrians and the wishes of public transport users are not inconsistent, and can relatively easily be resolved by a more considered and better balanced approach to the Golden Mile. However the underlying assumption – that ratepayers in vehicles are more valuable than ratepayers on foot- needs to change before any positive progress is likely.

I hope that the Council takes these issues into consideration – however the track record of the responsible officers is not encouraging. At a personal level; it is proving to be very frustrating to make the same obvious points again and again, only to have legitimate concerns brushed aside. As an example, I have appended some relevant submission information from the Ngauranga to Airport Corridor Plan – which (despite nearly half a billion dollars of proposed funding) remain completely unaddressed.

Pedestrian solutions are cheap, effective and have very quick economic payback. It's therefore time the Council stopped talking about pedestrians, and put its money where its mouth is.

Appendix

This is the relevant section taken from local resident submissions on the Ngauranga to Airport Strategy.

It is my view that this disconnect between theory and practice is most noticeable in the GWRC and WCC traffic planning approaches to pedestrians. It is apparent that:

- Neither the GWRC nor the WCC count pedestrians as "traffic movements" for the purposes of planning intersections, allocating funding or deciding priorities. In other words, only movements by mechanised means count – taking a taxi within the CBD is regarded as material for planning purposes, but walking the same distance is not.
- WCC traffic planners see their role as being the facilitation of traffic movements, rather than the facilitation of the movement of people. This can be seen in the allocation of resources, priority and engineering effort, and some of the more egregious results are discussed as case studies below.
- In the allocation of funding within GWRC and WCC budgets, there is a systematic over-weighting of vehicle travel and under-weighting of pedestrian movement. For instance, the WCC allocated \$100,000 over three years for pedestrian safety (translation: billboards telling pedestrians to keep out of the way of cars!), whilst allocating \$750,000 to bring more cars into the city by easing congestion on Aotea Quay. This is despite the fact that the economic benefit from less pedestrian deaths and injuries vastly outweighs the economic benefits from reduced congestion.

It is apparent that there are no logical or economic reasons for the anti-pedestrian approach taken by the GWRC and the WCC; rather, it is an attitudinal problem within a small number of traffic planning officers in each Council. Until this changes, we have little hope that there will be improvements in pedestrian injuries or amenity.

Case Study 1: Wakefield/Taranaki Intersection

This intersection is heavily trafficked, but includes no way for pedestrians walking south on Jervois Quay to safely cross either the Quay or Wakefield Street. Footpaths lead down to the "point" formed by the acute intersection of Wakefield Street and Jervois Quay, and pedestrians are then expected to dash between cars, or to magically vanish. There is no signage indicating to pedestrians the danger they will face when they reach the end of the footpath, nor any apparent alternative to jaywalking between cars moving at some velocity.

When this situation was discussed with Paul Barker from the Wellington City Council, he said that the intersection was "difficult" as any solution that increased pedestrian safety would delay cars. It seems that the official view of the WCC is that pedestrian injuries and deaths on this intersection are completely acceptable, providing car drivers aren't inconvenienced.

Case Study 2: Terrace Pedestrian Crossing

In May 2007 the WCC traffic planning staff decided to remove the pedestrian crossing at the north end of The Terrace and replace it with a light-controlled intersection. The specific purpose of this was to reduce car congestion into The Terrace, and the best way the traffic planning staff saw to achieve this

was to exclude pedestrians from the roadway. Pedestrians now must "ask permission" to cross The Terrace, and are typically given around 15% of the phase in peak times. Cars frequently run the red light on the crossing, but there is no enforcement by NZ Police.

To justify the \$100,000 of expenditure, WCC traffic planners surveyed vehicle traffic movements. Despite the fact that pedestrian commuter movements are equally beneficial in economic terms, the survey did not include pedestrians at all – even though pedestrian volumes can vastly exceed traffic volumes, particularly at peak times. This is a vivid illustration of the bias inherent in WCC traffic planning, that "only cars matter". When questioned about this approach, Soon Tek Kong from the WCC noted that the pedestrian volumes were "irrelevant" for deciding whether or not to remove the existing crossing.

