

Comments on the Transurban/SMEC Bicycle Detour Audit Report

This is Appendix 8 of the Bike North Audit of the M2 Interim Bicycle Detour as proposed by Transurban. This appendix should be read in conjunction with the other documents.

Overview

This appendix specifically addresses issues arising from the "SMEC Bicycle Detour Audit Report" of 25 January (SMEC Report) which was made available to Bike North on the same day. Bike North thanks Transurban for passing this document on as soon as it was received by them.

The SMEC Report is a report on the bicycle detour routes proposed by Transurban as alternatives to the existing M2 Motorway cycle facility. It is proposed by Transurban that cyclists be removed from the M2 on to these routes which use local roads and paths.

The SMEC Report, on page 1 of 11, states that:

"SMEC Australia Pty Ltd (SMEC) was commissioned by Transurban to conduct an audit of the alternate route to determine if it complies with the relevant Austroads Guidelines."

The report is extremely deficient in meeting this goal. It fails to assess the routes properly. The report seems to be addressing a different question: one that is neither requested nor appropriate. This can be seen, on page 4 of 11, where the SMEC Report concludes that:

"The proposed bicycle detour, as far as practicable, will be consistent with the practices outlined in the NSW bicycle guidelines and relevant AUSTRROADS guidelines (subject to the recommendations in Section 3)."

The comment "as far as practicable" is completely inappropriate and out of order for this report. The assessment of practicability is neither requested nor able to be answered by SMEC. Even after the few items in Section 3 are remedied, the route will fall far short of meeting the relevant guidelines and SMEC's role was to detail all the work required, not to stop at just a few items.

We think the report should have explicitly answered just two questions:

- a) Does the route comply with relevant Austroads 14 Guidelines for this cycle route?
- b) If it doesn't, list what is necessary to ensure the route can be made to comply?

The answer to the first question should be "no". The answer to the second question should be a complete list of works.

The detour route will be in place for a minimum of 3 years, probably 5 years and maybe even longer. Therefore it is critical to undertake a thorough audit to ensure that Transurban and the Councils provide a route that is not deficient in any way that would make them liable for negligence. The only way to do this is to assess the route for compliance against the Austroads Part 14 Guidelines and NSW Bicycle Guidelines. Only when this is completed will a full schedule of the required works be known. Unfortunately the SMEC Report does not achieve this.

The SMEC Report contains errors and inconsistencies and makes many omissions. Even photographs of key locations have been left out of the report. We suggest that the Bike North Audit of the route be provided to SMEC for comment.

The SMEC Report is so deficient it will need to be redone. The replacement report should be undertaken by a company or individual(s) with relevant qualifications and experience in planning and auditing cycle facilities.

Due to the enormous number of errors and omissions in the SMEC Report we will not analyse every statement. However it is not necessary to do this, because we have addressed most of the route audit issues separately in Appendices 1 to 5 of this document.

The rest of this document indicates the weaknesses in the SMEC Report by citing examples.

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The consultant used

- * Austroads 14 (p143) indicates that "it is essential that personnel conducting audits of bicycle facilities are experienced in and knowledgeable on the provision of bicycle facilities". From the report presented and the conclusions reached we doubt that this condition has been met.
- * We note that the Audit has been carried out by SMEC, a company that is not known to us as having experience in bicycle planning or bicycle audits. We believe that a company with a track record in bicycle route planning and auditing should have been used.
- * We would like to know which companies were asked to submit tenders for this part of the work and why SMEC was chosen.
- * We note that the Auditor was a Senior Environmental Engineer, who has "bicycle experience using both non-facility roads and facility roads". No indication is given of their experience in assessing or planning bicycle routes, nor even how much cycling experience they have.
- * Based on the route times given (34 to 37 minutes) it appears that the auditor is not a strong cyclist, nor do they understand many of the issues that face existing cyclists using the detour route when it is compared to the current M2 route.

