

23 May 2023

Let's Get Welly Moving - Golden Mile traffic resolution and City Streets consultation
Via email to: goldenmile@gwm.nz

RE: Golden Mile and City Street projects consultation May 2023

Introduction

1. Retail NZ is a membership organisation that represents the views and interests of New Zealand's retail sector. We are the peak body representing retailers across Aotearoa, our membership accounts for two thirds of all domestic retail turnover. Retailers contribute around \$112 billion a year to the New Zealand economy.
2. New Zealand's retail sector comprises of approximately 27,000 businesses and employs around 220,000 Kiwis.
3. In preparing this submission we sought feedback and comments from retailers across Wellington. This submission should be taken to be more than one submission and an accumulative representative voice of Wellington retailers.
4. Retailers are clear to us that despite many opportunities for LGWM to engage productively and constructively, they have been yet again let down by a lack of willingness to understand or hear businesses perspectives throughout this process.

Opening comments

5. We recommend that LGWM read our previous submission on the Golden Mile dated 14 August 2022, and for ease is attached as an appendix to this document.
6. The vast majority of concerns raised through consultation, numerous meetings, and engagement with LGWM still had not be resolved and Retail NZ and the retail community in Wellington have serious concerns about the Golden Mile project. These concerns are now projected across the City Streets project.
7. Retailers continue to be firm that these proposals will seriously threaten, or force the closure of, their business. A number of retailers have left Wellington City due to the impending proposals by LGWM.
8. Larger business and chain stores will also be seriously impacted, although they could be cushioned from the immediate impact as they have larger business structures.
9. Planners and decision-makers must be aware that implementing these proposals will result in retailers leaving the Golden Mile and surrounding Wellington CBD.
10. We note that, at the date of writing, Retail NZ and other industry groups (Wellington Chamber, Hospitality NZ and Property Council) have an extensive list of questions and information requests sitting with LGWM that have not been answered in time for full consideration of these consultations. This approach is unhelpful for genuine engagement. As a result Retail NZ considers that it will be making additional consultation comments in a piecemeal approach as LGWM provides the required information.

Significant concerns still unresolved by LGWM about the Golden Mile project

11. The current focus should be on **connecting wellington 'as a whole'**, not on irrelevant pieces of the city that will not make changes to mode transport - 12 additional buses will not do this. To date no answer

has been provided as to why the Golden Mile project cannot be paused with the focus moving to the big projects first that will unlock congestion in the city. Instead of piecemeal projects that will have significant impacts on Wellingtons businesses.

12. **The \$117 million plus proposed for the Golden Mile should be re-invested into increasing the resilience of our existing public transport infrastructure.** This is critically important with the wider transport infrastructure of Wellington failing to deliver services and without the required maintenance to be of service. The Council needs to consider there are must haves and nice to haves. **Given the now 49 per cent cost on the Wellington City Council and LGWM having no legal control over spending decisions by the Council. This project must be halted and clear communication from the Council as to how this project will be funded?** Especially with the current rates planning out for consultation and the 49 per cent liability not on the Council books.
13. **No crime prevention** through environment design, putting the safety of retailers, and the public at risk. This is incredibly important due to the endemic nature of retail crime in New Zealand and the most recent cases of smash and grab incidents in locations with eerily similar design to what is proposed along the entire Golden Mile.
14. **Is this the right design** to encourage customers to shop in the CBD? We have significant concerns that the best design to enable interaction with the majority of retail business has not been considered and the city is potentially not gaining the best design to enable a thriving retail environment.
15. **Still no modelling on courier and e-commerce business impacts.** There continues to be no modelling in the LGWM documentation on the impact this project has on delivery timeframes in the central city. This must be undertaken as a priority to understand impacts on businesses and the wider community.
16. **Impact of construction will be significant.** Compensation for businesses loss of earnings must be the priority and factored in immediately.