When the expenditure was presented to the WCC for approval, the traffic planners attempted to dress up their approach by claiming that the engineering changes were necessary for pedestrian safety reasons – the crossing saw one non-fatal injury accident in the last five years. This is clearly disingenuous, as if the WCC traffic staff were interested in reducing the death toll through engineering, they would have made changes to the Lambton Quay/Wills St intersection, which has seen multiple deaths in the last few years.

Case Study 3: Kent Terrace/Vivian Street intersection

Due to the proximity of car dealerships, KFC, Moore Wilsons and L’Affaire café in the immediate proximity, there is heavy pedestrian activity on this corner. However it has been planned as though pedestrians were an infrequent and inconvenient occurrence:

- There is no safe way for pedestrians to cross the southern end of the intersection safely, as no crossing points are provided. So to go from the Toyota dealership on the south-east corner to the south-western corner involves crossing four roads.
- Due to the perversity of the traffic planners, doing so will require four complete cycles of the traffic lights. This is largely because Kent Terrace and Cambridge Terrace must be crossed separately – pressing the pedestrian button on Kent Terrace does not activate the pedestrian lights on Cambridge Terrace, and vice-versa. As a result, it can take more than 8 minutes in peak times to cross the intersection!
- Due to the high traffic volumes, this can be a very dangerous intersection. However the anti-pedestrian light phasing is well known to local residents, and as a result many people jaywalk. This resulted in the death of a pedestrian – Amy Edward-Mintorn – in 2007. However neither Transit nor the WCC have made changes to the pedestrian crossing arrangements since her death, and this intersection remains as inconvenient and dangerous as before.

SUBMISSION
NUMBER

541

Submission form

Tell us what you think. Wellington City Council would like your feedback on proposals for the area between Taranaki Street and Willis Street and also Courtenay Place. These plans include re-routing buses through Manners Mall, lowering the speed limit in Manners Street and Courtenay Place from 50kmh to 30kmh and putting traffic lights on the three pedestrian crossings in Courtenay Place. Fill out this feedback form and post it back to us by Friday 5 December (no stamp required) or comment online at www.Wellington.govt.nz

All submissions (including name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of the consultation process. All information collected will be held by the Wellington City Council, 101 Wakefield Street, Wellington, with submitters having the right to access and correct personal information.

First name(s) PETER NEIL

Last name CLAYWORTH

Street address 51 BALFOUR ST, VOGELTOWN
WELLINGTON 6021

Phone 04 3893991

Email peterclayworth@hotmail.com

I am writing this submission (tick box)

as an individual

on behalf of an organisation

Name of organisation

Would you like to present your submission to the Committee considering the proposal?

Yes

No

What do you think about the idea of opening Manners Mall to buses?

I have lived in Wellington since 1999. I have walked through Manners Mall during the daytime on most working days during that time. I have also often walked through there at night. I believe its reputation as a 'space that does not work' is highly exaggerated and created by people who do not frequent the space. It is an open social space that generally acts as an asset for the pedestrians of Wellington. I believe it is safer than Courtenay Place. I have used the public transport system most days I have been in Wellington. I have nearly always had no problem finding the right bus & do not see how the destruction of Manners Mall can be justified to slightly speed up the bus system or make buses easier to find. I am 100% opposed to this proposal. Wellington needs more, not less, pedestrian spaces.

What do you think about the possible long-term changes to Dixon, lower Cuba, Victoria, Wakefield and Mercer streets?

I suspect these changes are unnecessary if Manners Mall is not destroyed. I am therefore neutral with regard to them.

Submission form (continued)

Tell us your views on the proposal to reduce the speed limit from 50kmh to 30kmh in Manners Street and Courtenay Place, including the mall area.

I think it would be a good idea to have 30 kmh as the speed limit throughout the inner city

What do you think of the proposal to put traffic lights at the three unsignalised pedestrian crossings in Courtenay Place?

It is probably a good idea.

Other comments:

Fold, tape and send this submission form to reach us by **Friday 5 December**.
Feel free to include extra pages if you need to.

