

Submission to: Palmerston North City Council
From: Cycle Aware Palmerston North
Date: 6 July 2006
Re: Draft Manawatu Active Transport Strategy

Preamble

Cycle Aware Palmerston North (CAPN) is a local community group that promotes everyday cycling (cycling for transport) and recreational cycling. The current membership is around 40 (some of which are family subscriptions). Our aim is to bring about improvements for cyclists and an increase in numbers cycling. We support other road user groups who experience difficulties similar to those experienced by cyclists (e.g. lack of safe and convenient mobility and access) and we support environmentally friendly modes of transport. CAPN is affiliated to Cycling Advocates' Network (CAN), the umbrella organisation of cycling advocacy groups in New Zealand.

General Comments

We appreciate the opportunity to comment on the draft Manawatu Active Transport Strategy (hereafter draft Strategy). CAPN members involved in the Strategy Working Group were disappointed that groups representing those who use, or potentially use, walking and cycling for transport were outnumbered by agencies and non-transport focused groups. As a result, CAPN, Massey Bicycle User Group and Living Streets Aotearoa input is not adequately reflected in the draft Strategy.

We are also disappointed that it took a year from when the Strategy Working Group had its last meeting until the draft Strategy was released for consultation. While we are pleased the consultation draft is now available we are disappointed that only two weeks was allowed for public consultation. From this a question might be raised as to what extent establishing a clear and strong strategic direction for increasing walking and cycling is a priority for both Councils.

In this submission we focus our comments primarily on walking and cycling in Palmerston North city and also Palmerston North City Council's policies and activities. Overall, while joint action is commendable and desirable in certain areas, we believe the joint plan is confusing given that the two districts have very different existing provision, needs, issues and priorities around walking and cycling. In addition, the two Councils have different Ten Year Plans and different community outcomes. We would like to see much tighter integration between the policies and actions in the draft strategy and community outcomes and PNCC's LTCCP.

We have perused a large number of the cycling strategies and walking and cycling strategies that have been adopted by other local authorities and our comments are based on best practice as reflected in these strategies and also as set out in the Land Transport New Zealand report, *New Zealand walking and cycling strategies - best practice*.

Chapter 1 Introduction

We question the title 'Manawatu Active Transport Strategy for Pedestrians and Cyclists'. This suggests that the document is for those who are recognised Pedestrians and Cyclists. We suggest deleting the words '**for Pedestrians and Cyclists**' to be more inclusive of those who are not currently pedestrians and/or cyclists. CAPN recommends that the Strategy is called a 'walking and cycling strategy' rather than an Active Transport Strategy. 'Active Transport' highlights just the transport aspect of the modes, and not its environmental and sustainability and other aspects.

We note that on page 9 and throughout the document there are several references to the role of 'partners' and the need for partnerships. We believe that the word 'partners' is misused and often used to give the impression of a collaborative relationship. Collaboration needs to happen on the basis of mutual respect and power-sharing and should be reflected in joint reporting and joint funding. We don't see much evidence of this in the document for many of the agencies and groups mentioned on page 9. In the absence of really-existing collaborations of the nature just described the terms remains, at best, rhetorical and, at worst, cynical.

CAPN recommends that the Introduction include the information about the benefits of walking and cycling that is currently buried in Appendix D. If organisations and individuals in the wider community are to appreciate the Strategy and commit to the Strategy's implementation they need to have information about the benefits of walking and cycling at the outset.

CAPN recommends that data on recent, current and expected trends be provided at the front of the strategy so that readers know what the current situation is and can see the links between the issues that we face and the planned actions. It was disappointing to us that the process of developing the draft Strategy occurred largely in a vacuum of data about current issues. Only very limited data on crashes and walking and cycling trends was available to the working group because public sector agencies have not collected robust data. Data should be included in the Strategy to indicate trends in traffic volumes as these are both a key factor in the need to increase active transport modes, and also a key element in safety and convenience/pleasantness of walking and cycling.

Regrettably, no information is provided on what has been achieved by the Bike Plan (e.g. Safe Routes to Schools, school travel plans, cycling infrastructure, Principal Cycle Network implementation status) so readers can know what has been achieved and where more effort is required. Key issues that need to be addressed if walking and cycling are to become modes of choice are: the lack of cycle- and pedestrian-friendly access to the CBD and within the CBD, traffic volumes and traffic congestion and lack of cycling infrastructure on many parts of the Principal Cycle Network (PCN), vehicle speeds, lack of maintenance of cycle lanes and other key streets on the PCN, and lack of travel demand management.