Other comments on Golden Mile

17. The proposed limitation of private vehicles in certain parts of the Golden Mile being available between 9pm and 7am does not recognize the day time need of retail businesses in these areas - like chemists, beauty businesses and homewares stores. From conversations with LGWM officials we understand that this was a decision made by NZ Police. We ask why? Why were the agencies given the authority to dictate this and what date or evidence is it based on? Furthermore despite significant feedback from the business community that this timeframe must be changed we do not see any of these feedback reflected in the traffic resolutions.
18. Given the outstanding questions and information requests sitting with LGWM at time of consultation closing, Retail NZ will have further comments.

Comments on City Street projects consultation

19. It is incredibly disappointing to see the lack of detail opening available on this project for businesses in the impacted areas. All front facing communications on the consultation does not lead with the main point that there is planned options in these proposals to significantly change how these roads are used, nor are proposed layout plans been provided up front - these are buried through multiple clicks on the LGWM website or buried deep in online surveys. For those with accessibility issues and have only received a less than complete A4 document that does not show maps or detail - this is a barrier for adequate consultation.
20. Business and the wider community require maps with full details of what is proposed in their city - upfront and easily accessible. On this basis alone we know many businesses in these impacted areas will not have the required information to make an informed submission - nor does the wider Wellington Community. We question the validity of this consultation given this approach.

21. It is strongly recommended by Retail NZ that LGWM does not make any changes to any of streets in the City Street project. Retail NZ picks the option of no change, these areas have full access and space for all modes of transport and that is the best option. This option is the best value for money for Wellington (especially with no costings), and the best option for businesses in those areas.

We thank you for the time for us to be able to made a submission, but as noted until the requested detailed information is provided by LGWM to the numerous outstanding and unresolved issues, this submission will have additions as further information is provided.

Kind regards,

Aimie Hines
Manager Public Affairs and Advice, Retail NZ
Aimie.hines@retail.kiwi

APPENDIX 1: Copy for most recent Retail NZ submission on Golden Mile proposals

14 August 2022

Let's Get Welly Moving - Golden Mile consultation

Via email to: goldenmile@gwm.nz

RE: Golden Mile consultation August 2022

Introduction

22. Retail NZ is a membership organisation that represents the views and interests of New Zealand's retail sector. We are the peak body representing retailers across Aotearoa, our membership accounts for two thirds of all domestic retail turnover. Retailers contribute around \$112 billion a year to the New Zealand economy.
23. New Zealand's retail sector comprises of approximately 27,000 businesses and employs around 220,000 Kiwis.
24. In preparing this submission we sought feedback and comments from retailers across Wellington. Retailers are firm that these proposals will seriously threaten, or force the closure of, their business. Larger business and chain stores will also be seriously impacted, although they could be cushioned from the immediate impact as they have larger business structures. Planners and decision-makers must be aware that implementing these proposals will result in retailers leaving the Golden Mile and surrounding Wellington CBD.
25. Retailers are also clear to us that despite many opportunities for LGWM to engage productively and constructively, they have been let down by a lack of willingness to understand or hear businesses perspectives throughout this process.

Opening comments

26. The project isn't business driven - we are concerned these proposals will significantly impact couriers and e-commerce viability and are not supported by the affected businesses.
27. The project risks forcing retailers to leave the Golden Mile and potentially the entire Wellington CBD- *we continue to hear* from several smaller/independent retailers that these proposals seriously threaten, or even force the closure of their business - these businesses don't feel listened to.
28. Costing and projections for the project are outdated and don't reflect the realities of the post-COVID environment.
29. Many of the reports referenced by LGWM as cornerstone proof points have not been reviewed considering the impact of COVID-19 and how people are using the city differently.
30. The project should be delayed until MRT is implemented.
31. The project no longer has the intention of increasing bus capacity.
32. Crime prevention measures need to be considered by LGWM as part of its environmental design for the Golden Mile, these are not in the current designs.
33. The original Golden Mile 'transform' option did not include dedicated cycle paths. This was included post consultation into the business case for Councillors only consideration.
34. The original Golden Mile consultation did not have the objectives and weighting that is currently being used by LGWM. These were implemented post consultation and used as the basis to pick the 'transform' option. We are significantly concerned by the lack of natural justice by not allowing the public to comment on the project again due to the new weight system for objectives.
35. Significant work remains to be done in delivering a realistic Golden Mile project, **including further modelling of foot traffic and public transport numbers, economic impact, and on courier and freight impacts.**

36. It is important that a full economic analysis is undertaken that considers the real economic impacts on retailers. This has not been delivered.

