

30 July 2021

Let's Get Wellington Moving  
Transport Planning – Cobham Drive and SH1 Speeds  
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## Re: Cobham Drive and SH1 Speeds, Have Your Say

### 1. About the Chamber

The Wellington Chamber of Commerce (the Chamber) 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. The Chamber is accredited through the New Zealand Chambers of Commerce network and as part of our wider organisation is also one of the four regional organisations of BusinessNZ.

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**. In Wellington, our organisation represents **over 1,300 businesses and organisations, accounting for 50,000 employees**.

The Chamber has worked closely with Let's Get Wellington Moving (LGWM) since 2017, and prior to this in the programme's various forms, to ensure Wellington's business communities' views on the changes proposed and impacts are front of mind. Our advocacy remains consistent and we continue to play a constructive role in the future development of Wellington's transport infrastructure.

### 2. Introduction

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.

But instead of getting Wellington moving, the current programme is doing the opposite. This proposal is, in plain speaking, putting a speed bump right on State Highway 1 (SH1). LGWM's focus and progress continue to concern us. We urge LGWM to return to its original vision and progress the major aspects of the indicative package, such as the Mt Victoria tunnel and Basin Reserve improvements – which will get Wellington moving.

Te Motu Kairangi (the Miramar peninsula) is an important part of Wellington City. It is home to an estimated 10,000 Wellingtonians, Weta Workshop, and the main airport for the lower North Island.

Wellington's newly adopted spatial plan also lists suburbs such as Miramar, Mapua, and Strathmore Park as opportunity sites for densification and development.

High-growth areas, such as this, need a well-functioning road and public transport network. With the expected growth in the opportunity sites and the increased usage of the airport, a fluid, well-maintained transport system should be the top priority for the infrastructure in this area.

### 3. [Summary](#)

The route from SH1 from the Wellington Airport to the Mt Victoria tunnel is crucial for Wellingtonians in the eastern suburbs and those travelling to and from Wellington's airport. According to the research, 35,000 road users travel on the road, daily. The Airport also has 6 million users annually, that will use the road to connect with the rest of New Zealand and in many cases, the world.

As Wellington Airport's submission puts plainly:

*"Cobham Drive is an excellent stretch of State Highway. It is long, straight, four lanes wide, and median separated, with a gold standard cycling and walking path. There are existing crossing points through the Lyall Bay underpass and at the major Evans Bay intersection, an appropriate place for traffic lights. It is not sensible to place an additional pedestrian crossing further along the road, particularly not a raised crossing that will function as a speed bump."*

The Chamber writes in **strong support** of the submissions made by **Wellington International Airport Ltd (the Airport)** and the **Road Transport Forum (RTF)**. Our submission will reference a number of the points raised by these groups and we find ourselves in strong agreement with them. These submissions, including ours, should be weighted accordingly, given the interest in the outcome, direct impacts proposed, and the number of members held by both the Chamber and RTF.

The weight of views from key stakeholders is so significant that it obliges the Council to look afresh at these issues and take a pragmatic approach to a solution. There are better, longer term alternatives than that which is proposed. The proposed solution is at odds with the publication of a Long-Term Plan and assertions from the Council that the quality of planning is very much about the long term.

We are concerned the LGWM has, on two recent occasions, used the notion of safety as the reason for advancing its proposals when the reasons for change appear to be more complex and the empirically 'safest' option is not necessarily the preferred or ultimate option. This is a concerning trend that we will watch closely. We would be seriously concerned to see repeated attempts from LGWM to adopt safety as a systematic template rationale for their actions.

The reason concerns are raised about safety is that outcomes are inconsistent with the claim. If safety is the key consideration for LGWM, it should prioritise the safest option available, instead of the cheapest? The best option in regard to safety would surely be to keep the different modes of transport from directly interacting with one another.

We also urge LGWM to be more proactive in the release of information critical to its decision-making processes. These are important, wide-reaching decisions being made by the LGWM team and stakeholders in the Wellington community have expressed a view that significant information is being withheld from them. Whether reality or perception, the Council must orient to this concern and be highly transparent (and appear to be so) in the information it provides the public.

The RTF and Airport both have considerable expertise in transport infrastructure, planning and management. They also understand the environment under consideration. Their expertise and contextual knowledge of Wellington's roads should not be ignored.

The Chamber would like to thank LGWM for the opportunity to submit on the *Have Your Say: Cobham Drive & SH1 Speeds*. We would also like to thank Siobhan Proctor, Seb Bishop, and the LGWM team for the opportunities to engage with them directly.

#### 4. Proposed Crossing on Cobham Drive

The Chamber **does not support the at-grade crossing on Cobham Drive** as it is currently proposed by LGWM. Safety on our roads and footpaths is a high priority for the Chamber, therefore we would appreciate the opportunity to look at alternative solutions to the at-grade crossing currently proposed.