Chapter 1 should state what timeframe to which the Strategy applies. CAPN recommends that the Strategy be for a period of three years (2006-2009) with a review starting in 2008 to develop goals and actions for the next 3-5 years. A longer

timeframe (to 2011, for example, would be possible especially given that both Councils have Asset Management Plans for Roading and for recreational facilities that encompass many of the actions in the Strategy.

Chapter 2 The Four Es

We support the focus on the four Es. The discussion in para 2.1 on Engineering interventions to deal with crash blackspots in the roading network should be broadened to acknowledge general design features such as lane and carriageway widths and kerbside parking which can contribute to hazards for cyclists. In places where there are wide, flat and straight streets average vehicle speeds are typically higher than on streets that are hilly, windy and narrow. Therefore, to achieve a higher level of safety for cyclists in Palmerston North, greater emphasis needs to be given to overall road design (incorporating narrower vehicle lanes, removing kerbside car parks adjacent to cycle lanes, etc.), rather than solely to crash blackspots.

CAPN recommends that the Strategy include examples of the regional initiatives planned by Sport Manawatu and also examples of Roadsafe Central's work with communities. The Strategy could provide much more inspiration by show-casing these and also by having photos as so many other walking and cycling strategies do.

Chapter 3 Vision and Goals

The use of the term 'network partners' is ambiguous. Earlier, on page 9, the term 'partners' includes a range of statutory agencies and community groups. Are these also network partners?

It is disappointing that the draft Strategy excludes meaningful targets for measuring progress, and is not accompanied by an implementation plan. CAPN recommends that the implementation plan should be published annually to sit alongside the Strategy. Our group participated in the Working Group's discussions of the implementation plan. In mid 2005 the Strategy Working Group discussed a very detailed listing of projects and timeframes. There are many important projects in this listing and we fully expected that this would be released with the Strategy.

The Land Transport New Zealand publication, *New Zealand walking and cycling strategies - best practice*, includes excerpts from a number of local authority cycling strategies which have implementation plans. It states (on p7):

Specific implementation plans are recommended to help translate strategies into practice.

Now that PNCC's draft LTCCP has been adopted CAPN recommends that paragraph 3.1 provide broad details about what will be achieved in the 06/07 years and the following two years, and a cross reference to where the detail of implementation for the 2006/07 year can be found. The same should be done for Manawatu District Council's implementation plan.

CAPN recommends that the table in paragraph 3.2 incorporate much more precise data about what will be done by when. A lead agency should be identified for each

action to co-ordinate different agency responses. The term 'ongoing' is used in a way that is mostly quite meaningless. Instead, the table should state clearly who will undertake actions, and when. CAPN recommends, for example, that there should be a schedule of all schools in the two districts and which ones will have Safe Routes to Schools.

CAPN recommends that the draft Strategy indicate which organisations will be given priority for development of Workplace Travel plans. Mention should be made of existing good examples (such as Massey University's PN Campus).

CAPN recommends that the draft Strategy clearly indicate what active transport events will be supported and how in the first three years. All of these need a budget with the LTCCPs being adopted it should be very easy to specify how an action is being implemented in the first three years of the LTCCPs.

While it is important to monitor satisfaction with the active transport programme, CAPN considers that this should not be via the Communitrak survey. More meaningful survey methods are required than a short phone interview. Many other local authorities make use of postal surveys. Likewise focus groups could be used.

CAPN recommends that more detail be provided to explain how Action 1.1.6 differs from 1.1.7. CAPN also recommends that PNCC be explicitly mentioned in the list of agencies responsible for actions associated with Objective 1.1. CAPN recommends that PNCC recognise its own responsibility to fund and work with school and local employers to develop travel plans as part of travel demand management for which PNCC is responsible. As mentioned above, already Massey University's Palmerston North campus has a very good Campus Transport Plan. This could provide a model and positive learning opportunity for other employers.

CAPN recommends that more detail be provided in Action 1.3.1 about how PNCC and MDC and other partners will act as role models for good corporate behaviour. Do PNCC and MDC have Workplace Travel Plans? If not, each Council should move quickly to adopt a plan for their organisation and to report regularly on the implementation of their plans.

CAPN recommends that examples be provided of what promotion is being done/will be done by Destination Manawatu to promote active transport tourism. Also, there should be actions to support the development of active transport tourism.

