

Living Streets Aotearoa



Submission from Living Streets Aotearoa Central City Safer Speed Limit proposal

Contact person: **Ellen Blake**
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Date: **9 March 2014**

About Living Streets

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see: www.livingstreets.org.nz

Submission

We support this initiative to reduce vehicle speeds in the CBD.

This will provide significant benefits to all road users including pedestrians.

It should reduce accident rates as vehicle users have more time to react to situations in the busy pedestrian environment of the CBD.

It will improve the chance of survival of pedestrians hit by vehicles.

It provides a key signal to vehicle users that they are in a pedestrian priority area.

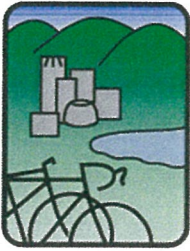
It will improve the walking environment and should help promote walking as a pleasant and viable transport mode, important for a healthy retail economy.

We would like to see the 30km hour area extended to make the system more legible (that is vehicle users can make better sense of it) by extending the area to include

- Murphy St from the Thorndon pool traffic lights and Thorndon Quay to Bunny St – this will provide better walk amenity for the large secondary schools in this area and the large number of pedestrians walking around the ‘Parliament precinct’
- Customhouse (from Bunny St), Waterloo and Jervois Quays, Cable and Wakefield Streets to connect with the Oriental Parade slow zone – this will finally bring some of the benefits claimed by the ‘inner city bypass’ by improving the connectivity with the waterfront and encouraging vehicles onto the bypass
- Kent and Cambridge Terraces to Vivian St
- Willis, Victoria and Taranaki St to Vivian St
- Upper Boulcott St to the motorway on-ramp

This initiative is a significant improvement for pedestrians, and with the work being done to improve Level of Service for pedestrians at intersections, and with implementation of the NZ Pedestrian Planning and Design Guidelines, will improve walkability for Wellingtonians. We would like to see formal adoption of a sustainable transport mode hierarchy with pedestrians as first priority on most roads in the CBD consistent with the new One Network Road Classification system.

We would like to be heard in support of our submission.



Cycle Aware Wellington

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Central City Safer Speed Limit – Cycle Aware Wellington submission

We would like to present our submission verbally. Please contact eleanor.meecham@gmail.com

Cycle Aware Wellington is a voluntary, not-for-profit organisation aimed at improving conditions for existing cyclists and encouraging more people to bike more often. We advocate for cyclists who use their bikes for recreation and transport. Since 1994, we have worked constructively with local and central government, NZTA, businesses, and the community on a wide variety of cycle projects. We represent 600 members and supporters.

Key points of our submission

- We strongly support lowering the speed limit in central Wellington to 30km per hour.
- We want the 30km zone extended to more of Taranaki Street and Willis Street.

Improved safety for all central Wellington road users, especially the most vulnerable

Lower speeds reduce the likelihood of crashes, making the streets safer for all road users. In the event of a crash, the most vulnerable road users (cyclists and pedestrians) are much less likely to die or be seriously injured at 30km per hour than at 50km per hour (Ministry of Transport, 2013, pp19, 38). We note that safety is also improved for those in motor vehicles.

A fast and effective way to make cycling safer and more attractive

We know that Wellington City Council is keen to provide a better environment for cyclists. Lowering the speed limit is one of the simplest, fastest, and most effective measures of beginning to create a safer and more comfortable cycling environment. In the Greater Wellington Regional Council Transport Perceptions Survey 2012, 54 percent of Wellington residents thought that lowering the speed limit would be a good option for making cyclists feel safer (GWRC, 2012, s8.2.2).

Making Wellington a more liveable city

We want to see central Wellington become more liveable – more attractive as a space to walk, ride a bike, shop, picnic, and relax. Lower speeds and safer streets will make a big contribution to this atmosphere, which is good for businesses, retail, and property values. Lower speeds will make driving less stressful, encouraging a more courteous driving culture, while hardly affecting travel times at all. Entering and exiting parking spaces will be easier with slower traffic.

In the long term, lower speeds mean less congestion

Lower speeds and safer streets encourage more people to walk and travel by bike, meaning fewer



trips taken by car. Over time, this will contribute to less congestion in the central city.

