# Before the Selwyn District Council

under: the Resource Management Act 1991

in the matter of: Proposed Private Plan Change 69 to the Operative

District Plan: Lincoln South

and: Rolleston Industrial Developments Limited

Applicant

Statement of Evidence of Nicole Lauenstein (urban design)

Dated: 4 November 2021

Reference: JM Appleyard (jo.appleyard@chapmantripp.com)

LMN Forrester (lucy.forrester@chapmantripp.com)





### STATEMENT OF EVIDENCE OF NICOLE LAUENSTEIN

### INTRODUCTION

- My name is Nicole Lauenstein. I have the qualifications of Dipl. Ing Arch. And Dipl. R.U.Pl. equivalent to a Master in Architecture and a Master in Urban Design (Spatial and Environmental Planning) from the University of Kaiserslautern / Germany. I was an elected member of the Urban Design Panel in Christchurch from 2008 to 2016 and am a member of the UDF (Urban Design Forum). Before moving to New Zealand I was a member of the BDA (German Institute of Architects) and the AIA (Association Internationale des Architects).
- I am director of a + urban, a Christchurch based architecture and urban design company established in 1999. I have over 25 years of professional experience in architecture and urban design in particular within the crossover area of urban development, master planning, and comprehensive spatial developments.
- I have practised as an Urban Designer and Architect for the first 8 years in Germany, Netherlands, England, Spain and Australia before re-establishing my own architectural and urban design practice in New Zealand. In both practices I have undertaken many projects combining the architectural and urban disciplines. Projects have been varied in scale and complexity from urban revitalisation of city centres, development of growth strategies for smaller communities, architectural buildings in the public realm and private residential projects in sensitive environments.
- 4 Prior to my arrival in NZ I worked for several European Architects and Urban Designers. I was involved in a range of urban studies and rural area assessments for the governance of the individual federal states in Germany, investigating urban sprawl of major cities such as Frankfurt, Darmstadt, Rostock, Berlin and the effect on the urban and rural character. This work included developing mechanisms and criteria to facilitate sustainable development. Other work for private clients consisted of the design of sustainable developments in sensitive areas with very stringent development guidelines.
- My experience in New Zealand includes working on growth strategies for urban and peri-urban areas including rural and urban residential developments with a mixture of densities from low, medium to high. I have prepared several urban analyses, development strategies and design concepts for urban and rural residential areas within the Canterbury region (Lincoln, Rolleston, Tai Tapu, Ohoka, Rangiora, Kaiapoi, Lake Hood, Ashburton), Akaroa as well as the wider South Island including developments in Queenstown, Wanaka, Invercargill, Marlborough Region, Hurunui District and Buller District.

- 6 My most recent urban design and architecture work includes:
  - 6.1 Papa Otakaro Avon River and East/North Frame concept design, Christchurch Central City;
  - 6.2 Kirimoko residential development in Wanaka Stages 1 6;
  - 6.3 Urban analysis and strategic plans for Selwyn District Council, Hurunui District Council, Christchurch City Council, Queenstown and Lakes District, Nelson and Buller District, Wellington CBD and Auckland City and the greater Auckland urban area:
  - 6.4 Masterplans for urban development in Lincoln, Rolleston, Taitapu, Amberley, Rangiora, Ohoka, Ashburton, Christchurch, Westport Wanaka and Queenstown, Auckland;
  - 6.5 Mixed Use development Hagley Avenue, Christchurch;
  - 6.6 New Tait Building and Masterplan, north-west Christchurch;
  - 6.7 Several commercial and residential 'rebuild' projects in Christchurch;
  - 6.8 Master Plans for post-earthquake Inner-City block infill and brown field conversions in Christchurch;
  - 6.9 ODP's for rebuild projects in the Christchurch CBD;
  - 6.10 Analysis and identification of Character Areas within Christchurch as part of the District Plan Review; and
  - 6.11 Several private plan changes.
- I have been involved in tertiary education and lectured in urban design at Lincoln University at both graduate and post graduate level. I am currently a guest lecturer at ARA Institute of Technology, teaching architecture and urban design. I have also delivered professional development workshops for both architects and urban designers.

# **CODE OF CONDUCT**

Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 7 of the Environment Court Practice Note 2014. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to

consider material facts known to me that might alter or detract from the opinions expressed.

