

27 October 2021

**Auckland Council
Queen Street Waihorotiu Valley Project**

Heart of the City Submission on the Queen Street Waihorotiu Valley Project

Heart of the City (HOTC) is the business association for Auckland’s city centre and we represent the interests of businesses and property owners. We are committed to the growth and success of the city centre as a vibrant, accessible, safe and welcoming urban community.

Overall Feedback:

Heart of the City (HOTC) wants to see a beautiful and well-functioning Queen Street – one that is inclusive, supports business and encourages people to come here.

Queen Street plays an important economic, civic, cultural and social role. Pre-COVID, Queen Street generated more than half a billion dollars of retail sales per annum. Economic recovery requires not only an attractive environment, but also one that functions well to ensure that both Queen Street and the wider city centre is inviting and accessible.

We have provided feedback to the specific elements that Auckland Council is asking for feedback on. This is outlined in detail below. We also offer general feedback.

We have reviewed what is proposed through the lens of the Access for Everyone concept which would *“rebalance streets to prioritise space-efficient modes of transport, **while freeing up road space for journeys that really need it.** By taking a strategic approach to managing road space, A4E would enable this work to take place while improving access for people and goods.”*¹

Auckland Council has published that Access for Everyone², wants to achieve:

- *“Mode shift towards public transport, walking, cycling and micro-mobility.*
- *Easier access for people with accessibility and mobility needs.*
- *Better conditions for freight access in the city centre, including construction, deliveries and rubbish collection.*

¹ <https://www.aucklandccmp.co.nz/access-for-everyone-a4e/vision-for-a4e/>

² <https://www.aucklandccmp.co.nz/access-for-everyone-a4e/vision-for-a4e/>

- *More reliable access for emergency services.*

We have also reviewed the proposal taking into consideration the needs for business. We have been asking for some time for a strategic and integrated approach to implementing changes in our city centre. One of the key elements in achieving this will be through the development of a city centre loading and servicing plan. We note this has yet to be developed.

Our General Feedback

Is it our view that elements of the proposals for Queen Street, including associated network changes **fall short of delivering on the intent for Access for Everyone**, particularly when it comes to achieving:

- *Easier access for people with accessibility and mobility needs.*
- *Better conditions for freight access in the city centre, including construction, deliveries and rubbish collection.*

A number of the proposed network changes, seeking to limit private vehicle access, will restrict essential access, preventing better conditions for freight access as well as easier access for people with accessibility and mobility needs.

Given the definition for A4E, HOTC expects that any proposals for Queen Street would ensure that:

- people and goods who **need** to get to Queen Street can, efficiently and without discrimination.
- changes for Queen Street are inclusive and take a strategic approach to user needs.
- Essential traffic is considered a priority, and that this includes goods and service vehicles, trucks and vans, small passenger service vehicles, emergency vehicles and people with mobility disabilities being dropped off or having a mobility permit.

We believe a more sophisticated approach needs to be taken, allowing for essential access that Access for Everyone clearly intends to accommodate, and until such time this can be implemented, certain elements of the proposal should not be implemented.

We also want to reiterate the need for a quality finish, that is well maintained. Lower Queen Street between Customs Street to Shortland Street is not an appropriate quality and doesn't represent the quality that is needed going forward.

Shared Micro Mobility/Bike Lane. We raise concern around the planned design with the intention to mix bikes, micro mobility and pedestrians. We believe this presents a safety risk and not conducive to a positive amenity for the street.

Construction methodology. The approach and staging of the works needs to consider the challenging retail environment in the city centre and the need for pre-Christmas sales. HOTC request to be engaged with Auckland Council on this matter before a decision on timing is made.

.....

Our specific feedback

1. EVA: What operating hours do you think should apply to Essential Vehicle Areas (EVA)?

Other

Tell us why:

HOTC does not support the proposed Essential Vehicle Access (EVA) area.

The proposal for the **EVA** could work in principle if it supported access for **all essential vehicles**. However, the current proposal for the EVA falls short of doing so. For example, it will not permit people with disability needs nor rideshare/taxis. In addition, many small business owners in the city centre undertake their own deliveries, in their own vehicles. Despite the EVA intending to support delivery vehicles, the proposed enforcement for the EVA, using camera enforcement would penalise those undertaking this activity. A more sophisticated system using number plate technology has been signalled as a possible future tool for enforcement but that has not been confirmed.

Our concerns are that the desire to restrict non-essential vehicles has a negative impact on those who do need to access this area.