Many agencies agree that lower speeds benefit everyone

A lower speed limit in central Wellington is in line with the Government's road safety strategy, and the Chair of the Automobile Association's Wellington District Council, Michael Gross, has already given his support to the proposal in a radio interview (Radio NZ, 2014).

We note that previous safer speed proposals have had support from NZ Bus, Greater Wellington Regional Council, Police, ACC, and the NZ Transport Agency.

We want the 30km zone extended to two key sections

To maximise the safety benefits for cyclists, we want the 30km zone extended to:

- the Ghuznee Street to Buckle Street section of Taranaki Street
- all of Willis Street.

Southbound, between Ghuznee and Vivian Streets a lane change is required to continue straight ahead. If motorists were going slower along this stretch, manoeuvring to the correct lane would be much safer and easier for cyclists. It also makes sense to extend the 30km zone to Buckle Street, to take cyclists safely all the way to Memorial Park, from where they will be able to access the Basin Bridge cycle route and the Island Bay to CBD cycle route.

Northbound, a longer stretch with the lower speed limit would give vehicles more time to slow down before the intersection of Taranaki and Courtenay Place, which has a high crash rate.

To complement the lower speed, advanced stop boxes and feeder lanes are needed at all intersections on Taranaki Street.

Because the top end of Willis Street (northbound) has so many left-turn lanes, to continue straight ahead requires a lane change between most intersections (especially for cyclists, who tend to travel in the left-hand lane). This can be dangerous and frightening for cyclists, as the street is heavily used by both cars and buses. Also, cars are parked on both sides for much of the length of the street, meaning there is little space for cyclists to stop and wait for faster traffic to pass. Lowering the speed on the entire length of this street would make the necessary frequent lane changes considerably easier and safer for cyclists. A lower speed environment would also benefit businesses along this stretch.

Nā mātou noa, nā Cycle Aware Wellington
8 March 2014

References and further reading

Greater Wellington Regional Council (2012). [Greater Wellington Regional Council Transport Perceptions Survey 2012](#). Available from www.gpiwellingtonregion.govt.nz.

Ministry of Transport (2013). [New Zealand's road safety strategy 2010–2020](#). Available from www.saferjourneys.govt.nz.

Radio NZ (2014). [Wellington council may limit drivers to 30k in city centre](#). Available from www.radionz.co.nz.

Cycling Advocates' Network's policy on speed:

<http://can.org.nz/canpolicy/speed-limits-for-urban-areas>

ACC's Down with Speed:

<http://can.org.nz/library/down-with-speed-0>

20's Plenty for Us (UK's lower speeds campaign):

<http://www.20splentyforus.org.uk>

Name and Contact Details

Mr Stefan Collins

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021 703 028

I am making a submission as an **individual**

I **would** like to make an oral submission to the committee considering the proposal in March (up to and including the morning of 21 March 2014)

1. This submission is **opposed** to the Central City Safer Speed Limit (the "Proposition").

2. Introduction

2.1. As I have previously submitted, there is little doubt that one can make a compelling case in support of Council's role in contributing to a safe environment for all constituents.

2.2. In my view, however, the Proposition is fundamentally flawed.

2.3. These flaws are exposed around six key themes:

- Measures for Success and Accountability
- Evidence that 30km/h is the 'Right' Speed Limit
- Appropriateness of Comparative Jurisdictions
- The Counterfactual
- Current Actual Speeds
- Traffic Counts and Mean Speed Data are Meaningless in the Context of the Proposition.

2.4. As such, I oppose the Proposition.

2.5. My preferred option is the retention of the current state.

3. Measures for Success and Accountability

3.1. Any proposed change should be supported by a definition for success. In the case of the Proposition, the implied (but not formally stated) measures for success are:

- The number of road crashes
- The severity of any road crashes that do occur.

