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Bike Auckland submission on East West Link proposal

Bike Auckland Incorporated is a registered charity aiming to make Auckland safer and more attractive for people wanting to ride bicycles, whether for recreation or transport.

Bike Auckland is asking the EPA / Board of Inquiry to decline the proposal for the East West Link proposal. Alternatively, should the proposal be granted, we ask the Board to modify various aspects of the proposal via design changes agreed with the applicant or via conditions of consent.

Reasons we seek this decision

Bike Auckland has a number of significant concerns about the proposal, which make us unable to support it. This is despite good working relationships with NZTA and Auckland Transport, and the fact that some aspects of the proposal will be very positive, including for cycling.

Key concerns which we consider are not mitigated (and in some case are not able to be mitigated without changing basic proposal), include:

- **Concern 1: Induced demand:** The proposal creates a massive capacity increase for motor vehicle traffic, and in good part is an explicit duplication / alternative for an existing route (the Neilson Street / Church Street connection between SH20 and SH1).

Such proposals are generally sold as having benefits for other routes (local streets) through reduced traffic and less congestion. However, these benefits - where they do occur - are generally lost very quickly again (often within a few years). This is due to induced demand, i.e. added new driving due to increased capacity for the driving mode. This effect has been well-known for decades, with a 1994 landmark report to the UK government¹ concluding:

"...considering all these sources of evidence, we conclude that induced traffic can and does occur, probably quite extensively, though its size and significance is likely to vary..."

Both re-routing effects to suit the new route options and induced demand will also lead to flow-on effects outside the immediate proposal area, as the new demand leads to "upstream" or "downstream" congestion. This will also make it harder to in the future to add bus lanes or cycleways onto routes affected by this re-routed or induced demand.

- **Concern 2: Associated noise, pollution and climate change effects:** The induced demand as per Concern 1 has negative effects on both the local environment (people and ecosystems being exposed to noise, motor vehicle pollutants, potential impacts on the harbour) and on the global climate (climate change emissions).

¹ TRUNK ROADS AND THE GENERATION OF TRAFFIC The Standing Advisory Committee on Trunk Road Assessment, Chairman: Mr D A Wood QC

While the proposal offers some localised mitigation (noise walls, run-off treatment), it is in our view clearly not neutral or positive - air pollution and climate change emissions in particular not being treated. This will create significant negative and cumulative effects - and in particular via sea level rise, forms a direct threat to Auckland and New Zealand.

- **Concern 3: Severance effects:** While we acknowledge that the proposal has gone to significant steps to mitigate this concern via the creation of harbour-side paths and crossings of the road, including bridges and underpasses, we consider that at its heart, it remains a "waterfront highway" - of a size and nature that will negatively impact the community's access and enjoyment of the harbour for, in all likelihood, many generations.
- **Concern 4: Walking and cycling provisions not complete or best practice:** While as for Concern 3 we acknowledge that the proposal includes significant work and mitigation for cycling, there remain a number of elements and sections where the proposal still falls well short in terms of providing best practice walking and cycling facilities. These aspects form a core part of the more detailed parts / change requests of our submission.
- **Concern 5: Rapid transit route impacts:** The proposal includes some high-level consideration of a future rapid transit to the airport. However, in our reading of the application plans, there will be an increasingly complex and more constrained corridor for the rapid transit route to pass through Sector 1.

The creation of new roads and other features like treatment ponds may force the future rapid transit project to add extra (costly) structures. The plans also indicate the route being deviated east, pushing it out of the proposal's own designation in parts of Section 1.

- **Concern 6: Opportunity cost:** We accept that it is not up to the Board of Inquiry to determine as to whether the proposal is good value for money. However, we are concerned that the very high - and in recent times quickly escalating costs - of the proposal will mean that many other projects will lack for funding.

Many urgent walking and cycling, public transport and road safety projects in Auckland could proceed with the billions of dollars the proposal is proposed to cost. These other projects would in our view create substantially greater benefits for Auckland. Somewhat related to this regard, the previously cited traffic study² from the UK also notes that:

"These studies demonstrate convincingly that the economic value of a scheme can be overestimated by the omission of even a small amount of induced traffic. We consider that this matter is of profound importance to the value for money assessment of the Road Programme."