FOLD

FreePost Authority Number 2199

Absolutely
POSITIVELY
ME HEKE KI PŌNEKE
WELLINGTON CITY COUNCIL **Wellington**

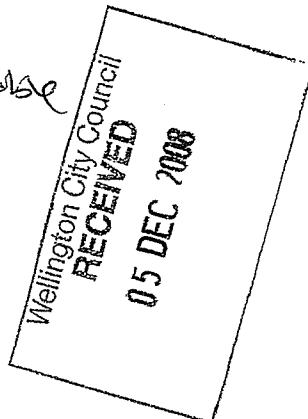
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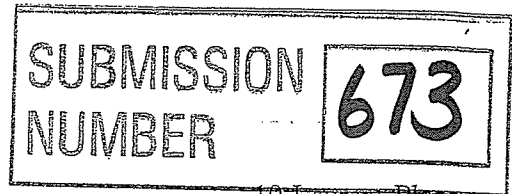
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FREEPOST 2199
TARANAKI TO WILLIS/MERCER STREET PRECINCT PROPOSALS (CAB2)
WELLINGTON CITY COUNCIL
PO BOX 2199
WELLINGTON

Josene Noble





10 Laurent Place
Kingston
Wellington
5th December 2008

Wellington City Council
Wakefield St, Wellington
goldenmile@wcc.govt.nz

Restoring Wellington's Golden Mile

Dear Councillors,

I have been a Wellington city resident and ratepayer for nearly 30 years. I have an interest in the environment and provision for pedestrians, pedal cyclists and public transport. I delivered a hand written submission form earlier today and this email provides that together with additional notes in a more readable form.

Yours faithfully,

M.G.Taylor

(A) Details:

Name: Michael Taylor

Street address: 10 Laurent Place, Wellington

Telephone: 3898071 or 4745478 (work)

Email: mgtaylor@kol.co.nz

I am writing this submission as an individual

I would like to present my submission to the Committee considering the proposal

(B) What do you think about the idea of opening Manners Mall to buses ?

Bad. Wellington has too few pedestrian malls. To "speed up" public transport restrict private [motorised] transport, don't restrict, inconvenience or put at risk pedestrians.

The main impediment for the bus system is competing with private and commercial motorised vehicles (including taxis). Rather than destroy a significant proportion of Wellington's pedestrian malls (do not confuse those with "shopping malls") I suggest WCC provide continuous bus only lanes along the existing route. Alternatively take the stronger measure of simply prohibiting other motorised vehicles on those routes. If the problem is seen to be only during certain hours (e.g. 07:30 - 18:30) then restrictions on other motor vehicles could be during that period only. Provision of additional car parking space only encourages greater use of private motor vehicles and is incompatible with sustainable development and carbon neutrality. Safety is reduced by introducing motor vehicles into one of the highest pedestrian use areas — Manners Mall. An area in which furthermore there are often people busking or playing games. The noise and fumes will drive away the public. Cuba Mall, the obvious refuge, is already, at lunch times at least, often over crowded.

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- (C) What do you think about the possible long-term changes to Dixon, lower Cuba, Victoria, Wakefield and Mercer streets?

Generally bad. If buses are put through Manners Mall, Cuba Street (Manners to Wakefield) should be made into an extension of Cuba Mall i.e. Pedestrian only. Car parking should be reduced not increased.

Increasing the amount of two way roading is a retrograde step. Generally one way systems are better in terms of flow, safety and junction management. Separating bus from other motor vehicle routes, generally results in increased space going to roading (unless some of the latter routes are closed). Wellington, especially the city centre, has insufficient space to use more for roading. I also note that pedestrian space in Manners Mall is effectively being stolen to provide more space for car and taxi parking in Cuba Street. If Manners Mall is turned into a road then Cuba Street should be made into a pedestrian only mall as compensation. Any benefit from increased footpath width in Dixon Street (e.g. space for "cafe and other activity") would be at the expense of a loss of such space in Manners Mall. Any strengthening of the connection across the Cuba Mall/Dixon Street intersection would be at the expense of a disconnection at the Manners Mall/Cuba Mall/Cuba Street intersection.