The audit process

- * We note that the first Draft Audit Report was completed on 11/12/06 with the actual route audit carried out on 22/12/06. We don't see how the draft report could have been started before the actual audit took place.
- * We are extremely disappointed not to have been consulted at an earlier stage in the process when we would have been happy to carry out joint saddle surveys of the route. It is clear that the auditor could have done with some assistance in identifying issues on the route.
- * It is common practice for local cyclists to be involved in saddle surveys and had this happened we believe that most issues would have been clearly identified up front.
- * No indication was given of the time of day of the audits. We consider that the Friday before Christmas (22/12/2006) and Wednesday after New Year (3/1/2007) were NOT good days to assess the route viability given the likely traffic volumes encountered.
- * We recommend that the audit be conducted several times as follows:
 - * at a time with low traffic volumes, to more assess and measure the physical issues,
 - * in daylight during afternoon peak traffic (between 4:30pm and 5:30pm), and also
 - * after dark to assess the night time issues.
 - * at lunch times for the shared path on Talavera between Khartoum and Herring.
- * The best way to resolve the issues is to commission an on-site audit to reach agreement.

The audit questions from Austroads 14 Appendix 1

- * The Auditor was asked to review the facility using the sample questions from Austroads 14, however they did not do that so the report is immediately in breach of the requirements.
- * Austroads 14 provides sample questions which address the issues within Austroads. These are not questions to sample, but sample questions to use which cover the guidelines.
- * In the detailed section of the SMEC Report, the full list of questions is not applied. Of the 88 questions in the Austroads Checklist only 24 are addressed or partially addressed in this audit.
- * There is no reason given as to why certain questions were left out. While some questions don't apply and it is expected to give a "not applicable" response, most of those left out were very relevant and would have had a bearing on at least one part of the route under assessment.
- * Please refer to Appendix 9 of the Bike North Report to see the full list of the questions that are in Austroads. Those questions chosen by SMEC are clearly marked.

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- * For example the question in section A3.1 "Does the design avoid or minimise the need for cyclists to slow or stop?" is never asked in any section. Why is this?
- * For example the critical question in section A-5-1 "Are bicycle lanes required?" is never asked. We believe lanes are required for separation from traffic.
- * For example the question in section A-5-2 " Are the intersection treatments appropriate?" is never asked and yet intersections are the main conflict points.
- * No travel times were given for the M2 cycle way, so how the times can be considered acceptable is a mystery to us. (See Appendix 7 for Bike North comparisons of two routes.)
- * No assessment has been made of the type of cyclist or the type and length of their journeys, so no assessment can be made of the likely impact on cyclists.
- * The report indicates that where a situation does not comply with guidelines, then erecting a warning sign is all that is required. Other non-complying conditions are simply ignored.

Conclusion Reached

- * The report states on page 4 of 11 that "The proposed bicycle detour, as far as is practicable, will be consistent with the practices outlined in the NSW bicycle guidelines and relevant AUSTRROADS guidelines (subject to the recommendations in Section 3)"
- * The above clause should be struck from the report. This statement is completely outside the brief of the SMEC Report which should have been an audit against the bicycle guidelines only.
- * The assessment if what is practicable is a separate question and relates to decisions about what is possible and what resources are available. These decisions need to be made by relevant decision-making bodies based on the audit rather than by the auditor who should be independent and is neither the proponent or the approver.
- * We note that the report states that, "Having regard to the volume and nature of cyclists using this route, the temporary nature of the arrangement, the proposed detour signage and subject to the improvements recommended in this audit, this cycle detour may be considered acceptable given 'practicable' consideration."
- * We cannot understand how this conclusion was reached given that
 - * the volume of cyclists was growing, but no analysis is given,
 - * that nature of the M2 cyclists, their origins and destinations and their need for fast continuous uninterrupted cycling, has not been described,
 - * the temporary nature is for at least three years and may permanent,
 - * the improvements will fall a long way short of raising the standard to meet Austroads guidelines for this route.
 - * the auditor is not in a position to determine "practicability".

The on-road environment

- * A major failing of the audit report is that it does not address the on-road traffic environment faced by cyclists. The on-road environment is critical to the viability of the detour route, which is significantly affected by traffic conditions, which vary dramatically through the week.
- * The traffic conditions are a serious safety concern for cyclists and the route will certainly lead to accidents and serious injuries as cyclists are forced into a very hostile environment.
- * It is essential to ride the route in peak hours during the reassessment, and we would be happy to accompany the auditor to reach consensus on the situation.