With all these factors weighing against the proposal, we would prefer it to not proceed, despite this also leading to some positive changes (including for cycling) not occurring as part of it.

Key changes would we like to see

Should the Board be minded to grant approval despite the concerns set out above, we ask that design changes be made and/or conditions be imposed regarding the following key concerns:

2 TRUNK ROADS AND THE GENERATION OF TRAFFIC The Standing Advisory Committee on Trunk Road Assessment, Chairman: Mr D A Wood QC

Key request 1 (Sector 1): Provide separated west-east cycle infrastructure

The proposal generally provides all cycle infrastructure separate from motor vehicles. This is supported and applauded. However, the proposal only provides a cycleway separate from both motor vehicles and pedestrians in Section 2. All other sections propose shared paths.

This is particularly a concern in Section 1, where future pedestrian and cyclist volumes will be high with the proximity of residential areas and various key walking and cycling routes convening here.

The key issue with shared paths is that walking and cycling, while often lumped together, are in fact not very similar travel modes. Walking occurs at speeds of 3-5 km/h. Cycling occurs at 15 km/h or faster. Transport cyclists, whether on e-bikes or not, often reach 30 km/h. To enable the transport benefits of cycling to be maximised, people on bikes need to be able to travel at reasonable speeds.

Acknowledging this, "*space to ride*" and "*speed maintenance*" are two of the six basic requirements for cycling cited in the Austroads Guidelines for cycleways (that the applicant subscribes to).³

However, in areas with significant pedestrian numbers that lack separated infrastructure, riders are constantly forced to choose between being safe and courteous, or being able to travel at an effective pace. This degrades the ability of both walking and cycling to offer effective alternatives.

It also severely limits the ability of cycling to grow in numbers - when many of the paths will stay around unchanged for decades. New Zealand's current wide-spread construction of shared paths in our view risks creating a "glass ceiling" for cycling growth.

Historically, preference for shared paths in Australia (and in our view, New Zealand) appears to often have been driven by cost savings and easier implementation, as shared paths are slightly cheaper and require slightly less width. Authorities have often acknowledged these factors, and at the same time shown little consideration of how increasing transport cycle use affects cyclist and pedestrian safety and conditions.⁴

In particular, even a small percentage of faster riders in the mix can create significant extra stress on people walking, who can feel intimidated and unwelcome. In this way, the lack of dedicated cycle infrastructure also depresses walking demand. It is also a key safety issue for the elderly or mobility-impaired, who often actively avoid shared paths due to the perceived and actual risks of mixed traffic - and thus will be particularly disadvantaged in such an environment.⁵

Bike Auckland, from our own experience and from hearing of regular complaints to authorities, is aware that shared path issues on Auckland routes are rising as use intensifies with the cycling renaissance. Particular examples include the Kingsland section of the Northwestern Cycleway, where parents with children walking to school are concerned about cramped and unsafe conditions. Another example is the Tamaki Drive shared path, where the lack of separation from pedestrians is leading to significant ongoing conflicts, especially in busier areas near town centres.

These issues, ironically, can be seen very well in **Image 01**, one of the visualisations provided by the applicant itself - showing the proposed shared path near the Orpheus Drive end of Sector 1. Providing only a mixed traffic space creates a very constrained environment, with pedestrians and cyclists needing to swerve around each other, and with no clear areas of travel.

3 Bicycle Rider Requirements, Cycling Aspects of Austroads Guides, Austroads 2011

4 Victoria Walks (2015). Shared paths – the issues, Melbourne, Victoria Walks

5 Victoria Walks (2015). Shared paths – the issues, Melbourne, Victoria Walks



Image 01: Example provided by the applicant - which in fact does well at showing the cramped and confused conditions that occur on shared paths as numbers of users rise



Image 02: A daily situation - photo by Bike Auckland, March 2017, Kingsland. Note cyclists and walkers struggling to navigate around each other on a busy shared path, and the tendency of some pedestrians to prefer walking on a (local) road over staying on the path

As discussed in sources such as the Victoria Walks study cited earlier, it is important in a "safe systems" context (which the applicant subscribes to) to depend not only on the *behaviour* of people.