- 3.2. To be clear, these measures for success are implied only. Nowhere does the Proposition clearly state which of these measures for success (or other potential measures) will be measured and reported by Council officers to Elected Representatives and constituents.
- 3.3. Unsurprisingly, the lack of defined measures of success brings with it an absence of performance targets. Nowhere in any of the consultation documentation does the Council offer any quantitative targets by which success can be measured.
- 3.4. The challenge in this situation is clear - in the absence of such measures, how will Council officers, Elected Representative and constituents begin to assess the success of the Proposition if implemented? More importantly, how will Elected Representatives be held accountable for any non-performance against target outcomes? Obviously, a lack of targets creates an environment where Elected Representatives cannot be held accountable for a lack of outcome performance relative to the investment required to implement the Proposition (including costs associated with communication, roading infrastructure and other related matters).
- 3.5. I submit that any Proposition that lacks clearly defined and stated measures for success and quantitative performance targets must be rejected as it is impossible to objectively assess and comment on the extent to which the implementation of the Proposition will contribute to the desired outcomes.**
- 3.6. I submit that any Proposition that lacks quantitative performance targets must be rejected as it prohibits the subsequent assessment of performance relative to those targets and renders constituents completely unable to hold Elected Representatives to account for non-performance relative to the non-existent performance targets.**

4. Evidence that 30km/h is the 'Right' Speed Limit

4.1. The Council's consultation documentation notes...

"Road safety experts agree that a 50km/h speed limit is too high for busy city centres..."¹

4.2. There is no subsequent link to any supporting documentation to support this proposition and no reference to specific research or evidence. In the absence of this supporting information it must be taken that this is at best a general statement unsupported by specific, genuine evidence.

Further, there is no evidence or specific research findings offered to support the Proposition's key theme – that 30km/h is the 'right' limit. Indeed, when the Council last reviewed the speed limit options for the Golden Mile the Proposition suggested that 20km/h was the 'right' speed limit.

4.3. What has changed in the Council's analysis to suggest that 30km/h, rather than the previously proposed 20km/h, is the correct balance between facilitating the effective flow of traffic and the minimisation of traffic crashes and related injuries? Unfortunately, there is

¹ Central City Safer Speed Limit – Your questions answered

no information provided by the Council in the consultation documentation that evidences that 30kmh is the 'right' speed limit.

4.4. This, to some extent, suggests that Council is simply making numbers up by feel rather than on the basis of solid evidence or research.

4.5. I submit that the Council has not provided any evidence to support the recommended speed limit of 30km/h relative to any other higher or lower speed limit point.

4.6. I submit that the Council has not demonstrated that 30km/h provides the best balance between facilitating the efficient flow of traffic and the minimisation of traffic crashes and related injuries

5. Appropriateness of Comparative Jurisdictions

5.1. The consultation documentation has noted a number of local and international jurisdictions where other cities have "...safer speed limits..."² without noting what those speed limits are. This makes a judgement on the Proposition's proposed 30km/h speed limit impossible.

5.2. Further, there is no analysis to suggest that the comparator cities are, indeed, comparable. Munster, for example, has city streets paved with paving blocks rather than high grip surfaces. Is it this that makes an unspecified "safer" speed limit in that particular jurisdiction appropriate?

5.3. The consultation documentation does not in any way provide insight or analysis as to the appropriateness of the comparator cities. There is no commentary regarding geography, topography, vehicle safety standards, road surfaces, climate, pre-reduction speed limits or impact of speed limit reductions. None whatsoever.

5.4. I submit that there is no evidence that the comparator cities are comparable with Wellington and therefore are irrelevant for the purposes of assessing the Proposition.

5.5. I submit that there is no evidence associated with the comparator cities that indicates the Proposition's 30km/h speed limit is appropriate.

6. The Counterfactual

6.1. Section 5 above notes the challenges presented by your selection and commentary of supposed comparator cities.

6.2. The counterfactual to the listed set of comparator cities is, of course, that there are any number of cities around the world that are not adopting lower speed limits for CBD-type areas. None of these other cities have, it would seem, been analysed to assess the reasons for maintaining relatively higher speeds. This is lazy analysis and, indeed, presents unnecessary bias into the overall analysis. Worse still, it suggests that Council officers have

² Central City Safer Speed Limit – Your questions answered

simply ignored any example that is inconsistent with their preconceived perception of the correct analysis.

6.3.I submit that no analysis has been completed to assess the impact of maintaining higher speeds in cities where this is the current practice and therefore the analysis supporting the Proposition is biased and was unfairly weighted in favour of the Proposition before the analysis was commenced.

7. Current Actual Speeds

7.1.The consultation documentation states...

