

Location	Modification required, with reasons
Intersection of Frederick St and Ward street and the new arterial	<p>Provision needs to be made for pedestrians and joggers crossing Ward Street on the seaward side. The observation on pages ii and 14 of the transport assessment for the NOR, that it is unlikely that pedestrians will wish to cross in front of the Anzide properties access is disputed.</p> <p>Pedestrians coming from Crawford Street (south of Stuart Street) walk on the seaward side of Anzac Avenue (rather than the other side) because on the western side there is no safe path between Crawford Street and Anzac Avenue. Pedestrians instead walk immediately in front of the Railway Station and along the seaward side of Anzac Avenue. Some arriving at the access to Anzide Properties may wish to cross Anzac Avenue e.g. to Frederick Street but others will</p>

	wish to proceed on the seaward side to reach Parry St West.
On the seaward side of the new arterial between the Frederick Street intersection and the mid-road crossing (“cycle refuge”) giving access to the south end of Parry Street West.	<p>A footpath is required, so that those walking from Anzac Avenue along the seaward side do not need to make three road crossings to reach the end of Parry Street West. (Pedestrians, cyclists, and joggers are currently using this route, inside the temporary traffic cones and on the grassed verge on this section of road.)</p> <p>Note: the ‘cycle refuge’ in the middle of the new arterial opposite the end of Parry Street West is also used by pedestrians</p>
Northern end of the new bridge over the Leith	Steps are required on/off the bridge where the path underneath the new arterial joins the footpath across the bridge. The route has been designed for cyclists and not for active pedestrians who prefer a direct route. The out and back graded path is a lengthy diversion for pedestrians and needs to be supplemented with steps
Crossing at the northern end of the stadium carpark, near the intersection of Parry Street and Ravensbourne Road, which leads to Magnet Street	The current crossing is too far to the west to provide a direct link onto the short road link leading to Magnet Street. Pedestrians and joggers are commonly crossing the arterial further towards the city (on the direct desire line towards the stormwater pond). The crossing needs to be redesigned to make is more safe for pedestrians.

The Otago Regional Council wishes to be heard in support of this submission.

1. Discussion

1.1 Pedestrian and Cycle Facilities

ORC supports the designation of the new arterial to provide heavy traffic a more direct route to the Port, as well as ensuring the transport system is as efficient as possible which is of critical importance to the city. However is also important to the ORC that as much attention is paid to designing infrastructure for walking and cycling as for motorised traffic. Therefore the ORC asks that the NOR be modified to also provide adequately for safe, convenient and direct pedestrian traffic.

ORC understands that DCC is planning to construct a new walkway/cycleway connection between State Highway 88 and Anzac Avenue, using the rail corridor in part. Once completed, this would provide an alternative route for some of the journeys on foot, particularly for people walking to and from the SH88 walkway/cycleway and the Queens Gardens and Octagon vicinities. Even so, there remains a need to provide better for pedestrian traffic in the area in which the new arterial road is situated to support other journeys.

In providing for roading improvements in the locale in which the new arterial road is situated, it would be sensible planning practice to consider future use by all modes, and not just motorised traffic. The NOR application considers motorised traffic in detail, but gives only cursory attention to walking and cycling. The choice of safe walking routes should be encouraged.

When designing infrastructure suitable for foot traffic, it is important to consider the entire journey (as when designing roads for motor vehicles) and not just single intersection or road crossings.

Ian Clark's transport assessment (page 15, Appendix D of the NOR application) dismisses the need for pedestrian facilities along the majority of SH 88 realignment itself because of the industrial development and absence of frontage activity. Instead Mr Clark considers that Anzac Avenue (the former SH88 route) "provides the right environment for pedestrians". This completely neglects to consider to where pedestrians might be heading (and from where they have come). It also overlooks the fact that those walking prefer direct routes, and commonly take shortcuts and risks to walk the shortest route. At present many people walk from Anzac Avenue to Parry Street West, as a way of accessing cars parked in Parry Street West, along the back of the Otago Polytechnic 1 block, the marina and sports clubs along Magnet Street, and the SH88 walkway/cycleway along the harbour.

One of the objectives of the original designation was to "improve access between the city centre and the east, southeast, and southern suburbs, including the Peninsula, Waverley and South Dunedin." This should include access by all common modes of travel including walking and cycling.

