



## Mt Victoria Residents Association

PO Box 19056, Wellington 6149

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Let's Get Wellington Moving  
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### **Submission on Let's Get Wellington Moving proposals**

The Mt Victoria Residents' Association Inc (the MVRA) aims to contribute to the wellbeing of residents and enhance Mt Victoria's attributes as a place to live. Our activities include promoting and protecting the quality and heritage values of the built and natural environment, and its sustainable management. Over the years, the Association has commented on transport plans and proposals from central and local government, including changes to the Resource Management Act which underpins transport policy. More recently, we were a party to the Basin Reserve Board of Inquiry hearings, and to the subsequent High Court case.

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### **General comments**

The Association was involved in the development of the principles for Wellington's transport improvements, and is broadly supportive of them. Unfortunately, none of the scenarios presented appears to fully reflect the principles, particularly those regarding climate change, health and the environment.

Because the four scenarios are cumulative, the MVRA supports some aspects of all of them, but this should not be read as support for all scenarios. We present our comments on the initiatives themselves, rather than on each scenario.

We are very pleased to note the package of scenarios includes improvements for people walking, cycling and using public transport. However, these improvements appear to depend on motor vehicle reductions in some areas of the CBD by creating a two-way, four-lane motorway 'ring road' between Thorndon and the airport. This will fulfil a 1960s transport dream but impose a permanent barrier and ugly scar across the centre of Wellington city, and significant and irreversible negative changes to the city's liveability from wide and busy roads, and possibly elevated structures.

### **What kind of city do Wellingtonians want to live and work in?**

1. The MVRA is pleased to note the LGWM's goals include moving to a transport system that enhances the liveability of the central city. This goal aligns with *Wellington Toward 2040* which articulates the aims of making Wellington a people-centred, eco, well-connected, and dynamic city. The MVRA fully endorses these aims and is pleased the 12 transport principles are

aligned with them. It is helpful that the principles are stated as fundamental propositions for action. Our comments below are therefore made in light of the extent to which the proposed transport initiatives contribute to realising these aims and principles.

2. We suggest a transport system which distributes access for all modes of transport across the network, rather than having 'corridors' dedicated to single modes, would improve liveability. This includes returning Vivian Street and Karo Drive/Arthur Street/Buckle Street (Arras tunnel) to two-way cycle and motor vehicle access.

### **What are the problems the scenarios should address?**

3. We note the LGWM Case for Change discusses the transport system's considerable environmental and health impacts because the main traffic flows pass through the urban street network which is narrow, used by motor vehicles, pedestrians and cyclists at close quarters to each other, and where buildings are on the footpath/road corridor. Given this, the Association is dismayed that after years of analysis, the problem definition, according to the Case for Change, is so short-sighted, particularly in putting congestion at the top of the list, ie:
  - a. Growing traffic congestion and unreliable journey times
  - b. Poor and declining levels of service
  - c. Safety issues, especially for cycling and walking
  - d. Vulnerability to disruption from unplanned events.
4. Unfortunately, LGWM's narrow problem definition has led to narrowly-defined programme objectives to provide the basis for developing the initiatives packaged into the four scenarios: The five objectives – to enhance liveability, support growth, reduce private vehicle reliance, improve safety, and be adaptable to disruption and uncertainty - fail to span the full scope of the principles. In fact, the principles should be treated as the programme objectives because they are stated as fundamental propositions for action.
5. Surely the compelling need to address New Zealand's climate change causes and effects should be at the top of the list, given that vehicle transport is a major contributor to the problem. The Ministry for the Environment's report *Our Atmosphere and Climate 2017* shows New Zealand's gross GHG emissions rose 24% from 1990 to 2015, but our net emissions rose 64%, and road transport CO2 emissions increased 78% in that time. In addition, the OECD Environment Performance Review in 2017 shows New Zealand's 2014 per capita emissions of CO2 and NO2 from transport were respectively the 4<sup>th</sup> and 2<sup>nd</sup> highest in the OECD. This undermines our clean and green image, so important to the economic benefits from our agriculture and tourism.. Closer to home, the Wellington Regional Land Transport Strategy notes the region's use of fossil fuels is primarily for transport purposes, and shows a projected growth of 25% in CO2 emissions by 2041 from 2006 levels (medium scenario).
6. In addition to the climate change effects, the problem definition also fails to include health effects, despite their being acknowledged in the LGWM Case for Change. The MVRA is very concerned about the negative health effects from transport emissions from trucks, diesel buses and other motor vehicles as these are a critical aspect of the city's liveability, and also have major negative economic effects. There are known health risks from air pollutants, 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 Costs of Physical Inactivity* – co-authored by the Wellington Regional, Waikato Regional and Auckland Councils).