Focus on the big picture

37. The current focus should be on *connecting wellington 'as a whole'*, not on irrelevant pieces of a utopian transport fantasy. Focus on moving the big projects first that will unlock congestion in the city, instead of piecemeal projects that will have significant impacts on Wellingtons businesses.
38. Currently, Wellingtons existing rail connections require significant investment - this is one of many examples highlighting the need to reprioritise transport investment in our city. Wellington's inadequate freight transportation situation is another useful example. There is no point in significant spending on other transport projects when issues with the existing infrastructure needs to be addressed.
39. LGWM feels pursuing the Golden Mile project is necessary to successfully deliver its plans for MRT due to the pressure it will alleviate from current strains on our public transports system - 12 additional buses will not do this.
40. The \$117 million plus proposed for the Golden Mile should be re-invested into increasing the resilience of our existing public transport infrastructure.

The Golden Mile changes should be delayed until MRT is implemented

41. It will be extremely damaging to make sweeping changes while businesses continue to recover from the economic and social shocks of the COVID-19 pandemic - with respect to this, Retail NZ requests any further work on the Golden Mile be delayed until the MRT project is implemented
42. In December of 2021, when submitting on MRT options, we asked for better clarity on the compounding impacts of LGWM transport projects. 9 months later, we still think these impacts are not well, or widely understood by those who will be most affected
43. Retail NZ Supported option 2 'Bus Rapid Transit to seas and skies', we view this a flexible solution that will make the most of existing public transport infrastructure
44. A comprehensive economic impact report of the project needs to be completed before a final decision is made
45. The consultation is lacking a plan to better support freight from the airport to Wellington City and further northbound
46. Given the recent opening of Transmission Gully and on-going government incentives related to electric vehicles (EVs), the compounding impact LGWMs various projects will have on private vehicle access need to be better understood

Golden Mile

47. The project is focused on making the "Golden Mile" look nice, on the flawed assumption that this will increase vitality in the CBD. We recommend that the project adopt the objective of encouraging customers to shop in the CBD. The project needs to be halted and fundamentally reviewed on that basis.
48. Outright removing private vehicle access from the Golden Mile and surrounding areas will have significant impact on shoppers, store owners, and staff.
49. Car parking in and around the Golden Mile is already limited - losing a further 300 plus carparks will put further pressure on CBD accessibility.
50. Before any car parking is removed, alternative parking options must be considered - the reality being private parking and public transport in/to the CBD is unaffordable for many families.
51. Relocating loading zones along the Golden Mile will significantly reduce delivery efficiency for retailers and impact viability of ecommerce options.

52. These proposals will encourage shoppers *away* from the city centre and towards suburban centres or retail parks where car parking is available and free. This has already happened with a significant upturn in sales in the outer suburbs in Wellington - by at least 20 per cent.
53. As part of LGWMs 2019 'Problem Definition' improving bus capacity along the Golden Mile was identified as a key objective, due to most Golden Mile users accessing it via bus. However, at some point between the 'Problem Definition' being released and June 2020, this objective was omitted. The focus is now on improving bus *travel times* and increasing *reliability* across the Golden Mile.
54. Based on LGWM modelling, a minimum increase of 50 buses/hour in each direction will be required to accommodate population growth over the next 30 years. The big problem here being the same modelling states the capacity of the CBD bus corridor as being capped at 100 buses/hour in each direction (the solution for this has yet to be discussed in detail). Effectively the Golden Mile investment will deliver 12 extra buses, and assuming these buses are double decker's, they will shift an approximate extra one thousand people.

