RECOMMENDED CHANGES TO DRAFT STANDARD

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Email. Rachel.ivianony@standards.co.nz	Closing date for comment 5 February 2010	Date of your comments 4 February 2010				
DR DZ 4404 Com	mittee: P4404					
Title: Land development and subdivision						

Comment is preferred in electronic format using Microsoft Word 97 or above, following the layout below. Electronic drafts are available from Standards New Zealand web site at http://www.standards.co.nz.

The following form is for comments to be submitted electronically. Please email your comments to Rachel.Mahony@standards.co.nz

GENERAL COMMENT

Type your general comments in the box. The comment box will automatically expand to accommodate comments of any length.

Living Streets Aotearoa, New Zealand's national walking and pedestrian organisation, promotes walkingfriendly planning and development. Our vision is "more people choosing to walk more often and enjoying public places".

- We support the approach taken in the revised standard with the recognition that achieving desired outcomes is a multi-disciplinary and collaborative process.
- We welcome the priority it gives to pedestrians through emphasis on walkability, pedestrian scale and
 provision for multimodal transport. Encouragement to lift the standard of urban design will improve the
 pedestrian experience. Safer, low speed environments encourage people to walk more and further, as do
 convenient crossing points, shade trees, public art and self-explaining streets. We support the need for a
 design rationale based on these aspects.
- We support the proposed hierarchy of streets with varying dimensions and connectivity to reduce walking and biking distance and improved access to services. The draft standard provides a useful matrix of land use and transportation, consideration of type and intensity of use and the needs of a range of road users.
- We welcome provision for vulnerable road users which include the young, the old, the infirm, people with a
 range of disabilities, and "wheeled pedestrians" including those with prams, pushchairs, wheelchairs, and
 mobility scooters. Good initial design (and ongoing maintenance) helps to avoid costly slips, trips and

stumbles. Infrastructure should be constructed to a standard that all can use. We include cyclists as vulnerable road users.

- 1. However, we are concerned that there appears to be an assumption that everyone drives in suburban areas and that walking is merely recreational. Suburban short trips are well suited for walking (and cycling) and planning should support this. Good accessibility and connectivity assists people to participate fully in the life of their community. Those who are unable to drive or who choose not to do so should be catered for. Pleasant walking and cycling environments for short trips to local schools and shops help to create vibrant, cohesive, inclusive communities that are valued by residents.
- 2. The revised standard does not appear to provide sufficiently for all shared use roads/ streets situations although small service lanes are detailed. Residential "home zones" typically 20 km/h in suburban zones differ from central city (CBD) "shared use" environments which are also slow speed and without kerbs, but with high pedestrian numbers and consideration of public transport links. We suggest that further consideration be given to this aspect.
- 3. As the revised standard appears to be primarily written to cover large greenfield sites, local authorities could appreciate further guidance on smaller scale or in-fill situations.
- 4. Reference to other documents is critical with regard to design details not fully covered by the revised standard. For example, the *Pedestrian Planning and Design Guide*, NZTA, 2007 provides detailed guidance on pedestrian crossings, pavement surfaces, lighting etc. The *NZ Urban Design Protocol, National Guidelines for CPTED, Safer Journeys New Zealand's road safety strategy,* are of particular importance for pedestrians.
- 5. District plans should reflect and link to the approach taken in the standard, i.e. walkable communities have streets that are connected, legible, convenient and safe. Every new development should form part of a connected pedestrian network. Mixed use and higher density favours walking and public transport. (see Appendix 3, *Pedestrian Planning and Design Guide*)
- 6. Once the standard is implemented, repairs and maintenance of surfaces, structures and landscaping should retain the standard as small variances can impact on safety.
- 7. There should be flexibility in implementation e.g. parking may not need to be continuous owing to topography. Parking includes cycle and motorcycle parking, for which a larger demand might be anticipated as fuel costs rise.
- 8. Local authorities should be encouraged to adopt the new standard or its equivalent. We would support a planned programme for implementation with publicity of best practice in doing so.

