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31 March 2014

Feedback on the Auckland Transport Code of Practice

This feedback sets out our comments on the draft ATCOP document.

Overarching Comments

- We are concerned that **ATCOP's purpose seems unclear**. Rather than simply collating technical drawings and specifications, it seems to vary from referencing external standards to setting very specific requirements to providing guidance more appropriately left to other policy / strategy documents by AC / AT. Implementation could be confused due to contradictory documents, especially where other statutory documents already exist.
- We therefore consider that **ATCOP should be refocused** more on the technical aspects, and the policy / strategy aspects removed. Alternatively, ATCOP should be further reworked and reviewed to ensure it conforms to those higher-level policy / strategy intentions, and is more coherent internally.
- Despite the policy / strategy aspects, and the mode hierarchy of Section 1, **ATCOP does not seem to clearly set out a priority for walking / cycling / public transport** in those sections where actual infrastructure designs are discussed. As an example, ATCOP seems to provide little to counterbalance the status quo situation that much cycle infrastructure is not built - or is built in inconsistent fashion - because achieving high quality cycle infrastructure would require car park removal or reduction of motorist convenience.
- On the other side of the same coin, we are concerned that **ATCOP seem to leave insufficient flexibility for temporary / quick change treatments** that give "80% of the benefit for 20% of the cost". ATCOP requires very high standards for some cycle infrastructure. While positive on its own, this may make implementing them harder in constrained areas. We **suggest providing "minimum" and "desirable" values**.
- We consider that the cycling design chapter, **Section 13, is more coherent** than some of the other sections. However, this does not totally invalidate concerns about overlap and possible contradictions with other documents that apply to cycling-related transport policy / strategy in Auckland.

Specific Sections

Section 5.2 Cycle Routes / Auckland Cycle Network (ACN)

Concern: The provided classification in “cycle metro”, “connector” and “feeder” links is described as setting minimum standards but gives insufficient detail as to the quality or dimensional expectations / facility widths of these various route standards. Table 12 attempts this somewhat, but has various errors and inconsistencies, and does not tie in closely to Section 13 of ATCOP. This makes it hard for designers or developers to assess appropriate inclusion of such links in their projects.

Change sought: Provide more clarification as to what the quality standards are for each cycle network hierarchy level. This should tie in more closely to the descriptions of facility design in Section 13.

Section 5.2 Cycle Routes / Auckland Cycle Network (ACN)

Concern: As set out in Table 12, not all hierarchy levels of the cycle network are targeted at all user groups. This offers less confident user groups a discontinuous network – by designing “connector”-level cycleways, for example, for “competent” and “experienced” cyclists, novice and less confident cyclists are left with a network that would be extremely patchy even if was already constructed (when in reality, even this multi-hierarchy level network will remain largely unfinished for the foreseeable future).

Change sought: Make ALL hierarchy levels of the cycle network suitable (if not necessarily optimised) for ALL user classes. This particularly relates to de-emphasising shared bus lanes and paint-only cycle lanes.

Section 6.3.2 Footpath Spatial Zones, Through Routes

Concern: The “through routes” and pedestrian zone section does not cover aspects of the design where these through routes are also shared paths for cyclists.

Change sought: Greater importance should be placed on / references to shared path design sections to be added - relating to the different, and more onerous requirements if the through route is to also serve as a shared path.

This particularly relates to minimum width, freedom from obstructions (including street furniture and rubbish bin placement) and proximity to visual barriers like fences or hedges which would create crash risks as vehicles or pedestrians cross the cyclist's route unexpectedly.

We also suggest a reference to the general inadvisability of having un-separated (shared) paths through areas of heavy pedestrian activity, such as outside of shop frontages – in these areas, protected cycle lanes / paths should be provided to avoid safety issues and user conflict.

Section 6.3 Pulling it Together - Spatial Arrangement, particularly 6.3.3 Sample Street Cross-Sections

Concern: None of the cross-section examples include any options with cycle facilities. This is problematic, as these are described as example, typical sections.