7. Key outcomes of the Wellington Regional Transport Strategy and the related Transport Plan include reducing greenhouse gasses and harmful emissions from transport with reduction targets. The Wellington City Urban Development and Transport Strategy 2014-2043 aims to continue reducing GHG emissions by 30 percent by 2020 and by 80 percent by 2050 by maintaining Wellington's compactness as population grows, and reducing car use by investing in the public transport network, footpaths and cycleways. The Strategy's sustainable transport hierarchy means the Council's plan includes promoting walking, cycling and public transport (in that order of priority) over other transport modes.
8. The need for transport systems to comply with the purpose of the Resource Management Act is also a high priority ie. to promote the sustainable management of natural and physical resources for people now and into the future. In addition to the climate change and environmental requirements, there are the sections 6(f) and 7(c) provisions regarding the protection of historic heritage from inappropriate subdivision, use and development, and the maintenance and enhancement of amenity values.
9. Concerted efforts are needed if New Zealand is to meet its commitments under the Paris Agreement, maintain its clean and green tourist image, improve health outcomes, and also here in Wellington, ensure Wellingtonians enjoy a liveable environment. Regrettably, by omitting to include climate change, environmental and health issues in its problem definition, the LGWM's four scenarios fail to properly address the fundamental transport problems we face.

#### **Support for initiatives that meet most of the aims and principles**

10. The MVRA supports a set of initiatives described in some parts of Scenarios A to D, plus some additional initiatives we suggest are necessary to fully meet the programme principles and address the real problems we have outlined above. We strongly agree to priority being given to walking, cycling and public transport, and it should also be in that order, to align with the Wellington City Council's sustainable transport hierarchy and Low-Carbon Capital Plan, and the Regional Council's climate change strategy.
11. We urge LGWM to adopt the sustainable transport hierarchy, and reallocate its budget towards walking, cycling and public transport initiatives.
12. We suggest an incremental approach to the implementation of any changes so that their impact can be monitored and assessed at each stage before moving to additional initiatives.

#### ***Improvements for people walking***

13. Because the city is compact, walking is a preferred mode for a large number of people living in Wellington, Wellington has the highest proportion of people walking to work in New Zealand, and numbers are increasing. We note the walking journey between Mt Victoria and the parliamentary precinct via the waterfront involves crossing seven roads of at least three lanes. We are pleased to see initiatives to enhance walkers' experiences by making them safer, more enjoyable and with shorter waiting times at crossings. In particular, improvements are essential for vulnerable walkers for whom negotiating wide road crossings and footpaths cluttered with signage, cafe furniture, and uneven surfaces is difficult.
14. Improvements for people walking should include:
  - a. traffic speeds reduced to 30kph throughout the CBD, Te Aro and Mt Victoria, and strongly enforced. Slower speeds are well-documented as a significant safety measure

- b. dedicated footpaths for pedestrians only throughout the city. Shared walking and cycling footpaths are dangerous for both groups of users and this acts as a deterrent, rather than an encouragement, to more people walking. We note although the Wellington Cycleways Master Plan includes such sharing, the Cycling Framework does not
- c. improved footpaths throughout the city which comply with the New Zealand Pedestrian Planning and Design Guide guidelines, and with the capacity for increased numbers of walkers. It is interesting to note that in Melbourne walking is seen as important for the city to function and be liveable, but the city struggles to cater for its 'pedestrian congestion' from a large and increasing number of foot traffic
- d. upgraded crossing facilities, shorter waiting times for pedestrians at road crossings, and longer crossing times at some crossings. We note, for example the LGWM data shows six minutes (20%) of a 30-minute journey through the city from Whitmore Street to Cambridge Terrace was waiting time at crossings
- e. more pedestrian crossings across Tory Street – this is a busy cafe, restaurant and retail area with only one crossing between Courtenay Place and Buckle Street. Also there should be more straight-forward access along Tory Street to Te Papa and the waterfront from Courtenay Place
- f. more and improved walking connections between the CBD and the waterfront
- g. development of the old exploratory tunnel to the north of the existing Mt Victoria vehicle tunnel for separated walking and cycling only, instead of a second vehicle tunnel. This would remove walkers and cyclists from the health and noise hazards experienced in the vehicle tunnel, and minimise the impact on built and natural heritage in the area
- h. using traffic signalling and other intelligent transport systems to align waiting times at junctions and crossings with the sustainable transport hierarchy
- i. in the Mt Victoria vicinity, six metre yellow doted lines at all intersections to improve visibility, additional pedestrian crossings on Kent and Cambridge Terraces at the Vivian and Elizabeth Street intersections, and removal of the free turn for vehicles other than buses from Cambridge Terrace into Courtenay Place.

