



[for CAA contact details, please see undersigned]

31 May 2013

Submission on the draft Unitary Plan

Executive Summary

Overall, Cycle Action Auckland (CAA) supports the draft Unitary Plan, though in many aspects, mainly limitation of sprawl and excessive car parking, we do not think the plan is ambitious enough in its goals or rules.

DUP Ref	2.2.1	DUP Text	Providing for Growth
Comment	<p>We consider that the draft Unitary Plan needs to be stronger in applying a sequential test for land allocation. The plan seems to spend too much focus on green field expansion rather than the recycling of brown field, or the further intensification.</p> <p>Include a strong sequential test to ensure brown field land is fully optimised first before any green field is taken. That way true intensification and compaction can occur.</p>		
CAA Recommendation: Support but strengthen. Reduce greenfields expansion.			

DUP Ref	2.3.3	DUP Text	Transport
Comment	<p>The plan seems upside down, with demand management last and infrastructure interventions coming first. Demand drives infrastructure so change/reduce demand = changed/reduced infrastructure response.</p> <p>There is no mention of mode hierarchy to inform decision making. It is time that walking – cycling – PT – freight – private car was entrenched in Auckland transport policy as the underlying formal hierarchy on our streets.</p> <p>During peak periods there no real available or useful capacity on arterial routes hence rat-running and red-light running. This means that opportunities for improvements to pedestrian and cycle facilities are often are rejected, as they would reduce car traffic space. Without a clear hierarchy, more road space allocation for pedestrians and cyclists (including re-arranging existing road space) will not occur, and car traffic demand will keep growing / will prevent expansion of other modes.</p>		

	<p>Building more roads on a predict-and-provide basis for more queues is yesterday's answer. Tomorrow's answer is to reallocate space, suffer the temporary pain, and watch the benefits flow.</p> <p>One way to achieve better peak capacity use is by reducing and harmonising speed through consistent capacity, rather than old-school sporadic widening at intersections. Add to this integrated traffic signal control, green waves, bike friendly traffic signals, and an integrated safe and connected cycle network, and we may begin to get closer to a managed urban road transport network by using existing infrastructure smartly.</p> <p>Re-order and substantially strengthen the travel demand component.</p> <p>Introduce requirements to actively monitor travel behaviour so that gaps to enable mode shift can be more readily identified and justified (i.e. identify where capacity can be reallocated when it is freed up).</p> <p>Rephrase this section to require capacity is given for cycling on arterial routes, including by re-allocating existing space, and that this is consistent, continuous, safe and convenient.</p>
CAA Recommendation: Support but strengthen. Focus on people not cars.	

DUP Ref	2.9	DUP Text	Climate Change
Comment	<p>Climate change as part of the wider environmental protection agenda should be a centre piece of the whole plan but is treated much as a tack on.</p> <p>Re-write and place the environment as central to the plan. We are all dependent on our environment / the climate and we all have role to play here. The current focus on further roading expansion weakens any statement made here.</p>		
CAA Recommendation: Support but the plan needs to focus on this issue more, particularly in terms of the impacts of sprawl and roading-centric development.			

DUP Ref	3.1.1.2	DUP Text	Parking Polices
Comment	<p>Various aspects need to be addressed better –parking demand is driven by lack of alternatives, not just car ownership.</p> <p>We support the abolishing of minimum parking rates across the board – this, in most cases, is a solution in search of a problem, and minimum parking is one of the key hindrances to greater intensification, needing not only extra cost to provide, but also reducing road space by encouraging car commutes.</p>		

	<p>The currently proposed (car) parking policies discourage sharing the parking resource, i.e. the default is that all activities nearby (or even on one site) have to provide "their own", even when demand has non-overlapping time periods, or only peaks very rarely . Reduce the default "no sharing" attitude, and make it easier for applicants to do so.</p> <p>Reduce the investment into new parking buildings, except where this is <u>directly</u> followed by a reduction of on-street parking to the same degree.</p> <p>More extensive use of parking charges and enforcement through simple and consistent parking restrictions. Need to use parking as a demand management tool and a transport product, not just something that is provided as if by right.</p> <p>Cycle parking should be mandatory for all land uses, not just selected ones – particularly, it makes no sense to exempt retail & cafes/restaurants from bike parking as in the draft plan - these are some of the key destinations for cyclists! Medical facilities also require bike parking.</p> <p>The plan should also strengthen the role for public bicycle parking, including the provision of secure, sheltered bike parking for major public infrastructure, including PT stations.</p>
<p>CAA Recommendation: Support maximums, support removing minimums - but need to be more ambitious yet.</p>	

DUP Re	4.2.1.2.3	DUP Text	Development Control – 3.1 Number of Spaces
Comment			<p>Support the introduction of required cycle spaces. This needs to cover all land-uses - including retail / hospitality and health.</p> <p>Opportunity should be taken to allow cycle parking pools to avoid over-burdening small commercial developments.</p> <p>End-of-trip shower provision rates seems low. Again need to be aware of development size but be creative. Doubling up mobility toilets and shower rooms is a common approach. Larger developments could also provide clothes drying room.</p> <p>Suggest to switch the secure cycle parking rates to "rates by activity area". Many developments at the application stage cannot yet define the number of staff who may work there!</p> <p>Ensure consistent secure bike parking numbers. Manufacturing workers do <i>not</i> need less cycle parking than office workers. Students do <i>not</i> need less – rather they need more – cycle parking. Suggest that secure cycle parking should be one consistent rate for all developments.</p>

CAA Recommendation: Support but strengthen, cycle parking needed at retail developments. Switch from by person rates to by area rates for secure cycle parking.

DUP Ref	4.2.1.2.3	DUP Text	Development Control – 3.2 Design of Spaces
Comment		No mention of cycle parking design (dimensions & types of rack) to support the required cycle parking. This needs to be addressed – suggest referring to Australian Standard AS2890.3 Parking Facilities, Part 3: Bicycle Parking Facilities. This also needs to include design guidance for access routes to bike parking (doors, ramps, lifts), especially where large numbers of secure storage spaces are required. “Secure” cycle parking needs to be defined to include weather shelter, and some general guidance on what is acceptable in terms of access control for security.	
CAA Recommendation: Amend to include cycle parking design / definitions.			

Thank you very much for providing the opportunity for this input.

Barbara Cuthbert
Chair / Spokesperson
Cycle Action Auckland

Mobile: 027412582
Phone: 094452223
Email: cuthash@world-net.co.nz

2A St Aubyn Street
Devonport
Auckland 0624