Inadequate design consideration

55. LGWM officials have told Retail NZ that they made the decision to prioritise the widening of the seaward side of Lambton Quay by placing this as design element to be signed off by Councillors in the business case stage (post public consultation).
56. At no point was alternative designs for the widening of the Terrace side of Lambton Quay considered as part of design work by LGWM.
57. Despite LGWM own documents stating that wider pedestrian space in retail areas creates a better environment they have not investigated widening the retail dominant side of Lambton Quay - and despite requests from the retail community to do so.
58. We have significant concerns that the best design to enable interaction with the majority of retail business has not been considered and the city is potentially not gaining the best design to enable a thriving retail environment.

Impact on couriers and e-commerce

59. The removal and moving of several loading zones and closing of subsequent side-streets along the Golden Mile is going to significantly impact couriers and other commercial vehicles.
60. Recently the popularity of e-commerce has exploded due to COVID-19, placing further pressure on retailers to have efficient methods for handling/shifting freight.
61. As per the detailed design: Smaller commercial vehicles (couriers/trade vehicles) will no longer be able to access Golden Mile, and any large commercial vehicle (8m+) wanting access to Courtenay Place, Willis Street or Lambton Quay will need to obtain a permit to do so (giving them access between on weekdays 10am-3pm & 7pm-7am).
62. While there are alternatives loading zones being provided, these alternatives are far less efficient than the status quo, and will favour some businesses more than others given their location.
63. From our conversations with freight and courier companies the changes proposed will significantly change the delivery timeframes for the entire central city. The best estimate is that these changes will mean that what is delivered in a day could take up to three days. This is not just for retail store deliveries; this is for all deliveries to office buildings and residential residents.
64. There is no modelling in the LGWM documentation on the impact this project has on delivery timeframes in the central city. This must be undertaken as a priority to understand impacts on businesses and the wider community.

Construction disruption will be significant

65. The construction disruption caused by the project will be significant due to the length of time and the work required.
66. There is currently no information publicly available for retailers on the plans for construction e.g. planned phases, impact, and scope. This must be considered alongside any design consultation for retailers to provide feedback on both construction impact and finished project.
67. Retail NZ understands from LGWM officials that there will be significant construction impacts, not just at evenings like previously stated.
68. Construction in the Golden Mile will require all above and below ground elements to be removed and updated - streets and paths included. Access by customers, for couriers and workers will be limited.
69. Construction will also be stop and start and in parts due to impacts by major events like the FIFA World and bus route relocations.
70. The proposed the initial starting point will be Manners and Willis Streets with LGWM saying as it will have minimum impact. But the issue here is this construction segment can only maintain one bus route through in one direction through the Golden Mile as a result. The other way will need to be rerouted, with no clarity of location. This will have a significant impact on getting the public into the central city.
71. The subsequent stage to rephase traffic signals on side streets needs to have modelling undertaken to understand the flow on impact to the rest of the city.
72. Then "big ones" Lambton Quay/Courtney in sections - these will take years and have significant construction impact on businesses.
73. Compensation must be the priority and factored in immediately.

