TAHUNANUI BUSINESS & CITIZENS ASSOCIATION INCORPORATED

SUBMISSION

NELSON FUTURE ACCESS PROJECT JUNE 2021

The Tahunanui Business and Citizens Association Incorporated (TBCA) represents the interests of businesses and residents of the Tahunanui Community

The Tahunanui Community strongly objects to the establishment of four lanes on Tahunanui Drive. We ask the planners and Waka Kotahi NZTA to investigate the development of an alternative route for traffic to Nelson City and the Port and that this plan shows the appropriate mitigation for the affected communities.

We contend that mitigation against the effects of increasing traffic movements is not possible in Tahunanui and that an additional route is required to share the increasing load of freight from the Tasman region to the port in particular.

We recognise that Tahunanui Drive will always be a major traffic route. Even with the provision of an additional route it will continue to be a significant contributor to the transport system of the city. No one is suggesting that an additional route will be a replacement. Rather it will provide the ability to share the traffic load across the three routes rather than the current two.

The Nelson Future Access Project (NFAP) proposals are dangerous and totally insensitive to the communities that are presently shouldering the burden of these high volumes of traffic.

The contention that the establishment of four lanes will somehow benefit the Tahunanui community is disputable. How can Waka Kotahi NZTA have as a part of its "Statement of Intent" that they will create livable communities, "that are healthy, thriving and well connected communities." when this proposal will not improve access and safety for those living in the Tahunanui community.

Waka Kotahi NZTA "Statement of Intent" "that people should come first" is in direct contradiction to the objective of this current proposal which is clearly about meeting the needs of those travelling through the Tahunanui Community. This is confirmed by Waka Kotahi NZTA's statement that:

"modelling tells us that approximately 450 more vehicles per hour would be able to travel south through the intersection in the afternoon peak with the reinstatement of the short southbound lane"

TBCA contends this will simply move the congestion to the next intersection or 'pinch point' without considering the safety of the Tahunanui community.

In Waka Kotahi NZTA's "Statement of Intent" we read their objective is to have a "people-centric approach" and "we are working on targeted partnerships to create transport links and services that can improve social, economic and environmental outcomes for communities and businesses".

TBCA believes that these NFAP proposals would have an extremely negative impact on Nelson's premier tourist and recreational areas of Tahunanui Beach and the Waterfront.

Tahunanui is a seaside village and an important recreational asset of the city with large numbers of city and regional dwellers using the beach and sporting facilities all year round.

It should also be recognised that Tahunanui is home to the largest holiday park in the southern hemisphere, with in excess of 3000 visitors staying in the peak period. This means that during the tourism season the numbers using the village facilities swell by several thousand. These visitors contribute considerably to the economy of the region.

The Tahunanui Structure Plan, adopted by Nelson City Council, proposed the development of a people-friendly village environment at Tahunanui - "... to promote a village heart for Tahunanui that is compact, walkable, diverse, accessible" and ..."to improve access to and enhance ... the area through a network of well connected links and spaces".

TBCA is mystified by the Waka Kotahi NZTA terminology surrounding these proposals. They are frequently referred to as "**improvements**". We do not view the provision of 4 lanes as an improvement for our community. The highway currently is at the heart of our community and home to many of the community's major services, especially its health services, dentist, bakery, Community church, bowling club, hairdressers, motels and restaurants. These facilities serve not only the community but the important tourist market. Accessibility for all these services is already difficult: however the planned introduction of 4 lanes will make access almost impossible and will certainly not make for safer movement of residents and visitors.

Waka Kotahi NZTA in its documentation has identified 'removal of parking' as a result of the establishment of clearways as an important factor, and although parking is crucial for the businesses no recognition has been given to the safety and accessibility for people visiting these businesses and services.

The proposed reinstated southbound clearway runs straight past the Tahunanui Pharmacy, Tahunanui Medical Centre, Tahunanui Physiotherapy Clinic, and Medlab. Safe access to these essential and crucial medical services is already difficult but would become almost impossible for clients and patients to access safely with four lanes and a clearway in operation. We note that the Tahunanui Pharmacy's contract with the NMDHB sets out requirements of service, expectations and commitment to the provision of care for their patients. They provide an essential community health service to the Tahunanui population which is a very diverse community, older, vulnerable, and with a lot of social housing - safe access is vital. These proposals would impact greatly on the Pharmacy's ability to safely provide this service.

In the proposal document Waka Kotahi NZTA gives the following reasons for their proposals - Better journeys for all

We do not believe that the introduction of priority lanes and clearways on this limited section of highway through Tahunanui would improve traffic flow now or in the future and would be at the expense of this community's livability, accessibility and safety. These measures will simply move the congestion to the next intersection.

