



Mt Victoria Residents Association

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Submission on Draft Annual Plan 2017/18

The Mt Victoria Residents' Association Inc (MVRA) submits the following feedback on the Greater Wellington Regional Council's (GWRC) Draft Annual Plan 2017/18 (draft Plan). Our comments relate to several key aspects of the plan.

We would like to present our views in person at a Council hearing.

General comments

1. We are pleased to note the latest Wellington Region Genuine Progress Index (GPI) shows from 2001 to 2015 the economic indicators improved – prosperous community by 4% and entrepreneurial and innovative community by 24.2%. While the overall environmental wellbeing index increased by 7.9% over the same 14 years, it is very concerning to note that the gross regional greenhouse gas emission (GHGs) reduced by only 4%, but net emissions increased by 39% as a result of forest harvesting (as per the AECOM report on GHGs on which the GHGs component of the GPI environment index is based). Unfortunately, the overall social wellbeing index increased by only 0.4%, and the cultural index declined from 2001 to 2012, but has shown a small increase since then.
2. These GPI indicators suggest the Draft Plan should concentrate more on much stronger measures to reduce GHGs, increase forestation, and developing our social and cultural capital. The recent OECD report on New Zealand's environmental performance (*OECD Environmental Performance Reviews: New Zealand 2017*) is evidence that major efforts are needed immediately to address serious shortcomings which impact negatively on a sustainable and resilient future:
 - New Zealand's road transport emissions are the highest or among the highest per capita in the OECD for nitrogen and sulphur oxides, carbon monoxide, non-methane volatile organic compounds and CO₂
 - New Zealand stands out as one of the few OECD member countries that saw emissions of major air pollutants increase since 2000, with transport and industry the main drivers,

and

- New Zealand's gross greenhouse gas emissions per capita and per unit of GDP remain among the five highest in the OECD, and have continued to rise, due mainly to road transport, the agricultural sector, manufacturing industries, and construction.
3. The MVRA regrets there is little real information in the consultation document despite its 32 pages, as it is unnecessarily padded and glossed up with pictures. Page 19 asks an important question "Where do the dollars go?" but this goes unanswered eg. we are told public transport funding is 62% but not of how much. The supporting document has only three pages of information, mostly repeating what is in the consultation document, plus 30 pages of financial data which is singularly uninformative as to what the money is really being spent on. While we understand that GWRC is only required to report changes from its long term plan in the annual plan, it is unhelpful and requires readers to refer back to the long-term and 2016/17 plans for a full picture. We expect more transparency from the Council about its planned activities and their costs.

Rates, funding and expenditure

4. We object to the magnitude of the 5.6% regional rates increase for 2017/18, even though it is lower than what was projected in the 2015-25 Plan. This is on top of increases of 9.8% for 2015/16 and 7.9% for 2016/17. All grossly exceeds the BERL forecast average change in the Local Government Cost Index of 2.2% for the year to June 2018, and is not forecast to be higher than 2.6% in any year to 2026. The Treasury's 2016 half-year economic forecast update's CPI inflation change to June 2018 is 2%. It is unreasonable for the Council to continue to expect ratepayers to tolerate such increases when ratepayers themselves must continue to live within tight financial constraints. In the interests of fiscal responsibility, we urge the Council to review its own staffing levels and pay rates, and those of its Council-controlled organisations, particularly the CEO's and managerial salaries, to reflect the scope of services provided.
5. We note capital expenditure planned for 2017/18 is reduced substantially, including by \$35 million for transport and bulk water supply, due to delays and reprioritization. However, there is no explanation of what this means for future years' capital spending, particularly when added to the capital implications of CentrePort's earthquake recovery costs.
6. We are pleased to see Standard & Poor's (S&P) December 2015 report rated the GWRC as having a strong economy along with strong financial management and liquidity and a stable outlook, although the economy's sensitivity to government policy decisions was also noted. The report also commented, however, that ownership of CentrePort Ltd presented some risk to credit quality, CentrePort did not provide crucial services, was involved in property development which was risky, and earthquake issues could be costly. These warnings became reality in November 2016 and are likely to press the next S&P rating downwards. The draft Plan addresses the loss of CentrePort revenue for 2017/18 but is silent on future years – the Plan should be transparent on this. We are also concerned that an additional \$2 million will be borrowed to partly cover the 2017/18 loss – borrowing to plug immediate revenue gaps is not a wise financial decision.