“On most central city streets where the safer speed limits would apply, drivers probably travel at about 30km/h already”³

7.2.If the Council’s own perspective is that the effective speed limits actually driven at are already at the Proposition’s 30km/h level, why is there a need for this Proposition at all?

7.3.I submit that the Proposition is redundant as conditions already dictate driver behaviours in line with the desired speed.

8. Traffic Counts and Mean Speed Data

8.1.The consultation documentation includes summary level analysis indicating traffic counts and mean speeds across the streets that are in-scope for the Proposition.

8.2.The mean speed data indicates that, for a number of the streets within the scope of the Proposition, the mean speed is already within or at the Proposition’s speed limit of 30km/h. That is a warning that perhaps a change to the speed limit is unwarranted.

8.3.More importantly, there is no evidence that ties together the number or seriousness of traffic crashes to the speed at the time of the crash. Council has not been able to demonstrate that speeds higher than 30km/h contribute to the number of crashes. For example, of the 531⁴ crashes that occurred during the 2008-12 period of analysis, how many were at times when traffic congestion was at such a high level that the actual traffic speed was above 30km/h?

8.4.Council has not provided any evidence or analysis of this relationship. As such, how is it possible to conclude that a reduction in the speed limit will actually reduce the number crashes and related injuries? If the number of crashes and related injuries is actually a product of congestion (where vehicles are likely travelling at speeds below the mean speeds presented in the consultation documentation), how will a reduction in the speed limit to 30km/h either reduce the number of crashes or the severity of the resulting injuries?

³ Central City Safer Speed Limit – Your questions answered

⁴ Central City Safer Speed Limit Proposal – supporting data

8.5. Further, Council has not provided any analysis whatsoever of the impact of other potential contributing factors to the number of traffic crashes and the consequential injuries suffered.

8.6. The logic simply is not there. The analysis that has been completed is lazy and the recommendations are unsupported by the data presented.

8.7. I submit that any Proposition that lacks the required level of analytical rigour to clearly demonstrate a link between cause (vehicle speeds higher than 30km/h) and effect (the number of crashes and the severity of related injuries) must be rejected.

9. General Observations

9.1. I support measures to make Wellington city a safer place for all constituents and visitors.

9.2. However, it is clear that the analysis completed by Council officers in support of this proposition is lacking in its depth, detail and rationale for conclusions. The conclusions reached by the analysis (such that there is genuine analysis presented in the consultation documentation) are tenuous at best and poor when compared with best practice examples for investment decisions in the private sector. At its heart, this is an investment decision.

9.3. It is unacceptable for Elected Representatives to support Propositions such as this where it will be impossible for constituents to hold those Elected Representatives accountable for the outcomes (or lack thereof) of their decisions. In my mind, this is a sign of generally poor governance.

9.4. The Elected Representatives of this council should be disappointed that a Proposition lacking rigorous analysis, well documented comparators and logical conclusions has passed through your first stage of review without being stress tested in a structured manner. As a constituent that contributes to the funding of your organisation, it is disappointing that you are unable to drive a high level of quality analysis to support your traffic-related decisions. It would be interesting to have visibility of the total (direct, indirect and allocated) costs associated with the analysis presented in support of this Proposition. I suspect it would be disappointingly high and, in the context of private sector investment, completely disproportionate to the relatively low quality of the analysis presented.

9.5. I submit that Proposition must be rejected on the basis that it is unsupported by rigorous analysis and conclusions.

HAVE YOUR SAY ABOUT A SAFER SPEED LIMIT IN WELLINGTON'S CENTRAL CITY. SUBMISSION FORM



Wellington City Council would like your feedback on its proposal to reduce the speed limit in the central city to 30km/h. The main routes in the city will remain at 50km/h.

To have your say, please make a submission online at Wellington.govt.nz/haveyoursay or fill out this submission form and post it back to us by Sunday 9 March 2014 (no stamp required).