In short, encouraging "safe cycling" or "share with care" in a sub-standard environment like a shared path is not enough, especially when the route is clearly a transport / commuting link.

Contrast the shared path issues discussed above with separated paths built to best practice. As can be seen in the following examples from The Netherlands and Australia, building for separation (usually around 3m cycle path and 2m walking path) provides each user group a clear dedicated space, to travel in safety and comfort.



Image 03: Example of a best-practice separated path, Amsterdam, Netherlands



Image 04: Example of a best-practice separated path, St Lucia, Brisbane (before opening)

A slight amount of extra space, plus a dividing line (ideally a kerb) between pedestrian and cycle sections, significantly improves perceived and actual safety - as well as convenience. This will maximise uptake from both people walking and cycling, and thus maximise the transport benefits from the investment into these new paths.

It is important to note that simple widening of a 3m shared path is generally not sufficient to overcome the issues discussed. Of course a wider shared path provides more space for avoidance manoeuvres and is thus beneficial. However, it does not provide the clarity and peace of mind for users that comes with actual separation, ideally with a (low) kerb.

We also note that the fact that some sections of shared paths are already provided as 4m wide does not necessarily represent an acknowledgment of shared path issues by the applicant. In our reading of the cross-sections, the widening of 3m shared paths to 4m in the proposal mainly occurs where paths are located directly adjacent or between barriers and retaining walls. In such areas, cyclists cannot ride as close to the edge of the paths as they would if there was soft landscaping alongside. The widening provided in these areas simply acknowledges the lack of "shy space" - or lateral clearance as required in the Austroads Guidelines⁶ - which is not being met via grassed areas.

To return to the main issue, and to clarify: Bike Auckland is not seeking separated treatment of shared paths for the entirety of the proposal. The applicant is already proposing separation for Sector 2. Meanwhile, in Sectors 3 and 4, pedestrian numbers are likely to stay low enough for the foreseeable future for shared paths to be acceptable, and conflict to remain limited.

However, with the Section 1 area being one of the busiest sections of the whole proposal in terms of walking and cycling, and easy widening / retrofitting at a later stage unlikely, we consider that it is crucial for the applicant to upgrade this section of the proposal.

Key request 1 (Sector 1): To ensure safe and convenient walking and cycling, even in the busiest path areas, change the design of the proposed west-east shared path to provide best-practice cycling paths (i.e. separate from cars but also from pedestrians). The change should cover Sector 1, from Orpheus Drive in the west to the already proposed-as-separate Section 2 paths in the east.

6 Clearances, batters and fences, Cycling Aspects of Austroads Guides, Austroads 2011

Key request 2 (Sector 1): Provide separated north-south cycle infrastructure

The proposal suggests only a shared path along Onehunga Mall, despite this being the key connection between the new west-east walking and cycling facilities along the harbour and the Onehunga town centre. This road also forms the main link between Onehunga / Onehunga Train Station in the north, and Mangere Bridge (suburb) in the south, making it a key through link as well.

In **Key request 1**, we have already discussed the issues Bike Auckland has with proposed shared paths in such busy environments. This need not be reiterated again.

However, Onehunga Mall also adds numerous driveways and heavy traffic into the mix. Driveway crossings add significant extra issues to a shared path, as drivers often do not perceive the fact that people on bikes can be significantly faster than pedestrians. Depending on layout, shared paths with driveways also create priority confusion, and issues with sightlines for entering / exiting vehicles.

For these reasons, the proposed shared path is seen as a very low-quality proposal. This is the case especially considering that the proposal significantly affects the form and function of the Onehunga Mall area - and even creates a whole new parallel road at the east of Section 1 - yet is not proposing best practice for the walking and cycling mode on this key route.

Best practice solutions could take several forms here, but the most likely appropriate solution would be protected one-way cycle links each side of the road, i.e. protected cycle lanes (with physical buffers) or "Copenhagen" cycle lanes (cycle-only paths atop a kerb, separate from footpaths).