Safer streets

NZTA does not believe that the proposals would improve safety in the Tahunanui community, road closures and restricted access/exit points will not make streets safer. The provision of traffic calming needs to be properly consulted with the residents affected. Consultation involves real listening.

Resilience

"The proposal is resilient" - TBCA questions this assertion. The Rocks Road area of Tahunanui has always been at risk of natural hazards, i.e. there are ample examples of sea inundation during high tides and storm events, rock fall/slips, and the Tahunanui Slump.

A 2004 Environment Court Decision on the impacts of additional roading on the Victory area rejected the proposal for reasons including social severance, the proximity of the route to schools, air quality degradation and a lack of evidence that it would improve safety and efficiency.

TBCA would argue that these same reasons apply to the current proposals to increase the lanes on the existing roads as they would affect the Tahunanui community in exactly the same way. There is no opportunity to mitigate against these effects on either of the current routes. The proposal should therefore be rejected.

TBCA believes that since 2004 major improvements in air quality, and technological engineering improvements have occurred which would make this additional route (previously known as the 'southern link') a more appropriate long term solution.

The current NFAP Report further states that "we could refine the priority lanes option to substantially lessen the impact on both the Rocks Road and Waimea Road corridors". This is a nonsense statement. How can putting four lanes (be they priority lanes or clearways) of traffic through Tahunanui, where mitigation is impossible, "lessen the impact" on the community. Safety, access, and severance would be much worse.

TBCA supports safer community streets for all of Tahunanui. The proposed introduction of traffic calming measures to prevent "rat running" is in our opinion a red herring. It is being introduced to distract the community away from the dangerous introduction of four lanes and re-establishment of a southbound clearway. We do however totally support the lowering of speed on all residential streets in Tahunanui to 30km/hr and 40 on Tahunanui Drive and along the Waterfront.

In the NFAP proposal there are several statements about encouraging walking, cycling, public transport and sharing a ride. This is commonly referred to as modal shift. Modal shift from cars to cycling, walking, and buses, will do nothing to lessen the impact of heavy vehicles through Tahunanui and along the Waterfront.

In July 2020 the Road Transport Association of NZ submitted to Waka Kotahi that

"Any option that is introduced should be evidenced-based, not done purely on assumptions, and not based on the belief that this is the best option for everyone."

The proposal documentation provides no information on the data around types of transport. There is for instance **no mention of Heavy traffic**. Heavy trucks use this route to the port and as the economy of the region has grown the number of these vehicles has increased. These large vehicles pounding along in a lane immediately adjacent to footpaths would be extremely dangerous for pedestrians, young and old.

The Waka Kotahi NZTA proposals continue to try and squeeze traffic of all forms, be it cyclists, pedestrians, freight, and domestic motorists, onto a road which has already been proven to be incapable of carrying this traffic mix safely. A previous clearway adjacent to the Pharmacy proved extremely dangerous with several near misses and a number of injuries. Why, when safety is a desired outcome, would anyone want to return it?

On a positive note the TBCA have for a number of years advocated for the installation of traffic lights at the Parkers Road Mairie Street intersection with Annesbrook Drive, however the installation of an additional seven sets of lights will do nothing to improve the congestion. The modelling being used to support these installations must be flawed.

The NFAP brochure states "the Priority Lanes package, has emerged as the best long-term transport solution for Nelson and follows extensive community consultation held last year".

TBCA questions this statement. The community consultation was clearly not extensive enough particularly for those in the Tahunanui community. The survey being used to justify this conclusion had a relatively small sample and lacks data on a number of issues. There is for instance no information on the reason for travel of single occupancy vehicles, and it is a massive assumption to assume that these vehicles could be reduced in number by modal shift, eg, public transport and cycling.

SUMMARY:

TBCA notes Waka Kotahi's Statement of intent to be a people centric approach, to create liveable communities and to provide services that can improve social economic and environmental outcomes for communities and businesses.

TBCA notes that this proposal does not achieve these objectives for the Tahunanui community.

TBCA vehemently opposes the development of four lanes (priority or clearway) through the Tahunanui business centre and the community as a whole. These lanes are unsafe.

TBCA believes that Waka Kotahi's proposal is in contradiction to its Statement of intent on several levels. On one hand we have a recorded statement that slowing traffic improves safety and then on another a desire to increase traffic flow by 450 cars per hour through the central Tahunanui intersection.

TBCA supports the establishment of traffic lights on the Parkers Road Tahunanui Drive intersection.

TBCA supports the development of an alternative route to share the load of the transport needs of the future and that this route should be designed using modern technology to appropriately mitigate against the effects of traffic on the communities affected.

TBCA would appreciate any opportunity to be heard.

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