### **SCOPE OF EVIDENCE**

- I have been engaged by the Submitter to provide a peer review of the urban design assessment prepared by Mr Compton-Moen in relation to this rezoning request.
- My assessment is focused on matters related to the urban form of Lincoln, urban growth, connectivity and walkability and does not consider the urban form implications for Greater Christchurch.
- In preparing my evidence, I have also reviewed and considered the following:
  - 11.1 The PC application in particular
    Appendix Ea Updated Urban Design Assessment prepared
    by Inovo Projects and DCM Urban Design Ltd
    Appendix Eb Landscape Assessment prepared by DCM
    Urban Design Ltd.
    Attachment 4 Proposed Outline Development Plan
  - 11.2 Section 42 report in particular Urban Design Evidence prepared for Selwyn District Council by Mr Hugh Nicholson and parts of Transport evidence prepared for Selwyn District Council by Flow Transportation Specialists sections 6.2 and 7
  - 11.3 Urban Design Evidence prepared for the Applicant by Mr Dave Compton Moen
  - 11.4 Summary of submissions for PC69 on the Selwyn District Council website with a focus on Urban design matters
- In response to the evidence provided I have made suggestions for improvement to the ODP primarily around connectivity and the internal green and movement network which are reflected in the revised ODP.
- I have visited the site and the wider Lincoln Township on several occasions. My last was on the 16 October 2021. Through my work on several developments in Lincoln I am familiar with the township and the immediate neighbourhood of the Plan Change site (the Site)
- 14 In my evidence I will discuss the following,
  - Lincoln urban form, structure and growth
  - Connectivity, walkability /accessibility

- Sequencing and planning methods
- Submissions in general

and provide a further assessment of this rezoning request against the relevant objectives, policies, and rules of the Proposed Plan.

### STRATEGIC DIRECTIONS

- 15 Similar to Mr Nicholson and Mr Compton Moen in my peer review and in providing evidence I have drawn strategic direction on good urban form from several sources including the National Policy Statement on Urban Development (NPSUD), the Canterbury Regional Policy Statement (CRPS) and the Operative Selwyn District Plan (SDP), all of which provide overarching guidance.
- 16 I agree with Mr Nicholson's descriptions para 5.2 5.10 of the strategic directions given by these documents with regard to he requirement that residential development
  - 16.1 provide "well-functioning urban environments" that enable more people to live near a centre or employment opportunities, and which are well serviced by public transport (NPS-UD)
  - 16.2 should be of a high quality and incorporate "good urban design (CRPS) NZ Urban as per Design Protocol 2005 These principles refer to the need for well-integrated places
  - 16.3 that have high-quality connections including walking, cycling and public transport, and that are environmentally sustainable.
  - 16.4 should ensure that "growth of existing townships has a compact urban form", and that a "high level of connectivity is provided both within the development and with adjoining land areas". (SDP)
- 17 Other relevant documents I have considered are NZ Urban Design Protocol 2005, in particular the core principles that refer to the need for well-integrated places that have high-quality connections including walking, cycling and public transport, and that are environmentally sustainable.
- 18 With regard to structural and spatial guidance related to Urban Design I have also considered the Lincoln Structure Plan 2008 which identified Lincoln as one of the key growth centres in the Selwyn District.

All bar one of the above mentioned document provide direction on overarching urban design matters such as density, urban form and walkability, sustainability, etc but these directives are generic in nature and apply to all urban residential development at an either national, regional or district level. The only document providing more specific and local information with regard to urban spatial structure and form is the Lincoln Structure Plan.