Working together for the greater good

7. We strongly support the draft Plan's focus not just on the short term, but also on providing for a sustainable and resilient future to meet the needs of future generations. Sustainability

implies the Brundtland Commission concept of meeting current needs without sacrificing future generations' ability to do the same. The purpose clause in New Zealand's Resource Management Act 1991 embodies this concept by requiring promotion of the sustainable management of natural and physical resources so as to *inter alia* meet the reasonably foreseeable needs of future generations. Professor Jonathan Boston recently wrote about the need for governments to more sharply focus and report on intergenerational implications of their decisions (*Dominion Post 4 April 2017*). One of his suggestions was to create new institutions to represent future interests. With this in mind we suggest GWRC consider appointing a senior person with foresight research and reporting skills to carry out that role.

Transport choices

8. The GWRC has an opportunity to contribute to keeping New Zealand's capital city as a people-centred, eco, well-connected, compact city for residents and visitors. This is our region's point of differentiation from other large New Zealand and Australasian cities with alienating motorways and flyovers slicing through them. The Wellington transport networks can avoid going along the same pathway as the Auckland fiasco. A 2012 Te Papa report suggests the first activity of visitors, who are important contributors to our social and economic life, is to walk the city streets. Wellington city is our nation's capital and guardian of many social and cultural heritage aspects of national significance. The Wellington City Council is implementing its urban growth plan in which the transport component has a sustainable transport hierarchy of pedestrians first, followed in order by cyclists, public transport, moving freight, and private vehicles. The MVRA urges that the GWRC's draft Plan adopt a similar approach, at least for urban areas in the region.
9. .Given the minimal improvement in the social wellbeing component of the GPI, we are concerned the draft Plan fails to mention that transport activities can contribute to improved quality of life in the region by reducing vehicle emissions, improving road safety, promoting public health and more connected communities, while also assisting economic growth. If the GWRC is serious about improving the quality of life in the region, it must work harder with central government and local councils to reprioritise transport spending away from roads and private cars, and towards walking, public transport, and cycling. Otherwise, our regional cities will be even more covered in unproductive roads and parking facilities which create alienating and unsafe environments for people to live and work in.
10. People-centred transport choices give priority to improving people's health. There are known health risks, especially to young people, from air pollution, and in particular diesel particulates which are strongly implicated in causing or contributing to asthma in children and neurological illnesses. In addition, physical inactivity in the Wellington region was estimated to cost \$141 million in 2010 (see *The Cost of Physical Inactivity* – co-authored by the GWRC).
11. In a recent submission to the Ministry of Transport, the MVRA expressed its dismay over the inadequacy of the draft Government Policy Statement (GPS) on Land Transport as its strategic priorities failed to include climate change, sustainable transport and health. Given the GWRC's long-term and draft annual plans' apparent desire to address these strategic priorities, we urge the GWRC to take a firm stand with the Government to have it amend its GPS on land transport. Even if the GPS does not change, that should not preclude local governments, such as GWRC, from concerted actions to address the issues.