TELL US WHAT YOU THINK	
<input checked="" type="radio"/> Mr / <input type="radio"/> Mrs / <input type="radio"/> Ms / <input type="radio"/> Miss / <input type="radio"/> Dr (Please circle which applies)	
First name* IFOR	Last name* OWEN
Street address* 174 MELBOURNE RD.	
Suburb ISLAND BAY	City WELLINGTON
<input type="radio"/> Home / <input type="radio"/> mobile 3836572	Email

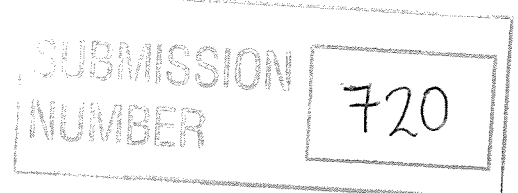
* Mandatory fields

I am making a submission <input checked="" type="checkbox"/> As an individual <input type="checkbox"/> On behalf of an organisation
Name of organisation
I would like to make an oral submission to the committee considering the proposal in March. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

QUESTIONS – HAVE YOUR SAY
Do you agree with the introduction of a 30km/h speed limit in central Wellington as shown on the map? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, with amendments
Please provide the reason(s) for your position 30km/h will not prevent pedestrians from walking into incoming traffic as proved in the Golden Mile. Ban jaywalkers - they cause the problem not the traffic
If your position is 'yes, with amendments', what alterations would you make to the current proposal and why?

Privacy statement

Please be aware that all submissions (including name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.



Any other comments you wish to make:

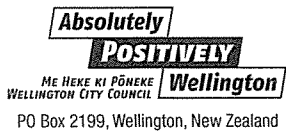
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If you would like to make an oral presentation in support of your written submission, please complete the appropriate details on the other side of this submission form.

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Central City safer speed limit change (KCIF02)
Wellington City Council (CAB5)
PO Box 2199
Wellington 6140

Kelly Rumens

From: Wellington City Council [saferroads@wcc.govt.nz]
Sent: Wednesday, 19 February 2014 8:08 a.m.
To: Safer Roads
Subject: Central City Safer Speed Limit - Submission

Submitter Details:

First Name: Ron
Last Name: Beernink
Street Address: 69 High Street
Suburb: Island Bay
City: Wellington
Phone: 027 9367557
Email: ron.beernink@gmail.com
I would like to make an oral submission: Yes I am giving this feedback: as an individual
Organisation Name:

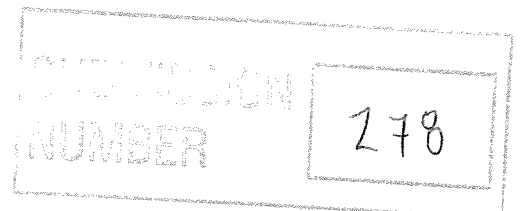
Questions / Comments:

Do you agree with the introduction of a 30km/h speed limit in central Wellington as shown on the map?
Yes, with amendments

Please provide the reason(s) for your position Without dedicated cycle lanes, it is imperative that traffic speed is reduced to 30km/h to create an environment that is not only safe but also enjoyable to cycle in. In addition, it enhances the image of Wellington as an environment & people friendly city, where cars and other motorised traffic are not put first.

If your position is 'yes, with amendments', what alterations would you make to the current proposal and why?

In line with a submission that I did for the last City Council Annual Plan, I strongly urge the council to show courage and extend the 30km/h speed zone across the full CBD (except for key arterial routes) and also for all high use cycle routes in the suburbs where at the moment there are no marked or dedicated cycle lanes, e.g. Adelaide Road, all of the Greater Harbour Cycle Way route.



Kelly Rumens

From: Wellington City Council [saferroads@wcc.govt.nz]
Sent: Monday, 24 February 2014 9:24 a.m.
To: Safer Roads
Subject: Central City Safer Speed Limit - Submission

Submitter Details:

First Name: Roland
Last Name: Sapsford
Street Address: 23 Epuni Street
Suburb: Aro Valley
City: WELLINGTON
Phone: 021651105
Email: roland@actrix.gen.nz

I would like to make an oral submission: Yes I am giving this feedback: as an individual Organisation Name:

Questions / Comments:

Do you agree with the introduction of a 30km/h speed limit in central Wellington as shown on the map?

Yes, with amendments

Please provide the reason(s) for your position Along with traffic volume, traffic speed is one of the core determinants of the severity of crashes involving active modes and vehicles. Lower speeds will make for a safer city, make cycling easier by reducing the speed differential between cars and bikes, and encouraged a more 'shared space' approach to roads. A big part of their success or failure will be a combination of enforcement and education as these measures succeed if they reset people 'speed baseline'.