# LINCOLN URBAN FORM, STRUCTURE AND GROWTH

- 20 Mr Compton Moen provides a good, succinct summary of the growth pattern of Lincoln and I agree with his observations but would like to add some further understanding around the unique features of the growth and urban form of Lincoln from a spatial urban perspective.
- The changes that were introduced by the Structure Plan and how this has influenced and solidified the layout, connectivity and the growth pattern of Lincoln.
- 22 Lincoln started as a small settlement centred around a high amenity environment provided by the Liffey Stream and serviced a small rural community with the introduction of the University campus it quickly grew into a township with a centre growing westwards along Gerald street. Schools and other community facilities where introduced but it was the University and its land based rural focus that has given Lincoln its identity beyond the picturesque landscape setting.
- Ongoing expansion extended Lincoln mostly to the north- east, east, and south- easts with the towncentre expansion lagging somewhat behind and the western edge remaining largely unchanged due to the influence of the university / landcare research and the underlying landownership structures. This started to create a slightly imbalanced urban form.
- The Structure Plan introduced the bigger vision for Lincoln guiding development via ODP areas into a more cohesive and consolidated form. Lincoln has since experienced rapid growth and developed into a key regional township. The commercial centre has extended to the west along Gerald Street and is starting to link the university campus with the town centre. There is further capacity for such growth on Gerald Street and I would expect it to continue to extend to Springs road in the future completing the connection to the University.
- Over the last decade this area has been completely reconfigured with the introduction of the supermarket additional retail, the new library and community centre, smaller open spaces, reserves and an upgrade of the road environment making Gerald Street between Springs Road and the Liffey stream bridge the towns 'Main Street'

- The structure plan has also guided residential development to the east, partially the west, to the south and north and all but one area have been developed since. The areas related to Landcare Research and the University of the township remain undeveloped as they were not included in the structure plan.
- 27 Incremental growth is mostly of a smaller scale and occurs gradually with little control, manifesting as ad hoc developments lacking a more strategic approach. Following a southern growth path that is already well established at first glance, PC 69 could be interpreted as the next increment. However, it should not be mistaken for incremental growth. PC 69 has a well resolved ODP informed by thorough understanding of all the components of design and development required to achieve a cohesive and strategic outcome. The integrated nature and size of PC 69 does not lend itself to an incremental growth approach as it would lack both cohesion and responsiveness to the wider environment surrounding the Site.
- **28** From an urban design perspective the plan change process is an appropriate planning mechanism to determine locations for urban growth.

## **Current urban growth**

- The Landcare Research areas in the North West of Lincoln will most likely remain undeveloped for a long time still as they are a key asset for the region as part of the ongoing research activities and are a key contributor to the reputation of Lincoln University and the identity of Lincoln. Landcare Research and the University are also the main workplaces for Lincoln residents. As such they are not available for future residential expansion. The urban form of Lincoln will therefore remain less compact and slightly incohesive and unconsolidated in this area.
- 30 Spatially the University campus, including its residential facilities is starting to form the western edge of the township. The most recent development (Te Whāraki and Verdeco) have reconnected the university with the township resulting in the University becoming a closer and more connected education facility.
- 31 Growth to the north along Birchs Road is possible and has been a growth direction for the last 10 years (Barton Field and Flemington), but at some stage the distance to the township will gradually make this less suitable.
- The same has occurred along the eastern edge of Lincoln (Rosemerryn, Liffey Springs and Ararira Springs to the south east) where development is nearly reaching the full extent of the Structure Plan area . Further development in this direction would become less suitable due to the increasing distances to the town centre.

### PC 69 and urban form

- 33 With regard to consolidated urban form, PC 69 is a logical sequence of urban development for Lincoln and fits within the overall direction of growth initiated by the Lincoln Structure Plan. In particular the growth of the towncentre westwards along Gerald Street makes this southern extension of the township a very feasible option as the distances between PC69 and the towncentre are reasonable short between 1.2-2.5 km.
- 34 The timing of PC 69 is appropriate within the context of the urban growth rate which has accelerated post-earthquakes and to some extent superseded the planned sequences of growth as anticipated by the Structure Plan in 2009. Mr Compton Moen provides more detailed numbers as to the actual growth of Lincoln in his evidence which clearly show the acceleration of growth beyond the original expectations in 2009.
- As Mr Compton Moen states in his evidence the proposed plan change area is considered to naturally extend existing residential development at Te Whāraki, Verdeco Park, and Liffey Springs to the south of Lincoln Township and I agree with this assessment. At the edge of existing residential settlement, the continuation of residential dwellings at a similar density is likely to be seen as an anticipated natural extension when compared to the broader context.
- In addition, the proposed plan change gives careful consideration to the movement hierarchy, spatial layout, existing and proposed green and blue networks, and heritage protection to ensure the development retains an open character akin to the existing environment of Lincoln.
- 37 The Plan Change provides a buffer of low density lots along the eastern edge of the development to soften the transition into rural land and most importantly it celebrates Springs Creek and the L II river with generous landscaped margins that are publicly accessible which will result in an overall 'spacious' character even with the increased density.
- As a result of the above, the Plan Change area will be seen as an extension of the existing character and within an extended but still compact form of Lincoln keeping well consolidated.