Based on recent experience, CAPN is opposed to the current wording in Objective 2.1.1. Our experience is that catering for all road users does not result in satisfactory provision for walking and cycling. Therefore, CAPN recommends that Objective 2.1.1 be reworded as follows:

The importance of active transport will be reflected in all road design and re-design activities and all design and redesign will ensure enhanced conditions for walking and cycling.

CAPN recommends that Actions 2.1.1-2.1.9 incorporate a commitment to involving

groups that represent people who walk and cycle for transport. There has been insufficient inclusion of such groups in reviews and investigations by PNCC yet such groups have a strong awareness of users' needs and concerns. We are particularly concerned, for example, about how long it is taking to bring the riverbank cycle paths to a necessary standard for cycling commuters. Both the cycle path on the western side of the bridge (Esplanade to Dittmer Drive and beyond) and on the eastern side (to Te Matai Road) are extremely hazardous for commuters in the winter months because of the lack of lighting. These paths form part of the Principal Cycle Network yet the eastern path to Te Matai road also lacks a suitable surface for hybrid bikes that many commuters use.

PNCC recommends that, because some important cycle paths are not sealed, Action 2.1.3 should not apply only to sealed pathways but should apply to all cycle paths. We recommend that lighting similar to that used by Massey University on its cycle path near the Tennent Drive entrance should be installed as a matter of high priority. This is needed urgently to improve cyclists' personal security and also to reduce the likelihood that they will inadvertently leave the cycle path in the poor light and ill-defined edges, and crash (possibly into the river). Such lighting is also very beneficial for recreational walkers and cyclists.

It is of considerable concern to us that Palmerston North's Principal Cycle Network is so underdeveloped. This was to be implemented by 2007. CAPN recommends that a PCN implementation status report be developed as an additional action. This report should be a top priority (i.e. for completion in 2006/2007) and should document what engineering and infrastructural interventions are required and what the priorities for the next three years are. This should then be linked to the LTCCP. Additionally, CAPN recommends that targets then be established (as in many walking and cycling strategies) for the full implementation of the PCN.

CAPN recommends that the term 'regular' in Action 2.1.12 be accompanied by more detail indicating frequency.

CAPN recommends Action 2.1.15 include the Councils' websites and that as an additional action the PNCC's website should be updated at least 6-monthly to include up-to-date information and statistics. The current PNCC web pages on cycling are out of date and boring, which does not assist in portraying cycling as a valued mode of transport.

CAPN recommends that Actions 2.1.16-2.1.19 be amended to include: "with a priority list developed for each year, and progress to be reported annually." The sump grate in the Ruahine Street cycle lane between the Featherston St intersection and the hospital is a high priority for action.

CAPN recommends an additional action as part of Objective 2.1, as follows:

Action 2.1.20 When new cycling and walking infrastructure is constructed, a Pedestrian and Cyclist Audit will be conducted involving local users and independent experts. This could replace Action 3.2.4 or be added to it.

CAPN recommends that PNCC be included in the agencies with responsibility for Action 2.2.2. Again, this Action needs to be more specific about when the SMS is reviewed and how groups representing users can have input and know the outcomes of the review.

CAPN recommends that Objective 2.4 and Objective 2.5 be more explicit about the timeframe and content. This, like several other actions, is emblematic of the draft Strategy's very weak vision and commitment. For example, there should be a timeframe for constructing a second river crossing for active transport modes. We are aware that many of the walking and cycling strategies recently adopted around the country have very firm plans for new routes (see for example, Taranaki Regional Council, New Plymouth District, Hastings District Council, Gisborne District Council). Similarly, in their submissions to the Walking Access Consultation Panel many local authorities have prioritised access for walking. CAPN recommends that this draft Strategy provide similar detail rather than merely lines on maps. Without more concrete plans, these routes on the maps in Appendix A are largely hypothetical.

In the case of Objective 2.5 we are unclear whether the words 'Manawatu District' refer to PNCC's neighbouring territorial authority, Manawatu District Council or to the Manawatu (i.e. the two districts combined). We believe it should be the latter but the draft Strategy is extremely ambiguous.

CAPN recommends that PNCC as well as Manawatu District Council should be undertaking Actions 2.5.1-2.5.5 and we recommend that more specific timeframes be attached to these actions, as well as other details. For example, in Action 2.5.3 PNCC should start with public facilities such as the I-Site building, the Esplanade, Te Manawa, community centres and suburban libraries and the PN Community Leisure Centre.

