



Road Transport Forum NZ Submission to:

Let's Get Wellington Moving

on:

**SH1 East of Mount Victoria
Safer speeds and Cobham Drive crossing**

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Road Transport Forum (RTF) submission on Let's Get Wellington Moving (LGWM) proposals on SH1 east of Mount Victoria

1. Representation

- 1.1 Road Transport Forum New Zealand (RTF) is made up of several RTF members include Road Transport Association NZ, National Road Carriers, and NZ Trucking Association. The affiliated representation of the RTF is some 3,000 individual road transport companies which in turn operate 16-18,000 trucks involved in commercial road freight transport, as well as companies that provide services allied to road freight transport.
- 1.2 The road freight transport industry is 3.0% of New Zealand's gross domestic product (GDP) and it carries 93% of the nation's freight. We employ around 26,000 people and vocational education is of growing importance in our industry due to a shortage of drivers and other workers.

2. Introduction

- 2.1 The RTF provides sector leadership and believes we all need to operate in an environment where the following must be managed and co-exist:
 - 2.1.1 The safety and wellbeing of our drivers and other road users. Our drivers are our most valuable asset.
 - 2.1.2 The impacts of transport on our environment.
 - 2.1.3 The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
- 2.2 Let's Get Wellington Moving (LGWM) is seeking feedback on its proposals to reduce speed limits on some sections of road east of Mount Victoria and build a signals controlled crossing on Cobham Drive.
- 2.3 The RTF has been proactively participating in LGWM conversations since the latter started in 2016 and some of our most recent formal feedback includes:
 - 2.3.1 Golden Mile Improvement proposals in July 2020.
 - 2.3.2 Thorndon Quay and Hutt Road proposals in June 2021.

- 2.4 The RTF is also mindful that its earlier feedback does not appear to have been captured in the various LGWM summaries to date. Given our earlier view that LGWM is not thoroughly considering the risks, trade-offs and opportunity costs we question the authenticity of the consultation. We urge LGWM to give genuine consideration to these matters before forging ahead regardless.
- 2.5 We would like to acknowledge at the LGWM team that engaged directly and provided RTF with a face-to-face briefing on these changes in their Wellington office on 6 July 2021.
- 2.6 The lens and scope of our submission is predominantly:
 - 2.6.1 The quality of policy development and decision making.
 - 2.6.2 The impacts and risks related to commercial (road freight) traffic and the economy that traffic serves.
- 2.7 Given a significant part of this LGWM proposal relates to speed management, we would like to remind it that over the past decade or so, many operators in the road freight transport industry have proactively taken steps to better manage heavy vehicle speed, for example speed limiting their vehicles. More recently, given the advancement in vehicle tracking telematics and digitised speed limit mapping, heavy vehicle speed compliance reporting and associated driver coaching and reward programmes are not uncommon.
- 2.8 To supplement this submission the regional trucking associations for which the RTF provides unified national representation will, at their discretion, provide explicit submissions on changes in their respective locations.

3. Comments on policy making process

- 3.1 We are concerned that so little evidence base has been provided by LGWM to support its proposals, in particular the Cobham Drive crossing. As far as we are aware, LGWM has not provided any robust evidence, such as benefit cost analyses, to underpin its latest ideas.
- 3.2 According to LGWM's Consultation Document, in essence the rationale for the crossing is because some people make dangerous crossings, and other people may choose to drive, even for short trips. We also heard at our LGWM briefing that the Cobham Drive crossing construction will cost in the order of \$1 million, excluding associated externalities.

