



10 December 2021

Let's Get Wellington Moving Programme
Waka Kotahi | Wellington City Council | Greater Wellington Regional Council

Email: info@lgwm.co.nz

'Hello' LGWM,

The Chamber makes its eighteenth submission¹ since 2013 relating to the broader Let's Get Wellington Moving programme.

The Chamber has worked closely with Let's Get Wellington Moving (LGWM) partners since 2017, and before this in the programme's various forms, to ensure views of the Wellington business community on the proposals and their impacts are front of mind. Our key messages remain consistent, and we continue to play a constructive role in the future development of Wellington's transport infrastructure.

¹ *Submissions to LGWM, WCC, or GWRC on LGWM, on Wellington transport infrastructure:*

1. https://www.wecc.org.nz/_data/assets/pdf_file/0020/222653/20210730,-Submission,-Wellington-Chamber-of-Commerce,-Cobham-Drive-SH1-Speed-Limits,-LGWM.pdf
2. https://www.wecc.org.nz/_data/assets/pdf_file/0007/219697/Submission-on-LGWMs-Thorndon-Quay-and-Hutt-Road-Consultation,-Wellington-Chamber-of-Commerce.pdf
3. https://www.wecc.org.nz/_data/assets/pdf_file/0011/199262/20200809,-WECC-Golden-Mile-Submission-FINAL.pdf
4. https://www.wecc.org.nz/_data/assets/pdf_file/0008/196415/Wellington-Chamber-Parking-Policy-Speaking-Notes,-June-2020.pdf
5. https://www.wecc.org.nz/_data/assets/pdf_file/0008/194669/Parking-Policy-Statement-of-Proposal-2020.pdf
6. https://www.wecc.org.nz/_data/assets/pdf_file/0005/193658/2.pdf
7. https://www.wecc.org.nz/_data/assets/pdf_file/0005/184901/20191216,-Wellington-Chamber-of-Commerce,-Central-City-Safer-Speeds,-LGWM.pdf
8. https://www.wecc.org.nz/_data/assets/pdf_file/0004/177961/WCC-Parking-submission.pdf
9. https://www.wecc.org.nz/_data/assets/pdf_file/0004/168097/08052019-Wellington-Chamber-submission-on-six-WCC-Traffic-Resolutions.pdf
10. https://www.wecc.org.nz/_data/assets/pdf_file/0008/146564/Traffic Resolutions Oct 2017.pdf
11. https://www.wecc.org.nz/_data/assets/pdf_file/0003/142797/LGWM-Submission-from-the-Wellington-Region-Chambers-of-Commerce .pdf
12. https://www.wecc.org.nz/_data/assets/pdf_file/0009/117936/Wellington-Chamber-of-Commerce-Submission-to-WCC-on-the-Eastern-Suburbs-Cycleways.pdf
13. https://www.wecc.org.nz/_data/assets/pdf_file/0019/114571/Wellington-Chamber-of-Commerce-Submission-to-Transport-Committee-Inquiry-into-future-of-mobility.pdf
14. https://www.wecc.org.nz/_data/assets/pdf_file/0003/114564/Wellington-Chamber-of-Commerce-Submission-to-WCC-on-Hutt-Cycleway.pdf
15. https://www.wecc.org.nz/_data/assets/pdf_file/0020/114563/Wellington-Chamber-submission-to-WCC-Car-Share-Policy.pdf
16. https://www.wecc.org.nz/_data/assets/pdf_file/0007/78424/Business-Central-submission-to-NZTA-on-the-proposed-Petone-to-Grenada-Link-Road.pdf
17. https://www.wecc.org.nz/_data/assets/pdf_file/0006/60891/Letter-to-WCC-Basin.pdf

We also want to acknowledge and thank the LGWM team's engagement to date. While we have not always agreed, they have continued the dialogue and we look forward to continuing our discussions ensure the very best outcome for the city and its users.

About the Chamber

Our organisation has been the voice of business in the Wellington region for 165 years since 1856 and advocates for policies that reflect the interest of the Wellington region's business community and that support the development of the Wellington economy as a whole.

Through our memberships, the Wellington Chamber of Commerce, Business Central, Porirua Chamber of Commerce, and ExportNZ, our organisation represents around 3,500 businesses across the central and lower North Island. We are accredited through the New Zealand Chambers of Commerce network and are the central regional organisation of BusinessNZ.