Issues that are left out of the report

- * We are surprised that so many problems can be missed in the audit or just glossed over, which indicates a lack of understanding of cyclists' needs.

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- * For example, the path down Beecroft Road is suggested to be just 1.2m wide. There is no provision for such a path in Austroads. The narrowest path to be constructed is 2.0m wide. Austroads (p88) only allows an "absolute minimum" of 1.2m where the path abuts a footpath (thus forming a path over 2.0m wide), where the path is used for local access only, where commuters and higher speed cyclists are a small proportion of users and where cycle speeds are relatively low. None of these conditions is true. Even on a one way shared path, cyclists will have to share with other cyclists travelling in the same direction and with pedestrians. The width should be 3.0m
- * The report contains no recommendation as to the required construction along certain sections to meet the guidelines. Generally an off road path will consist of safety barrier/fences between the path and hazards such as fast moving traffic or sheer drops, safety buffer zones, and paths clear of all encumbrances. Transurban, if relying on this report will be very surprised when they learn of these requirements.
 - * For example, the path at Terrys creek is described as "narrow, steep and has poor visibility, the bridge is only 1.1m wide. Tree obscures path at two locations". The recommendation in the SMEC Report is to "trim the trees", as if everything else complies with Austroads. We were astounded at this conclusion for a facility which is completely inadequate and we claim it is unsafe. Of considerable interest is that there are NO PHOTOS of the offending narrow section of this bridge even though, judging by the photo numbers they were taken. Please see photos 79 to 84 in Appendix 1.
- * The report states that on the Talavera Rd shared user path that two pedestrians were encountered. During business hours and especially lunch hour, this path is heavily used by pedestrians to the point that it is dangerous for cyclists. This path must be reassessed at lunch time and putting cyclists on the existing path creates a dangerous situation for all users.

The report contains many errors

- * For example on the question on Section A "Are fixed objects treated to ensure visibility at night" the report says "No objects". However photo 1 indicates a pole in the centre of the cycleway which has no reflective material. Therefore the report is twice in error in this case.
- * In answer to the question "can utility covers, grates, drainage pits etc be negotiated by cyclists" the report answer yes in all but one section. Our report clearly shows many such grates that are missed by this report. The auditor clearly knows what to look for as shown in photo Q2 but how could they miss many others? Where were they looking? They should have been included.

The report is inconsistent

- * The report answers the question about hazardous conditions on the Talavera Road section by saying "Yes, at traffic lights at Alma Road." Having identified a hazard no remedy is suggested nor is a recommendation made.
- * The report states that some pavement markings on Talavera Road are less visible than others, but doesn't recommend remarking.
- * The report identifies a number of hazardous conditions but does not make any attempt to recommend proper remedies. For example the report states that crossing Epping Road at Vimeira Rd might be "hazardous" but does not suggest a solution.
- * The report states that lighting is satisfactory, then states that "it appears to be dark at Terrys Creek". Either lighting is satisfactory or not. In this case it is not and we suggest the consultant visit at night and then redraft this answer.
- * The report says on the Terrys Creek section "Did not investigate fence in detail however it appears to be without sharp edges." We suggest the consultant stop at the fences and examine more closely, especially the ones with chain wire, which is specifically excluded (Austroads p114).
- * On the Terrys Creek Section in answer to "Are fixed objects treated to ensure visibility at night?" the report says "No, fence on bridge might need treatment". The fence on the bridge

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definitely needs treatment because it doesn't have any reflective material, but this isn't in the recommendations. Nor is the missing reflective tape mentioned on the two power poles, wooden fence over drain, railings on Epping Road, or the fence across the minor creek.

