



ROAD TRANSPORT FORUM NEW ZEALAND INC

SUBMISSION TO LET'S GET WELLINGTON MOVING ON GOLDEN MILE IMPROVEMENTS

Road Transport Forum NZ
PO Box 1778
Wellington
Ph: (04) 471 8281
E-mail: forum@rtf.nz

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Road Transport Forum New Zealand response to public consultation on Let's Get Wellington Moving's Golden Mile Engagement Report

1. Representation

- 1.1 Road Transport Forum New Zealand (RTF) is made up of several regional trucking associations for which RTF provides unified national representation. RTF members include Road Transport Association NZ, National Road Carriers, and NZ Trucking Association. The affiliated representation of RTF is some 3,000 individual road transport companies which in turn operate 16-18,000 trucks involved in road freight transport, as well as companies that provide services allied to road freight transport.
- 1.2 The RTF is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 32,868 people (2.0% of the workforce), and has a gross annual turnover in the order of \$6 billion.
- 1.3 According to MOT's research (National Freight Demands Study 2018) road freight transport accounts for 93% of the total tonnes of freight moved in New Zealand, about 75% of New Zealand's land-based freight measured on a tonne/kilometre basis.
- 1.4 RTF members are predominately involved in the operation of commercial freight transport services both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and as multi-unit combinations that may have one or more trailers supporting rural or inter-regional transport.

2. Introductory comments

- 2.1 Within the scope of this response to the engagement report, RTF will be commenting on the apparent lack of consideration for commercial traffic for goods delivery and the prohibition on accessibility of truck traffic proposed for the Golden Mile.
- 2.2 We believe the notion of banning trucks and delivery traffic solely to provide opportunity to facilitate the movement of pedestrians and cyclists is not viable. Our concern is heightened by the proposition that retail products and the distribution of goods are expected to be delivered from delivery vehicles parked some distance from where the goods need to be delivered. This is an illogical approach to logistics efficiency and may present health and safety issues where heavy goods are being moved greater distances.
- 2.3 Plans for freight delivery are only evident from the web page Q and As, although a muted explanation on page 13 suggests goods deliveries could be limited to certain times and certain locations. Both approaches are almost unachievable and ignore the inevitable cost impacts, and the former has been tried without success in some cities overseas.

Forcing delivery vehicles to operate outside of normal business hours also significantly adds to safety risks. Drivers have a higher chance of fatigue at night along with an increased accident rate. It's easy for professional people to want to cast vital work such as freight delivery to times where they are out of sight, but the truth is such activities are a core aspect of economic productivity and must be better considered than the thinking we have seen to date.

Trying to deliver goods outside of normal hours overseas has resulted in increased assaults on delivery personnel and wholesale theft of products from delivery vehicles.

- 2.4 These alarming ideas are seemingly backed up by a series of comments recorded on the same page where there is an emphasis on foot traffic and cycles and an obvious disdain for service and delivery vehicles, in fact anything with internal combustion (IC) engines. One of the ideas suggests IC vehicles be substituted by vehicles with alternative power/drive systems. This latter point is somewhat far-fetched when the alternative power technology for commercial vehicles is still in its infancy, with a lengthy time frame before its performance and range capability becomes sufficiently reliable to displace most IC applications. (Ref the Green Freight Working Paper is on the Ministry of Transport's webpage: find the link [HERE](#)).

3. The Golden Mile proposal

- 3.1 We were going to resist commenting on the overall conceptualised ideas being promoted in the engagement report because our sphere of interest is solely the inhibited and truncated opportunity for commercial freight access proposed by the Golden Mile plan, but we are of the view the concept is flawed from the outset.
- 3.2 The fact that the concept is wrapped around Let's Get Wellington Moving (LGWM) - which is itself is an oxymoron - it's arguably hard to comprehend just how LGWN actually gets things moving within the Golden Mile proposal.
- 3.3 The problem with Wellington is the lack of proper planning for the present traffic flows to the southern suburbs and airport, and the seaport, and we would have thought greater effort should be paid to sorting out these routes through expansion of SH1 at the Terrace tunnel and focussing on the entire route to the airport. It seems that the narrow focus is on limited environmental and amenity scenarios in the Golden Mile initiative. Access to the airport and seaport are essential for Wellington's economic viability.

4. The Golden Mile; a misguided ideal

- 4.1 The concept of the Golden Mile initiative is predicated on enhancing public spaces, leading to greater foot and cycling traffic by improving the attractiveness of the road thoroughfare.
- 4.2 This is a lofty aspiration but totally ignores the potential for significant economic impacts on commerce within the same zone.

- 4.3 Wellington is not some post-World War 2 European city with wide open spaces and plazas and equally wide thoroughfares; Rotterdam comes to mind. The Golden Mile is Wellington's primary inner-city arterial retail canyon; it is narrow, with few light shafts and almost no views at street level to the sea.
- 4.4 The southern part or eastern zone of the Golden Mile is populated by alcohol establishments and various types of take away food outlets that can only be sustained by frequent and easy product delivery support.

5. Pre and post Covid-19

- 5.1 In our view, a vision of routes through the central city with no traffic other than buses was barely desirable even before Covid-19 and the lockdown, and it must be even less so post Covid-19 with its legacy effect of economic atrophy. The Golden Mile is questionably golden no more. Foot traffic has declined significantly and many shoppers are dis-inclined to return to their previous spending and purchasing habits.
- 5.2 It appears the economic decline will take some time to right itself and even then, some commentators have suggested there will be "new normal" in terms of retail practices. By our observation, the post Covid-19 idea of banning traffic on the so-called Golden Mile may be even less viable and simply drive potential retail customers away to other retail venues, such as drive-to or destination malls.
- 5.3 Having said that, the possible lack of retail customers is not a problem for our industry to resolve.