Overview

The Chamber supports the overarching goals of the wider Let's Get Wellington Moving, but have some serious reservations about the details, including changes in focus, timing, and delivery. Our views are well documented in our previous submissions to LGWM.

Wellington businesses themselves have a huge stake in ensuring the wider region's public transport works – particularly given their financial contribution to the region's public transport rate, 39 per cent of regional funding is rated from Wellington businesses. This is an excessive subsidy from Wellington CBD based businesses to other user groups, seven times as much on the dollar that cannot be sustained. For example, the building that our organisation occupies a floor within currently pays 85 per cent of its total GWRC rates bill towards the targeted transport rate alone - \$55,069.26 of the total \$64,531.38 rates bill.

On concerns on costs, earlier this year Treasury's Budget Economic and Fiscal Update warned that the LGWM programme is *'expected to cost significantly more than previously estimated, increasing the risk that it may not be delivered in full'*. The Chamber has consistently maintained that the LGWM funding split between Central and Local Government was an unfair deal for the city, with Central Government not taking on their fair share of the costs. In some ways, it shouldn't be a surprise that Treasury has flagged the funding arrangement and Council's contribution as a concern, given it unfairly shifts costs onto Wellington ratepayers who right now can't afford any further rates increases.

We believe a well-developed public transport system is vital for Wellington. Business operators have a direct interest in a sound, reliable public transport system that they themselves, their customers, employees and suppliers use daily. It is important for the city's future visitor economy which includes business, domestic and international visitors. This part of the LGWM moving programme is particularly important because it addresses passenger transport flows to, from and within the CBD where the bulk of Wellington's employment is based. Moreover, this is important to the wider Wellington region given many people travel into Wellington to work in the CBD.

We consider that the solutions for LGWM are narrowly focused on Wellington itself and should be part of a regional solution. We have had considerable feedback from the regions around Wellington that a true future-focused transport solution for our city also includes impacts on regional transport. Straightforward examples of this include the deep concern expressed by business people in the Wairarapa or Upper Hutt that they will

not easily be able to do business in the city when parking solutions are reduced with no concurrent and complimentary transport solutions for years.

Public transport provides wider economic benefits flowing from the reduction in congestion and the contribution to an efficient transport system generally. Increased availability of good public transport options provides an alternative to other modes, such as private vehicles. We would agree, a reduction in per-capita car use due to people voluntarily choosing public transport themselves is desirable. While the Chamber has been a strong advocate for the government's increased roading investment in recent years and remains so, this does not mean we are not also strong advocates for other forms of transport, particularly where there are climate change and public benefits. We support a balanced approach driven by the overarching intention of the maximum quality liveability that modes of transport provide Wellingtonians.

Wellington faces numerous challenges as it continues to grow, including our roading and transport infrastructure. The Chamber fully supports Let's Get Wellington Moving's original objectives to support the growth of the city and to make it easier and safer for goods and people to get around. Wellington's transport problems are well known. Wellington's growing population has led to rising traffic congestion, pressure on public transport, and longer commuting times. Areas in the central city as well as around the port and airport are particularly problematic. Public transport is straining, trains are reaching capacity, and the recent bus reforms have been a debacle.

The Chamber remains concerned with the impact of increased congestion and slower journey times. We understand that average journey times, cited from Wellington Airport's submission, shows that peak times between the Airport and CBD have increased by up to 18 per cent on average between 2011 and 2021 – this despite the travel impacts from Covid19. Data also shows steady increases in the weekends. We are concerned that LGWM's own projections that journey times will continue to increase under all scenarios - this is alarming.

Further, Wellington's roading transport network is long overdue for completion, there remains the need to remove inefficiency, congestion and cost. SH1 improvements are required at a more fundamental level. The Terrace and Mt Victoria have long been marked for improvement to fully complete Wellington's transport network as originally designed. It makes no sense for a four-lane state highway to be channelled down to two or three lanes at two choke points through the city.

A last, fundamental point should be made. With an excessive focus on transport, we miss the fact that transport plays a part in the integrated planning for the city's focus. First, we need to understand how people will *live* in the future Wellington. Then, and only then, can we truly plan for how people will *move*. This has always been a flaw in focusing so closely on transport alone as a 'game changer.'