2. Regulatory considerations

2.1 Regional Policy Statement

Section 171(1) of the Resource Management Act 1991 (RMA) requires the territorial authority to consider the effects on the environment of allowing the NOR, subject to Part 2 of the RMA. The NOR should promote the sustainable management of resources as set out in Part 2. Sustainable management is defined as managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety. For people and communities to provide for their social, economic, and cultural well-being and for their health and safety, good quality, safe infrastructure that encourages and promotes walking and jogging is needed. Walking is an important mode for commuters. Both walking and jogging are common forms of recreation and exercise, that promote good public health and support a productive community. They are also relatively safe modes of travel.

Section 171(1)(a)(iii) of the RMA requires the territorial authority considering the NOR to have particular regard to a regional policy statement. Relevant policies in the Regional Policy Statement for Otago (RPS) include 9.5.3 and 12.5.3:

Policy 9.5.3 promote and encourages the sustainable management of Otago's transport network through: (a) promoting the use of fuel efficient modes of transport....

Policy 12.5.3 promotes energy efficiency in Otago through...(d) encouraging energy efficient transport modes in Otago.

Walking is the most common energy- and fuel-efficient mode of transport. The RPS thus implicitly supports and promotes the use of walking as a mode of travel. The requiring authority should therefore be having particular regard to providing for pedestrians. The environment results anticipated in the RPS include the built environment meeting the present and reasonable foreseeable needs of Otago's communities¹, and Otago communities being able to meet their present and reasonably foreseeable energy needs².

2.2 Regional Land Transport Strategy

The Otago Regional Land Transport Strategy 2011 (RLTS 2011) envisages less reliance on private motor vehicles and greater provision for active and shared travel, such as walking and cycling.

Walking, as an essential component of a sustainable, accessible land transport system, is considered a suitable mode of transport for short trips (under 2km) and for connecting different modes (e.g. walking to a bus stop or from a carp park to work). Walking also has an important recreational role and contributes to improvements in public health, the minimization of environmental effects and reduced oil dependency.

The RLTS 2011 envisages people walking longer distances and more often. It seeks to encourage and support higher levels of pedestrian activity through land-use planning that enables people to live within walking distance of local services, including transport services, and through improved pedestrian facilities.

The applicant has considered outputs 2.2.1, 3.3.1, and 3.3.3 in concentrating on freight traffic³. The ORC acknowledges the relevance and importance of outputs 3.3 due to the movement of freight to and from the port, specifically:

Output 3.3.1

Efficient flow of traffic on the entire transport network, including state highways and trains on the main truck rail line

Output 3.3.3

Unimpeded and efficient flow of goods to/from Port Otago, by road and rail

The applicant has, however, overlooked the following sections of the RLTS 2011 that concern active travel:

Output 2.2 Basic network design

Output 2.2.3 notes that in urban areas, people should have choice in the mode of travel available that cover both active and motorised transport while utilising space in urban areas, and key corridors in alternative ways with less reliance on private motor vehicles.

Output 5.1 Walking and cycling networks

¹ Regional Policy Statement for Otago, 9.7.1, page 131

² Regional Policy Statement for Otago, 12.7.1, page 176

Greater provision for the active modes of walking and cycling is the focus of Output 5.1.1. This should enable people in urban areas to be able to choose to commute via either mode.

Output 6.1 Resilience in the face of changes to oil prices and supply

This output seeks to ensure people are able to make sensible choices in travel when oil shortages or price spikes occur, including making greater use of active travel for local trips.

The NOR application treats non-motorised (or ‘active’) transport as being of secondary consideration to motorised traffic. The idea that walking and cycling is of lesser importance than motorised transport is not a view ORC supports, nor an approach the RLTS 2011 takes. The latter states that the strategy will have been successful in providing for walking and cycling networks and facilities for safe convenient travel when:

- a) all district plans in Otago recognise that pedestrians and cyclists have the same rights to road space and to safe infrastructure as do motorists,
- b) their travel time is of the same value as that of motorist, and
- c) they have the same right to travel safely³.

The Transit Planning Policy Manual (version 1 effective from 1 August 2007 and available on NZTA’s website) recognises that state highways should provide for walking and cycling.



Fraser McRae
Director Policy and Resource Planning

30 August 2013

Address for service of submitter:	Otago Regional Council Private Bag 1954 DUNEDIN
Telephone:	(03) 474 0827
Fax:	(03) 479 0015
Email:	warren.hanley@orc.govt.nz
Contact person:	Warren Hanley Resource Planner - Liaison

³ Otago RLTS 2011, assumption ii and Indicators of success 5.1.1 and 5.1.2, page 43.