



1 May 2006

**Environment Canterbury**

PO Box 345  
Christchurch

**Re: Draft Long Term Council Community Plan (LTCCP) 2006-16 - SUBMISSION**

Spokes Canterbury, the local cycling advocacy group, is pleased to offer this submission to you regarding the ECan LTCCP. We would be happy to provide any further information or clarification if required. In making this submission, Spokes has based its feedback on the public consultation document and comments from our members.

We do not wish to be heard in person regarding our submission.

**General**

**Spokes is generally supportive of the aims of this LTCCP** and we look forward to its implementation. There are a number of specific points that we will raise below.

Despite its high environmental impacts, there still appears to be insufficient priority accorded to regional transport planning at ECan. This is evidenced for example by the relatively small number of staff in this area (not including passenger transport operations). We would like to see (for example) councils like ECan push hard nationally for the development of National Policy Statements and National Environmental Standards in the transport area, to give the Resource Management Act more teeth and consistency with regards to the impacts of transportation-related projects.

There appears to be only relatively minor mention of the Greater Christchurch Urban Development Strategy (p.47, p.66); we're surprised that it doesn't rate any discussion at all in the Introduction. We hope that this does not reflect its relative priority within ECan.

There's even less mention of the impacts of climate change and peak oil in the LTCCP. This seems strange given the growing awareness of the issue even in the media. Although we're pleased to see a project for 2006/07 to "*Investigate projected climate change and peak oil impacts on council services and operations*", we're surprised that the issue is not already higher on the radar within ECan for the next 10 years.

**Specific Comments**

Spokes offers the following specific observations about the proposal:

- Throughout the LTCCP, the document does not acknowledge the recent dissolution of the Banks Peninsula DC (e.g. p.4, 83); please correct this in the final version.
- Under Air Quality (p.17), despite acknowledging the problems of motor vehicle emissions (and with plenty of other MoT/MoH evidence on the subject), there appears to be no direct efforts here to address this. For example:
  - education/enforcement on "smoky" vehicles
  - public awareness of environmental effects of motor vehicle emissions
  - encouragement of low/zero-emissions vehicles (incl. cycles)
  - consideration of air quality issues in major roading resource consents (as done with Nelson Southern Link for example)

- Under Coastal Environment (p.23) we suggest including *“investigation of opportunities for recreational trails”* where ECan has appropriate land/influence.
- We strongly support the development of Waimakariri Regional Park and associated trails (p.47). We suspect that other major Canterbury rivers could also offer similar experiences for cyclists and walkers along their corridors, and we encourage ECan to also investigate these.
- We strongly support the proposed Public Passenger Transport initiatives (p.60) and indeed look forward to even more enhanced programmes (including improved linkages with cycling) following the current review of the Chch PT Strategy.
- On p.66 we do not support the proposal to *“develop a measure and target for the average journey time from home to work by private motor vehicles”*. The key measure should be door-to-door time irrespective of mode. We note that:
  - In many cases, cycle trips can be quicker than motor vehicle trips, particularly because of reduced time needed for parking, refuelling, etc.
  - Proposed bus priority projects may make PT faster, (again with potential parking time savings at the ends of trip as well).
  - Better land use planning may result in shorter trips on average, also improving travel times.

The proposed measure will not address any of these sustainable initiatives.

- Under Regional Land Transport (p.67) we're disappointed to see no specific mention made of any further development with the Canterbury Regional Cycle Network or Travel Behaviour Planning (although some local councils are now taking on board travel planning initiatives, we feel that ECan still can play a strong leading & coordinating role). Whilst there is a vague item talking about *“Developing an implementation plan for Regional Land Transport Strategy”*, given that the RLTS has been out for a year, we would have expected things to be further progressed than that.
- We support the proposed efforts to develop and maintain the parts of the Little River Cycleway on ECan land (p.67). We would like however to see ECan continue to play a more leading role in overseeing this project across its various jurisdictions.
- On p.97 we note that CAN (Cycling Advocates Network) is not mentioned as one of the groups that ECan is a supporting organisation of. If not already we also encourage ECan to support Sustainable Otautahi Chch (SOC) and Living Streets Aotearoa (LSA).

Please consider modifying the LTCCP to incorporate the issues raised above.

Yours sincerely,

**Glen Koorey**

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Spokes Canterbury (the former Canterbury Cyclists' Association) is a local cycling advocacy group dedicated to including cycling as an everyday form of transport within local and regional planning. The group is affiliated with the national Cycling Advocates Network (CAN) and includes a number of CAN's executive members. We currently directly represent over 800 people.

Spokes provides significant cycling expertise through its many longstanding advocates, transportation professionals and (most importantly) regular cyclists. The group is represented on Christchurch City Council's cycling steering committee and Environment Canterbury's Regional Land Transport Committee and provides regular feedback on various council transportation and planning proposals.

Website: [http://www.can.org.nz/spokes\\_chch](http://www.can.org.nz/spokes_chch)