# Benefits of larger ODP's

Plan Change 69 also offers the benefit of size and scale avoiding piecemeal development. It covers a large area of 186 ha and will therefore create certainty around location and availability of additional commercial nodes, certainty around a pedestrian and cycle network integrated within a high amenity green network. It also creates certainty around the status and protection of the local

springs and waterways by integrating them purposefully and carefully into this wider green network.

# Well-functioning urban environment within the Lincoln context

- 40 PC 69 will support an urban density of a minimum of 12hh/ha so will provide significant capacity within the context of Lincoln township. This increase in residential area is supported by 3 smaller commercial nodes and several green spaces strategically spread throughout the site.
- 41 It avoids creating future impediments to connectivity and urban growth by providing good linkages to future development to the south and east if this was to occur. To the west, the existing stream creates a natural boundary.
- 42 It supports well-functioning urban environments as per the National Policy Statement on Urban Development 2020 (NPSUD). By organising the residential layout around a strong pedestrian and cycling focused green network, the proposed plan change is inkeeping with the character of Lincoln.
- It takes its cues from the neighbouring Te Whāraki development with regards to water management and open space strategies.other cues are taken from the core Lincoln identity, the Liffey streams, and in the way it 'protects' its waterways, surrounding it with generous green spaces and high amenity landscaped environments with public access.

## CONNECTIVITY, WALKABILITY /ACCESSIBILITY

Accessibility or 'walkability' relates to providing good access to public services and facilities and places with a high priority on walking, cycling as well as public transport. This needs to be considered at various scales within the development.

## **Pedestrian and cycle connectivity**

With regards to internal connectivity, Plan Change 69 organises the residential layout around a strong pedestrian and cycling focused green network, in-keeping with the character of Lincoln. This will encourage the use of these active transport modes and creates a less car dominated environment. Cycleways and footpaths are often shared and taken through off-street green links through the extensive green network, towards the norther boundary. Here a "collector" green corridor stretches east-west along this edge and offers several direct pedestrian and cycle links through to Te Whāriki and via local roads and green spaces further to the towncentre approx. 1.2 to 2.5km away.

- The intention of PC 69 is to elevate foot and cycle movement over travel by car. This is reflected by the fact that the most direct routes to the town centre are all pedestrian and cycle routes. Cars would be used predominantly to go to places outside of Lincoln via the existing primary roads to Rolleston, Christchurch, and other smaller destinations. The fact that Te Whāriki and Verdeco do not offer possibilities for vehicular connections encouraged PC 69 to utilise this limitation to its benefit by responding with a different development concept to the traditional subdivision. As Mr Compton Moen states in his evidence, , "the ODP design intentionally does not provide vehicle access to the north to promote a greater range of active modal options for residents, to reduce car-dependency for short local trips, but while recognising private vehicle use is necessary for longer trips".
- The lack of direct vehicular connectivity, in my opinion, is not a concern but a positive aspect of the design. It promotes alternative active modes of transport, which for a township the size of Lincoln is very appropriate.
- As I understand, from expert evidence by traffic design, the proposed vehicular connections available are sufficient to service the entire area of PC 69. In addition to this, the local roading network will create a finer grain distribution and integrate with the pedestrian/cycle and green network.
- I consider this proposed hierarchy of movement with cycling and pedestrian being a priority will create a better living environment than a car dominated one, and will be more in keeping with the character and scale of Lincoln township. This approach is supported by the graphic appendices from Mr Compton Moen's evidence.

## **Public transport**

The main roads are capable of supporting a bus route, including bus stops at key commercial nodes and green spaces. These stops would also cater for safe cycle stands and sheltered areas for pedestrians. Existing bus routes could be extended to take users from the site through the towncentre and, via Birches Road, to Prebbleton and Christchurch.

# **SUBMISSIONS**

In his evidence Mr. Nicholson summarises the key issues raised by submitters as follows;

Para 12.4 Loss of identity and change in character of Lincoln was another common theme in submissions with submitters mentioning the loss of the 'village' feel or small town character, together with suggestions that Lincoln might become another commuter suburb.