If your position is 'yes, with amendments', what alterations would you make to the current proposal and why?

Very keen to see these extended further south into Southern Te Aro - back to Webb and Buckle Street. There is very significant pedestrian traffic in these areas, and higher speed traffic is now concentrated on one or two roads, meaning streets like Abel Smith are ideal for traffic calming and speed reduction. There seems no clear reason to stop at Vivian St, and good reasons to extend the area south.

Kelly Rumens

From: Wellington City Council [saferroads@wcc.govt.nz]
Sent: Tuesday, 4 February 2014 10:34 a.m.
To: Safer Roads
Subject: Central City Safer Speed Limit - Submission

Submitter Details:

First Name: James
Last Name: Burgess
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Suburb: Wellington
City: Wellington
Phone: 021565633
Email: jim.burgess@gmail.com
I would like to make an oral submission: Yes I am giving this feedback: as an individual
Organisation Name:

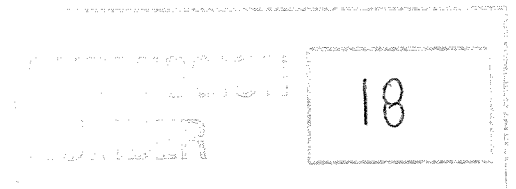
Questions / Comments:

Do you agree with the introduction of a 30km/h speed limit in central Wellington as shown on the map?

Yes

Please provide the reason(s) for your position Safer speeds reduce the likelihood and severity of collisions between vehicles and pedestrians/cyclists. They also make it easier for cyclists to keep out away from gutters or parked cars, where there is no bike infrastructure, without holding up other traffic.

If your position is 'yes, with amendments', what alterations would you make to the current proposal and why?



Kelly Rumens

From: Wellington City Council [saferroads@wcc.govt.nz]
Sent: Tuesday, 4 February 2014 10:51 a.m.
To: Safer Roads
Subject: Central City Safer Speed Limit - Submission

Submitter Details:

First Name: Terence
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I would like to make an oral submission: Yes I am giving this feedback: as an individual
Organisation Name:

Questions / Comments:

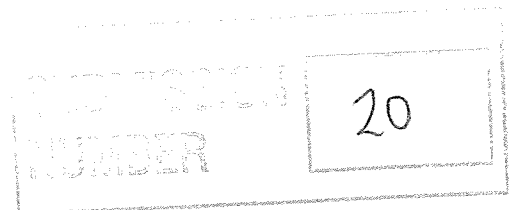
Do you agree with the introduction of a 30km/h speed limit in central Wellington as shown on the map?

No

Please provide the reason(s) for your position

The issues in Wellington City are that it does not have a one-way system therefore confusing the public and pedestrians. Where you have public transport that can go opposite to the rest of the traffic flow create several obvious and clear issues. The issues created by the current exception factor for public transport has created overseas that same confusion. Those areas (in other countries) that have changed to a pure one-way system do not have the same issues.

Reduction in speed from 50K to 30K is not 15metre based upon pure speed straight-line calculation that only a simpleton (not road safety expert) taking bare facts would use. Why do countries that have a 50mph (80km) through towns not have the same issue? The simple answer is that the slower the cars the more likelihood other forms of transport take risks to pass in front. Why not provide real hotspot data rather than say 766 crashes occurred 2008-2012. This is unintelligent data that provides no information. The information you have provided looks like the injuries to people are caused in areas where the one-way system is confusing. Who and what caused the injury and at what time? It also appears as people get use to the change, the numbers have dropped for pedestrians.



Transportation is calmed by traffic lights that are operating in the area and traffic flows that become busy at certain times. To slow the speed limit to 30km in the new area proposed will create frustration and not stop the hoons and bad drivers. Also when you consider the mean average speed through all areas are 31km then this idea of making the speed limit 30km saved 15metres of travel (based upon the straight line theory).

This means in conclusion 1 become a pure one-way system 2 Changing the speed limit is based upon data that does not stand scrutiny.

