

17 August 2004

Mr Ian Clark
Transit New Zealand
PO Box 5084
WELLINGTON



Dear Ian,

Re: Draft Transit NZ Cycling Strategy

Thank you for the opportunity to comment on Transit's draft Cycling Strategy; we also appreciate the extra time allowed to provide a comprehensive response. The Strategy has been reviewed by the CAN Executive team.

CAN is certainly pleased to see progress made on this important policy document. Attached is an annotated copy of your draft Strategy with our comments and suggested changes. However we also have a number of other general comments that we wish to make:

- We continue to be frustrated by ongoing delays to the release of the *New Zealand Supplement to Austroads Part 14*. This is particularly so, given that Transit has been producing this document on behalf of **all** road controlling authorities in New Zealand, as opposed to being a Transit-specific document. As a preference, we would sooner have the Supplement released ahead of completing this Strategy.
- Our general impression is that this Strategy is still very much a rough document, rather than a near-final version. Certainly as our specific comments suggest, there appears to be much that is either missing or unnecessary. This is disappointing, given both the ongoing dialogue between our two organisations and the amount of guidance provided in recent times by the Government and other Government agencies.
- We are still unclear from this Strategy whether Transit intends to pro-actively improve the existing State Highway network for cyclists, or whether it will simply continue to apply these guidelines to new highway facilities and other locations as it sees fit. Clearly the latter approach does little to promptly address the existing problems with the State Highway network for cyclists, and to pro-actively meet the objectives of the NZTS.
- It is important that the Strategy focuses on "providing for cycling" rather than "providing cycle facilities". This subtle distinction belies a significant difference in thinking that, if applied in all aspects of project development and network management, will produce a better outcome for cyclists.
- There are a number of sections within the draft Strategy that seem very technical or detailed for a strategic document, and often may be better located within the *New Zealand Supplement* (or at least as separate Appendices to the Strategy). The danger otherwise is that, with further experience of providing for cyclists on State

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Cycling
Advocates
Network

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PO Box 6491
Auckland
New Zealand

.....
Tel/Fax: 04-972 2552
Email: secretary@can.org.nz
Web: www.can.org.nz

Highways, some of the specified criteria may be inappropriate and require modification. Similarly, some initial guidance in the *New Zealand Supplement* may require modification following practitioner or research feedback.

- On further reflection about all of the various simplistic criteria specified for providing cycle facilities on State Highways, we wonder whether Transit should instead develop some kind of “rating system” that scores each of the many attributes (traffic volumes, cycle volumes, speed limit, alternative routes, sight distances, etc) to determine priorities for improvements. We are aware that similar approaches have been done for prioritising treatments like guardrails on bridges. This would seem to be a more pragmatic way of allocating Transit’s limited funds in this area. However, all this is rather premature until we’ve seen the final format of the *New Zealand Supplement*. Such an approach, if used, should probably not be documented in Transit’s Strategy but in more operational documents, which would be more easily modified as circumstances dictated.
- It is our understanding following a recent Transfund Board meeting that Transit will continue to provide off-road cycle facilities within their highway corridors, rather than the adjacent local authority having to do this. Therefore a number of clauses within the Strategy will need to be changed to reflect this.

In our view, this initiative needs to be kept moving. There are other important players too, including the LTSA and Transfund. We strongly recommend that these agencies be provided with a draft of the Strategy as soon as possible, and that the process of developing a draft Transit Cycling Strategy be continued in parallel with preparations for the release of the *New Zealand Supplement*. Both documents should be available as soon as practicable for consultation and use.

Finally, our comments should be seen as the CAN Executive’s first informal look at the strategy. We look forward to the opportunity for more formal consultation, where we can involve our wider membership, and where other interested parties also have an opportunity for input.

We hope that our comments are clear; please get in touch with us if you require any clarification. Ultimately, we are certainly keen to see world-class provision for cycling by Transit.

Yours sincerely

Glen Koorey

Technical & Policy Advisor

for

Cycling Advocates Network (CAN)

Cc: *David Young, Dennis Davis (Transit NZ)*