We are also concerned about the impact that the EVA will have on restricting accessibility to two key arts destinations, including the CIVIC Theatre and the future St James Theatre. Whilst we note that this section of the street (between Wakefield Street and Wellesley Street) only has bus stops, restricting access to these venues is at odds with the recent recognition for pick up/drop off provision outside the Town Hall, particularly for those with disability access needs. HOTC has yet to see any further work around the use of the kerbside for loading, servicing as well as mobility access needs and believes this work needs to be undertaken before any further restrictions are implemented.

Notwithstanding that HOTC does not support the EVA as currently proposed, if an EVA is implemented, HOTC would like to see:

- **Implementation as a trial with an ability to adapt, or remove, if it is not successful. There must be measurable outcomes with evaluation and engagement with the surrounding community and specific sector groups.**
- **It operating during daytime hours only. The hours proposed from 6am to 11pm will not support the evening economy. The area needs to be opened up in the evening to allow access to support the night-time economy as well as a safer city environment. Given this HOTC believes that a more appropriate time to reopen would be around 7pm at night.**

2. TURNING RESTRICTIONS

How do you feel about removing the right-hand turn out of High Street at Victoria Street East

HOTC does not support removing the right hand turn.

Tell us why:

Auckland Council has identified that the main reason for the proposed removal of the right hand turn from High Street into Queen Street is to remove access for private vehicles.

Before a change of this nature is considered, HOTC believes that more work needs to be undertaken to determine how best the strategic intent for Access for Everyone (A4E) is met, which the Queen Street/Waihorotiu pilot project is intended to deliver on.

Auckland Council has published that Access for Everyone, wants to achieve:

- *“Mode shift towards public transport, walking, cycling and micro-mobility.*
- *Easier access for people with accessibility and mobility needs.*
- *Better conditions for freight access in the city centre, including construction, deliveries and rubbish collection.*
- *More reliable access for emergency services.*

Our concern is that this right-hand turn ban will negatively impact access for essential traffic within the core city centre and is being proposed prematurely in advance of the Loading and Servicing plan being developed, as well as more work around the Access for Everyone Concept.

We believe that this:

- Is a blunt way of removing non-essential traffic in the core city centre, without consideration to the needs for essential traffic movement.
- Change could negatively impact Lorne Street, between Victoria Street and Wellesley Street with an increased traffic using this as an alternative North to South access way.

HOTC would like to see:

- **Further investigation of what and how essential traffic needs to get around the city core city centre before blanket turning restrictions are put in place that will cause further impacts for essential traffic and vital city operations.**

3. PEDESTRIAN MALLS

Vulcan Lane

Could support with changes.

HOTC agrees that there is a need to address the ongoing issue of illegal vehicles stopping and parking on Vulcan Lane, in particular lower Vulcan Lane. This compromises the safety and enjoyment of pedestrians. This issue has been regularly raised with us by businesses in the area. We believe a mechanism needs to be put in place to stop this activity from occurring, and that this would generally be supported by businesses in the area.

A Pedestrian Mall designation makes sense for the Lane if there is provision for access for specific activity. This has been identified in earlier engagement with businesses with Auckland Transport's involvement. This has also been acknowledged by the Auckland Council Queen Street Project Team. Specific activity that needs to be supported in the lane, includes, but is not limited to:

- Gas truck delivery
- Grease trap cleaning – (a sucker truck)
- Rubbish picks ups

Earlier engagement with businesses also identified opportunities to explore more specific time windows for this activity to occur.

The Statement of proposal (SOP) as it is currently worded, will not accommodate access to support specific servicing needs, and it is disappointing that this has not been actively acknowledged in the proposal given the known needs.

Whilst the SOP confirms that the Lane would “allow for managed access for all necessary movements to maintain services, buildings and their uses, on and adjacent to the area (by way of road closure and temporary traffic management plans)” there is no provision for accommodating regular servicing/loading activity.

We do not support the proposal for a Pedestrian Mall in the Lane as described by the current SOP.

We do not agree with the statement in the SOP that suggests that:

- *All adjacent buildings have alternates for loading and unloading away from the proposed pedestrian mall. There are very specific needs that have been identified by some of the businesses in the lane and this can be accommodated away from the lane.*

HOTC would like to see:

A full assessment of the servicing needs to support Vulcan Lane property and business activity; engagement with the community to identify collective opportunities for how and when this activity could best be undertaken; with an amended SOP to reflect this.

There is also a need to have in place a wider strategic loading and servicing plan for the city centre as there is increasing pressure for space for loading and servicing, which is evidenced by frequent use of the Lane for couriers and other companies. We are aware this remains a significant pain point for businesses in the area despite increased provision for loading in High Street.