Economic impact on retailers

74. The economic position of Wellington is on a knife edge, retailers and hospitality are significantly impacted by the Alert Level settings due to the Omicron outbreak, two years of COVID-19. Furthermore, the protests in Wellington again impacted sales and foot traffic to dire levels. Businesses are stressed, under financial strain and many unsure how they can continue operating. We are concerned for the mental health and wellbeing of many in the sector.
75. The project risks forcing retailers to leave the Golden Mile - the required construction work will be a key factor, as will the removal of carparks, the restriction of private vehicle access and restriction on courier access and delivery timeline impacts.
76. The reports used by LGWM to justify a minimal perceived economic impact did not include the retail sector, understanding of consumer spending or the change in foot traffic due to COVID-19.
77. The LGWM retail assessment EY report reports states that "quantifying impacts is further challenged by the difficulty in isolating variables, leakage effects and the long- term nature of the impacts being measured, which often goes beyond the evaluation period." Despite being urged to undertake further reports that includes the sector LGWM has chosen not to.
78. Furthermore, the report has significant limitations as "has not quantified any economic impacts on retailers and instead obtained quantitative data".
79. The construction required to deliver the project will, for a significant amount of time, keep shoppers away from Golden Mile and surrounding areas. This, coupled with no private vehicle access will seriously impact footfall of which has already failed to bounce back to pre-COVID levels.
80. Retail NZ strongly recommends affected retailers should be able to apply for financial compensation during the construction period. We are prepared to discuss designing this further with LGWM and costing needs to be undertaken urgently to be incorporated into the project costs.

No quicker buses or increased capacity

81. The project has no intention of increasing bus capacity. LGWM no longer considers increasing bus capacity as a key objective, coupled with a lack of investment/low budget means consultants could not consider the purchase of more land to widen road space.

82. Originally, *increasing bus capacity along the Golden Mile* was a key objective for the project, however sometime between August 2019, and June 2020, this changed
83. Over the next 30 years, Wellington expects an additional 50,000-80,000 commuters, with the CBD bus corridor capacity needing to increase from 90 buses/hour in each direction to 140-170.
84. LGWM has confirmed that currently there isn't adequate road space at key locations on Willis and Manners Street to increase capacity (via 'offline' bus stops). This means the CBD bus corridor capacity is capped at 100 buses/hour in each direction. Therefore, the CBD bus corridor, in its current state will not be able to support the increase in buses/hour over time.
85. Dedicated bus lanes, improved signals, and fewer private vehicles does little to address the long-term capacity issues Wellington transport system is facing (particularly the CBD corridor) - although LGWM considers these options to be the solution.
86. Retail NZ would like to hear more about the unspecified north-south bus corridor that will service bus volumes beyond 100 vehicles/hour in a direction.

No crime prevention by environmental design

87. Crime prevention measures need to be considered by LGWM as part of its environmental design for the Golden Mile.
88. Current environmental considerations per the detailed design only include street furniture, paving and planting.
89. The current 'at level' nature of the design (footpaths and roadway) creates a significantly high risk for ram raids, smash and grabs or a mass casualty event.
90. Retailers or furthermore businesses safety is not considered as a priority stakeholder in the current design report.
91. Given the spike in retail crime (ram raids especially), crime prevention measures need to be considered as part of environmental design. While this design, in its current form, is primarily focused on the safety experience of those using active modes of transports and ensuring they are safe from each other, the safety of retail and hospitality businesses and consumers while on the Golden Mile deserves equal recognition.
92. Crime prevention through environmental design is incredibly hard to retro fit, and expensive. Crime prevention environmental design must sit alongside all plans due to the need to consider going underground to secure objects to stop vehicles entering buildings or public spaces. We are concerned that no costing for crime prevention design is included in the project.
93. The lack of consideration for safety due to crime, or an incident of significant impact/mass casualties into the design at this stage is a significant risk that must be addressed.

Cycle way inclusion

94. The original 'transform' option did not include dedicated cycle paths, Retail NZ is concerned this sets a bad precedent for subsequent LGWM consultations.
95. To move the goal posts and add new components post consultation is not best practice in engagement.
96. As per the detailed design: There is a dedicated cycle path for Lambton Quay (between Parliament and Panama Steet) and Courtenay Place (between Cambridge Terrace and Taranaki Street)
97. While we agree the proposal should support a range of transport options, LGWM should not feel they can circumvent the consultation process and include new features where they see fit
98. There is meant to be dedicated cycle ways included in the City Streets project and other projects.

Who pays for this?

99. Final costs are yet to be provided, with many elements still requiring more costing and the inclusion of additional elements.