Walking or cycling transport modes

12. The MVRA is very concerned and dismayed that people walking or cycling are not mentioned as a focus, although they were in the 2016/17 Annual Plan. In fact walking/pedestrian are mentioned only three times in the entire consultation document, and cycling only four, and neither is mentioned in the supporting document, except for one 'pedestrian' mention.
13. The draft Plan does not appear to include any new spending to promote and encourage people to walk or cycle, or to improve pedestrian and cycle safety (see page 25 of the supporting document on public transport spending). These modes contribute to people's improved health and wellbeing, and a pollution-free environment, use less ground space, and are likely to be important if there is a major disaster which disrupts vehicle movements.
14. Although pedestrian and cyclist safety is a serious issue in the Wellington region with its high fatal accident rate, large number of walk to work and increasing number of cycle trips, trends show people are moving towards more active modes. Research has shown the main barrier to cycling identified by people who would like to cycle to work or for recreation is the perceived lack of safety on shared roads. We would like to see similar research on how to increase walk mode share.
15. We urge the GWRC to give a strong focus and substantial funding to walking and cycling and include the following in its planned projects and programmes:
 - a. research on how to increase walk mode share
 - b. better promotion of walking and cycling and their health and environmental benefits
 - c. major improvements in pedestrian and cycle safety, including reduced vehicle speeds around areas of high mixed use by all modes. We do not agree to shared facilities for pedestrians and cyclists as this has serious safety and amenity concerns for both groups
 - d. improved accessibility and priority for pedestrians at road crossings and intersections
 - e. more pedestrian infrastructure that meets as a minimum the standards in the NZ Pedestrian Planning and Design Guide, and pedestrian-friendly urban centres
 - f. more cycle infrastructure
 - g. education campaigns that promote good road use behaviour by all users

Actively discourage private car use into and around the CBD

16. One of the barriers to economic growth and the amenity value of the CBD is the amount of land occupied by unpleasant and unproductive roads and parking buildings required for commuters' private vehicles. Reduced commuter car traffic would remove pressure for wider roads, more tunnels and flyovers, and enable parking building space to be used more productively. It would also free road space for walking or cycling and public transport, reduce air pollution and noise, and make the city safer, healthier and more attractive for all. The so-called roading improvements at Kapiti, Transmission Gully, Tawa and Ngauranga Gorge are a negative change as they will encourage increased car use into the CBD which is contrary to keeping the city liveable.
17. We suggest the GWRC include the following in its Annual Plan so major gains can be made by:
 - a. a public education campaign to discourage private car use into and around the CBD and to instead encourage people to walk, bike or use public transport
 - b. dropping major roading projects that encourage more private cars entering the CBD, including the Terrace tunnel, the second Mt Victoria tunnel, the widening of Ruahine St and Wellington Rd

- c. introducing road-use pricing, at least at peak times
- d. introducing further controls on parking, including to free up street space for pedestrians and bus and cycle lanes.

Public transport

18. The MVRA is pleased to see one of the GWRC's four priorities in the draft Plan is growing public transport patronage. We agree to not increasing fares so as to encourage growth. As its budget is 62% of GWRC's total budget, public transport has a vital role in contributing to positive outcomes for those who live in the Wellington region. While the MVRA agrees with the focus areas mentioned, we are concerned at the lack of any commitment to ensuring public transport contributes to a sustainable and healthy system.
19. The MVRA urges that all public transport be electrically-powered as soon as possible. We note the large amount spent on upgrading our commuter rail systems and urge that a similar investment now go into electrifying other components of the public transport network. As part of that, serious consideration needs to be given to investment in a light rail system in Wellington City – it was included in growth spine options but overpriced by incorrectly including the cost of a second Mt Victoria tunnel. Population size is not a barrier - French cities such as Tours (population 135,000) and Montpellier (population 255,000) have similar populations to Wellington City and excellent light rail systems.
20. The decision to stop using the electrically-powered trolley buses in favour of diesel and hybrid buses is a retrograde step which we do not support. The trolleys have at least 10 years' life left and the cost of upgrading the power infrastructure is exaggerated. Over 300 cities worldwide have trolley bus systems. We strongly urge the GWRC and Transport Committee to reconsider this decision, particularly in light of doubts over the cost of removing overhead wires – this money could be more constructively spent on upgrading the trolley bus service.
21. We further recommend that priority be given to retiring all diesel buses from use and replacing them with electric buses as soon as possible. The planned interim move to diesel-electric hybrids should be skipped as funds would be better spent on testing electric bus models and charging facilities for their suitability for Wellington conditions. We oppose upgrading the diesel fleet as this will perpetuate negative health, environmental and livability effects, including the emission of PM 2.5 and noxious gases.
22. Bus rapid transit (BRT) is also a retrograde step as it perpetuates use of diesel buses and will not deliver on its aims. BRT claims of faster journey times are unlikely to happen between Courtenay Place and the north end of Lambton Quay because the speed limit is 30kmh and there are many pedestrian crossings and lights. We strongly support the speed limit and crossings, and they should not be removed to enable BRT. Larger BRT buses and fewer stops will mean longer waits at bus stops for more people to get on and off. Longer and larger BRT buses will also face even more difficulty turning at sharp corners between Lambton Quay and Courtenay Place than the longer diesel buses do currently. The experience in London of larger articulated or "bendy-buses" found the increased vehicle size meant they were more likely to block junctions and cause difficulties for other road users. Media coverage regarding cyclists and motorcyclists was generally negative due to the reduced viewpoint of the driver and greater likelihood of cyclists to enter blind spots. The bendy-buses were introduced from 2002 and withdrawn by 2011, resulting in higher costs all round.