### ***Improvements for people cycling***

15. Improvements for people cycling should include:

- a. a coherent cycling plan for Wellington, rather than the current piecemeal approach. The MVRA has participated in consultation about cycling plans for one small section of Oriental Bay, but found that and commenting on other small parts in Wellington difficult. We note the Wellington Cycleways Master Plan and Framework, but these lack an overall detailed picture of how it all works together
- b. dedicated cycle lanes throughout the city, including round the Basin Reserve. It is unsafe for cyclists and walkers to use the same space, including because both groups move at different speeds and can behave erratically
- c. a speed limit of 30kph throughout the CBD and Te Aro, and in suburbs where there are large numbers of pedestrians and cyclists
- d. development of the old exploratory tunnel through Mt Victoria as noted above
- e. in Mt Victoria, painting cycle boxes at the intersections of Majoribanks and Pirie Streets with Kent Terrace.

### ***Improvements for people using public transport***

16. Electronic signs at bus stops have greatly improved bus services by providing some certainty about bus arrivals. We are pleased to note there is already a commitment to deliver a new, simpler network design in 2018 where more people can access high frequency routes, there will be more off-peak and weekend services, and with more reliable and punctual services.

However, there are components of this initiative with which we do not agree, particularly buses which are not fully-electrified, and much larger (see below).

17. Public transport services could be further improved through:

- a. a fully-electrified bus fleet as soon as possible The scrapping of the trolley-buses was a foolhardy decision, now resulting in more dirty diesel buses which increase negative impacts on people's health, climate change, and our environment. We note the large amount spent on upgrading Wellington's commuter rail systems and urge that a similar investment now go into electrifying other components of the public transport network. The planned interim move to diesel-electric hybrids should be skipped as funds would be better spent on testing charging facilities and electric bus models for their suitability for Wellington conditions
- b. bus priority lanes from the railway station to the eastern and southern suburbs, including at the Basin Reserve, and along Thorndon Quay. Along the Golden Mile, parking (except for mobility parking) and service delivery spaces should be removed in favour of cycle and bus priority lanes. Service deliveries should be made before 7am and after 7pm. This includes removing the slip lane and parking so the Courtenay Place south bus area is restored to being a bus hub well-connected to the footpath
- c. increased central and local government subsidies of public transport fares to encourage more people to use public transport
- d. integrated ticketing across the Wellington transport network with free transfers and all service Snapper use. This will significantly improve the attractiveness of public transport. We also recommend having better coordination of timetables so wait times are minimal
- e. an upgrade and improved use of the bus tunnel at Pirie Street. This tunnel is the second Mt Victoria tunnel and was built to facilitate Wellington's original light rail system, the trams. This tunnel has the advantage of linking the city, Mt Victoria, the airport and the eastern suburbs via the local streets where people wish to hop on and off buses. It also diverts buses away from the Basin Reserve. We note LGWM has rejected this as an option because it doesn't have capacity for more frequent services and is located on residential streets, and therefore should serve Hataitai only. We disagree. The tunnel already serves bus routes (numbers 2, 5, 30, 31, and 91) to Hataitai, Kilbirnie, Miramar, Seatoun and eastern beaches, and the airport. Mt Victoria residents' key issues are dirty diesels and speed which could be remedied with electric buses, light rail and a 30kph speed limit
- f. a light rail system from the railway station to the hospital and airport, developed in stages if necessary. The route could avoid the Basin Reserve by using the Pirie Street bus tunnel to the airport and Taranaki/Wallace Street to the hospital. We disagree with an assertion in the LGWM documents that the trigger point for mass transit is about 10 years away. Wellington has already reached the trigger point for a detailed investigation. International experience suggests 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. We note the report on Wellington Mass Transit by WSP mentions international experience has shown the significant land development and property, amenity and city enhancing benefits that light rail systems are known to bring
- g. in Mt Victoria in particular, we suggest the airport flyer bus should have stops on Pirie Street, and the bus service to the Mt Victoria summit operate in the weekends.