Image 05: Example of protected cycle lanes on Carlton Gore Road, Auckland (note that the lane in the opposite direction is also protected behind buffers behind the parked cars)

Key request 2 (Sector 1): Change the design for Onehunga Mall, to provide best practice cycle facilities, separate from both vehicles and pedestrians. See also Key request 1 and 8a.

Key request 3 (Sector 1): Review protection / allowance for rapid transit

Bike Auckland is uncertain whether the proposal appropriately protects the future rapid transit (rail or light rail) route to the airport, including not making such a route harder or more costly to construct. While it is beyond our expertise to review this closely, we ask the Board to do so.

Key request 3 (Sector 1): Assess, as part of the Board of Inquiry proceedings, whether the proposal appropriately allows for and protects a future rapid transit project, including ensuring that the proposal does not make construction of the other project harder and more costly.

Key request 4 (Sector 2, 3 and 4): Protect & improve side access to cycle route

We are concerned that between Onehunga and Sylvia Park (essentially Section 2 to 4), there are very limited opportunities to access the new walking and cycling facilities from the areas to the north and southeast. This creates a 3-4km long section with limited practical access, as routes such as Great South Road are very hostile.

Even currently more pleasant streets such as Hugo Johnston Drive will see significant volume increases, as they change from relatively "sleepy" (albeit industrial) cul-de-sac roads to busy road feeders of the new East West Link.

The proposal does not propose improved cycle facilities on any of these roads except at the western edge of Section 2, at Alfred Street. Users wanting to access workplaces north of the path in the Te Papapa suburb, or destinations such as Mt Smart Stadium, would need to ride on-road in an industrial / heavy traffic environment. This severely limits the practical utility of the new walking and cycling facilities along the harbour edge link - except for a much smaller group of long-distance commuters and recreational users. This undermines the investment into these new paths.

With Auckland Transport's available funds for cycling being harshly oversubscribed, it is in our view very unlikely that there will be any projects in the foreseeable future to overcome this gap in the middle sections of the proposal.

Since we accept it as unlikely that the proposal's scope and designation would be extended to incorporate such cycle links into the proposal's designation, we suggest that a high level scoping exercise could be undertaken between NZTA and AT during the hearings process to investigate the feasibility and likely costs of adding cycle facilities to key links such as:

- Captain Springs Road, north of the park entrance where the proposed shared path stops;
- Hugo Johnston Drive and O'Rorke Road as far north as Mt Smart stadium; and
- Great South Road as far south as Portage Road, Otahuhu.

The mitigation requirements for the proposal could then include a funding agreement consent condition for Auckland Transport works on these or similar appropriate routes.

We are aware that the applicant is not keen on such a funding condition. Bike Auckland would accept other arrangements, but we consider that if the Board agrees that some level of such extra work is required, then there would need to be a formal agreement that is not dependant on, for example, the vagaries of available general cycle funding in future years.

Key request 4 (Sector 2, 3 and 4): Provide much better and safer north-south cycle access to centre sections of the new west east paths - to ensure the paths provide a practical active transport component for the areas around them, rather than just an isolated long-distance link. These added works could occur via a mitigation works funding condition in favour of Auckland Transport works, similar to the arrangement in the Waterview Shared Path EPA process.

Key request 5 (Sector 5): Provide proper Panama Bridge cycle facilities

We are concerned that the proposed design for the new Panama Road bridge provides only shared paths, despite the unique opportunity that a full bridge rebuild affords to provide dedicated cycle facilities separate from both vehicles and pedestrians.

As already discussed extensively in Key request 1 and 2, shared paths are not best practice - and there is no reason to implement such lesser outcomes on a brand new bridge. Similar mistakes were made some years ago when various South Auckland rail overbridges were rebuilt for electrification without consideration of proper (or any) cycling facilities, even on key cycle routes.

Additionally, the proposal currently shows these shared paths virtually only on the bridge deck itself. It thus does not - not even at concept level - resolve the issue of utility (how riders would effectively and safely enter and exit the proposed paths in a busy roading environment, including a nearby intersection). The concept is visible in Image 06.