23. BRT apparently also depends on a second Mt Victoria tunnel and widening of Ruahine St and Wellington Rd (although these were not included in its costs when spine options were considered). This makes no sense as there is already a functioning bus tunnel at the top of Pirie St and buses running along Moxham Ave (where the users are), which keeps eastern suburb buses away from putting pressure on the Basin Reserve area.
24. We recommend integrated ticketing is introduced this year, rather than being delayed, with free transfer and all service Snapper use. This will significantly improve the attractiveness of public transport. We also recommend having better coordination of timetabling so wait times are minimal.
25. We would like to see the weekend service to Mt Victoria lookout started as soon as possible. This has been long promised yet still not delivered.
26. We also note central government is pushing some of its costs onto local government, for example, NZTA's Funding Assistance Plan for Wellington rail services is reducing, and GWRC must refinance its interest-free Crown loan from commercial sources. We trust measures to increase rail patronage will contribute to covering additional costs.

Let's Get Wellington Moving (LGWM)

27. The MVRA appreciates the GWRC, and its City Council and NZTA partners, have been open to discussing plans for the Ngauranga to Airport area, and an MVRA representative participated in a recent workshop for the LGWM project. The workshop was disappointing as it did not appear much progress had been made since Jim Bentley left the project last year, and the whole process went silent.
28. As Mt Victoria sits within this area, the MVRA is strongly opposed to proposals which encourage and prioritise vehicle use over local activity and sustainable transport modes: Calling the area a 'corridor' and its roads a 'ring route for vehicles' in the 2015 Regional Land Transport Plan are misguided concepts which have led some Wellington city streets to be classified as SH1. There is no demand for a ring road through Wellington – it is the end of the island and the eastern suburbs are a *cul de sac*. These are local streets inhabited and used by residents and visitors for daily activities.
29. We strongly disagree with the draft Plan's statement that congestion and traffic issues are the biggest frustrations. The MVRA's biggest frustrations are the lack of commitment to longer-term actions as outlined above. A narrow focus on cars and trucks is never going to result in lasting improvements as it inevitably leads to NZTA's short-sighted plans for a second Mt Victoria tunnel, the seizing of Town Belt land to widen Ruahine Street, and widening of Wellington Road. As noted by the Basin Reserve Board of Inquiry, the severity of congestion in the area is exaggerated and some delay occurs only during a few peak times per week. We note with interest the 2014/15 Wellington City Council Annual Report's information on peak travel times for vehicles between the CBD and Miramar and Island Bay shows the upper times have been reducing since 2010/11. Upper times of 16.9 minutes and 15.3 minutes suggest no great delays in journeys. Any problems could be better addressed by encouraging people out of their cars and into sustainable transport modes, with an at-grade and fully-functioning roundabout at the Basin Reserve that works well for all modes.

Heritage, quality of life and amenity value

30. The draft Plan states one role of the GWRC is promoting cultural and natural heritage but is silent on actions to do that. The Basin Reserve flyover case and Maori land issue with the Kapiti expressway both highlight the need for urban development and transport planning to pay careful attention to the Resource Management Act provisions regarding negative heritage and environmental impacts. The Act also requires particular regard be had to the maintenance and enhancement of amenity values. NZTA's 'Roads of National Significance' create permanent barriers through local communities, ghettoize the surrounding properties as no-one wants to live in them, and impose unfair major disbenefits on local communities in favour of people living elsewhere.