6. Why we are opposed to inhibiting freight and delivery service traffic on the Golden Mile

- 6.1 There is an explicit connection between retail facilities and freight transport services that involve both pickup and delivery of product. RTF and its Wellington regional Road Transport Association New Zealand (RTANZ) affiliate are implacably opposed to any proposed prohibition on freight and delivery services, and the closing or reduction of the present loading zones providing kerb side delivery within the Golden Mile precinct.
- 6.2 The transport groups are also opposed to relocating the loading zones to side streets as these are not easily accessible for even small trucks and will involve reversing and other manoeuvres that in our view unnecessarily compromise safety of vehicles, the drivers, and possibly pedestrians and cycle traffic within the same locale.
- 6.3 It's totally unrealistic to allow ideas to be fostered suggesting small vans or pedal delivery cargo cycles (para 8, page 13) will be capable of substituting the present forms of delivery vehicle. Another aspect that seems to have been ignored is that the retail outlets on the Golden Mile have no rear delivery option and consequently everything must go in and out the front door.

7. Public safety risk

- 7.1 There is also a complete misunderstanding about the size or volume of goods that are frequently delivered to retailers. There appears to be some assumption the goods are able to be delivered or distributed by hand, which is an entirely incorrect notion. Typically, the goods delivered are a range of sizes and volumes (some being of considerable bulk) but most deliveries will entail the use of hand trolleys for boxed goods or hand carts for bulkier goods.
- 7.2 Given that freight delivery vehicles (under what is proposed) will have to be parked some distance away from the receiving retail site, drivers and delivery personnel will be expected to move these man powered devices lengthy distances along the pavements while being mindful of the health and safety of other thoroughfare users. There is also the potential for goods to be displaced from these material handling devices (increasing product damage) because of the additional need to negotiate pavement ramps far more frequently than front of shop kerbside deliveries would require.
- 7.3 We see the remote parking of delivery vehicles away from the delivery site as potentially creating a new set of risks and significant inconvenience for all parties, plus increasing delivery costs because of the additional inconvenience for freight operators. The impact of Wellington's variable weather on frangible and high-quality textile products, like clothing, cannot be ignored either. With kerb side delivery, exposure to the weather of any consumer products is effectively limited by both the short delivery distance and the fact that in most cases the pavement has some weather protection because of the shop veranda overhead.
- 7.4 If textile products get damp retailers will be justifiably aggrieved which all adds to the argument that side street loading zones are not a realistic option.
- 7.5 The DomPost of 8 July 2020 reported business owners' dismay that the potential impact of the Golden Mile plan on retail activity. <https://www.stuff.co.nz/national/122047984/wellington-business-owners-worried-golden-mile-plans-will-be-disastrous-for-retailers>

8. Other aspects against the proposal that need acknowledgement

- 8.1 RTF and our affiliate member RTANZ share the same views concerning the Golden Mile proposal and we are concerned about the lack of pragmatic forethought that has gone into the proposal.
- 8.2 Our members in the region make a number of valid points, such as, the proposal has overlooked the level of transport access functionality required for the freight and service industry to support not only the retail sector, but also coffee shops, food facilities and high-rise office and apartment buildings. They comment that no thought seems to have been given to freight access to service the needs required for shop refurbishments or fitouts, apartment servicing, and aircon system or alarm maintenance.

- 8.3 As users of the Wellington loading zone spaces, RTANZ states that there are frequently times when present loading zone capacity is completely exhausted by plumbers', builders', and electricians' vehicles, and the constant movement of concrete and demolition trucks around sites where earthquake strengthening and other remedial works are being carried out. This experience by our members simply demonstrates the fact that there is already insufficient loading zone capacity for freight services to provide for retailer needs.
- 8.4 On top of this situation, service vehicles such as rubbish trucks, street cleaning vehicles, emergency service vehicles and commercial cleaners all need access to the premises on the Golden Mile. The large-scale redevelopments in some areas of the Golden Mile and constant office relocations demand vehicular kerb access.
- 8.5 RTF is of the view that the present Golden Mile experience for the freight and service industries paints a pretty parlous picture of the current situation. Efforts to further inhibit freight delivery access will only add to the woeful situation that retailers are now experiencing; the converse of what the proposal hopes to deliver.
- 8.6 A number of adjustments have been made to the Golden Mile, one of which is the significant reduction in vehicle speed to make the environment more palatable to pedestrian traffic. In addition, various chicanes and road islands have been added over time to control traffic movements and traffic flow. These have been designed to improve pedestrian safety and public transport access. Our point being, that the Golden Mile has already been saturated with traffic engineered enhancements to help build public access opportunities.
- 8.7 One of the few redeeming features of the engagement report is the Automobile Association's comments about the imperative importance of Willis Street's connectivity to other inner-city routes. RTF supports AA's comments and opposition to changes impacting vehicle access to Willis and Manners Streets and Courtenay Place (Page 37).

9. Concluding comments

- 9.1 Our comments reflect economic necessity in a busy city. The functions we are supporting in our submission are not "nice to have," but ensure the smooth operation of businesses that support our daily lives and the vibrancy of a special city.
- 9.2 The freight sector sees the latest approach as another attack on commerce, following on from the roving camera van that was circulating the streets a few years back issuing questionable infringements to freight operator vehicles and disrupting retailers being serviced with products. That exercise was expensive for all parties and the freight sector cannot accept a repeat of this, or bans on access, or confining freight deliveries to inaccessible small laneways.

Kerry Arnold, Roading and Technical Manager, RTF