Change sought: Provide example layouts with cycle facilities, including options for narrower conditions.

Section 6.3 Pulling it Together - Spatial Arrangement, particularly 6.3.3 Sample Street Cross-Sections

Concern: We are concerned that despite increasing demand for road space for uses other than parking cars, there is no option without on-street parking shown. This is problematic, as these are described as example, typical sections.

Change sought: Provide example layouts without on-street parking, including for narrower arterial cross-sections.

Section 6.3 Pulling it Together - Spatial Arrangement, particularly 6.3.3 Figure 4, Suburban Local Street

Concern: While the text notes for Figure 4 note the need for street “Lane widths minimised to emphasise local street nature and encourage slow speeds” and for “Minimal road markings to slow traffic and avoid visual clutter”, the example shows very wide lanes, and shows a centre line, which is not needed in a suburban slow-speed environment, and in fact encourages speeding

Change sought: Change example layout figure to show narrower lanes and remove centre line, including noting in the text that the centre line can be omitted.

Section 6.3.6 Spatial Arrangement at Street Intersections

Concern: The notes regarding the figure’s updates to come seem to disagree on whether pedestrians walking along (parallel) the route of the primary street carriageway have priority or not. The design also seems to show traffic signals on the minor streets, yet implies pedestrian priority?

Change sought: We support pedestrian priority, especially in town centre environments, and in parallel to major streets, over priority for side street traffic. However, the figure likely needs alternative options or be omitted to not imply a “one size fits all” approach.

Section 6.3.6 Spatial Arrangement at Street Intersections

Concern: The text notes advises the need for advanced stop boxes for cyclists. However, it does not discuss the fact that without feeder cycle lanes to make these ASBs useful, they do not create significant benefit. We also note that neither feeder cycle lanes nor ASBs are shown in the figure.

Change sought: Add advanced stop boxes and cycle lanes to the diagram, or add alternative options or omit to not imply a “one size fits all” approach.

6.3.7 Spatial Arrangement for Streetscape Components Table 2

Concern: Providing a table with only yes/no options may not be appropriate for placement of these elements.

Change sought: We suggest that a graduation from “suitable” / “potentially suitable” / “unsuitable” provides greater ability to respond to local context and constraints.

Section 7.5.2 Design Vehicles & Swept Path Analysis

Concern: By simply stating that an 18m semi-trailer or articulated truck is the design vehicle for arterial route intersections, full stop, this ensures that even intersections of local roads with no need for such vehicles will be designed accordingly, with resultant large intersections even in inappropriate circumstances. This leads to speeding by turning smaller vehicles, and hazardous pedestrian / cycling environments.

As such, the simplified application of this rule would lead to an inappropriate road environment.

Change sought: Allow smaller design vehicles if the road connected to is NOT an arterial road / not as high in the classification as the other road.

Allow larger vehicles to use the opposing lane of the minor road they are turning into, if that road is low-volume, to enable a tighter side road throat.

Also emphasise in the guidelines that where such large vehicles have to be allowed for, this can be assisted by mountable over-run areas etc... that will geometrically allow such large vehicles to turn, without enabling fast turns for smaller vehicles.

Section 12 Footpaths and Pedestrian Facilities

Concern: The section cover is dominated by a helmetless cyclist riding on a footpath, apparently at speed. Not exactly what the chapter should imply, especially being about pedestrians.

Change sought: Use a different section cover photo.

Section 12 - Footpaths & Pedestrian Facilities

Concern: We are concerned that the proposed liveable city, and a greater focus on active transport modes does not translate through into ATCOP design for pedestrians being given more priority over motor vehicles. This contradicts ATCOP’s own suggested hierarchy with pedestrians being given high formal priority. By focussing on individual aspects of the pedestrian network without acknowledging the issue that implementation of such features is regularly stymied by the need to “balance” them with motor vehicle demands, ATCOP will fail to assist greater walkability.