The report contains omissions

- * For example when describing the crossing of Wicks and Epping Roads it is agreed that it is "tedious to cross" and that "bicyclists need to negotiate with pedestrians". Yet the fact that this facility does not comply with Austroads is just not mentioned.
- * For example in the Wicks Road section and other sections the question is "are all necessary pavement markings provided?" The answer is "No markings exist". However pavement marked on-road lanes are necessary. It is clear that if no markings exist, then they are not provided and the route is deficient in terms of Austroads, but this conclusion is missing.
- * In the Terrys Ck section in answer to the question "Does the cross section of the path safely accommodate the anticipated cyclists" no mention is made of the dangerously narrow bridge over Terrys Ck and the adjacent high speed traffic on Epping Road. Instead the report inadequately states, "At the time of the audit there were no pedestrian encounters."
- * At the Epping Road/Pembroke St crossing the only mention of the diabolically difficult exit from the crossing is that "interference with pedestrians might be expected". We would like to know how (or if) the auditor managed to ride this section at all, given the difficulty.
- * While the report does include the creation of a new bike path down to the M2 off ramp at Beecroft Road, it doesn't continue this across the gravel to meet the M2. How are cyclists meant to reach the M2 on a complying path? This is another omission.
- * There are no photographs or mention of critically dangerous sections, such as the Waterloo Khartoum roundabout or the Bridge at Terrys Creek. The only photo of the difficult Epping Road crossing at Pembroke Street Epping, is obscured by a vehicle.
- * The report seems to be incomplete because photos that are referred to in the text are not in the document (e.g. F2, F5, G8, G9, G10, G14, L15, L18.)
- * There is an almost complete lack of facilities for cyclists on road and this noted and accepted by the report, however there should be suggestions for their implementation.

The report contains ridiculous statements

- * The report says "To cross Lane Cove Road, bicyclists need to be in the middle lane at the intersection. This could interfere with vehicle traffic." It is unbelievable that a bicycle audit consultant would comment that this could interfere with vehicle traffic, when the real danger is to cyclist's safety in this situation. The report seems to be written from the point of view of a car driver and needs to take the view of the cyclist who is exposed to life-threatening danger by Transurban in proposing this section of the route.
- * The report suggests that an alternative to turning right at Fontenoy Road (with "no right turn" is to turn right at Talavera or Waterloo where the report casually mentions that a cyclist would "have to cross three lanes of traffic at 70 km/hr". Is the writer of this report serious? Have they attempted this cycle manoeuvre during peak traffic flow, or at any time?

Were alternative routes considered?

- * A bicycle audit report will usually review alternative routes to find the best one especially in the case of major problems. This concept is understood by SMEC who analysed five options for the length of the 3rd lane in the REF, however no alternative cycle routes were considered.
- * There is no reference of how or who chose the route to be audited. The route is so deficient that it is completely unreasonable and inappropriate that the RTA signed off before the audit.
- * The auditor would have been familiar with the NSW Bicycle Guidelines where an example of a regional route selection process is given (page 82). By an amazing coincidence the case study in the Guidelines covers a section of the proposed detour route. Even with this assistance the

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parameters were not assessed by SMEC. Significant problems and differences would have been highlighted, comparing between the M2 and the detour route.

- * We believe that a range of alternative routes should have been considered by the auditors and some attempt be made to identify the best possible route.

Is the route just proposing a current cycle route?

Transurban have stated that their proposed route just puts cyclists on roads and paths they can use already and that the route is already a cycle route. This is false in several ways

- * There are sections of the route that do not exist at all and can't be cycled at present (e.g. Beecroft Road where there is no footpath and no room for a footpath.)
- * There are proposals to create sections of shared path where none currently exist and upgrades are necessary (e.g. Wick Road near Epping Road)
- * Sections of the route are marked as cycle way but do not comply with current standards (and may never have complied) and need major upgrade before cyclists are directed onto the route (e.g. Terrys Creek Bridge, and Pembroke path descent to Terrys Creek).
- * Some cycle paths that are dangerous or problematic and are avoided by cyclists in the area (e.g. Talavera path at Macquarie Centre).
- * There are roads where it is legal to cycle but where cyclists would not generally choose to cycle at certain times due to significant pressure from traffic or topography or both (e.g. Waterloo Road, Talavera Road).

Conclusion

The SMEC Report is embarrassingly deficient and it appears that SMEC and Transurban could not have expected anyone to check or even read the report.

The only way to resolve the discrepancies and the claims made by Bike North in this report is to undertake a field audit with a team consisting of Transurban, Bicycle Audit Experts, RTA, Council Officers and Bike North cyclists to discuss the issues on-site. At each site, various measurements can be taken and assessment made against Austroads and NSW Bicycle Guidelines. All the issues should be able to be resolved into a single agreed works list.