

15th December 2019

Let's Get Wellington Moving
NZTA, GWRC, WCC
via email: info@lgwm.nz and saferspeeds@lgwm.nz

Let's Get Wellington Moving: scoping consultation seeking feedback on the 'Golden Mile' and 'Central City Safer Speeds', the precursor to the next round of formal consultation.

Thank you for the opportunity to submit regarding these two policy proposals. We note that this scoping consultation is a precursor to formal engagement on the proposals themselves. We understand that this process is an informal engagement which seeks to provide guidance and direction for the two proposals. To this end, this letter seeks to give general comments on the matters for consideration.

Generally speaking, the Chamber supports the overarching goals of the wider Let's Get Wellington Moving, but have some serious reservations about the details, including timing and delivery. These views are well documented in our previous submission to LGWM¹ in December 2017 and are also on the public record by way of press releases² and media comments. We are grateful for LGWM team's engagement to date and we look forward to discussing matters further to ensure the very best outcome for the city and its users.

Through our three membership brands, the Wellington Chamber of Commerce, Business Central and ExportNZ, our organisation represents around 3,500 businesses across the central and lower North Island. Our organisation is one of the four regional organisations that make up the Business New Zealand family and is also accredited through the New Zealand Chambers of Commerce network. The Wellington Chamber of Commerce has been the voice of business in the Wellington region since 1856 and advocates policies that reflect the interest of Wellington's business community and the development of the Wellington economy as a whole.

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."

Wellington businesses are concerned about the underinvestment in the City and region's transport infrastructure. As part of our previous submission to LGWM, the Chamber undertook an extensive survey of businesses, and when asked: "Do you believe that Wellington's transport system needs further development

¹ https://www.wecc.org.nz/__data/assets/pdf_file/0003/142797/LGWM-Submission-from-the-Wellington-Region-Chambers-of-Commerce_.pdf

² <https://www.wecc.org.nz/advocacy/media-releases>

and investment?" Some 96.86% of respondents believed that the Wellington region needs further transport development and investment - over 600 people. This is also a common concern highlighted in our quarterly business confidence surveys. Our most recent survey, in September, asked respondents "What are the three issues that concern you most about doing business in your area?" It was the most highly ranked issue of concern from businesses. Over half, 55.91% cited Transport Infrastructure as their main concern.

Below are some of the comments, in response to asking respondents about what they believe are the barriers holding back the city, region, or their own business. Responses to this question were unprompted, with respondents having unlimited characters to provide a response, and taken from the past three quarterly surveys.

- "The lack of parking in the city as well as places to be able to pick up and drop off passengers."
- "Getting around the city - still nowhere to put a truck to unload it. Constant enforcement of parking when no alternatives are provided."
- "Parking to visit clients (not in a position to use public transport) and the one-eyed view of the Wellington City Council against cars which at the moment remain a necessity."
- We need "Parking in the central city for short term parking (up to 4 hours) rather than the commuters - who stop those who need to visit the city."
- "Lifting through-traffic out of the CBD by way of flyover or tunnels, not implementing the light rail and reduction of parking in the CBD. Naive projects."
- "Although I am a cyclist, I find the anti-Motor car movement worrying, lack of car parking and deliberate restrictions on roading."
- "Parking is a big issue - there is so little of it around."
- "Lack of parking in Wellington and now the council is charging for parking on weekends. This significantly reduces visitors to Wellington and makes it uneconomical to open on the weekend."
- "Roading. The adverse effect of increased cycle lanes on traffic flow and the lack of parking in the city as well as places to be able to pick up and drop off passengers."

As referenced above, in November 2017 the Chamber undertook extensive research of our members' transport views as part of the first Let's Get Wellington Moving public consultation. The survey resulted in 642 responses from businesses across the region's five chambers. Respondents were asked about the current transportation challenges for themselves or their business as they saw them. Responses to this question were unprompted, with respondents having unlimited characters to provide a response and lack of parking in the CBD was cited by 15 per cent of respondents. More interestingly, respondents were also asked about what trade-offs they would be prepared to make if it meant the implementation of the full Let's Get Wellington Moving package, with the result of a more efficient transport network for all users. Suggestions were provided, and respondents could answer more than once. Just under half, 42 per cent, said they would consider giving up street car parking close to their destination, and 41 per cent would consider giving up some private vehicle access to the inner city. There was a crossover of 20 per cent between the two answers. What these responses reinforced was the need for an efficient transport network that made it easy for users, regardless of the mode of transport used. Respondents were willing to change or moderate their behaviour and modal use should there be alternatives to support them.

It is little known that business contributes significantly to both the general rate take and the regional transport rate. Given Wellington businesses pay the lion's share of the transport rate, improvements must happen – and cannot come soon enough.