- Para 12.2 Impact that PC69 would have on the community infrastructure and facilities of Lincoln, and questioned whether there was sufficient capacity to meet the needs of an additional 2,000 households. The impact on schools and medical facilities, and the capacity of the retail area were particular matters that were identified.
- Para 12.5 People's sense of belonging or emotional attachment to a place is generally understood to be based on their shared experiences of a specific territory over time. Changes of the scale proposed in PC69 are likely to threaten the perception that local people have of their town, both in the disruption of existing urban patterns and the introduction of new elements.
- Taken in its 'purity' the introduction of new elements always introduces change, and change always disrupts. However, not all disruption is necessarily negative. If this was to be taken through to its natural conclusion, it would preclude any development as it introduces change. So the discussion really is not one of *should* there be development occurring but a discussion about development location, character, scale of development, and about planning mechanism and implementation.

### **KEY URBAN DESIGN MATTERS**

### Scale and character

- 55 'Village character' and high amenity are not a result of a specific density or lot sizes and are only loosely linked to the actual size of a township. Not every small town has character and not every large town is characterless.
- The specific or unique character of a township is a result of
  - the way it has organically grown,
  - how it manifests its historic patterns and features,
  - how it expresses its underlying urban and landscape structure, defines boundaries and creates connections,
  - how it integrates landscape features, topography and views,
  - how it presents itself through streetscape, the quality of its public spaces, the appropriate scale of its building and,
  - last but not least, how it supports and takes care of the people that live in it by facilitating movement, safety and public engagement at a pedestrian level.
- 57 PC69 builds on the existing landscape characteristics of Lincoln by taking its cues from several key elements already existing, such as the landscaped margins of the Liffey Stream and the stormwater

treatment areas of Te Whāriki. It uses these to create a connected green and blue network to provide a structure for green spaces and high amenity green pedestrian and cycle linkages. This will break development into smaller components. Between clusters of residential areas, the extensive reserves and green links will allow views into the rural land, towards the taller university buildings, and towards the Port Hills. This will preserve a sense of openness and strengthen Lincoln's sense of place. All these design elements will contribute to the small town feel, village type character, and will contribute to a well-functioning urban environment.

- More importantly, PC69 assists in linking the township with the University, strengthening this important relationship and supporting the current westwards movement of the towncentre. This allows for a structured growth of the commercial and community facilities along Gerald Street. It will be perceived as a natural extension of the township by wrapping around the southern boundary of Te Whāriki and Verdeco.
- With regard to the overall understanding of Lincoln as a cohesive township, PC 69 does alter the size of the residential areas of the township; however, does not significantly impact on the character of the towncentre nor any local destinations. The revised ODP for PC 69 will provide its owns small commercial nodes to support its residents within a walkable distance, a key principle of the proposal.
- 60 PC 69 can positively contribute to the Lincoln township and character by creating a different type of residential development designed around pedestrian and cycling, thus offering an alternative to the traditional car oriented suburban developments.
- One of the key advantages of this plan change is its scale and that it is mostly in single ownership. This allows for a more integrated and coherent approach to all aspects of the design. It will provide far more certainty around character, connectivity, and infrastructure than a variety of smaller ODPs, which tend to internalise their designs and foster compartmentalised thinking. The potential to 'overwhelm' due to its large scale can be overcome through good staging protocols. This is a common practice for larger ODPs to bring them in line with other parts of the wider growth of the township, such as roading and infrastructure.
- There is one area of concern raised that may be able to be improved regarding the development turning its back onto Springs Road. This is a valid concern. Stage 4 of Te Whāriki experiences the same issue as a result of the request by council staff to avoid private driveways accessed from Springs Road.
- In the interest of slow speed environments, direct access off Springs Road could be considered from the gateway at the Collins

Road/Springs Road intersection onwards. This would introduce a more urban street scape with stronger affinity with the adjacent residential properties.

Should this not be possible there are ways to mitigate and improve public surveillance over the street. Either way, these are matters of detail that are best resolved at subdivision stage and can be included within the overall requirement of upgrading of road frontages as shown on the ODP.