***Improvements at the Basin Reserve***

18. The MVRA continues to advocate for at-grade improvements at the Basin Reserve, as we did

at the Basin Reserve Board of Inquiry hearings, and in the High Court. Plenty of evidence was presented at the Board of Inquiry on how the roundabout could function efficiently at grade, and how approaches to it could be improved. We note the Arras tunnel and removal of traffic signals at Tasman Street have already improved traffic flows. We are concerned that the LGWM proposals together will concentrate more buses and other motor vehicles at the Basin Reserve with the development of the ring road and the Mt Victoria tunnel(s) as the bus route to the eastern suburbs. Basin Reserve improvements should include:

- a. major improvements for people walking and cycling in the approach to and around the Basin Reserve. Unfortunately, the LGWM information is silent on such proposals. With three schools located at or nearby it, the roundabout must be made child-friendly, with dedicated footpaths, and dedicated cycle lanes – the cyclists should not be using the footpath through the Basin Reserve
- b. dedicated bus lanes with traffic signals enabling buses to move straight through from north to south
- c. a fully-functioning roundabout at the Basin Reserve. Where else in the world is there a roundabout with parking on it? The Basin Reserve Roundabout Improvement Option presented to the Board of Inquiry hearings by Richard Reid and John Foster is one model for what could work, and there are others. Parking should be removed from the roundabout, including at least one of the lanes by St Mark's school, and lane widths adjusted to enable better facilities round the Basin for people walking and cycling and bus priority lanes
- d. the roundabout could function better if there was also improved vehicle sorting on Kent Terrace, on Paterson Street at the Mt Victoria tunnel, and on Adelaide Road, before vehicles enter the roundabout area
- e. public transport for the eastern suburbs should be directed as much as possible through the Pirie Street bus tunnel, not the Mt Victoria tunnel, or along Taranaki and Constable Streets
- f. returning shops and housing to Ellice and Dufferin Streets on any surplus land
- g. treating the exhaust from the Mt Victoria tunnel's ventilation system as it adversely affects air quality for students and staff at Wellington East Girls' College.

#### ***Better connections between the waterfront and the CBD***

19. The MVRA supports the proposals in Scenario D to re-allocate some of the space on the quays to active modes and streetscape improvements. We agree improvements include crossings at all intersections for walkers, and dedicated cycle lanes in each direction. The latter could then remove cyclists from the waterfront footpath where they do not mix well with people walking and otherwise enjoying the area. We do not agree to re-allocate some space to parking.

#### ***Improved standards and information gathering***

20. As an initial step, targets need to be set and better information collected. These will then indicate the extent of initiatives needed to improve air quality. We recommend initiatives include:
  - a. setting stringent targets for emissions reductions (both quantities and percentages)
  - b. significantly raising fuel efficiency and emissions standards of vehicles entering New Zealand (buses, trucks and other motor vehicles)
  - c. establishing more monitoring stations in the CBD, Te Aro, and to the east including at bus stops and near schools. Technological improvements have significantly reduced the cost of air quality monitoring devices. Also, by having display panels on the monitors, people could be more informed on the long-term cumulative health impacts they are being

subjected to

- d. monitoring GHGs and particulate matter - both PM2.5 and PM10. Particulates damage neurological, respiratory and cardiovascular systems by penetrating the deepest parts of the lungs and accessing the gas exchange regions of the lung via diffusion.