Despite this, given the feedback we continue to receive from businesses, it is increasingly the Chamber's view that we are no longer in a transport infrastructure deficit, but that we are now bordering on a crisis, particularly when readiness and resilience needs are factored into the equation. We have got to get Wellington moving.

Support for Option Two

The 2013 Public Transport Spine Study reviewed three passenger transport options for the corridor from the Railway Station to Newtown and Kilbirnie – Light Rail, Bus Rapid Transport (BRT) and Bus Priority Measures. This consultation was heralded as selecting the "final choice of public transport system will help shape Wellington's transport system for decades to come."

Lack of detail and clarity (outlined below) makes the ability to fully endorse any proposed option almost impossible. There is no true economic impact analysis on business, and consequently no real analysis or true calculation of the costs of this project. This makes it difficult to be confident in putting our weight behind one option.

Nowhere else in the world would a ca. \$7b project be so poorly supported by economic analysis. LGWM often discusses transport solutions applicable to other exemplar cities of the world, but all cities attempting such major improvement in infrastructure would be confident in the robustness of their impact on their economy. Local economies are not resilient to all change, and brave statements from politicians about what 'creative destruction' they are prepared to absorb on behalf of the city are reckless and ill-thought through.

The 2013 Spine Study showed that BRT had the highest overall benefit-cost ratio and the highest transport benefits. The Chamber submitted on this consultation and supported BRT. It is worth noting the following: had Councils invested and undertaken work to put this lengthy engagement and subsequent plans into action, **BRT would be fully in place by now** in 2021.

Bus Rapid Transport (BRT) is once again our preferred option. This is the only option that has a dedicated lane public transport lane to Wellington Airport. It will also reduce freight traffic around Oriental Bay, provided that the new tunnel can effectively accommodate freight movement. This option could future proof the corridor for light rail later on. Ideally, this option would be enhanced by allowing taxis and rideshare to use Bus Rapid Transit lanes, particularly at the tunnel pinch points. Option 2 also includes an additional four-lane tunnel through Mt Victoria. We do not support the conversion of the existing Mt Victoria tunnel to walking and cycling - if any tunnel were converted to this use, the existing bus tunnel is more appropriate.

The introduction of light rail provides an expensive solution for peak demand periods of the day morning and night. Given the relatively short distance to the city and limited funding, buses with dedicated bus lanes and the bus tunnel provide a more flexible solution that can be scaled up or down to meet demand, while protecting the corridor for the future. We continue to be concerned about the capital and ongoing investment required for Light Rail, given the associated expenses of the track and its relative inflexibility. A key strength of BRT is that the vehicles can carry on further than Light Rail and are flexible, as they are not bound by the track layout. We believe there is more potential for passenger growth under this option.

We are still unclear how the MRT option along the quay's interplays with public transport provision along the Golden Mile. In the detailed design, this would be helpful to understand the interaction more clearly.

We are supportive of LGWM's proposed improvements to the Basin Reserve and the extension of the Arras Tunnel. We will be interested to see the detailed design when detailed business cases are released, as the information available is currently limited. We also agree with the Airport's submission, that "the Arras Tunnel and Basin improvements could proceed now, irrespective of what scheme is finally adopted for Mass Rapid Transit. These improvements will immediately bring very large benefits by unlocking the Basin, these projects should proceed as early priorities while the more complex MRT is developed."

We remain concerned that there is a lack of detail underneath what is proposed, such as specifically how it relates to the city's supply chain and logistics movements. There is little recognition in LGWM's documents of the need to support freight movements with convenient access through and around the city. The continued movement of freight needs to be incorporated. For example, at least 600 heavy vehicles are using Cobham Drive each day, and all of these will be affected by increased congestion. Option two will go some way to address this, as it will reduce freight traffic around Oriental Bay, provided that the new tunnel can effectively accommodate freight movement. Our members and the city will continue to need roading connections and

private access to transport goods and services for growth and development. Again, we advocate for a balanced, whole of system approach.

Climate Change and Sustainability

A carbon zero organisation ourselves, the Chamber and our members are committed to reducing our carbon emissions and creating a sustainable economy. Business is leading the way in our ecological journey – it is through creativity, innovation, and entrepreneurship that we will find new ways of cutting waste from our economy. Complex or unnecessary regulations make this change harder to achieve.

