



MISSION BAY-KOHIMARAMA RESIDENTS' ASSOCIATION INC.

23 September 2016

Submission on Resource Consent Application for Ngapipi Rd – Tamaki Drive

Overall, we do not support this project

1. While we accept that the project should have a beneficial effect on safety, particularly for cyclists, we have serious concerns about the overall project.
2. First and foremost, we are concerned that this project has been conceived and designed in isolation. There are numerous other problems and opportunities relating to Tamaki Drive and its environs, and it is important that this project is evaluated in this context to ensure that it is consistent with other future projects and that the highest priority projects are undertaken first. We see no evidence that this has been done.
3. Secondly, we are concerned about the scale and cost of this project for relatively minor benefits.
4. Thirdly, we do not believe that there has been an adequate analysis of the impact of future sea level rises.

We do not support a piecemeal approach to Tamaki Drive

5. Tamaki Drive has a number of problems and opportunities, and the Ngapipi Road/Tamaki Drive intersection is just one of them. Rather than deal with each one in isolation, we believe that they should be evaluated in the context of the overall vision.
6. The Tamaki Drive Master Plan is a good starting point that sets out a high level vision for the road and associated foreshore. It recognises that Tamaki Drive is more than just a road; it is an arterial route for the entire eastern suburbs, a scenic and recreational route for tourists and locals, it provides a connection between the community and the harbour, the associated beaches and reserves provide a recreational playground, and it hosts more special events than virtually any other asset in Auckland. In order to retain and enhance these attributes, a number of projects are anticipated, including:
 - 6.1. Raising the level of Tamaki Drive 500m west of the project site to deal with severe flooding which periodically closes the road;
 - 6.2. Widening the footpath over the full length of Tamaki Drive to create a boardwalk and separated cycleway;
 - 6.3. Addressing maintenance issues with the existing seawall;
 - 6.4. Widening the Ngapipi Bridge;

- 6.5. Improving traffic flows to accommodate future population growth in the eastern suburbs, accelerated by the Unitary Plan choosing to preferentially intensify this area.
7. Before we could support this project, there are two aspects we would like to see addressed:
 - 7.1. Is this project the highest priority project for Tamaki Drive right now, or would the funds be better spent on, for example, raising the road surface to avoid flooding, or building a new boardwalk and separated cycling path?
 - 7.2. Has this project been designed to be consistent with other future Tamaki Drive initiatives? For example, has sufficient room been allowed for both an additional future eastbound traffic lane and the separated boardwalk and cycle way envisaged for the whole of Tamaki Drive? It would be disappointing to find that the seawall has to be rebuilt again in the near to medium term to accommodate the new boardwalk and traffic lane.
8. From what we can see, no consideration has been given to anything outside of the project scope.

High project cost for modest benefits

9. We note that the entire rationale for the project is to “[undertake upgrade works to enable safety improvements for cyclists, pedestrians and motorists through the Tamaki Drive - Ngapipi Road intersection](#)”. The primary benefits are therefore expected to derive from a reduction in accidents.
10. We agree that signals should theoretically improve safety for cyclists, but it is far from clear that there will be any significant reduction in accidents overall.
11. The Traffic Assessment Report indicates that some crash reduction may be expected because of the configuration changes, but warns that “[a comparison of the intersection types for urban T-intersections shows that the fatal and serious crash rate is similar for all control types \(i.e. roundabouts, traffic signals and priority control\)](#)”. This is based on a comprehensive analysis of all intersection accidents in New Zealand by NZTA.
12. In short, there is no reason to expect a reduction in accidents by replacing priority controls with signals.
13. So how much benefit is there? The data presented shows that there has been an average of only 4 accidents per year at this intersection, with only 1 serious injury in the past 4 years. Injury accidents involving cyclists have averaged just 1.5 per year. The Traffic Assessment postulates an improvement of 20% to 45% which means that the project might avoid 1 injury accident every 2-3 years. This does not seem like a very large benefit.
14. Other benefits include the greater ability to turn right into Ngapipi Road from Tamaki Drive and to turn right into Tamaki Drive from Ngapipi Road during the afternoon peak. The former benefit is significant, reducing queue lengths from over 600m to just over 400m. The latter is of minimal benefit as virtually no vehicles attempt to turn right out of Ngapipi Road at afternoon peak times.

15. Another benefit is the provision of pedestrian crossings to provide better pedestrian access to the waterfront. Of course, it would be possible to get the same benefits simply by installing a pedestrian crossing, rather than reconstructing the entire intersection, but regardless, this is a benefit.
16. Detracting from the benefits, is the broad conclusion that average traffic delays at this intersection will roughly double at peak times. The modelling data concludes that average morning peak delays will increase from 1 min 40 secs to 3 min 5 secs, and in the afternoon peak, from 1 min to 2 min 7 secs. (The modelling does show potentially significant benefits to westbound morning commuters on Tamaki Drive, with substantially shorter queues modelled, but this hypothetical gain is predicated on ensuring two full lanes of Tamaki Drive westbound traffic proceeding through the intersection, ie removing the T2 restriction on the left lane, which is not actually proposed; the benefit is therefore dubious.)
17. So overall, the project benefits seem quite limited; a reduction in injury accidents of around 1 every 2-3 years, an improved ability to turn right from Tamaki Drive into Ngapipi during the afternoon peak, and improved pedestrian access to the waterfront. These are partially offset by an overall doubling of traffic delays. Despite the modest benefits, the proposed solution is disproportionately large and expensive.
18. We wonder whether the very high cost is justified by the modest benefits, and whether some of the benefits could be achieved at much lower cost. For example, uncontrolled pedestrian crossings could be installed either at the intersection or at a more convenient location nearby, bringing the same pedestrian benefits with minimal cost.

Sea Level Rise

19. We are also concerned that the likely impact of sea-level rise has not been properly assessed. The Coastal Process Assessment states:

“Within the project area the minimum road level of Tamaki Drive is approximately 1.6m above the HAT, and the road level of Ngapipi Road is approximately 1m above the HAT. Accordingly, at the current rate of sea-level rise, the intersection will not be at risk of sea-level risk related flooding during normal tide conditions for many hundreds of years.”
20. This is a simplistic and misleading analysis. We would prefer to see a fuller analysis of the estimates and likely impacts using the NIWA definition of red alert tides and data from authoritative sources.
21. Tamaki Drive is already prone to severe flooding periodically closing the road and cutting a major arterial route. This is not generally because of “normal tide conditions”, but because of the combination of normal king tides coincident with storm surge and wave action.
22. Further, according to the Auckland Council’s own report commissioned from NIWA, the rate of sea-level rise will increase over time, and so a linear extrapolation of past rises is inappropriate. We understand that the NIWA report predicted sea-level rises of around 0.3m by 2065, increasing to between 0.4m and 0.8m by 2100. With rising sea-levels, Tamaki Drive will be flooded more frequently; what currently takes a 100 year event to cause serious flooding is predicted to occur as frequently as every week once sea levels have risen by 0.8m, or every 2 years for a 0.4m rise.

23. While it is accepted that the most flood-prone part of Tamaki Drive is outside the project area, this is no excuse for not undertaking a proper analysis of the potential impacts of rising sea levels. It also questions whether a project to raise the low part of Tamaki Drive should have much greater priority than this project.

Summary

24. We recommend that this project not proceed until it has been evaluated in the context of all the potential Tamaki Drive projects to ensure that it is the highest priority for the limited funds available, and that it is compatible with other future projects.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'D Stock', written in a cursive style.

Don Stock
Chair
Mission Bay Kohimarama Residents Association