## **Appropriate Planning mechanism**

Are further assessment of growth in the whole region required to ascertain the direction of future growth in Lincoln?

- In my opinion, a comprehensive and strategic investigation of alternative options (as suggested by Mr Nicholson) might provide slightly more oversight, however this process would come to the same overall conclusions. The Structure Plan has laid out the overarching structure and determined the direction and pattern of growth for Lincoln.
- 66 Plan Changes within the southern future growth paths are a logical continuation of the direction and patterns already in place. Plan changes reflect the willingness of landowners to develop and, as such, play a significant role the direction and manifestation of growth. Plan changes also provide a high level of detailed information specific to a PC site and the immediate surroundings. This feeds back valuable information into the wider urban growth process. Last but not least, plan changes are a recognised planning tool with public consultation and input through submissions that allow the community to contribute to the shaping of their town. Having been involved in several plan changes over the last 20 years I do consider them to be a comprehensive and thorough urban design and planning tool.
- A Plan Change by its nature is site 'specific' whilst a structure plan is site 'generic'. Plan changes therefore form an important part of the urban planning environment. They are a good tool to inform and test urban development as they provide certainty around land availability and the willingness to develop, as well as more detailed information regarding site specific connectivity, density, and character than structure plans do. Plan changes also allow for public submissions with opportunities for dialogue and public input.

# Sequencing of growth - The reality on the ground

- 68 Sequencing of development is not an exact science and can rarely be fully controlled or predicted as it is a result of many underlying conditions and pressures. This includes, but is not limited to:
  - property size;

- location;
- ownership structure;
- land availability and suitability;
- historic development patterns;
- surrounding developments and sensitivities;
- landscape characteristics;
- ground conditions and terrain;
- specific events;
- land use;
- market pressure;
- planning and zoning requirements;
- national and regional policies;
- individual circumstances;
- availability and capacity of infrastructure;
- transport and services;
- connectivity and access;
- competition;
- design trends;
- finances and budgets; and
- project timelines.
- Along with these factors there is the desire to develop, or resistance to develop, on both a personal level, and as a community. Some of these parameters are controllable, measurable and visible, while others are less tangible. Some are interconnected, others are isolated issues, but all of these and many others not listed above will influence the sequence of development.
- Anticipating and guiding larger scale development in our discipline is often done through structural, spatial and master planning. It combines strategic, spatial and structural design and planning and goes beyond the pure planning with figures and linkages, traffic and services etc. This process actually lays down a spatial structure for a town to grow into at its own pace/ sequence.
- 71 With regards to sequencing of development to achieve a consolidated urban form, it would be ideal if growth was always centric moving outwards. However that is utterly unrealistic, brings with it issues of efficiencies, and is in itself not organic nor sufficiently responsive to most of the issues driving development. Townships often develop in 'chunks' based on market pressure, ownership structures, personal circumstances of owners, landscape features, land availability paired with planning and infrastructure guidance, and the need for housing.
- With regards to Lincoln, and Mr Compton Moen has covered this in his evidence and graphics, the southern part of Lincoln covered by PC 69 is a logical development area to move into next. Te Whāriki, Barton Fields, Flemington, and Rossmeryn are all nearing completion, leaving only smaller pockets of land available for development that are included in the Structure Plan.

73 Further expansion to the north and east are generally possible with no strong natural boundaries restricting this. However, I consider this southern expansion more suitable as it is located closer to the Town centre and supports the 'stitching' together of the township with the University. A move that has been initiated by the structure plans and is already occurring along Gerald Street with the Town centre expanding westwards.

### CONCLUSION

- After reviewing the evidence of Mr Compton Moen and Mr Nicholson and considering the key urban design matters raised through submissions I consider that PC 69 is an appropriately located and well-designed development. It will extend the urban form of Lincoln in a logical and structured manner changing the physical size of the town as a result of ongoing demand for residential growth without negatively affecting the overall character of Lincoln.
- The ODP will provide for a high amenity living environment as a result of the underlying design concept. Based on pedestrian and cycling priority movement, the green network, and the large stormwater areas there is an affinity with the key landscaped areas of Lincoln such as Liffey Stream. I consider that the proposal will provide some benefits to Lincoln by offering a slightly different residential environment with this strong focus on active transport modes.

Dated:	4 November 2021	
Nicole L	_auenstein	