

# Living Streets Aotearoa



[www.livingstreets.org.nz](http://www.livingstreets.org.nz)

## Submission to Wellington City Council on TR173-22 Newtown to Wellington City – Proposed interim cycle and bus lanes and parking changes

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Thank you for the opportunity to submit on this important project. We would like to be heard in support of this submission.

### Our submission

#### 1. Support for concept

We support the provision of bus lanes, accessible bus stops and cycle lanes in the context of the Council's sustainable transport hierarchy – people on foot, then people on bikes, then people in buses – subject always to due process and to central government guidance. We therefore support the concepts behind this Traffic Resolution, but some details are concerning and some are unacceptable.

#### 2. Bus stops

We support improved bus stops, but the stops as implemented and proposed are not satisfactory for pedestrians or bus passengers.

Looking at the current situation outside the hospital, pedestrians appear to be at the bottom of the heap. The stops present particular difficulties for older people and those with reduced mobility, who are likely to be a significant proportion of people using stops on Riddiford Street and Adelaide Road in particular. The design of the stops at the hospital, particularly the distance between the shelter and the stop with a bike lane in between, creates barriers in several respects:

- \* the need for visibility between waiting passengers and the drivers of arriving buses so that passengers can identify their required bus and hail it if necessary, and the drivers can see prospective passengers;

\* the need to cover the distance between the shelter and the stop during the short time available between when a bus is identified and when it stops;

\* all the while being aware that people on bikes will be crossing that gap, with the associated risks.

We have noticed that while many people on bikes slow down and give way, that is no means universal, making this essential walk not just hazardous but unpredictably hazardous.

Waka Kotahi has made some comments re improvements to the temporary stops, such as better colour contrast, but we are not aware that these changes have taken place. It was agreed that the tactile indicators on the edge of the platform for new stops would be moved back from the edge, but we understand that this cannot be done with the existing stops as it would require the platforms to be dismantled, modified and then reassembled. This is somewhat surprising: we understood that the ability to make such modifications in response to feedback was the whole point of tactical urbanism.

Lighting, particularly at the heads of the stops, needs to be improved for safety so that bus drivers can see people waiting.

The gradient is steep and can be dangerous for people when getting off the bus, especially someone using a wheelchair, mobility scooter, or with prams/strollers.

The click-together design has gaps and is not a level platform. This can pose issues for people using crutches, walking sticks or canes, or wearing high-heeled shoes, as there is the potential for these to get stuck. In addition, there is still a significant step between the stop and the bus floor, reducing accessibility and increasing dwell time.

Along Adelaide Rd, where people on bikes will have to ride past bus stops that have 15+ buses per hour passing them, the stops are shown as requiring all passengers to board from and alight into the bike lane. The risk that this presents to passengers, particularly those alighting, is unacceptable, and we fail to see how this could possibly pass a safety review. (See also the due process section below.)

### **3. Bus lanes**

We support the new bus lanes, subject to the following.

According to Auckland Transport [https://at.govt.nz/media/309552/Section5\\_SpecialRoutes\\_and\\_Road\\_Elements.pdf](https://at.govt.nz/media/309552/Section5_SpecialRoutes_and_Road_Elements.pdf), para 5.1.2.3.2, special treatment for buses should be considered where there are 15 or more per hour, but in the proposal the 20+ buses per hour off peak at the northern end of Cambridge Terrace - the highest such bus throughput in the region outside the Golden Mile - will get no particular treatment at all. Putting private vehicle parking ahead of such significant bus movements is in clear conflict with the sustainable transport hierarchy and with the Parking Policy, and a sad example of a missed opportunity just where it is required.

The proposed 7am-9am and 4pm-6pm, Monday-Friday only, operating hours for Cambridge Terrace from Barker Street to Courtenay Place and the eastern side of Kent Terrace from

Elizabeth Street to the Basin Reserve are inadequate, and ignore the fact that bus-delaying congestion can be just as bad at weekends as during the week.

#### 4. Shared paths

Waka Kotahi's Pedestrian Network Guidance <https://www.nzta.govt.nz/walking-cycling-and-public-transport/walking/walking-standards-and-guidelines/pedestrian-network-guidance/design/paths/shared-paths-shared-zones-and-trails/shared-paths/> states:

*Some pedestrians will avoid using shared paths because of anxiety about interactions with cyclists, so their installation should be limited. In all cases, options to provide a fully separated path should be considered first*

and

*retrofitting an existing footpath for shared use may reduce the level of service and safety for pedestrians.*

We are particularly concerned about such retrofitting of footpaths to shared paths at the Adelaide Rd/Rugby St corner, and along Oriental Parade and Cable St.

The former is already a congested footpath, by a busy crossing and close to schools, bus stops and attractions like McDonald's. Adding people on bikes would make this worse, reducing the level of service and safety for pedestrians, and we fail to see how any significant increase in cycle volume could physically be accommodated here. This must be rethought.

The proposed retrofitting of Oriental Parade and Cable Street is discussed in the next section.