Fort Street

Do not support.

Tell us why:

There does not appear to be a strong rationale for proceeding with a Pedestrian Mall for such a small portion of the street. The current environment (as a pocket park) poses little risk to ongoing issues around vehicles accessing this area illegally.

HOTC believes it would be more appropriate for a wider Fort Street shared space assessment to be undertaken, given there are ongoing operational issues in the area that continue to be raised by businesses. Any review of how it should work, and any associated designations should be considered

in a more holistic way.

Lorne Street

Do not support

Tell us why:

HOTC views the proposal to turn a small part of the Lorne Street shared space into a pedestrian mall as a clumsy way of meeting specific objectives around discouraging private traffic to access Queen Street.

It gives no consideration to the wider intent for Access for Everyone which seeks to improve access for essential activity. This should give consideration as to who may need to access Queen Street from Lorne Street (such as couriers, uber/rideshare). It also does not appear to take into consideration the opportunity and needs for Lorne Street shared space now or in the future.

We are concerned that this proposal will bring negative impacts to the Lorne Street environment. There has been significant investment to turn this into a shared space, and considerable investment into the Central Library. There is future opportunity to evolve the space with the planned reopening of the St James theatre and the apartment development above.

Creating an environment that would result in two-way traffic in the Lorne Street area, albeit low speed, will remove opportunities for future placemaking, including activities such as outdoor dining and will also likely impact on the use of the space for loading and servicing which is vital. This need will increase over time with more retail to open as part of the St James development. There also appears no recognition of the likely operational needs in the area if the theatre reopens which would include large vehicles, as well as large volumes of pedestrians, of which many will need to get access to taxis/rideshare. This proposal makes no reference to or accommodation for this activity.

HOTC asks that:

More strategic work is undertaken to assess the future place needs for Lorne Street taking into consideration the planned redevelopment of the St James, placemaking opportunities and operational requirements for loading and servicing as well as access needs for the Library, before any move is made to make any further restrictions to access from Lorne Street.

4. LOADING, SERVICING AND MOBILITY PARKING?

What do you think of the proposed changes to loading and servicing zones, and mobility parking?

Support with Changes.

Please Tell us Why:

The overall proposal for loading and servicing in Queen Street is largely consistent with interim proposals that Auckland Transport publicly consulted on in May 2021 which Heart of the City was supportive of.

We support the retention of a combination of both GSV and general Loading Zones (P15), which

Council's FAQs outline "Any vehicle, including goods vehicles, can use a Loading Zone (LZ) for short term parking to pick up or drop off goods or passengers".

An Auckland Transport consultation report dated July 2021, Page 7 (add reference), outlines, "The provision of loading zones not only supports commercial vehicles but also public drop off and pick up along the street." It is important that the function for both people and goods drop off and pickups is maintained and the proposal enables this. We are striving to create an inclusive city centre and to consider the needs for some people who will have to be dropped closer to their destination. For example, this includes people with mobility needs, and customers to businesses such as accommodation providers who will have heavy bags to drop offs as well as those arriving by rideshare and/or taxis.

We note that Council's description for the Parking proposal "is a response to the Wai Horotiu Queen Street project and considers feedback AT has received as part of consultation on our network and interim parking and loading changes **that a level of loading and servicing must be retained to ensure that businesses and people living on Queen Street can still receive goods and services.**"

HOTC agrees with Council's rationale for the proposed Parking Plan on Queen Street.

We continue to reiterate the importance of developing a strategic approach to loading, servicing, kerbside planning which would include provision for rideshare, taxi and mobility access. This should be guiding decisions.

What should change?

380 Queen Street Loading Zone: Extend length to accommodate Tour coaches

The loading zone situated outside 380 Queen Street (in close proximity to accommodation providers Airedale Suites and Four Points by Sheraton) is currently proposed to be one vehicle length long. **Based on the confirmation of needs from both accommodation providers in the area, and the lack of any suitable alternatives, Heart of the City requests that this is extended to allow for a coach to stop and drop off/pick up customers.**

As discussed with Auckland Council and Auckland Transport staff in a meeting on the 14 October, representatives from the Airedale Suites outlined their concerns about the lack of accessibility for guests to and from their place of business. They touched upon a number of Health and Safety concerns with the current design which appears to force tour coaches transporting guests, to park in the lane of traffic or in a position that will block Airedale Street.

They also explained the process whereby large groups of guests (usually foreign and unfamiliar with Auckland and Queen Street) are unloaded, and their luggage transferred via large and heavy trolley's to the hotel. They outlined the need for proximity and well-designed accessible routes from the Tour Coach to and from the hotel are imperative to the safety, and smoothness of the operation. The further any such stop is from the hotel the longer the operation will take and the longer a tour coach would be in that location.