Change sought: Identify that where pedestrian safety is a concern, this overrides efficiency considerations for motor vehicles. Identify that where pedestrian convenience is a concern, this at least takes equal – not secondary – priority to motor vehicle convenience.

Section 12 Footpaths and Pedestrian Facilities

Concern: The section does not include any discussion of the requirements for pedestrian crossings to have a decent level of service (LOS) for pedestrian users. This is entrenched for the construction of vehicle traffic signals, to the degree that it often is the primary concern around which the whole design revolves - however, for pedestrian signals, there is no expectation given as to delay minimisation, and appropriate facilities for level of road volume / speed to be crossed.

Change sought: Include the relevant guidance from documents like the Pedestrian Planning and Design Guide, NZTA, 2007 to ensure pedestrian (and cyclist signals!) are phased appropriately to serve users, and to encourage a walkable city.

Section 12 Footpaths and Pedestrian Facilities

Concern: The section does not identify the necessary pedestrian volumes for the installation of certain crossing types (informally known as "pedestrian crossing warrants"). This guidance should be included both for consistency, and to keep the design process above-board, as the "warrant is not being met" argument is one of the key reasons requests for pedestrian crossings (zebra crossings) get declined.

Change sought: Include the warrant procedure, and also connect it to the discussion of appropriate levels of service (LOS) for crossing facilities (see above point).

Section 12.2 - Footpaths & Pedestrian Facilities, General

Concern: The general section implies that residential areas and many other areas, even in urban areas, do not need footpaths on both sides. Providing good-quality footpaths, conveniently located on both sides of roads is necessary for liveable neighbourhoods, to encourage safe and attractive walking environments.

Change sought: Footpaths should always be provided on both sides of a road, unless in rural areas, or where existing constraints absolutely prevent this. Rather than specify a number of areas where footpaths on both sides should be provided, this needs to be reversed, and a small number of potential exemptions to a default "footpaths on both sides" requirement given.

Section 12.8 – Pram crossings

Concern: This section is missing discussion of pram crossing use by cyclists.

Change sought: Please identify in the section that pram crossings are also often used by cyclists, especially when crossing at signalised pedestrian crossings or using shared paths - and identify the desire for wider pram crossings than the minimum width in these locations (so a bike can be stopped in the refuge clear of traffic).

Section 12.13 – Pedestrian Refuge islands

Concern: The section gives two minimum widths for the island (1.4m and 1.8m). The lower minimum is less suitable for cyclists using the refuge to cross the street, for example between shared paths, and ideally should not be used in such situations.

Change sought: Add reference to Section 13.3.10 Refuge islands, about how to design refuges for cyclist use, especially at shared paths, by providing wider and deeper refuges.

Section 12.14 – Pedestrian Railings

Concern: This section seems to omit several reasons why pedestrian railings should be avoided. Using pedestrian railings in too-widespread fashion encourages greater driver speeds, create potential sight hazards to children hidden behind railings (with overlapping supports making the railing opaque for approaching drivers) and can create a walking- and cycling-unfriendly environment.

Change sought: Clearly state that pedestrian railings should be a method of last resort to identified safety issues that cannot be remedied with other methods, such as better pedestrian crossing facilities or road speed reduction.

Section 13 – Cycling Infrastructure Design

Concern: As for Chapter 12, we are concerned that the proposed liveable city, and a greater focus on active transport modes does not translate through into ATCOP design for cyclists being given more priority over motor vehicles. This contradicts ATCOP's own suggested hierarchy with cyclists being given high formal priority. By focussing on individual aspects of the cycle network without acknowledging the issue that implementation of such features is regularly stymied by the need to "balance" them with motor vehicle demands, ATCOP will fail to assist greater cycle uptake.

Change sought: Identify that where cyclist safety is a concern, this overrides efficiency considerations for motor vehicles. Identify that where cyclist convenience is a concern, this at least takes equal – not secondary – priority to motor vehicle convenience.