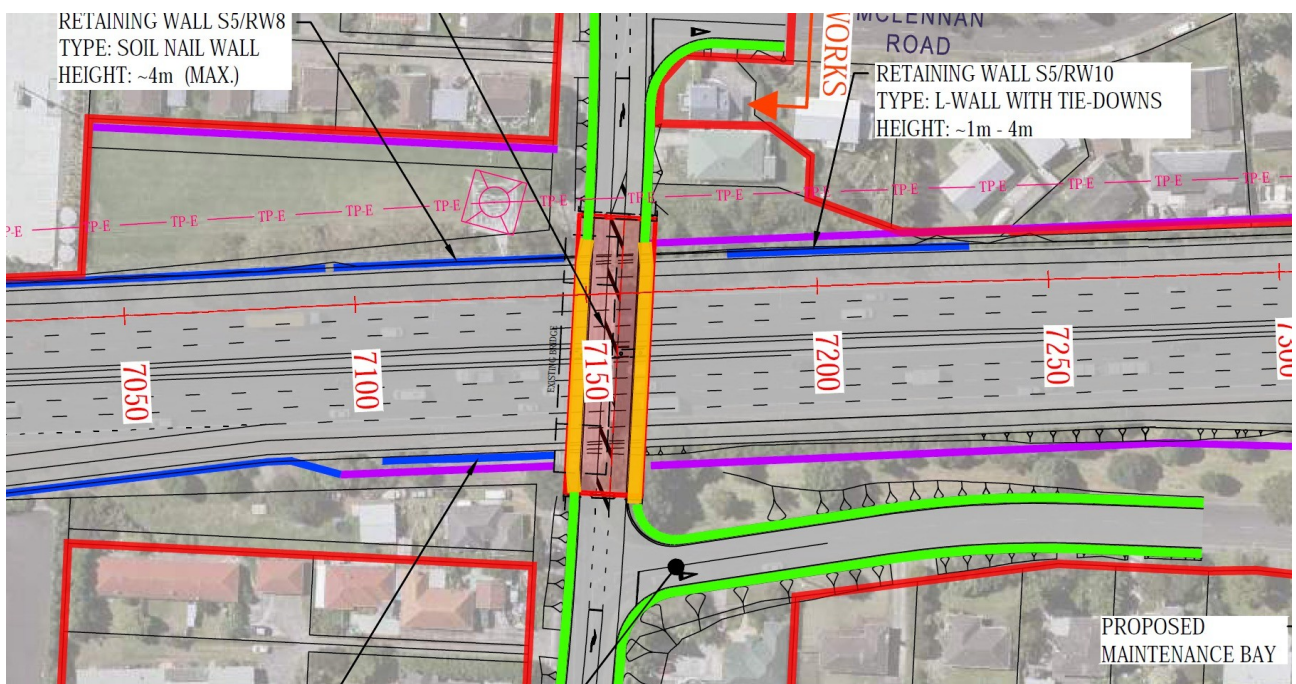


Image 06: Showing the concept of the reconstructed Panama Road bridge with shared paths only (noting that the key calls out the green sections as footpaths - they are not cycle lanes)

Panama Road is one of the (very few) local connections across the barrier of State Highway 1 in the area. A high-quality walking and cycling design, which does not cement into place a lesser outcome for decades or even generations, will thus be extremely important.

NZTA have shown at other locations such as Royal Road on SH16 (currently being built with protected lanes), that separated cycle facilities on new bridges are understood and feasible.

Key request 5 (Sector 5): Require the design for the new Panama Road bridge over SH1 to provide best practice cycle facilities (i.e. separate from both pedestrians and motor vehicles), to avoid permanently limiting key local cycle connectivity - despite a brand new bridge being built.

Key request 6 (Sector 5): Otahuhu Creek bridge west-east cycle links

The proposed widened north-south SH1 bridge over Otahuhu Creek is located in an area where Auckland Council's Greenways plans also show key west-east connections (under SH1).



Image 07: Excerpt from earlier Greenways plan showing links at/under the SH1 circled in red

The proposal does not seem to provide this west-east link under the bridge, though documents indicate that it will be enabled / protected.

While we acknowledge that the proposal's new north-south walking and cycling path proposed between Mataroa Road and Deas Place will provide good local active mode benefits, providing a link under the motorway to the streets and future Greenways to the west would be a significant area-wide mitigation for the extra traffic and the motorway works impacts.