This submission makes general comments on the five questions the LGWM is seeking feedback on:

Golden Mile

- 1. What improvements would you like to see on the Golden Mile to improve bus reliability, and to make it a more attractive and safer place for people walking and on bikes?*
- 2. What's working well, or what's not, for you if you're walking, on a bus or on a bike, anywhere along the Golden Mile?*
- 3. Do you have any other comments about the allocation of road space or the kerbside on the Golden Mile?*

Central City Safer Speeds

- 4. We're proposing that all streets within the central city, except the main roads, have a 30km/h speed limit. What do you think? If you think any of these streets should have a different speed, tell us what speed you think it should be and why*
- 5. We're suggesting the main roads – Waterloo Quay, Customhouse Quay, Jervois Quay, Cable Street, Wakefield Street, Kent and Cambridge terraces, Vivian Street and Karo Drive – all remain at 50km/h. What do you think? If you think any of these streets should have a lower speed, tell us what speed you think it should be and why.*

This consultation asks questions about what was called 'Scenario A' in the LGWM package. We feel that, while straying outside the scope of this consultation, it is imperative to record the Chamber's bottom-line view: that to only implement Scenario A alone would be completely unacceptable to business and arguably the majority of Wellingtonians. The full LGWM package, of Option D, must be implemented.

The Golden Mile

The Golden Mile stretch from Lambton Quay to Courtenay Place is such a significant proportion of the CBD. It is one very important route within a major network of roading, so any changes must ensure it is seen as part of the bigger picture. The Chamber has long been on record in its views that fewer vehicles in the CBD would be a welcome development but restricting or banning access altogether would be ill-advised.

We know that each year about 3.5 million people get on and off buses along this stretch of road with over 500,000 of them getting on and off outside Farmers and over 578,000 outside David Jones. With this number of people using public transport along Lambton Quay, there's no doubt that removing vehicle access to it will have a serious impact on the retail businesses there.

We would agree that Wellington's walkability is responsible for much of the city's vibrancy and is what distinguishes it from other New Zealand cities. The widening of footpaths and the introduction of judder bars in some parts of the Golden Mile have already achieved a reduced vehicle count. As a thoroughfare, it is now quicker to use the alternative routes and so people generally only use the Golden Mile if that (or the neighbouring streets) is their destination. However, improving the surrounding roads and widening the motorway (implementing the full Option D package) to discourage transiting vehicles from travelling through the CBD would be a far better solution.

With respect to fully pedestrianising the Golden Mile, the Chamber believes there is plenty of scope to beautify the city and increase public spaces without pedestrianising this stretch of road. Wellington is compact but it does not yet have a sufficiently large population density to sustain the vitality of a pedestrian road as long and large as the Golden Mile.

The issue is all about balance. The city has to look good, but it also has to function properly, and it needs to facilitate economic growth. Wellington's compact nature means that scarce road space needs to be used wisely. It is not only important for Wellington city - the CBD is in a narrow isthmus through which traffic must flow to connect the port and airport from the rest of the North Island. An efficient transport system is essential.

The design of the consultation questions, and the wording, consider only three of the user groups that use the Golden Mile stretch. We appreciate the targeted considerations that policymakers are seeking to address here. However, it goes without saying that there are several other users, from scooters to service vehicles, that have a very real interest in the Golden Mile area. We look forward to the next round of consultation considering the impacts of proposals for all users.

Local Business Concerns – access and parking

We have been approached by a number of member businesses who operate within this area who are concerned about current proposed changes to the status quo. We must emphasise the need for practical solutions. A solution also needs to be found around, for example, how deliveries to businesses would work, because most businesses do not have delivery access from The Terrace. The Chamber is concerned about access for users, and this needs to be a paramount consideration.

The Chamber is concerned about what happens to the parking spaces on the side streets between Willis Street and Parliament, and how vehicles would circulate should access to Lambton Quay close. For example, would adjoining streets become cul de sacs?

We believe that any changes to the Golden Mile must align with the principles set out in the draft Wellington City Council parking policy, which are:

- Provides guiding principles for the management of on-street and other Council-controlled parking, including mobility parking, that are aligned with the wider vision for the city.
- Is responsive to increasing parking pressures, flexible enough to respond to changing transport behaviours and makes use of evolving technology where appropriate.
- Enables a consistent approach to managing parking across the city that is clear and easy to understand.

Acknowledging that there are many competing demands for the CBD's limited street space, it is imperative that the policy changes support providing access to businesses who are located within the central city, allowing for customer access as well as servicing and deliveries to buildings.

We note that while there are 29,000 parking spaces in Wellington CBD, just 15,500 are public spaces, and of these just 4,179 are council-owned and managed. Given the recent closure of the Civic Square and library buildings, there are now just 3,278 on-street parks available and 838 off-street. Any further loss of carparks, such as along but more importantly around the Golden Mile, puts the issue in even sharper focus.