Responding to climate change

31. The MVRA is pleased the GWRC has shown leadership in our region by developing a climate change strategy which includes a commitment to "mitigate climate change through reducing greenhouse gas emissions across all its areas of influence, including its own operations". In light of these intentions, we would expect to see funding allocated to substantial reduction activities in the draft Plan in both the agricultural and transport areas, not a mere \$43,000 (see page 22 of the consultation document) . We are also extremely disappointed to note that plans are forging ahead with developing large roading projects in the region, resulting in more vehicles converging on Wellington city creating more pressure for larger roads and more car parks, worsening air quality, and completely contrary to the regional goal of keeping our environment clean, and the city's goals of being a people-centred, eco city. It is insufficient to rely on technological changes, as these are happening too slowly. There should be a major strategic shift towards active transport modes, and public transport.

Caring for our water, land and air

Air quality monitoring

32. Of great concern to the Association is the concentration of diesel exhaust during peak hours near bus stops, near schools and playgrounds and on heavily-trafficked roads which are surrounded by buildings that interfere with the dispersal of pollutants. World Health Organisation guidelines on air quality have identified diesel particulates as a strong contributor in the development of childhood asthma. Fine particles can remain suspended for a long time and travel far, causing most health damage because they penetrate deeper into lungs than coarser particles ie. PM¹⁰. Fine and ultrafine particles can also travel from our nostrils along neural pathways directly into our brains, provoking or accelerating dementia diseases. Residential exposure to air toxins is also linked to lower grades among school children. We wish to see provision in the draft Plan for:

- a. more monitoring of air quality, including PM^{2.5}, across the CBD, other urban centres and suburban centres with large traffic volumes
- b. the contracts with the bus companies to include a clause requiring all diesel buses to be constantly maintained to the most rigorous emission standards required by the European Community and the World Health Organisation
- c. each bus stop within the inner city to have an air quality monitor that demonstrates to waiting passengers the air quality being experienced at that time. It is understood that nanotechnology has significantly reduced the cost of air quality monitoring devices
- d. GWRC to contract an independent air quality and vehicle emission monitoring company to measure once every month the emissions from every diesel bus in each company's

fleet

- e. the contracts with bus companies to also contain a clause that all diesel bus drivers be trained in the techniques of slow acceleration and slow stopping so as to reduce diesel exhaust and reduce fuel consumption.

Proposed Natural Resources Plan

33. The MVRA is participating in the process to develop this plan. Our key concerns with it are:
 - a. The Regional Policy Statement calls for integrated planning “particularly in relation to transport”, and has two major aspects of natural resources management - climate change causes and transport matters - clearly integrated throughout much of its issues, objectives and policies. However, the Proposed Natural Resources Plan does not include any provisions to address these aspects; it addresses only the adverse consequences.
 - b. The Proposed Plan’s objectives, policies and rules for air quality do not include anything specific regarding transport-related pollutants. This is a major omission given that the GWRC’s Air Quality Management Plan 2000 states that motor vehicles are the most significant source of air pollution from mobile sources, and discharges from aircraft can have significant localised effects.
 - c. The water quality at coastal/marine and freshwater recreation sites in the region did not rate very highly in 2013, indicating to us that the current rules and standards and their enforcement are insufficiently stringent to ensure improvements. Even more concerning is that the freshwater standard was made less stringent in 2013 by raising the upper limit for E. coli to nearly four times the Health Ministry’s standard.
 - d. Around the inner-city harbour-front, a world-class attraction greatly enjoyed by Wellingtonians and visitors, we are concerned that new structures, which privatise the space, have no particular need to be on the waterfront, and no maritime purpose or relevance, continue to be built and proposed.

Emergency management

34. The MVRA is concerned that the response and support network that used to exist in our neighbourhood has been allowed to lapse through lack of support from local and regional councils. Last year the MVRA and other people in our community and in Oriental Bay participated in three WREMO-led workshops to develop a community emergency hub plan. Unfortunately, rather than building on the knowledge and experience that already exists in Mt Victoria, the process started from scratch, and we received back from WREMO only an incomplete plan. We urge GWRC to ensure that WREMO is properly resourced to adequately support all the region’s local communities so that their networks remain sustainable.