- (D) Tell us your views on the proposal to reduce the speed limit from 50kmh to 30kmh in Manners Street and Courtenay Place, including the mall area.

Good, except the implication that traffic is allowed in the mall area.

- (E) What do you think of the proposal to put traffic lights at the three unsignalised pedestrian crossings in Courtenay Place?

Bad. Refer to my submission on proposals for encouraging walking [WCC Draft Walking Policy August 2008]. Prohibit private motor vehicles from Courtenay Place to help the flow of public transport, pedestrians and cyclists.

My written submission included 'I strongly support 1.1 but note that the steady replacement of "zebra crossings" with traffic light controlled ones has resulted in the loss of pedestrian rights and his or her treatment as subservient to motor vehicles. That is contrary to this policy. If lights are needed to make sure motorists stop for pedestrians on crossings then they must be configured to turn amber immediately a pedestrian presses the button to cross. That is no more than reestablishing their right and honouring this (1.1) policy.'. In my oral submission I specifically praised the Courtenay Place zebra crossings and also mentioned the Wakefield Street one. These should be retained.

The main impediment for the bus system is congestion from private and commercial motorised vehicles. WCC should honour its earlier proposal to close Courtenay Place to private motor vehicles.

- (F) Other comments

I shall email a more detailed submission but that may not get through by midnight Friday "deadline" [This is that].

Submission form

Tell us what you think. Wellington City Council would like your feedback on proposals for the area between Taranaki Street and Willis Street and also Courtenay Place. These plans include re-routing buses through Manners Mall, lowering the speed limit in Manners Street and Courtenay Place from 50kmh to 30kmh and putting traffic lights on the three pedestrian crossings in Courtenay Place. Fill out this feedback form and post it back to us by Friday 5 December (no stamp required) or comment online at www.Wellington.govt.nz

All submissions (including name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of the consultation process. All information collected will be held by the Wellington City Council, 101 Wakefield Street, Wellington, with submitters having the right to access and correct personal information.

First name(s) MICHAEL

Last name TAYLOR

Street address 10 LAURENT PLACE
WELLINGTON

Phone 3898071 or 4745473 (work) Email mgtaylor@kol.co.nz

I am writing this submission (tick box)

as an individual

on behalf of an organisation

Name of organisation

Would you like to present your submission to the Committee considering the proposal?

Yes

No

What do you think about the idea of opening Manners Mall to buses?

BAD. WELLINGTON HAS TOO FEW PEDESTRIAN MALLS.
TO "SPEED UP" PUBLIC TRANSPORT RESTRICT PRIVATE
TRANSPORT, DON'T RESTRICT INCONVENIENCE & PUT
AT RISK PEDESTRIANS.

What do you think about the possible long-term changes to Dixon, lower Cuba, Victoria, Wakefield and Mercer streets?

GENERALLY BAD. IF BUSES ARE PUT THROUGH MANNERS MALL
CUBA ST (MANNERS TO WAKEFIELD) SHOULD BE MADE INTO AN
EXTENSION OF CUBA MALL i.e. PEDESTRIAN ONLY.
CAR PARKING SHOULD BE REDUCED NOT INCREASED.

Submission form (continued)

Tell us your views on the proposal to reduce the speed limit from 50kmh to 30kmh in Manners Street and Courtenay Place, including the mall area.

GOOD EXCEPT THE IMPLICATION THAT TRAFFIC IS ALLOWED IN THE MALL AREA

What do you think of the proposal to put traffic lights at the three unsignalised pedestrian crossings in Courtenay Place?

BAD. REFER TO MY SUBMISSION ON THE PROPOSALS FOR ENCOURAGING WALKING. PROHIBIT PRIVATE MOTOR VEHICLES FROM COURTENAY PLACE TO HELP THE FLOW OF PUBLIC TRANSPORT, PEDESTRIANS & CYCLISTS

Other comments:

I SHALL EMAIL A MORE DETAILED SUBMISSION BUT THAT MAY NOT GET THROUGH BY MIDNIGHT FRIDAY "DEADLINE"

Fold, tape and send this submission form to reach us by Friday 5 December

Feel free to include extra pages if you need to.