### ***Change people's transport behaviours***

- 21. If climate change, health and environmental improvements are to be achieved, and the city continue to be liveable, we all need to change our transport behaviours, but this will not happen without interventions to encourage us to do it. In addition, one of the barriers to economic growth and the amenity value of the CBD is the amount of land occupied by unproductive and unattractive roads and parking buildings required for people's private vehicles. Reduced car traffic would remove pressure for wider roads, more tunnels and flyovers, and enable 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.
- 22. The MVRA is pleased to note in the LGWM data that there was no growth in car journeys to work to the CBD between 2001 and 2013; all the additional journeys were by public transport, walking or cycling. We would like to see all car journeys reduce and not just plateau, and we advocate for:
  - a. a programme to encourage more people out of their cars and towards more walking, cycling and use of public transport
  - b. using travel demand tools to encourage and incentivise reduced car movements in the CBD
  - c. encourage truck drivers and private car users to travel in off-peak times
  - d. actively discouraging private car use into and around the CBD, for example by introducing road-use pricing, reducing parking facilities and charging more for them
  - e. increased park and ride facilities for bicycles and cars by train stations and some bus stops in the outer suburbs
  - f. not proceeding with so-called roading improvements outside the city such as at Tawa, Petone, and Ngauranga Gorge. These are negative changes as they will encourage increased car use into the CBD, contrary to the principles
  - g. incentivise use of electric vehicles.

### ***Rejection of initiatives that contribute little or nothing to the aims and principles***

- 23. The MVRA strongly urges that there are no further major developments until the effects of the initiatives we have outlined above have been implemented and properly assessed. The case for the major roading initiatives is built primarily on exaggerated claims of increased 'congestion' and dubious assessments of the initiatives' impacts. It is well-documented internationally that more roads result in more motor traffic.
- 24. The Basin Reserve Board of Inquiry noted the lack of a formal definition of congestion (BOI report page 132), although we note the LGWM documents includes a definition of the cost of congestion. This definition is based on travel times and so we cannot understand why none of the documents has information on observed or estimated travel times for people in vehicles – there are only some unhelpful travel time percent changes and data on calculated congestion increases. Interestingly, the claims in the data that congestion levels increased in 2013 and 2014 is contrary to data in Wellington City Council's 2014/15 Annual Report on peak travel times for vehicles between the CBD and Miramar, Karori, Island Bay and Johnsonville (page 105). In the Council's report, the upper limits in 2014/15 were all lower than in 2010/11, and

not excessive travel times – only 16.9, 16.5, 15.3 and 11.5 minutes to/from each suburb respectively.

25. Unfortunately there are no cost-benefit analyses to enable us to assess whether spending up to some \$2.3 billion of taxpayer money on the proposed initiatives is an effective and desirable investment. However, shaving a minute or two off people's vehicle travel times for largely private benefit appears to be a poor investment if climate change, health and environmental costs are factored in - any time reduction is likely to be short-term. The roading, bridge and tunnel money from Crown appropriations would be better invested in social housing, health and education where there would be major public benefits.
26. The MVRA is very concerned that some of the analysis and assessment of the scenarios against the principles and the scenario benefits and impacts is misleading or flawed as this appears to have led to misguided judgements about what needs to be done. For example:
  - a. Appendix 3 of the Strategic Assessment of the Scenarios describes the duplicate Mt Victoria vehicle tunnel and Basin Reserve bridge(s)/tunnel(s) as public transport initiatives when the reality is they are primarily designed for trucks and private motor vehicles.
  - b. The analyses of the scenarios and the principles and benefits/impacts claim less traffic for all scenarios based on the assumption significantly more people will take public transport. While we accept improved public transport should result in increased patronage, it is erroneous to assume this will greatly outweigh increased traffic resulting from the major roading proposals in Scenarios B to D.
  - c. The same erroneous assumption has led to the claim in the benefits/impacts analysis there will be “minor impact” for emissions with Scenarios B, C and D. In addition, much is made of the countervailing effects of future fuel efficiency, low-emission buses, car fleet improvements, e-cars etc. but these are much longer-term and none of the proposals appears to be aimed at accelerating their adoption.
  - d. the scenarios/principles analysis regarding the clean and green principle claims no significant change in GHGs in the region, but fails to mention what really matters ie. the impact within the city.
27. We reject the following proposals because they have a negative impact on, or contribute little to realising, the liveability aims and transport principles, particularly those relating to climate change, health, the environment and amenity. Experience in Auckland from several decades of large road-building projects shows that is not the answer. Wellingtonians do not want that to happen in our region.

### ***Roading proposals***

28. The MVRA strongly opposes a second Mt Victoria vehicle tunnel, the widening of Ruahine Street and Wellington Road, and the seizing of Town Belt land. Also, the current tunnel's footprint should not be expanded. The Basin Reserve flyover case and Maori land issues 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 second tunnel will severely impact the historic heritage on Paterson Street which includes Waring Taylor's former home, several houses built by Harry Crump, Ettrick Cottage, and their sites. We are aware of proposals to demolish or move some of these houses, but this is contrary to good heritage practice – the area is not just a Hollywood set. The Board of Inquiry's decision acknowledged the heritage significance of this southwest area of Mt Victoria and the adverse effects of the proposed flyover. These findings contributed to the Board's rejection of the flyover project.