Section 13 – Cycling Infrastructure Design

Concern: ATCOP does not seem to provide any design options for detouring cycle lanes around the back of bus stops. Especially for routes where bus and cycle traffic is both heavy, we do not consider it should stay acceptable to, by default, have the cycle lane be interrupted by bus stops.

Change sought: Provide various design solutions for detouring a cycle lane behind a bus stop, depending on available width and convenience.

Section 13 – Cycling Infrastructure Design

Concern: ATCOP does not seem to identify the need for / the opportunities for localised use of flexi-posts and lane dividers (as retrofits or new-build solutions) except within the discussion of protected cycle lanes as a whole.

Change sought: Provide various "typical examples" of how flexi-posts and land dividers can be used to prevent cycle lane encroachment, particularly at traffic signals, corners and where cycle lanes are used by parked cars.

Section 13.2.2.1 Kerbside Cycle Lanes

Concern: The table and associated chapter implies that non-separated cycle lanes on roads above 50 km/h speed environment are an appropriate facility, and separation should only be "considered where feasible".

It is considered that such faster roads are unfit for paint-only cycle lanes, when considering that many potential cyclists (current non-cyclists) already feel very unsafe on paint-only lanes in a 50 km/h speed environment. ATCOP should encourage cycling via recommending appropriate designs.

Change sought: Identify that above 50 km/h speed limits separated facilities should be the default, and paint-only lanes the exception.

Section 13.2.2.2 Cycle lanes next to parallel parking, Table 2, Note 3

Concern: We suggest that it is not relevant whether parking is recessed or not in this regard, and that the note may not clarify the issue for non-cyclist designers.

Change sought: We suggest the note should be reworded to clarify that parking should be minimised in width only if the width is then added to the cycle lane - as opposed for example to adding this gained widths to berms, or to making car lane widths higher than minimum. This is because combining narrow parking with standard-width cycle lanes is a worse outcome for cyclist safety (door zone risk), especially when the parking is used by SUVs or similar wide vehicles.

By providing the extra width from the parking to a wider cycle lane however, even wide vehicles do not create a worse outcome than before the parking narrowing, while narrower cars are more likely to park outside the cycle lane.

Section 13.2.2.3 Cycle lanes next to angle parking, Table 3, Note 3

Concern: Note 3 is somewhat unclear.

Change sought: Change Table 3 to include actual cycle lane width within table itself.

Section 13.2.2.4 Cycle lanes between other lanes

Concern: We consider that cycle lanes between other traffic lanes are inappropriate for speed environments of higher than 50 km/h.

Change sought: In such higher-speed environments, protected lanes or off-road lanes should be mandatory designs, and such “floating” lanes be actively avoided.

Section 13.2.2.5 Protected cycle lanes, Table 5

Concern: We consider that the island / bollard strip widths are too high for many Auckland roads, despite being an admirable goal. This will lead to such protected cycle lanes being even harder to install (due to the very large overall width requirements in constrained road requirements). We consider that this section attempts to default to a too-high standard, which as a result will mean much fewer such facilities will ever be built, leading to few safety gains. Overseas examples show that the overwhelming part of the actual and perceived safety benefits can be achieved with reduced island / buffer strip widths.

Change sought: Introduce "minimum" widths, keep the draft widths as "desirable".

For the "minimum" widths, reduce the island / bollard strip widths by at least 0.2m for the 0.6m wide facilities (i.e. allow 0.4m wide buffers) and by 0.3m-0.4m for the 1.0m islands (i.e. allow 0.6m-0.7m wide islands next to parking).

This also acknowledges that neither do cars tend to park right on the kerb edge, nor do cyclists tend to ride exactly on the edge of their relevant space. A car door that might swing out over a small percentage of the cycle can thus usually be easily avoided - and is much preferable to no protected cycle lane being installed at all.