CAPN recommends that Objective 2.6 include actions around Travel Demand Management.

CAPN does not consider drinking fountains to be a high priority given that people who are cycling and walking for transport are making relatively short trips (up to 6km one way) and are easily able to carry water if they need it. In reality, most people walking and cycling for transport will not spend more than 45 minutes each way and water is not normally needed for someone engaged in moderate activity for this length of time. Recreational walkers and cyclists might do longer distances, at greater speeds, and require hydration but we are not convinced that this should be a Council responsibility, let alone a priority for an Active Transport strategy. We think that recreational walker and cyclists can also carry their own water. Secure, well-lit and sheltered bike stands and lockers are a top priority for cyclists doing utility trips.

CAPN recommends that Action 2.6.3 be reworded. It does not make sense to say "Promote public transport... as a measure of promoting active transport." Instead, the action should be "Develop and promote opportunities to use public transport in conjunction with walking and cycling."

Objective 3.1 is a key objective from our perspective. Without consistency between

Council plans and policies across a range of areas (including health and recreation as well as resource management, urban design and land use planning), promotional and educational efforts to increase walking and cycling will not succeed. The links between land use and sustainable transportation planning are now widely acknowledged yet Council policy documents such as PNCC's District Plan and Transportation Management Plan contain many contradictions. An example of these contradictions, that has yet to be satisfactorily resolved, is the issue of cycle access around the CBD in Palmerston North. The four-laning of the inner ring road without proper cycle lanes and pedestrian crossings is fundamentally incompatible with the goal of active transport. It is not satisfactory simply to say that cyclists should use another route.

CAPN recommends that more detail be provided in Actions 3.1.1, 3.1.3, 3.1.4 3.1.5 and 3.1.9 about how user groups representing those who walk or cycle for transport will be involved in the reviews.

CAPN recommends that Action 3.1.2 be amended to include reference to the Urban Design Protocol.

Action 3.1.10 as currently worded is confusing. If it applies to Manawatu District this should be reworded as follows: "Develop a riverside pathway policy for Manawatu District to complement PNCC's riverside plans." We are not aware of PNCC's riverside plans and these were not discussed with the Strategy Working Group. More detail needs to be provided about what these plans are in order for submitters to make informed comments.

CAPN recommends an additional action as part of Objective 3.1, as follows:

Action 3.1.12 PNCC and MDC will include a detailed annual Active Transport Strategy implementation plan as part of the LTCCP or Annual Plan.

Action 3.1.11 falls far short of best practice. CAPN recommends that it be amended to provide for a comprehensive Annual Report so that the results of the 'ongoing monitoring' and details of progress on actions are made available to individuals and groups and other organisations in the community.

More detail is needed about how Action 3.1.2 will be implemented. CAPN recommends that the District Plan review include new provisions and rules.

CAPN recommends that Action 3.2.4 requires more explicit detail about when and how this will be done and how users can have input. See our earlier comments about an additional action for Objective 2.1.

CAPN recommends that Objective 3.4 requires more effective actions to support it. Action 3.4.1 merely reflects the basic statutory requirement. This does not ensure that effective consultation occurs. This current consultation on the draft Strategy is a very obvious example of deficiencies in local authorities' approaches to consulting with groups representing people who walk and cycle for transport. The timeframe is insufficient and there has been minimal publicity beyond the public notice in the

paper. A more appropriate action would be:

Ensure that, when consulting stakeholders, Council will ensure that (i) sufficient information is provided to all known local groups, as well as community in general, (ii) meaningful and comprehensive feedback is provided to those who make submissions and (iii) appropriate forums are provided for information-sharing and dialogue.

CAPN further recommends an additional action for Objective 3.4 as follows:

Action 3.4.2 Regular community forums will be held by PNCC, initially on a quarterly basis in 2006/07, to allow walking and cycling issues and planned activities to be discussed.

Manawatu District Council may also wish to hold forums regularly in its District but because many walking and cycling issues are specific to each local authority we see it as inappropriate to hold combined forums. One of the four forums each year should be held when the draft LTCCP or Annual Plan is released to outline the proposed programmes for walking and cycling (not just active transport). Another forum should be held to present the annual report on the implementation of the Active Transport Strategy. CAPN recommends that all local groups and organisations that have an involvement in the achievement of the Strategy should be invited and have the opportunity to have input. This would include employers and schools that already have, or intend to have, travel plans.