FOLD

FreePost Authority Number 2199

Absolutely
POSITIVELY
ME HEKE KI PŌHĀKE
WELLINGTON CITY COUNCIL **Wellington**

PO BOX 2199, WELLINGTON, NEW ZEALAND

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FREEPOST 2199
TARANAKI TO WILLIS/MERCER STREET PRECINCT PROPOSALS (CAB2)
WELLINGTON CITY COUNCIL
PO BOX 2199
WELLINGTON

Submission form

SUBMISSION
NUMBER

425

Tell us what you think. Wellington City Council would like your feedback on proposals for the area between Taranaki Street and Willis Street and also Courtenay Place. These plans include re-routing buses through Manners Mall, lowering the speed limit in Manners Street and Courtenay Place from 50kmh to 30kmh and putting traffic lights on the three pedestrian crossings in Courtenay Place. Fill out this feedback form and post it back to us by Friday 5 December (no stamp required) or comment online at www.Wellington.govt.nz

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First name(s) NORMA MARGARET

Last name BEATTIE

Street address SA/124 WAKEFIELD ST.

WELLINGTON 6011

Phone 499-6601

Email _____

I am writing this submission (tick box)

as an individual

on behalf of an organisation

Name of organisation

Would you like to present your submission to the Committee considering the proposal?

Yes

No

What do you think about the idea of opening Manners Mall to buses?

Excellent idea. Hopefully it will exclude the truants and tyrants from monopolising this area.

What do you think about the possible long-term changes to Dixon, lower Cuba, Victoria, Wakefield and Mercer streets?

More trees in these areas as they seem to do well - and more interesting shopping in lower Cuba St to discourage the neo-do-wells who may hang about and increase the graffiti in the lanes that lead off from lower Cuba St.

Submission form (continued)

Tell us your views on the proposal to reduce the speed limit from 50kmh to 30kmh in Manners Street and Courtenay Place, including the mall area.

Yes excellent move in a high density area.

What do you think of the proposal to put traffic lights at the three unsignalised pedestrian crossings in Courtenay Place?

Yes - for pedestrian safety with increased traffic.

Other comments:

We in this central area love our little gem of a city - and wish to see it more sensitively used and enjoyed by all. The crosses in Lombard St + Park are a great success.

Fold, tape and send this submission form to reach us by Friday 5 December.
Feel free to include extra pages if you need to.

FOLD

FreePost Authority Number 2199

Absolutely

POSITIVELY

ME HEKE KI PŌNEKE
WELLINGTON CITY COUNCIL

Wellington

PO BOX 2199, WELLINGTON, NEW ZEALAND



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CON ANASTASIOU

Barristers & Solicitors

SUBMISSION
NUMBER 348

4 December, 2008

Rose Palmer
Project Manager
Golden Mile
Wellington City Council
101 Wakefield Street
WELLINGTON

By Courier

And by fax: 801 3100

Dear Rose

**Re: Submission by Luigi Muollo in Opposition to Proposal to Reopen Manners
Mall to Bus Traffic**

I enclose herewith submission by Luigi Muollo in opposition to proposal to reopen Manners Mall to bus traffic.

I have signed the submission on Mr Muollo's behalf as his counsel.

Please acknowledge receipt by signing, dating and returning the enclosed copy of this letter.

As discussed I am keen to receive details of the process for hearing for submissions and in particular the time that will be allowed for each submitter to present the submitter's case.

Your early advice in this regard would be appreciated.

Yours faithfully



C Anastasiou



**SUBMISSION IN OPPOSITION TO PROPOSAL TO REOPEN MANNERS
MALL TO BUS TRAFFIC**

To: Wellington City Council
Strategy and Policy Committee
WELLINGTON

Submission by: Luigi Muollo
Standard 806 Limited
Level 3
Creo House
57-59 Courtenay Place
P O Box 9739
WELLINGTON 6141
Telephone: 04 384 3940
Email: Luigi.Muollo@cspl.co.nz

LUIGI MUOLLO makes this submission as an individual.

Luigi Muollo wishes to present this submission to the Committee considering the proposal.