If your position is 'yes, with amendments', what alterations would you make to the current proposal and why?
Get real information from a data expert.

Kelly Rumens

From: Wellington City Council [saferroads@wcc.govt.nz]
Sent: Monday, 24 February 2014 12:50 p.m.
To: Safer Roads
Subject: Central City Safer Speed Limit - Submission

Submitter Details:

First Name: Martin
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City: Wellington
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Email: martin.ehrenstein@gmail.com
I would like to make an oral submission: Yes I am giving this feedback: as an individual
Organisation Name:

Questions / Comments:

Do you agree with the introduction of a 30km/h speed limit in central Wellington as shown on the map?
Yes, with amendments

Please provide the reason(s) for your position

1) Conflict increases when different vehicle classes travel at nearly the same speed. For example trucks and cars on the open road and in this case motor vehicles and cyclists in central Wellington. I am unconvinced this aspect is sufficiently understood.

2) The streets included in the map for the central Wellington speed limit change apparently fail to take into account the needs of cyclist and fail to leverage existing cycle path infrastructure.

If your position is 'yes, with amendments', what alterations would you make to the current proposal and why?

1) A lower limit of around 20km/h may be more appropriate as that would permit most motor vehicle traffic and cyclist to flow together. Expert recommendations would be valuable here.

2) Good arterial cycle routes exist South and East of Karo Drive. It would be beneficial to link Karo Drive with the central speed limit zone, by extending it on a) all of Cuba St b) Ghuznee St almost to The Terrace (to link with the path leading to Karo Drive) c) Taranaki St to Jesse St.

Last but not least note that with Kent and Cambridge Tces becoming even more prominent arterial vehicle routes, cycling infrastructure needs to be

addressed there.

Kelly Rumens

From: Wellington City Council [saferroads@wcc.govt.nz]
Sent: Monday, 24 February 2014 1:35 p.m.
To: Safer Roads
Subject: Central City Safer Speed Limit - Submission

Submitter Details:

First Name: Susan
Last Name: Wyllie
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Suburb: Papakowhai
City: Wellington
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Email: susiep@xtra.co.nz

I would like to make an oral submission: Yes I am giving this feedback: as an individual
Organisation Name:

Questions / Comments:

Do you agree with the introduction of a 30km/h speed limit in central Wellington as shown on the map?

No

Please provide the reason(s) for your position Because it will cause frustration which in turn will keep people out of the area and thus bussiness will suffer.this will only increase people walking out in front of cars as traffic is slower they will feel they are safer which again will slow traffic and frustration may cause accidents more frequently.

If your position is 'yes, with amendments', what alterations would you make to the current proposal and why?

Kelly Rumens

From: Wellington City Council [saferroads@wcc.govt.nz]
Sent: Thursday, 27 February 2014 10:53 a.m.
To: Safer Roads
Subject: Central City Safer Speed Limit - Submission

Submitter Details:

First Name: Kent
Last Name: Duston
Street Address: 115a Pirie Street
Suburb: Mt Victoria
City: Wellington
Phone: 021 536 873
Email: kent@mtvictoria.org.nz
I would like to make an oral submission: Yes I am giving this feedback: as an individual
Organisation Name:

Questions / Comments:

Do you agree with the introduction of a 30km/h speed limit in central Wellington as shown on the map?

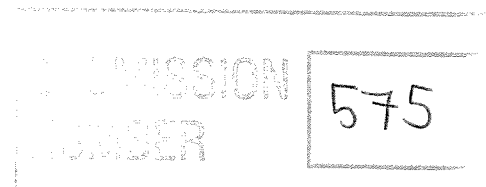
No

Please provide the reason(s) for your position I am opposed to the change to CBD speed limits and ask that the Council reject the proposal. My reasoning is as follows:

1. This issue has already been considered and rejected

Less than 18 months ago, Council officers proposed a 20km/hr limit along the Golden Mile, which in many respects was functionally indistinguishable from the current proposal. It used the same arguments advanced in the same ways, supported by the same data – and this proposal was firmly rejected by the elected Council. Officers may be unhappy with the outcome of that consultation, but to revive it less than two years later displays an alarming contempt for the democratic process. Wellington has already spoken on the subject of lower speed limits in this area of the city, and ratepayers have better things to do with the \$250,000 this exercise is apparently costing than continually re-litigate the same issues over and over again.