- 3.3 While we appreciate that there have been a number of injury incidents including a tragic fatality in 2016, and we support the aspiration of Road to Zero, we do not support the approach of safety at any cost.
- 3.4 We agree that the crossing will provide a safer alternative for cyclists and pedestrians to use. However, it does not follow that the presence of a facility means everyone will use it. Therefore, we believe LGWM is being overly optimistic with its rhetoric on the road safety benefits associated with the proposed crossing.
- 3.5 We acknowledge that LGWM has undertaken an options analysis on four scenarios of where a crossing could be positioned and various construction forms, namely at road level, over-road bridge or a tunnel. However, in our opinion where LGWM has failed is that it has not thoroughly considered the option of doing nothing, or any opportunity costs, and instead it has jumped straight to a starting point of delivering a crossing regardless of justification.
- 3.6 As a general observation, there are a number of recent initiatives being presented under the guise of safety initiatives and we are deeply concerned that the likes of LGWM and Waka Kotahi NZ Transport Agency are exploiting the transport sector's broad support of Road to Zero and these agencies are now blindly applying a safety at any cost approach. Each time a project such as the Cobham Drive crossing proceeds, it sets a worrying precedent. Our understanding is that this approach is not what New Zealanders signed up for and it is certainly not what we signed up for.
- 3.7 As an example of the issue raised in 3.6 above, we agree that creating a controlled crossing provides a potential solution however, the installation of a raised platform is very much in the diminishing returns space. The raised platform will enable a smoother crossing for the likes of people on mobility devices and wheelchairs however, it will also adversely impact the 35,000¹ vehicle movements that typically use Cobham Drive every day. Every driver will need to slow down on their approach to the crossing even when the traffic signals are green. We believe there needs to be a better balance between adversely impacting tens of thousands of people for the benefit of a few.
- 3.8 Further to 3.7 above, we believe that unless a better balance is introduced to LGWM thinking then there is risk that the minorities benefiting will become increasingly marginalised.
- 3.9 We urge LGWM to develop and provide a more balanced case on the impacts of its proposal on all parties, and in particular provide quality

¹ Mt Victoria to Cobham Drive Scoping Study - Technical Report – Traffic and Transport Assessment and Evaluation, Waka Kotahi NZ Transport Agency and Wellington Tunnels Alliance 2011

data on the economic and social benefits and disbenefits. This would enable much more meaningful discussion on the return on investment, the opportunity costs, the winners and losers, and the risks associated with the proposal. We believe LGWM has a fundamental responsibility to not only our members but the wider New Zealand public, to bring more transparency to these changes before forging ahead regardless.

4. Technical comments on the proposals

4.1 Lowering the speed limits:

4.1.1 We agree that the physics associated with reducing the speed could contribute to safer outcomes.

4.1.2 In our view there are a number of differences in the build environment of Cobham Drive and Calabar Road (refer Figures 1 and 2 and 4.1.3 below) therefore we are concerned that in the event a driver misses seeing a speed limit sign they may become confused and distracted while trying to establish the applicable limit. In addition to the adverse risk to safety, that also puts those drivers at risk of either receiving an infringement notice or being penalised by their employers in their internal safety assurance speed management programmes.



Figure 1: Cobham Drive



Figure 2: Calabar Road

- 4.1.3 Cobham Drive is median divided, and either side of the carriage way is relatively free of clutter whereas, Calabar Road generally has narrower shoulder width, a variable median definition and includes access points to Caledonia Road. In our view, it would not be unreasonable that a driver having just travelled north on Calabar Road would, upon transitioning onto Cobham Drive, expect that the speed limit is higher given the change in development and the road geometric characteristics.
- 4.1.4 In the event the speed reductions proceed, we suggest that to help with implementation of changes there should be a considerable amnesty period when changes to speed occur, and furthermore, there should be agreement that enforcement does not occur within several hundred metres of the boundary where the speed limit is reduced.
- 4.1.5 We would also like LGWM/Waka Kotahi to work more closely with telematic providers so any changes are widely publicised and drivers get a fair and reasonable chance to adapt to the changes.
- 4.1.6 When undertaking future consultation on speed limit changes we request LGWM provide the mean free flowing speed and 85th percentile speed for the respective sections of road as this will give parties a much better understanding of the impact of any change.
- 4.2 The Crossing
 - 4.2.1 We note LGWM's justification for the crossing suggests that this crossing will make it easier for people in Miramar to walk or bike to

destinations like ASB Sports Centre, the beach at Lyall Bay, or the shops in Kilbirnie.