The Submitter

1. Luigi Muollo is the owner of the property situated at 90-92 Manners Mall and a part owner of the property situated 73 Manners Mall.
2. Mr Muollo purchased these properties specifically because they are located within a pedestrian mall which provides a setting and an environment necessary for the proper functioning of the businesses contained within these buildings.

Submission

3. Mr Muollo opposes the proposal to reopen Manners Mall to buses for the reasons set out in this submission.

Background

4. Manners Mall was established in 1979 at which time driving or parking of any vehicle in Cuba Mall became prohibited.
5. There were limited exceptions to this prohibition comprising emergency vehicles, vehicle servicing the businesses located in Manners Mall and maintenance vehicles.
6. The Council commissioned Jones Lang LaSalle to conduct a retail assessment of retail activity along what is commonly known as the "Golden Mile" and to also

assess, inter alia, the impact of reopening Manners Mall to bus traffic.

7. The Jones Lang LaSalle report commissioned by the Council was completed on or about September 2008.
8. The Jones Lang LaSalle report confirmed anecdotal evidence as to the effective functioning of Manners Mall.
9. The Jones Lang LaSalle report concluded Manners Mall works effectively as a retail, office and pedestrian environment. Occupancy rates in Manners Mall are high and rental rates are appropriate for the environment in question and the specific mix of activities. This equates to a commercial, retail and pedestrian environment which is functioning effectively and delivering benefits to stakeholders in the Mall.
10. In fact the rental situation in Manners Mall is better than recorded in the Jones Lang LaSalle report (page 7). The data recorded in the Jones Lang LaSalle report in respect of rental rates in Manners Mall appears to be out of date. In fact rental rates in Manners Mall are higher than in any other part of Manners Street and in line with the top rental rates in Cuba Mall.
11. In particular the Jones Lang LaSalle report at page 6 records as follows:

"Vacancy for Manners Street was at a low level although it increased slightly from December to June. Manners Mall, as the middle part of the entire Manners Street, has been 'integrated' to the Cuba retail precinct with proximity to Cuba Street and high pedestrian thoroughfares. Negative net absorption for Manners Street was attributable to the slow uptake of retail space around Manners Street West rather than Manners Mall. As part of the CDB Frame office precinct, Manners Street West has generally less pedestrian thoroughfares for retail premises and weaker uptake of large sized retail space compared to other parts of Manners Street. This has been the main reason for a significant drop in the overall net absorption for Manners Street." (page 6)
12. At page 7 the Jones Lang LaSalle report records as follows:

"It is evidenced from rental level analysis that rents achieved in the subject precinct depend on the premise's proximity to Cuba Mall and Manners Mall." (page 7)
13. On pages 18 and 19, the Jones Lang LaSalle report records the top pedestrian counts in the Wellington CBD.
14. 78 Manners Street which comprises the Kentucky Fried Chicken premises is the highest rating location outside Lambton Quay.
15. In 2007 the pedestrian count outside these premises was 2507 which is

marginally less than the count outside the Westpac Bank at 318-324 Lambton Quay at 2,537, and slightly less than the counts outside 3 other locations along Lambton Quay (See table, Jones Lang LaSalle Report page 19).

16. Although the table on page 18 of the Jones Lang LaSalle report ranked 78 Manners Mall as having the highest pedestrian count outside Lambton Quay, the report does not provide pedestrian counts for the non Lambton Quay businesses which fall below the pedestrian count of 78 Manners Street.
17. The evidence set out in the Jones Lang LaSalle report clearly demonstrates that Manners Mall is far from dysfunctional and requires neither "strengthening" nor "revitalization".
18. Indeed the last bullet point under the heading "Key Points" in the Executive Summary of the Jones Lang LaSalle report records as follows:

"Low vacancy rates in the subject area indicate pedestrian flow in the current traffic network for retail of works well with current retail mix."
(page 4)