2. The data does not support the conclusion



The supporting data provided by officers shows no causal link between speed and crashes. At best, the international studies show that the effect of a lower impact speed is less severe injuries and less vehicle damage, but this is entirely self-evident from the laws of physics. The crash maps demonstrate that most of the injury crashes occur at intersections, but again no causal link is demonstrated between these and excessive speed – despite the fact that the crash cause data is available from NZ Police. While a hypothesis might be inferred that at least some of the crashes might have been caused by excess speed, officers seem to assume that they do not need to demonstrate this – that they can simply hand-wave about safety. This reflects either laziness or ineptitude on the part of the officers concerned, and they seem to assume that – like far too many transport matters in Wellington – that we should take the proposal on faith rather than expecting them to prove their conjecture.

3. Speed was not a factor in the most serious crashes

In the two most severe crashes since the design changes to the Golden Mile – the death of Vanessa Green and the serious injury of Tim Brown – there is no indication that speed was a factor. In both cases, the underlying cause seems to be the poor design that routinely puts pedestrians in harm's way, rather than the velocity of the vehicles involved. Further, the speed limit on the Golden Mile is already 30km/hr, yet people are still dying in crashes – in fact, the death and injury rate has increased in the years following the design changes, which would seem to indicate that the cause is poor design, not excessive speed.

4. There's no indication that Police will enforce a lower speed limit anyway

Despite apparently having the highest rate of deaths and injuries per square kilometre in New Zealand, there is no specific road policing plan for Wellington city. This stands in stark contrast to other areas of focus, such as drink driving or open road speeding, where plans are made and resources are allocated to ensure the crash rate declines. Police are on record as saying that they had no intention of enforcing the 30km/hr suburban shopping centre limits, and despite the regular meetings that occur between Police and Council staff, no evidence is presented in the information about this proposal that indicates Police will be taking the lower inner city limit any more seriously.

This lack of interest in inner city enforcement is borne out by my own experience; in 12 years of walking to and from work down the Golden Mile, I saw Police undertaking traffic duties three times – and two of those occasions involved drink driving checks. In comparison, I sometimes travel down SH2 in peak times, and I've never failed to see Police on the road – sometimes up to 8

of them on a single journey. We can conclude from this that Police have the resources to undertake traffic enforcement, but that the priority is ensuring the safety of people in cars, not the ones on foot or on bikes. I have never ever seen any enforcement action being taken at the most crash-prone intersections in the city, and the Council's proposal provides no reason to believe that this will change.

5. Council should focus on fixing the problem that does exist, not the one that doesn't

Given that the Council has offered no objective proof that a lower speed limit is either necessary or will contribute to a lower pedestrian body count, it should focus its efforts on the things that will actually make the city safer. Many of these items have been brought to the Council's attention over the years, both formally and informally, and it is appalling that officers have intentionally ignored them.

For instance, even the recommendations of the last Steering Group – the one that was set up by Council officers to blame pedestrian behaviour for the crash rate, prior to the last proposal on speed limits in October 2012 – specifically noted that long wait times for pedestrians at intersections led to impatience, which led to risky behaviours that sometimes led to crashes. However officers have done absolutely nothing to address this systemic issue in the city, despite it being drawn to their attention over decades.

6. Conclusion

It is apparent from the foregoing that:

- The cause of the crash rate in the CBD is not related to excessive speed;
- No evidence is presented that speeding is endemic anyway;
- Police have provided no assurance that a lower limit will be enforced;
- The actions that would reduce the crash rate are deliberately not being undertaken by Council.

It is my view that this proposal is a futile waste of \$250,000 of ratepayer's funds, and that the sole purpose of re-litigating the speed issue is to act as a form of "safety theatre" – to provide the illusion that something is being done about the crash rate in the CBD, to disguise the fact that officers have consistently and deliberately refused to make the design changes that will prevent the deaths and injuries of Wellingtonians.

Accordingly, I ask that Councillors summarily reject this proposal, and instruct officers not to bring another proposal for speed limit changes in the CBD to this Council for the remainder of its term.

If your position is 'yes, with amendments', what alterations would you make to the current proposal and why?