#### 5. Due process

It is our view that due process has not been followed in this project with respect to the proposed shared paths on Oriental Parade and Cable Street, as follows:

##### 5.1 Consultation

**The consultation process is flawed in that**

- \* there are inconsistencies between the text and the maps/drawings on the consultation webpages, making it unclear as to what is proposed, and misleading if the text or the graphics are looked at in isolation;**
- \* there is nothing making it clear that the proposed shared paths are repurposed footpaths; and**
- \* there is no mention of any possible negative effects on pedestrians, including those identified by Waka Kotahi.**

*Please note: these comments relate to the website as accessed on 29 August. We understand that there have been some change since, addressing some issues but creating others (for example, when accessed on 30 August there were two different documents on the website both purporting to be the proposed TR, in addition to different versions of the plans). We have not changed this section because much of it continues to apply, and it describes the*

position that existed during the period up to 29 August during which we understand over 1,000 submissions were made.

Looking at the consultation information on the website at the time of writing in the order that it is displayed:

1. Initially both aerial maps on the consultation page at <https://www.transportprojects.org.nz/current/newtown-to-city/> showed the proposed route as not going north of the Oriental Parade/Cable Street intersection. Following our raising this issue the top map has since been amended to include those streets, but the second, entitled *The route - the most important connections*, has not.
2. The plans at [https://www.transportprojects.org.nz/assets/Newtown-to-city/Newtown-to-city-Plans-TR-consultation-simplified\\_small.pdf](https://www.transportprojects.org.nz/assets/Newtown-to-city/Newtown-to-city-Plans-TR-consultation-simplified_small.pdf) and the two sets of plans included in the formal Traffic Resolution consultation document <https://www.transportprojects.org.nz/assets/Newtown-to-city/TR173-22-Newtown-to-City-bike-and-Bus-lanes-Final.pdf> (together described on <https://www.transportprojects.org.nz/current/newtown-to-city/project-details/> as "the full set of plans") do not show any changes proposed along the west side of Oriental Parade north of the Cable Street intersection, nor any for Cable Street. The TR document's plans are also incomplete, with Adelaide Rd covered in just one of the two sets.
3. The text in the 56-page TR document <https://www.transportprojects.org.nz/assets/Newtown-to-city/TR173-22-Newtown-to-City-bike-and-Bus-lanes-Final.pdf> does include shared paths on that part of Oriental Parade and on Cable Street, on pages 3 and 47 (the latter street referred to on the latter page as "able Street").
4. In every other TR that we have seen recently, there is a standard item called "Pedestrian impact" (an unfortunate choice of word), which summarises the effects on pedestrians. This is missing from this TR, despite its having a much greater effect on pedestrians than any other TR that we can recall, both positively (e.g. the new crossing at Vivian St) and negatively (e.g. the bus stops on Adelaide Rd and the shared paths).

In addition, the plans included in the TR appear to be deficient. While not explained, there are two sets of plans included, the second having the words "Parking signage plan" added. Examining the small print on the first set, it appears that they are Lane marking plans. Comparison of the two sets shows that the whole of Adelaide Rd is missing from the Lane marking set, so how are submitters supposed to be able to comment on – or Council resolve – plans that are not there?

## 5.2 The working party

This process was flawed in that at no stage were the Oriental Parade and Cable Street proposed shared paths described to or considered by the relevant working party, despite:

- \* apparently now being considered an integral part of the project, despite the lack of drawings noted above;
- \* being described early in the project as "out of scope" and "not an issue", with cyclists apparently being encouraged to ride (illegally) on the footpaths;

\* repeated comments and requests for information, both in writing and orally, from October 2021 right up to the last meeting before consultation opened.

Apart from being poor working practice, this is in direct conflict with the Waka Kotahi guidance noted above: at no stage were options to provide a fully separated path mentioned, let alone considered first. Consequently there was no discussion about the levels of service or safety of the existing users of these footpaths, so no recognition of any possible reduction in this aspects - clearly a likely outcome with the level of bike use anticipated.

## **6. Our submission**

We support the proposals, with the following modifications:

- redesign of the bus stops, to facilitate safe boarding and alighting; minimise any conflict between people on foot and on bikes; and conform with the sustainable transport hierarchy;
- replacement of the shared paths at the intersection of Adelaide Road and Rugby St, and on Oriental Parade and Cable Street, with facilities that follow Waka Kotahi guidance and are consulted on properly;
- make the operating times of all bus lanes 24/7, or at least 7am-7pm daily.

We also submit that relevant processes and procedures be reviewed for this and subsequent projects, so that:

- the proposals and their consequences are made clear, with just one version of the truth;
- relevant guidance from Waka Kotahi is always taken into account;
- relevant working parties consider the whole route, without exclusions;
- the sustainable transport hierarchy is explicitly acknowledged and incorporated.

### ***About Living Streets Aotearoa***

*Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking-friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".*

*The objectives of Living Streets Aotearoa are:*

- *to promote walking as a healthy, environmentally friendly and universal means of transport and recreation*
- *to promote the social and economic benefits of pedestrian-friendly communities*
- *to work for improved access and conditions for walkers, pedestrians and runners, including walking surfaces, traffic flows, speed and safety*
- *to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.*

*For more information, please see [www.livingstreets.org.nz](http://www.livingstreets.org.nz).*