Reasons for Submission

19. Mr Muollo submits that opening Manners Mall to bus traffic will have a significant adverse effects on landowners in Manners Mall; on businesses in Manners Mall and on pedestrians using Manners Mall.
20. These adverse effects are recorded in the very report prepared by the Council's own consultant Jones Lang LaSalle.
21. They include but are not limited to the following:
 - "• *Proposed bus stops at the intersection of Victoria Street with Manners Mall, and Cuba Street with Manners Street, could cause congestions.*" (page 10)
 - "• *Impacts on local retailers during the redevelopment process will need to be investigated. These impacts could be costly to both retailers and the Council.*" (page 11)
 - "• *Noise, possible pollution from diesels, along with the possibility of the above mentioned congestion, if any, may diminish the existing amenity value of the premises in Manners Mall.*" (page 11)
 - "• *It is likely that any negative impact that occurs on premises located in Manners Mall may also affect Cuba Street premises as both locations are regarded as an 'integrated' retail precinct.*" (page 11)

- "• *Removal of bus routes along Dixon Street and Wakefield Street and into Manners Mall is likely to increase the number of people waiting for buses around Manners Mall. This may provide a negative impact on retail premises."* (page 11)
 - "• *It is expected that pedestrian flows to destination retail premises such as McDonalds, Burger King, KFC, Time Zone, and the Cinema in Manners Mall are not likely to be enhanced significantly due to extra transport services directly to the area."* (page 12)
 - "• *The introduction of bus services to the Manners Mall area may increase the risk of collisions with pedestrians. Negative impacts on pedestrian movements may affect retail attractiveness. Suitable restrictions may need to be put in place to stop this from occurring."* (page 12)
 - "• *Increased vehicular movement along Manners Mall is likely to slow traveling time for retail pedestrians and office commuters. This may detract from the attractiveness of the area."* (page 12)
22. Mr Muollo agrees with the findings of the Jones Lang LaSalle report regarding the potential adverse effects on Manners Mall arising from the reintroduction of bus traffic into Manners Mall.
23. In addition to the adverse effects identified in the Jones Lang LaSalle report Mr Muollo submits that the following additional adverse effects will occur:
- (a) The central part of Manners Mall will effectively become a carriageway even though it is restricted to bus traffic.
 - (b) Public seating and architectural features which provide amenity for pedestrians in the central part of Manners Mall will be removed and will not be effectively replaced.
 - (c) The character of Manners Mall will change completely and will be severed into two discreet halves as is the case at the western end of Manners Street.
 - (d) At peak times buses will stack in the carriageway and effectively provide a barrier to pedestrian movement from one side of Manners Mall to the other.
 - (e) All of the foregoing factors will result in less foot traffic and congestion and will drive pedestrians to use other routes with attendant adverse effects on the businesses in the locality. Less foot traffic will inevitably result in lower rentals and a potential deterioration and the quality of the buildings and the surrounding environment.

- (f) There will be a loss of public open space and passive recreational opportunities currently provided in Manners Mall which runs contrary to the objectives and policies of the Wellington City District Plan.
- (g) The aggregation of all these effects will lead to a reduction in quality of retail and office activity in the Mall with attendant reductions in rental values and in capital values.

Global Context

- 24. At pages 13-17 inclusive, the Jones Lang LaSalle report discusses the enhancement of downtown shopping areas in many cities around the world.
- 25. Pages 13 and 14 of the Jones Lang LaSalle report records as follows:
 - "While vehicular traffic has often been withdrawn from these types of redevelopments, a number of pedestrian malls have been partially or completely reopened to private and/or public transport."*
- 26. This section of the Jones Lang LaSalle report goes on to address in a very limited way the reopening of Malls in the USA and in Australia.
- 27. Mr Muollo makes the primary submission that there is no evidence that the experience in the United States and in Australia is in any way relevant to Manners Mall. Indeed Jones Lang LaSalle's own findings clearly demonstrate that Manners Mall is not and should not be a candidate for so-called "strengthening" and "revitalization".
- 28. If the international experience is considered relevant to Manners Mall then the disadvantages of reopening pedestrian malls to traffic highlighted at pages 16 and 17 of the Jones Lang LaSalle report are sobering to say the least.
- 29. The disadvantages highlighted by Jones Lang LaSalle on these pages are as follows:
 - *Significant cost outlay.*
 - *Increase in pollution from exhaust emissions.*
 - *Pedestrian safety becomes an issue, depending on the form of traffic reintroduced . i.e. increases the chances of collisions and accidents, possible mixing of people under the influence of alcohol with vehicular traffic poses serious safety issues.*
 - *Congestion of vehicular traffic.*
 - *Security and safety not enhanced as the primary source of crime is not dealt with. People in cars are just as able to violate public safety as those not in cars.*