Additionally, there is never a more cost-effective time to construct a link like this at the time as the these new bridge works occur. NZTA and AT and the Council should be required to work together to provide this, both as mitigation and to take up the key opportunity.

Key request 6 (Sector 5): Require the design for the new new Otahuhu Creek overbridge to incorporate the future west-east Greenways links under SH1, to mitigate local traffic and construction impacts, and to take up the unique opportunity afforded by the new construction.

Key request 7 (Sector 5): Protection of Princes Street Interchange paths

The future Princes Street interchange proposes only shared paths. As already discussed for Key requests 1, 2 and 5, this creates safety and efficiency issues by forcing the mixing of pedestrians and cyclists, and is seen as not taking the opportunity afforded by a full interchange rebuild.

Additionally, in this location, the shared paths are next to and cross heavy traffic lanes. This adds further issues of safety and convenience. In an interchange environment, where traffic volumes are extremely high, and actual road speeds often also exceed the (formal) 50 km/h speed limit, lack of best-practice provision and separation is particularly problematic for both safety and uptake.

Shared paths create situations where a rider could be traveling in one direction at 30 km/h, while a motorist passes into the other direction at 60-70 km/h, i.e. closing speeds of up to 100 km/h in direct proximity between vehicle and person on bike. If a rider has to take evasive action or has a crash - for example due to pedestrians - then there is very limited margin of safety. The use of shared paths in such an environment in our view does not comply with NZTA's "safe system" approach.



Image 08: An example of cycling in an interchange environment (Esmonde Road) - even with a small painted buffer as shown, conditions are hostile - and when the path is crowded, will force riders and pedestrians very close to speeding / heavy traffic with no physical protection

The lack of physical separation or buffer strips also means that users of the interchange paths would have to travel in close proximity to heavy traffic as a daily occurrence, something that is unpleasant and stressful, especially for families with children.

Finally, the provision of signalised path crossings in an interchange environment generally creates very long delays for bike users, as the signal phases are extremely dominated by and optimised for vehicle traffic, and as active mode users often have to pass several signals in an interchange.

From some other interchanges, we are aware of waits of several minutes regularly being required to pass even a single crossing. This particularly disincentivises walking and cycling routes which are dependent on being competitive in travel times - but are not deemed important enough to prioritise in such a signals environment. It also encourages unsafe movements by impatient active mode users (with NZTA documents like the Pedestrian Planning and Design Guide specifically calling out such long pedestrian signal delays as serious safety issues).

For all these reasons, we request better separation and better quality links for active modes at the interchange. This also applies for the various sections of Frank Grey Place that are effectively part of the interchange, with the same issues of higher-speed and very high volume traffic.

Appropriate alternatives could include providing a separate grade-separated walking and cycling connection over the motorway in close proximity of the interchange (i.e. the interchange itself being motor-vehicle only), or providing greater buffers / protective barriers against vehicle traffic and better prioritisation of pedestrians and cyclists at the signals.

Key request 7 (Sector 5): Require the design for the new Princes Street interchange (as well as the parts of Frank Grey Place sections that are effectively forming part of the interchange) to provide safer and more attractive walking and cycling facilities that better acknowledge the particular issues of walking and cycling in a busy interchange environment.

Key request 8 (Various sectors): Review and improve design details

We also have a number of further requests which generally relate to design details or management of the works, and in many cases would likely to be able to be accommodated relatively easily, by the applicant providing changed plans, or by relevant consent conditions being added.

Key request 8 (various sectors): Review and incorporate a number of further detail change requests not falling under the above other key requests. These are detailed below:

- The proposed Onehunga Mall / Onehunga Harbour Road roundabout in Section 1 would be very pedestrian and cycling-unfriendly as shown - with multiple traffic lanes for people to cross, large diameter circulatory lanes, and no pedestrian crossings. Similarly, the retained design of Onehunga Harbour Road (sweeping turn etc) will make it stay very "speedy".

This link and the intersection should be designed as much more people-friendly, considering the important role of Onehunga Mall as the main active mode north-south link, and considering there is a parallel new Galway Street link aimed at heavy traffic just to the east.