Overall, CAPN is concerned that the draft Strategy is inferior to the Bike Plan. The draft Strategy lacks precise details of how the two local authorities will work to ensure there is more walking and cycling by more people in the two districts. The draft Strategy should build on and extend the vision, policies and actions of the Bike Plan if those have been met. Where the policies and actions have not been implemented, actions should be included to implement them.

It is very difficult to see how the draft Strategy reflects something other than 'business as usual' (i.e. the status quo). 'Business as usual' is not feasible as the data on cycle crashes and cycling to work reveal. Moreover, 'business as usual' resulted in significant shortfalls in implementing the Bike Plan.

Where actions are genuinely of an ongoing nature (being standard practice as opposed to a distinct initiative) we would question why they are listed as actions. For example, Action 2.4.2 refers to considering access for pedestrians and cyclists in any future road bridges/underpasses or road crossings. Likewise Action 3.2.1 refers to reviewing the reseal programme for opportunities to reassess road layout. These kinds of practices hardly need to be stated as an action as they are often a requirement of the Land Transport Management Act and associated policies and manuals and/or are standard professional practice.

Similarly, Action 3.2.2 should not be included unless it refers to a specific time-bounded review to which groups promoting walking and cycling for transport can have input and will be advised of the outcomes of the review. Otherwise CAPN

assumes it is part and parcel of ordinary management practice to ensure the needs of active transport modes are recognised. Rather than stating the obvious and normal day-to-day business, a strategic document should set out what distinctive actions will be taken to deliver the vision.

As noted in our comments about Action 3.1.10, if Action 3.5.1 applies only to Manawatu District Council then the action should be reworded as follows:

Consider the appointment of an Active Transport Officer at Manawatu District Council.

However, CAPN further recommends that this action be deleted because Action 3.5.2 encompasses the issue of allocation of Council staff resource to strategy implementation. Considering an appointment should always be done as part of standard management practice if there is not Active Transport Officer, and not confined to one point in time (July 2006).

Action 3.6.1 should state what is meant by a short trip (i.e. under 3km) and also should be accompanied by a further action providing incentives to staff who use their own bicycle for Council business and providing for a comprehensive review to be undertaken of all policies related to vehicle supply and use as part of developing corporate behaviour that is consistent with the vision and goals of the Strategy.

CAPN recommends additional actions to provide cycle skills training.

CAPN recommends that Action 3.6.3 be deleted. The purpose and composition of such a Steering Group proposed in Action 3.6.3 is not explained. Given that Horizons is the key agency identified as having responsibility we assume this is a Steering Group for the whole Manawatu-Wanganui region. We question why a region-wide Steering Group would be appropriate for Objective 3.7 which relates to active transport in Palmerston North City and Manawatu District Councils. This Action was not discussed with the Strategy Working Group. We note that Horizons Regional Council makes no reference to such a Steering Group as a priority in its Regional Land Transport Strategy.

Chapter 4 Indicators

This section is particularly disappointing. Lengthy discussions took place at meetings of the Strategy Working Group about the need for good quality data to measure progress and also the mechanisms for obtaining such data. In particular, the need to utilise expert external data collection was noted because local authorities in smaller cities like Palmerston North, and district councils, typically do not have research capability and because economies of scale in use of human resources and technology can be achieved through having professional data collection agencies involved across more than one local authority. The indicators that are proposed have a serious gap, namely counts of cyclists on popular commuting routes. The Census data on travel to work must be supplemented by intercensal data. It is quite unacceptable for a city the size of Palmerston North to continue to fail to have adequate data on cycling on the Fitzherbert Ave-Massey/Fitzherbert Science centres route.

The draft Strategy should include details of the frequency of commuting counts, school cycle parking surveys and CBD cycle parking surveys. Other cycle parks outside the CBD (e.g. Lido Aquatic Centre) should also be included.

It is not clear why recreational cycling counts are being included as part of a strategy promoting active transport. Certainly they cannot be used in isolation from commuter route cycle counts.

To be consistent with Action 1.3.1, which refers to satisfaction with the Active Transport programme, the reference on page 25 in #3 should be to Active Transport **programme** i.e. promotional and educational initiatives, not just infrastructure.