It is important that we put on the record the direct feedback from Wellington businesses. Our members' view is that finding a park in the central city is getting harder and harder. This is not just anecdotal feedback but is drawn from our regular quarterly business confidence surveys. These are regional surveys so attract comments from businesses from all around Wellington region and the lower North Island. The feedback reveals steadily growing concerns about the ease of access and the ease of doing business in the central city.

One recent survey comment we received was that 'with the significant loss of parking facilities, is making the city a very unfriendly place to meet in'. That's the last thing we want to be said about our city. Solutions need to be found to ensure we're not closing off the CBD to economic activity. The Chamber is concerned about access for users, and this needs to be a paramount consideration.

Data – demand, capacity and accessibility

We believe there is information that must form part of the decision making that appears to be available. The Council has in place smart parking technology, and as such this information ought to form the background material to the proposals - to look at demand, capacity and accessibility, based on sound up-to-date data. We believe with this information LGWM would be in a strong position to undertake this consultation with smart data modelling and solutions. The Chamber would be interested to know the most recent rates during peak times, given the perception that parking is currently challenging and falling short of availability expectations. The current performance measure and international standard of 85 per cent as proposed appears reasonable but again would need to be understood in the context of the current city challenges.

As an aside, we believe that this technology ought to enable the deployment to look at new tools of managing demand, such as dynamic pricing. We would strongly support moves to provide "new ways to pay, digital signage, real-time data and other technological innovations... to deliver its parking service more transparently and efficiently and could improve the user experience." The Chamber would agree that providing more information to the public about where, when, and how long they can park will help reduce congestion and give users a choice on how they will travel.

Greater provision of mobility and other designated user parking

The Chamber would also support greater provision of mobility and other designated user parks along and around the Golden Mile. Where space-by-space occupancy for this designated parking falls below 50 per cent we would recommend a review. We would support that "other" designated could include parents with babies or click and collect shoppers, and this reflects a targeted approach to provide access and availability to the city - which we note several businesses who themselves own car parks, have recently implemented.

Safer speed limits.

The Chamber is mindful that despite the good intentions behind this policy it may eventually lead to a slippery slope of preventing public vehicle access within the CBD altogether or have other unintended but perverse outcomes. As we have set out in the above section, we would be strongly opposed to this outcome. Fewer vehicles in the CBD would be a welcome development but banning them altogether could be a retrograde step. Specifically, regarding lowering speed limits, the Chamber commented in the 2017 LGWM consultation:

“While we have supported the proposal look at lowering speed limits in the central city, we note that lowering speed limits could lead to perverse outcomes and unsafe behaviour, requiring mitigation. In a submission to the Wellington City Council on their Central Safer Speed Limits (2014), the Wellington Chamber of Commerce stated that: “...The new study released by the AA has found that reducing Wellington’s inner-city limit to 30km/h would not prevent most injuries to pedestrians and cyclists. The study shows that if speed limits were lowered, more people would cross streets unsafely and be injured. Following from the AA’s study, the Chamber believes that speed signs saying 30km/h may create a false sense of safety and result in unsafe behaviour from pedestrians and cyclists in crossing these streets. Although the mean vehicle speed is 31km/h, the speed signs of 50km/h create more caution and pre-planning for pedestrians, cyclist’s and vehicles in their decision-making process creating a safer environment. The AA report has found that each year, on average, three serious injuries and nine minor injuries were suffered from crashes over 30km/h. The Wellington City Council’s Pedestrian Crash Reduction Study, May 2012, states that pedestrian type crashes make up 51% of the injury crashes and an even higher proportion (76%) for just the fatal and serious injury crashes. This is in-line with AA’s study that about half the injuries were suffered by pedestrians and cyclists and the rest were drivers, passengers and motorcyclists. Accordingly, pedestrian and cyclists’ perceptions of safety and judgement are important. Therefore, signage implementing a 30km/h speed limit would lower the perception of risk and may cause greater uncertainty for pedestrian and cyclist safety within the CBD. The Chamber supports the AA’s findings that a lower speed limit may alter perceptions and create a greater safety risk for pedestrians and cyclists within the CBD.”

We would encourage LGWM to consider this research, and if taking decisions that would be in opposition to the research that they ensure that these concerns are sufficiently negated when looking to lower any speed limits.

Conclusion

Thank you again for the opportunity to submit on this scoping consultation project. We look forward to the formal consultation, as well as further discussion and progress with Let’s Get Wellington Moving on these matters.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Milford', written in a cursive style.

John Milford

Chief Executive

Wellington Chamber of Commerce, Business Central, ExportNZ