SPECIFIC COMMENT

Insert the number of the clause, paragraph or figure. Do not preface the number with words (i.e. 1 not clause 1). If there is no clause number, use the section heading (e.g. Preface). Insert the page, paragraph and line number as appropriate. Use a new row for each comment.

The rows will automatically expand to accommodate comments of any length. Remove unused rows, or insert additional rows as required. To insert extra rows at the end of the table, go to the last cell and press the TAB key.

Clause/ Para/ Figure/ Table No	Page No	Recommended Changes and Reason Exact wording of recommended changes should be given
3.2.3.c (vi)	43	Delete "Safety, convenience and crime prevention" which do not fit under Utility and Amenity infrastructure. These are important higher level considerations.
3.1	44	Suburban work and play. Delete final sentence "non-motorised trips are primarily recreational and occur on local roads" and replace with "Active transport trips – walking and cycling – for whatever purpose – occur on both local and arterial roads."
3.1	44	Shop and trade – suburban . "most trips are made in private vehiclesrequiring these land uses to have large amounts of parking allocated to each site" add "but should also provide for walking, cycling and public transport."
3.1	44	Shop and trade – centre "highly connected, walkable and bikeable environments"
3.1	45	Work and learn – suburban Transport – most trips are made in private vehicles during peak periods requiring these land uses to have large amounts of parking allocated to each site. Add "provision should also be made for access by public transport and for walking and cycling."
3.1	45	Work and learn – centre most highly connected and walkable and bikeable environments"
3.2.4.2.	46	Link context – (d) Minor arterial road "typical urban operating speeds are 40 to 70 km/h" Change to 40km/h to 50 km/h. Whilst operating speeds are observed speeds, slower urban speeds improve safety for all road users: pedestrians, cyclists and vehicle drivers. All modes are present on minor arterials including pedestrians, some of whom will be getting to and from passenger transport.

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3.2.5	46	Network connectivity - add to last sentence "thereby improving access and urban living"
3.2.6	46	Design and access statement. "This statement shall show the basis for selection of road dimensions and layouts and how they will provide for the expected activities and demands including specific reference to the people who are expected to use the development/subdivision.
		For example, we note in some areas the increasing proportion of older people who are less likely to drive.
3.2.2.2	47	Add Assessment of sight distances for pedestrians should also be taken into account at intersections as this affects accessibility and safety.
3.2	48	Rural, live and play allowance for pedestrians on the road shoulder and berm, of 0.5m of sealed shoulder, is inadequate to accommodate most wheelchairs. Recommend a minimum of 1m sealed shoulder in areas of clustered housing as grass berms are difficult for mobility aids and prams.
3	55	Notes: add (10) shared use zones in either suburban or central locations which typically are low speed areas, with high pedestrian use and absence of kerbs require specific design standards relating to the context
		Add (11) shared use paths for pedestrians and cyclists may require safety measures such as chicanes, planting or build-outs to reduce cyclists' speeds at some points.
3.3.4.1	57	Pedestrian and cycle barriers - include reference to NZS 4121 (13.2.3)
3.3.17.1	62	Vehicle footpath crossings should be designed in such a way that they do not increase the crossfall of the footpath to more than 1%. Add "New vehicle crossings shall be smooth with no raised vertical surfaces, and the open top of new slotted vehicle crossings shall be covered with a mesh grate."
		The revised standard prescribes safe crossings for vehicles, but does not do so for pedestrians, cyclists and the mobility impaired.
73.6	143	Add (i) safety for pedestrians Some species are hazardous for pedestrians, especially for those with impairments.

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7.3.8	143	Structures shall not reduce accessibility to amenities for "wheeled pedestrians" or people with disabilities. (Refer to Pedestrian Design Guide)
7.3.2	142	Add: Reserves should be laid out to the benefit of the pedestrian network, with good links to local roads especially where travel by road would be a much longer distance.