Miscellaneous

All the Actions should be linked to some key targets around achieving a particular level of numbers of people walking and cycling for transport. This should be linked to the 2011 Census count of travel to work (CAPN recommends a figure of 15% for numbers cycling) with intermediate goals as measured by the number of cyclists on key commuter routes. The single measure of success in the PNCC LTCCP is very inadequate.

CAPN recommends that Appendix B.1 should include reference to the Urban Design Protocol and the National Energy and Efficiency Conservation Strategy.

CAPN recommends that Appendix B.2 needs to be updated. Policy 5.2 on page 31 of the Horizons Regional Council's Regional Land Transport Strategy 2006-2015 adopted in March 2006 is not the one quoted on page 40 of the draft Strategy. Likewise the information on page 40 regarding walking and cycling issues is not correct. The draft Strategy also incorrectly states on page 40 that the "[Regional Land Transport S]trategy is currently under review..." The relevant policies from the Regional Land Transport Strategy for the Manawatu-Wanganui Region 2006-2015 (especially Policy 8 but also Policy 6 and 7) should be incorporated in Appendix B2.

Census data provides very blunt details of trends. CAPN recommends that Appendix C should contain the most recent cycle count data for different parts of the two local authorities as well as cycle parking counts. In Palmerston North such data has been collected for many years.

Finally, CAPN recommends that the draft Strategy be professionally edited before the final version is adopted and published. There are numerous grammatical, syntactical and factual errors that reflect poorly on the two Councils and should not appear in a document from a public sector organisation. A list of some of these is attached.

Summary of Key Points

CAPN recommends:

- Inclusion of overall targets to provide a direction for the Strategy.
- Preparation of an implementation strategy as a matter of urgency. This can be based on what is included in Programme 705.02 in PNCC's draft LTCCP but obviously needs to include other relevant programmes in the final PNCC LTCCP (e.g. 705/19 Railway Road cycleway, James Line upgrade, etc.) and also Manawatu District Council's programmes. It can also be based in what is in the 20 year Asset Management Plan referred to on page 150 of PNCC's draft LTCCP.
- Inclusion of specific time targets for the completion of the Principal Cycle Network (as mapped).
- Inclusion of adequate indicators (in particular, for measuring trends in walking and cycling for travel to work and other utility trips).
- Inclusion of effective reporting mechanisms (including an annual report sent to key groups involved in achieving the vision set out in the Strategy).
- Establishment of quarterly cycling forums in Palmerston North City that allow for public and stakeholder input requires detail. The first such forum should take place soon after the Strategy is adopted and can be used to give feedback to submitters and other stakeholders on the submissions received, as well as to seek feedback on a draft implementation plan.
- Much closer consistency between the Strategy and Horizons Regional Council's Regional Land Transport Strategy.

We look forward to continuing to work with PNCC and MDC and other agencies in the two districts seeking to promote walking and cycling.

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Page	Correction
3	The word district is confusing since in local government legislation and policy it means the area of a single territorial authority; the plural should be used as in “In these districts...”
3	Consistency needed – the Manawatu should be used not Manawatu when referring to the combined territorial authorities
11	Should be ‘... interventions used in central government’s Road Safety....
11	Transit New Zealand is not the national road authority; it is the Road Controlling Authority responsible for the state highway network
11	Cross reference required to page number where supporting documentation can be found
12	Compliments should be complements programs should be programmes
12	Check correct title of Public Health – should be Public Health Services, Midcentral Health
12	communities key benefits should be communities’ key benefits (if both communities are included)
12	Pedestrians and cyclists safety should be Pedestrians’ and cyclists’ safety
18	view of applying should be view to applying
22	Should be ‘ unjustly prejudices ’
24	use of bikes for staff should be use of bikes by staff
24	practises should be practices
27	National Land Transport Strategy should be New Zealand Transport Strategy
29	We recommend use of the definition of the term ‘cycle network plan’ as found on page 4 of the LTSA <i>Cycle Network and Route Planning Guide</i> : “A map of the primary cycle route network and a schedule of the infrastructure projects required to develop it.”
29	As above, the definition of cycle path should be consistent with that in the LTSA <i>Cycle Network and Route Planning Guide</i> : “An off-road for cycles. It can be an exclusive cycle path, a shared-use path or a separated path (see below).”
29	As above, the definition of shared path should be consistent with that in the LTSA <i>Cycle Network and Route Planning Guide</i> : “A path provided for use by both cyclists and pedestrians.”
45	someone that should be someone who