The Chamber urges LGWM to **do it once and do it right**. It cannot and should not look for the "quick" wins, only to revisit the project again in five years' time. Wellington deserves a high-quality corridor from the city to the airport, as well as first-class cycling and walking facilities.

#### ***Public Feedback on the Cobham Drive Crossing Proposal***

Engagement with the public shows a less than convincing argument in favour of the current crossing proposal. As of writing this submission, there had been just over 3,400 responses to LGWM's survey and despite (what we would consider being) a skewed questionnaire, there is strong opposition to the current plan;

- 51 per cent believe the proposal will have no change to their current behaviour.
- 23 per cent of respondents think it would make them **less likely** to walk, run, cycle, or scooter. Note that 80 per cent of respondents are road users.
- 57 per cent of respondents also disagreed with the location of the proposed crossing, with only a quarter agreeing with its location.

It is important to note that a majority of respondents (51 per cent) do think it is important to make changes to improve safety on SH1. It will be interesting to see how these results are taken into consideration by LGWM.

The Chamber **expects to see the raw data from the consultation survey**, specifically how many of those respondents requested an overbridge or underpass – options that had been disregarded by LGWM.

### **Chamber Support for Other Group's Submissions**

Rather than relitigate points made in other submissions for which we have expressed support, we wish to highlight the key points made by both the RTF and the Airport. While the support the submissions as a whole, these are the points we believe LGWM need to focus on;

Road Transport Forum's key comments regarding the proposed Cobham Drive Crossing:

- *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.*
- *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.... With our data provided in this submission from external sources.*
- *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. Our understanding is that this approach is not what New Zealanders signed up for and it is certainly not what we signed up for.*

Wellington Airport's key comments regarding the proposed Cobham Drive Crossing:

- *An overpass is the best safety solution, and the one supported by the community. We strongly believe LGWM should choose the best solution, not the fastest or cheapest.*
- *The proposed crossing prioritises 250 walkers and cyclists (at best) over 35,000 daily motorists. Congestion on Cobham Drive is already unacceptable, and the crossing will further increase congestion and delays. Our analysis shows LGWM has not adequately accounted for these delays and has not considered the issue of tailbacks into the Troy St roundabout and along Calabar Road.*
- *We are not able to support proposals on the airport access route that would significantly worsen congestion and delays which are already at intolerable levels.*

- *Wellington Airport has reviewed the LGWM technical report supporting the proposed corridor changes. We are disappointed at the level of rigour that the evaluation has undertaken, which we suspect is related to the small capital costs of the project (circa \$1M for the at-grade crossing, \$10-17M for grade-separated). As with many smaller transport projects, the level of detail/analysis needs to be more rigorous to fully appreciate localised impacts across the transport network; particularly the impact on road users of which this corridor has many.*
- *For the at-grade crossing to work, the speed limit of Cobham Drive would have to be reduced (from 70km/h to 60km/h) as traffic will need to slow to approximately 40km/h to drive over the raised crossing platform even when the crossing is not in use. In other words, while the technical team has separated the speed limit changes from the crossing, the two are actually linked along Cobham Drive, and so the economic summary presented in Table 6 should also include the cost to road users of the speed limit reduction from 70 to 60km/hr. This is particularly so given there are no grounds for the speed limit reduction for safety reasons on their own.*

## 5. Proposed Speed Limit Changes

At this stage, the Chamber also **does not support the reduction to the speed limit** on Ruahine Street, Cobham Drive, and Calabar Road. As we would prefer to be consulted on alternative options for a crossing over SH1, there is no need to decrease speed limits on the highway.

LGWM was intended to ensure local roads and highway routes were grade-separated and fit for purpose. Anything other than this intent is simply a ‘*Karo Drive compromise*’ that does not fully meet any of the expectations of the public.

The focus on this stretch of road (from Mt Victoria tunnel to the Airport) should be about making it fit for its purpose. This is a critical route to both the city’s airport and eastern suburbs and must be fit to be worthy of its current SH1 designation.

As the Airport says;

*“The speed limit proposal is another example of short-term thinking. While Ruahine St in its current state is less than ideal, the original LGWM package envisaged widening the street to four lanes and removal of residential access and turning bays.”*

We agree with the Airport and do not believe the case has been made for speed limit changes. The analysis of both the crossing and speed limit proposals is flawed. We regret that we cannot support the initial projects being advanced by LGWM, as we have worked hard to understand and support LGWM’s requirements for mass transit and access to the airport.

## 6. Conclusion

The Chamber hopes that the points raised by our submission and the submissions made by the Airport and RTF are taken into consideration and that the current proposal is not a done deal as some assume.

We look forward to continuing our discussion with LGWM regarding this proposal and future projects.

For further information about this submission please contact Joshua Tan, Senior Policy Advisor at [joshua.tan@wecc.org.nz](mailto:joshua.tan@wecc.org.nz).

Nāku iti noa, nā



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