Section 13.2.2.8 Contra-flow cycle lanes and contra-flow cycling

Concern: There is no discussion of “entry treatments” where streets are two-way over most of their length, but are interrupted by a short one-way section (for traffic calming reasons). Allowing cyclists to pass through these one-way sections in contra-flow via the entry treatment does not require a full contra-flow cycle lane.

Change sought: Provide examples of such entry treatments, but also clarify that where the one-way section is wide enough, two-way cyclist flow can be enabled simply via road signs (i.e. we do not want infrastructure treatments as mandatory).

Section 13.4.1 Cycle Paths

Concern: We note that the cycle path one-way requirement at 2.0m is higher than that for protected cycle lanes at 1.8 (even when the latter are also located between kerbs).

Change sought: Introduce "minimum" widths, keep the draft widths as "desirable".

Reduce the minimum width required for one-way cycle paths to 1.8m to make it easier to implement them in narrower cross-sections. Such paths are better for cyclists safety and convenience than not providing them at all in constrained areas.

Section 13.4.2 Shared Paths

Concern: We note that the final comment suggests wider paths where user numbers, including those of pedestrians, are high.

Change sought: We suggest this instead (or in addition) reference Section 13.4.1 instead (i.e. instead of simply providing wider shared paths, separate cycle-only paths should be considered instead - this should not be limited to only a quick mention in Section 13.4.3).

Section 13.4.2 Shared Paths

Concern: We note that this section should include discussion of the risks of shared paths where these would have to be constructed close to property boundaries with driveways (i.e. risk of vehicles hitting shared path users due to lack of intervisibility).

Change sought: Problem should be discussed, including possible opportunities for resolution, such as different types of facilities (such as protected cycle lanes).

Drawing CD008

Concern: We do not believe that "share with care" is an appropriate sign to be placed in front of a signalised pedestrian crossing across a cycle lane. Cyclists already have to obey the traffic signal. It also would appear to only add extra signage clutter with little benefit or statutory relevance? The signalised crossing is not a shared path.

Change sought: Omit "share with care" sign from drawing.

Drawing GD017 & GD018 & GD019

Concern: The drawings do not allow for roads where the berms are very deep or very narrow / non-existent, by simply setting the front (carriageway width) of the driveway as "rear distance plus 1400mm" plus a further 900mm flare each side.

This creates excessive / strange results for the driveway width & shape, if the requirements are followed as per the drawing. I.e. it produces very long gradual flares, where both sides of the driveway should logically be parallel (long driveways over very deep roadside berms) or creates almost diagonal tapers to achieve the 1400mm width increase (where the footpath / berm combination is very thin).

The drawings also have no layout for situations where the footpath is at the back of the berm (along the property boundary) / where no berm exists.

The drawings also have no layout for where the footpath itself is particularly wide or where it is a shared path.

Change sought: consider the above situations and how the drawing could be modified to apply more suitably. By preventing excessive driveway widths, we hope this

Drawing FP009

Concern: As per our comment on Section 12.8.

Change sought: Add text to “Notes” or drawing itself regarding wider pram crossings - we suggest that for such pram crossings with common cyclist use (such as at shared paths), the 1500mm minimum should be increased to a 2500mm minimum width.

Drawing FP011

Concern: The reason for a 9m minimum width (cyclist pinch point avoidance) is not given. The width is also just stated as “preferred”. This may encourage some designers to reduce this value further.

Change sought: Identify, on the drawing, the safety issue for cyclists if lanes at kerb build-outs reduce below 4.5m.

Drawing FP012

Concern: The reason for a 4.5m minimum width (cyclist pinch point avoidance) is not given. The width is also just stated as “preferred”. This may encourage some designers to reduce this value further.

Change sought: Identify, on the drawing, the safety issue for cyclists if lanes at kerb build-outs reduce below 4.5m.

Conclusion

Thank you for the opportunity to provide comment on the draft ATCOP document.

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