29. Widening Ruahine Street would involve taking a large piece of the Town Belt land for roading. The Town Belt land is already only about a half of the land originally designated as Town Belt. The 1873 Town Belt Deed gifted the land to the current and future citizens of Wellington to be enjoyed as a public recreation ground with no thoroughfare upon it. What land remains needs to continue to be protected for public enjoyment. The proposed motorway along Ruahine Street and Wellington Road will also create a significant barrier for people in Hataitai and Kilbirnie to access that part of the Town Belt which includes basketball courts, a badminton hall, a velodrome and paths over the hill to the city.

30. The Association also strongly opposes any bridges, tunnels or large buildings at the Basin Reserve. As Amy Adams, then Minister for the Environment, stated in 2013 in establishing the Basin Reserve Board of Inquiry, this is an area of national heritage significance which includes the Basin Reserve, the former Home of Compassion crèche, the former Mt Cook Police Station, the former National Art Gallery and Dominion Museum, the national War Memorial Park Pukeahu, and Government House. The Canal Reserve at Kent and Cambridge Terraces, covered and protected by the 1873 Town Belt Deed, also forms part of this heritage area. While undergrounding Buckle Street was a positive move, moving the crèche has already violated good heritage practice. The Board of Inquiry noted the network of open spaces formed by the Basin Reserve and surrounding area was an important and significant element of Wellington's landscape through its historical associations, and should be protected from visual obstruction. The Board concluded the project, including the flyover and additional buildings, constituted an inappropriate development, in terms of section 6(f) of the Resource Management Act, within this significant heritage area.

31. We also oppose any changes along Arthur Street and Karo Drive which underground or bridge them, and shift Vivian Street eastbound traffic to them. The development of Karo Drive has already desecrated an early Wellington heritage area around Tonks Avenue and the south of Cuba and Willis Streets. The ring road will add to creating a permanent and alienating barrier across local communities in the centre of Wellington, ghettoize the surrounding properties, and impose unfair major disbenefits on local people in favour of people living elsewhere.

32. The proposals for a second Terrace tunnel and another southbound lane from Ngauranga Gorge to Aotea Quay should also not proceed as they will only encourage more people to drive their cars into Wellington city with all the negative consequences already discussed.

### ***Public transport***

33. The MVRA supports some public transport improvements, as noted above, but does not support the use of the proposed bigger buses on the transport spine. We acknowledge that bus congestion can be a problem on the Golden Mile, but more reliable and faster journey times are unlikely to happen where the speed limit is 30kmh, there are many pedestrian crossings and lights and parts of the road are narrow so buses cannot pass. We strongly support the speed limit and crossings, and they should not be removed to enable better bus services. Larger buses and fewer stops will mean longer waits at bus stops for more people to get on and off. Longer and larger 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.

34. The mass transit proposals in Scenarios B to D also depend on bridge(s)/tunnel(s) at the Basin Reserve, a second Mt Victoria tunnel and widening of Ruahine Street and Wellington Road. That is because the new bus routes are all designed to run through the Basin Reserve and proposed new Mt Victoria tunnel. We disagree with this. As noted above, we suggest to the extent possible, running bus routes elsewhere in the road network to spread the load. This includes using Taranaki and Wallace Streets, and the existing bus tunnel at Pirie Street, and buses running along Moxham Avenue (where the users are), which keeps eastern suburb buses away from putting pressure on the Basin Reserve, tunnel and Ruahine Street areas.

## Conclusion

35. The LGWM principles and Wellington city's goals in *Wellington Toward 2040* establish the aims and objectives for a well-functioning transport system for Wellington. The MVRA supports and recommends transport initiatives which contribute to improvements in liveability by addressing the obvious imperatives of climate change, health and environmental challenges. We support the sustainable transport hierarchy and priority being given to walking, cycling and public transport initiatives with the LGWM budget being re-allocated towards them. We also recommend an incremental approach to changes, accompanied by emissions targets and better monitoring, so impacts can be assessed for effectiveness before moving to further initiatives.