This need has also been confirmed by Four Points by Sheraton.

Two options were discussed, including a configuration (extension) of the loading zone on Queen Street to accommodate coaches as well as an option (2) of using the existing bus stops on Mayoral Drive.

Both businesses have investigated and confirmed that the Mayoral Drive option could not work due to trees, grade of footpaths, proximity as well as conflicts with the public bus network and have confirmed that the only viable options is to make provision for this activity on Queen Street.

151 Queen Street: Retain Loading Zone

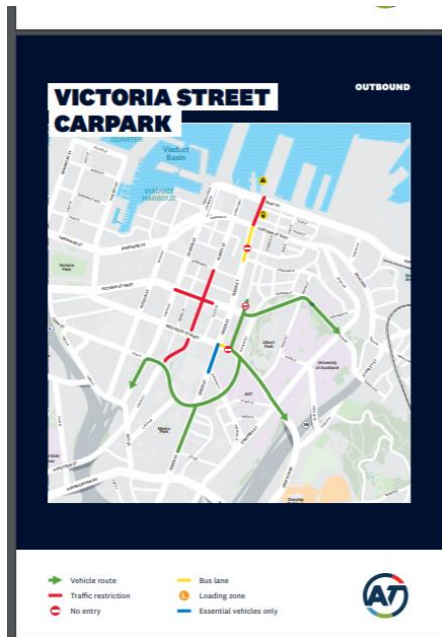
The draft proposal includes the removal of the current loading zone on the western side of Queen Street between Wyndham Street and Shortland Street in close proximity to 151 Queen Street. It is our view that this needs to be retained for the following reasons:

- That due to the bus only section operating between Shortland Street and Customs Street between 7am to 10am and 4pm to 7pm, if this was change was implemented there would be no accessible loading zones on the western side of Queen Street between Wyndham Street and Customs Street during these hours.
- HOTC has previously submitted on the need to provide **access** for essential vehicles – particularly those supporting loading and deliveries, during the ‘bus only’ operating times to allow access to these loading zones. This has not been put in place.
- Auckland Transport has undertaken an assessment of the use of loading zones and have concluded that there is no need for the retention of this particular loading zone. **HOTC is concerned that this evaluation was undertaken at a time when the city is not back to full capacity owing to COVID-19. For example, there will be much higher demand for couriers and deliveries at different times of the year, including Christmas and once the borders are open.**
- **There has yet to be a strategic loading and servicing plan developed for the city centre. HOTC believes it is premature to remove space for loading in advance of this being developed.** Earlier engagement with businesses and organisations such as the National Road Carriers has indicated the issue for loading and servicing. Auckland Council have also confirmed that **that a level of loading and servicing must be retained to ensure that businesses and people living on Queen Street can still receive goods and services.**
- One of the Queen Street project’s KPI’s is to “maintain existing provision for servicing and loading”. The overall loading provision is already down on what was originally in place for street. The removal of this loading zone coupled with the lack of access to two loading zones during the hours of operation of the bus only zone, results in an overall reduction in space dedicated for loading provision.

5. ANY FURTHER COMMENTS?

Network Access: Right hand turn access from Wellesley Street into Mayoral Drive

Mayoral Drive has been identified in the A4E Concept to be one of the key West/East access routes for vehicles. Auckland Council’s ‘Accessing the City Centre’ maps on the Queen Street valley, also identifies Mayoral Drive as a key inbound and outbound route to get to the Victoria Street carpark. (<https://akhaveyoursay.aucklandcouncil.govt.nz/waihorotiu-queen-street> “



Ensuring access to Mayoral Drive is enabled and/or maintained is critical to enabling positive access in the core city centre.

We have spoken with businesses in the area of 350 Queen Street and the Wellesley Street/Kitchener Street area. Auckland Transport has recently put in place a bus only right hand turn from Wellesley Street into Mayoral Drive.

This restriction now means that businesses and residents located in Wellesley Street between Kitchener Street and Lorne Street are unable to access Mayoral Drive. Enabling this access, would also support essential access into the area around 350 Queen Street/Central Library from the South, which is currently prohibited and will be particularly difficult if the Queen Street EVA is put in place.

Heart of the City would like to see:

A right hand turn for vehicles from Wellesley Street to Mayoral Drive reinstated.

-ENDS-

For contact:

Tania Loveridge

Head of Advocacy and Engagement
Heart of the City

Tania@hotcity.co.nz