An inefficient or ineffective approach will have a perverse effect - drive up costs for businesses, stifle innovation and hamper our economic recovery. In particular, attempts for a one-size-fits-all approach is not consistent and instead creates risks. Vehicle fleet efficiency and electrification will have a greater impact on carbon output than any of LGWM's proposals. There is still a role for private vehicles in a low-carbon future, and LGWM should focus on this in addition to public transport and active transport modes.

Wellington Airport's submission makes an excellent point, as follows:

“Vehicle fleet efficiency and electrification will have a greater impact on carbon output than any of LGWM's proposals. There is still a role for private vehicles in a low-carbon future, and LGWM should focus on this in addition to public transport and active transport modes. Surprisingly, LGWM's analysis shows its own proposals will only reduce private vehicle use by 1-2 per cent. In other words, significant damage to Wellington's road network is being justified on the basis of climate change improvements which simply are not borne out in the modelling.”

“We note LGWM's programme is not scheduled to commence until 2028, by which time the Government ought to have made significant progress toward its target of decarbonising 30 per cent of the vehicle fleet. Assuming this equates roughly to a 25 per cent reduction in emissions, fleet efficiency will achieve 10 to 20 times the carbon reduction that will be achieved by LGWM's \$6-7 billion proposals, before MRT construction is even significantly underway. The place of a lower-carbon vehicle fleet must be recognised by LGWM, rather than dismissing private vehicle use out of hand.”

We note the Property Council's submission also makes the following excellent points:

“For emission reductions to occur, a holistic approach to net emissions is required, taking into account each individual sector but having an overarching cross-sector lens, which often requires trade-offs to ensure the best possible overall outcome will occur. For example, a new building which is made up of partially recycled materials may result in two different transportation methods (i.e. two separate trucks) to get the new and recycled materials to site. Despite, higher emissions upfront using two differential transportation methods, if the use of recycled building materials resulted in a lower net carbon outcome overall then this trade-off should occur. This example illustrates that a whole-of-system approach is required to reduce emissions, rather than solely focusing on transport emissions.

“Unfortunately, the LGWM consultation document is singular focused on removing private vehicle use without considering the wider landscape (e.g. the Government's EV policies). For example, LGWM considers inner city transport options but does not consider the future role of private vehicle use (e.g. EVs and hybrids), nor the

Ministry for the Environment's recommendations² to work with Wellington City Council to introduce congestion charging, nor considers alternative transport routes both in and out of the city. These omitted transport options within the LGWM consultation document cause further alarm when there is lack of detail on how this will affect Wellington's landscape and density (i.e. housing options), and how to best utilise current and future connections for freight movement. These are two significant pieces of the Wellington transport puzzle that urgently need attention.

"For emission reductions to be successful, the sector requires clear national direction with a joined-up approach from Local Government. It is therefore highly concerning to see the LGWM proposal to remove private vehicle use and car parks within the city. This directly contradicts the Government's commitment towards EVs and the soon to be opened Transmission Gully project which seeks to allow for private vehicle use in and out of the city centre. We urge LGWM to reconsider its proposals and look into supporting EV charging stations and car parks within the city.

"Current and future markets will likely continue to dictate what people want and given reliable and future public transport options are decades away, short-term over-reliance on private vehicle use will still occur. Taking an environmental lens to private vehicle usage, the introduction of T2 or T3 transport lanes, with a similar model to Auckland, would be beneficial and encourage carpooling and other more efficient private vehicle usage. These simple but effective alternative private vehicle use options should be considered when developing future transport options for Wellington.

Key considerations for further detailed proposals

We understand that a more detailed proposal will be released early 2022 for consultation. We strongly recommend the below information is required within this more detailed proposal in order to fully understand the overall impacts of decisions made within the LGWM proposal:

- The economic impact on businesses, community organisations, residents and commercial property that will stem from both disruption costs of development and the reduction of car parks and how this will be mitigated; and
- The number of car parks that will be removed across the CBD and the strategy in dealing with an increase in the number of private vehicle use as a result of Transmission Gully and future growth.

Thank you again for the opportunity to submit on this consultation. We look forward to engaging with you over the coming year.

Ngā mihi,



Simon Arcus
Chief Executive
Wellington Chamber | Business Central | ExportNZ Central | Porirua Chamber

² Ministry for the Environment, [Te hau mārohi ki anamata: Transitioning to a low-emissions and climate-resilient future](#)