- 4.2.1.1 We agree that the crossing should increase the safety of cyclists and pedestrians accessing ASB Sport Centre however, that is contingent on them using that crossing.
- 4.2.1.2 Jay-walking is a well-known phenomenon in Wellington and other parts of the world and a similar risk applies with other vulnerable road users such as, but not limited to, cyclists and mobility scooters. It is not a sign of well-behaved versus less well-behaved pedestrians, but merely a sign of a traffic system which is not laid out to meet pedestrian requirements for short waiting periods at lights and easily accessible crossings at level². For people travelling from Miramar, the proposed crossing is north of the ASB Sport Centre which means they must travel past their final destination and then backtrack. Therefore, it appears quite predictable to us that some people will cross Cobham Drive before reaching the proposed crossing and that those people will face the same risks as with the status quo. LGWM do not appear to have considered this and its rhetoric implies that had the crossing been there earlier, it would have prevented the previous injury incidents. Unfortunately, that is simply not the case.
- 4.2.1.3 In the event LGWM proceed with having a crossing we suggest it consider effective ways to make road users obligated to use it.
- 4.2.1.4 Our other concern regards LGWM's view that this crossing will make it easier for pedestrians and cyclists from Miramar to access the shops in Kilbirnie. It appears to us that there are three obvious routes:
 - via Kemp Street near Troy Street roundabout and the crossing;
 - via Rongotai Road near Troy Street roundabout and the crossing; and
 - remain northbound on the newly built facilities on Cobham Drive and access Kilbirnie via Evans Bay Parade.
- 4.2.1.5 Presuming one of the three routes in 4.2.1.4 is safer than the others, and in the event the safest route is to remain on Cobham Drive until Evans Bay Parade, which is also the best way of promoting maximum use of the new cycleway and pedestrian facilities, then the crossing creates a risk of promoting and diverting those road users to a less safe route. We suggest LGWM consider the risk of perverse outcomes.

²City to Waterfront- Public Spaces and Public Life Study: October 2004 Wellington City Council.

- 4.2.1.6 Our concern is that LGWM has become myopically obsessed with simply installing a crossing without more strategically considering and planning the safest routes for the cyclists and pedestrians and use of the new facilities.
- 4.2.1.7 If LGWM do not consider the issue in 4.2.1.6 more comprehensively, then our fear is that the perverse outcomes will further escalate and LGWM will then propose the likes of Kemp Street and Rongotai Road needing similar treatment to Cobham Drive to make safer cycling and pedestrian facilities. In our view, that would be an extremely poor use of public money.
- 4.2.1.8 We understand that to provide a smooth crossing for wheel chair users and mobility scooters LGWM proposes that the crossing will be a raised platform design. We also understand from information at our briefing with LGWM that to maintain good car control and ride comfort while traversing the platform it is envisaged that all free flowing (off peak travel) car drivers will slow from 60 km/h to approximately 40 km/h regardless of the signals requiring the traffic to stop or not. We agree that raised platform crossings have that effect.
- 4.2.1.9 Introducing a traffic device that will slow the 35,000 vehicles that typically travel on Cobham Drive each day has negative impacts on vehicle emissions, both CO₂ and harmful emissions (nitric oxides and particulate matter) and noise. We request LGWM provide evidence justifying that the benefits of a smooth crossing for a relatively minute number of people exceeds the costs associated the vehicle related negative externalities.
- 4.2.1.10 In the absence of evidence justifying it, we do not support the proposal to use a raised platform.

5. Concluding comments

- 5.1 As a general observation, there are a number of recent initiatives being presented under the guise of safety initiatives. We are deeply concerned that the likes of LGWM and Waka Kotahi NZ Transport Agency are exploiting the transport sector's broad support for Road to Zero and these agencies are now blindly applying a safety at any cost approach. We do not believe that this is what New Zealanders signed up for.
- 5.2 We do not support safety at any cost and we believe that approach places considerable risk to public money. Decision making using public money must come from an evidence base and the evidentiary rigour is

sadly lacking in this proposal from both a road safety for all road users and economic benefits and disbenefits perspectives.

- 5.3 We are concerned that LGWM has become ideologically obsessed with Road to Zero and it is myopically focussed on installing a crossing as soon as possible. Each time a project such as the Cobham Drive crossing proceeds without being supported by good quality policy development and decision making it sets a worrying precedent.
- 5.4 We urge LGWM to develop and provide a more balanced case on the impacts of its proposals on all parties, and in particular provide quality data on the economic and social benefits and disbenefits. This would enable much more meaningful discussion on the return on investment, the opportunity costs, the winners and losers and the risks associated with the proposal. We believe LGWM has a fundamental responsibility to not only our members but the wider New Zealand public, to bring more transparency to these changes before forging ahead regardless.