- *Demolition of the mall's greatest and most loved feature may occur.*
- *Limited sidewalk size increases pedestrian congestion.*
- *Lack of seating and shelters as a result of removal of mall space.*
- *Pedestrian walking times lengthened due to waiting for traffic.*
- *No more pedestrian friendly than when downtown streets were wider and didn't have dedicated bus lanes."*

Officer's Report to Strategy and Policy Committee dated 9 October 2008

30. It is telling that this report is headed "Strengthening and Restoring the Golden Mile - Bus Priority as a Catalyst for Change".
31. This clearly evidences the basic premises of the report which is unfortunately not substantiated by any evidence let along the evidence of the Council's own consultants, Jones Lang LaSalle.
32. The Council Officer's report notes that a partnership approach has been taken with the Greater Wellington Regional Council "... so that actions of the Council align with Greater Wellington Regional Council's public transport plan and reviews, and with initiatives being implemented by the bus companies."
33. The fact of the matter is that whilst some alignment makes commonsense the respective Councils have different mandates and objectives. The objective of the Wellington City Council is to enhance the amenity of the Wellington CBD for its inhabitants and not to promote transportation alleys at the expense of public amenity.
34. In section 6.3 of the Council Officer's report the following statement is made:

"changes to Manners Mall would be in the context of a low speed environment, as far as practicable retaining its pedestrian friendly feel. The treatment achieved adjacent the Old BNZ building on Lambton Quay provides a useful comparison... Carriageway and footpath widths (4 metres plus) achieved in Manners Street West are relevant to Manners Mall."
35. Mr Muollo submits that there is no valid comparison between what is proposed for Manners Mall and the situation adjacent to the Old BNZ building on Lambton Quay. For a start the situation outside the Old BNZ building on Lambton Quay provides for one way traffic whereas the proposal for Manners Mall is for two way bus traffic.
36. In section 6.6 of the Council Officer's report headed "Retail Impact Assessment" the Council Officer's report records a number of the findings of the Jones Lang LaSalle report.

37. The findings recorded in the Council Officer's have been selectively chosen to say the least and comprise only positive outcomes. The Council Officer's report completely neglects to record the extensive adverse effects identified by the same Jones Lang LaSalle report.

Costs

38. The Jones Lang LaSalle report records that:

"There would be a substantial cost in resources and time in redevelopment of the current streetscape of the Taranaki to Willis Street precinct. It is expected that a large proportion of the funding for this would ultimately come from the community. Therefore, robust and defensible analysis on the impacts to change the current status quo will need to be undertaken to mitigate any negative public feedback".

39. There is no evidence in the Council Officer's report that this exhortation has been heeded. Indeed that part of the Council Officer's report which records the substantial direct costs associated with the proposal is far from complete because it does not identify the opportunity costs resulting from the adverse effects on businesses, pedestrians and property owners in Manners Mall should Manners Mall be reopened to bus traffic.

Conclusion

40. In conclusion Mr Muollo submits:
- (a) The adverse effects on businesses, property owners, and pedestrians will be substantial if Manners Mall is opened up to bus traffic.
 - (b) The public amenity of the Mall will be irretrievably destroyed.
 - (c) Public safety will not be enhanced by opening up Manners Mall to bus traffic.
 - (d) There is no sufficient evidence justifying the proposal either in the Jones Lang LaSalle report or in the Council Officer's report.

Outcome Sought

41. Mr Muollo seeks that any proposal to reopen Manners Mall to bus traffic be abandoned and that the other alternatives identified in the Council Officer's report to enhance the movement of buses through the CBD be further investigated and implemented instead.

Dated at Wellington this *4th* day of *December* 2008



C Anastasiou
Counsel for Luigi Muollo