100. There is no clear information on how this project will be paid for or if Wellington City can afford a project with this level of costs.
101. Treasury has consistently raised concerns and concerns that the LGWM projects cannot be funded, whilst questioning who will pay.
102. Businesses are stretched and cannot handle a commercial rates increase to pay for the project. Especially with the expected downturn in sales that the construction and final project will create.
103. Increases in public transport rates will not get people back into the city either.
104. A congestion charge will limit the viability of the central city and the ability for people to access the city - as will a targeted tax on public and private carparks.

General wider comments

105. There is no inclusion of EV charging locations into car parking planning.
106. There is no change to the number of carparks assigned for the dedicated use of the Wellington City Council in the central city. Also included in having no change is the dedicated diplomat carparks.
107. The amount of disability carparks provided is significantly low.
108. Other projects will impact CBD retailers and remove further carparks e.g., City Streets, and Wellington City Council projects.

Retailers are defeated and disheartened Comments from Wellington retailers

109. “To be honest I feel rather defeated by WCC and their constant calls for consultation which they then ignore! I have got to the point where it all seems a bit pointless and disheartening. Their very expensive independent reports are all very well but not necessarily relevant here.”
110. “I have had a lot of conversations with people who say they will stop coming into the city. In fact, a lot already have, with the exorbitant cost of parking! And post-covid, the streets are already substantially quieter than pre-covid days. I'm already struggling for customers.”
111. “I am located on Manner Street, a previous example of a failed pedestrianization in Wellington. Yet officials won't talk to me about the issues with the approach from direct experience.”
112. “I have signed a 9-month lease, after 20 plus years in the city like many others I doubt I will remain”
113. “How are we expected to evolve our business to meet the growing demand of ecommerce when LGWM removes or significantly limits the ability of couriers to access our stores”
114. “After the 2009 removal of Manners Mall happening outside my shop I am aware that these projects always take much longer than they predict and the consequences are very real!! I'm not convinced that retailers are very high on their list of priorities. But without a vibrant retail and hospitality sector, why would people visit our city?”
115. “Easy access to the Golden Mile for people with disabilities will be nigh on impossible, especially with the fewer bus stops much further apart. And with most of the bus stops being in the traffic lane, it is hard to believe that travel times for buses will be much improved. It is buses holding up other buses at stops that is the problem now and this doesn't look like it will improve with the new proposals.”
116. “My concerns are that there is a lack of focus and planning for improving the state of our sewage systems. No point in spending this amount of money if it's going to be under water before it's paid off.”

The impact:

117. Furthermore, from a snapshot survey (previously provided to LGWM) of Wellington retail, hospitality and close contact businesses told us that if LGWM projects progress we will see a significant impact on the city. Businesses across the city told us -
 - 28 per cent will close their businesses;

- 25 per cent will relocate their business to an outer suburb in Wellington, Porirua or Lower/Upper Hutt;
- 25 per cent will undertake processes to initiate staff redundancies;
- 9 per cent will reduce operating hours.

118. This is the vast majority of businesses taking significant steps that will have economic impact on the city - 87 per cent. This is not a viable position for the city to be in and will not enable a thriving city for Wellington.

Our recommendations and further work to be undertaken:

119. Speed up the big project - MRT.
120. Stop Golden Mile, Cobham Drive and the Thorndon Quay/Hutt Road projects. They are not required for MRT to progress.
121. Undertake an urgent review to update figures of the movements of people in the city to be incorporated into LGWM projects.
122. Undertake a genuine economic impact studies for all projects - include retail, hospitality and close contact businesses views and partner for genuine consultation.
123. Undertake a study to understand the impact on delivery timeframes for freight and courier deliveries in the central city.
124. Move investment into existing public transport infrastructure that requires urgent investment.
125. Provide a plan for construction phasing for businesses to understand what parts of the city will be impacted through construction.
126. Design compensation for businesses impacted by construction and incorporate these costs into the project.