Key request 08a (Section 1): The proposed Onehunga Mall / Onehunga Harbour Road route and the roundabout connecting the two roads should be more strongly de-emphasised for motor vehicles compared to Galway Street, and traffic-calmed accordingly.

- The proposed "Commuter Cycleway" (separate from the footpath) in Section 2 is supported strongly, and, as set out in our Key request 1, should be extended to Section 1. However, we note the proposals for Section 2 do not yet seem to include a kerbed separation - there is no vertical difference or kerb shown as is best practice between walking and cycling zones.



Image 09: Example photo showing chamfered kerb between cycle and footpath zones

Key request 08b (Section 1 and 2): To clearly demarcating the neighbouring pedestrian and cycle zones, a kerbed separation between footpath and cycle path zones should be included in Section 1 and 2, ideally in a chamfered (“forgiving”) format as per the Dutch example in Image 09 of the Bike Auckland submission.

- From discussions with NZTA, we hear that the proposed cross-section of the separated “Commuter Cycleway” and nearby road in Section 2 is still being reviewed. In particular, there is discussion that, to “moderate speeds” on the main East West road link, the road shoulders and the proposed landscape buffers between the road and the commuter cycleway could both be removed or narrowed, creating a more “constrained” environment for drivers.

Bike Auckland strictly opposes such a potential change. As we have already discussed in depth in Key Request 7, we consider it unsafe (as well as hostile to people cycling) if shared paths or cycle paths are located directly adjacent to busy / fast roads. The comments related to Key Request 7 would apply doubly or triply here - as speed limits and volumes even higher than on the interchange, and as there will be a high volume of trucks (extra width, wind wake etc). The design needs to retain crash barriers or landscape buffers between the road carriageway and the cycle / walking paths.

Key request 08c (Section 2 and 3): Bike Auckland expresses strict opposition to a potential removal of barriers / landscape strips separating the Sector 2 “Commuter Cycleway” respectively the Sector 3 shared path from the road carriageway (this was mooted in discussion with the applicant as a potential future design change). Such a change would be considered unsafe and hostile - it is not the function of people on an off-road path to be a traffic calming element for the new road.

- The proposed walking and cycling bridge from Alfred Street in Sector 2 lands in parallel with the main west-east paths on the south side. Any rider crossing the road from the north and then heading west to the Mangere Bridge / Port of Onehunga area would need to undertake a very sharp 180 degree turn - which is not actually cycleable in the space given.

Similar issues exist at the northern end of the same bridge - and on each side of the Great South Road walk / cycle overbridge in Sector 3.

Key request 08d (Section 2 and 3): Ensure that the various walking and cycling overbridges (particularly Sector 2 at Alfred Street and Sector 3 over Great South Road) provide enough space and large enough path radii to allow safe u-turns at the bottom of the ramps for users wanting to go in the other direction at the path-path intersection.

- The proposed design of the Great South Road / East West Link at grade intersection is missing cycle facilities in the south-eastern quadrant. Since the proposal's current design maximises and fills the available space in this corridor, and since large buildings directly abut it to the east, it will likely be very difficult & costly to add these in the future.

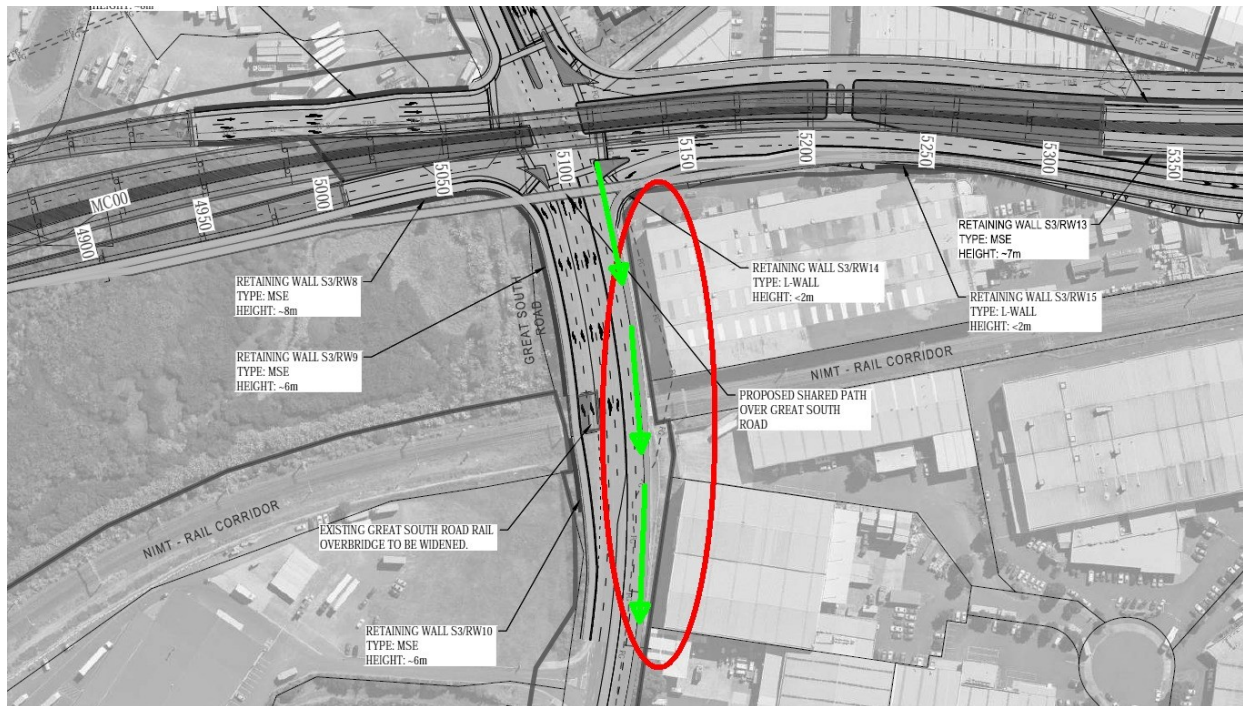


Image 10: Showing the lacking southbound facilities for people on bikes, with no practical space left in the corridor to provide them on Great South Road later

The future cycle facilities along Great South Road are very likely to be one-way facilities on each side (two-way facilities being inappropriate for urban roads with numerous industrial driveways). Therefore, the gap in cycle facilities on the eastern side will mean that southbound cyclists on any future facility will be particularly disadvantaged, and will likely be asked to switch over to the western side, adding multiple unnecessary signal crossings.

Key request 08e (Section 3): The current design of the Great South Road / East West Link intersection creates a significant issue for the future Auckland Cycle Network facilities - by not providing space for southbound cycle facilities in the south-eastern quadrant. This needs to be avoided by providing these now, or confirming practical future-proofing space.

- Various drawings of the north-south cycle route on the eastern side of the Otahuhu Creek bridge show a cross-section wide enough for a local road - much wider than the shared path shown as 3m wide. This raises the question of what this link is going to be designed as. We understand the added width is required for construction purposes (temporary motorway diversion). However, the long term nature (local road or walk/cycle path?) should form part of the discussion and approvals during the Board of Inquiry process.

Key request 08f (Section 5): Clarify whether the shared path bridge link between Deas Place and Mataroa Road is to become a road in the short or long term (noting the designs showing a much wider cross-section on the bridge deck), and how this affects cycling conditions and cycling facility design on this section, and on the nearby public roads.

- Various parts of the existing path network, especially at the Onehunga end of the proposal, already form key connections for people on foot and bike. The major works of the proposal could conceivably cut these links for long periods during the construction stages.

Key request 08g (All sections): Add consent conditions that any closures of any existing walking and cycling links for construction works need to be minimised in extent and duration as much as practical (similar to the condition in that regard in the Waterview EPA).

- For a proposal of such extent and size, continued input will be crucial to ensure further input from local and regional stakeholders into the design processes in any future stages.

Key request 08h (All sections): Bike Auckland seeks to be noted in the consent conditions as one of the stakeholders in further design and approval processes after EPA, as per similar conditions in the Waterview EPA process, for example via a Community Liaison Group.

Thank you for the opportunity to provide feedback on this proposal. Bike Auckland will participate in the hearings process, and any further meetings as may become appropriate.

Bike Auckland, 21 March 2017