



WAIMAKARIRI DISTRICT COUNCIL
Resource Management Act 1991

HEARING REPORT

Hearing Date:	Commencing Wednesday 28 October 2015	Time:	9:30 A.M.
Hearing Venue:	Waimakariri District Council, Council Chambers, 215 High Street, Rangiora		
Subject:	Plan Change 40: Review of Parking, Loading and Manoeuvring		

Bev Bray
28 October 2015

Copies to:

His Worship the Mayor
Councillor Kirsten Barnett
Panel – Commissioner Jane Whyte (Chair)
Councillor Peter Allen
Councillor Caroline Faass

Senior Policy Planner – Bev Bray
Development Planning Administrator

Submitters:

As per attached list

Submitters List – Proposed Council Plan Change 40 (PC40) – Parking

Submission Number:	Name:
83	Mr David Blackwell 21 Adderley Terrace Kaiapoi 7630
84	Community & Public Health Canterbury District Health Board PO Box 1475 Christchurch 8140 Attention: Bruce Waddleton
85	Foodstuffs South Island Ltd C/- Anderson Lloyd PO Box 13831 Christchurch 8141 Attention: Jen Crawford / Alex Booker
86	Mrs J.K. Galbraith 21 Melford Close Rangiora 7400
87	Lockbox Storage Rangiora Ltd C/- Planz Consultants Ltd PO Box 1845 Christchurch 8140 Attention: Sam Flewelling
88	Ministry of Education C/- Opus PO Box 1482 Christchurch 8011 Attention: George Enersen
89	McAlpines Limited Incorporating McAlpines Rangiora Ltd C/- Planz Consultants Ltd PO Box 1845 Christchurch 8140 Attention: Sam Flewelling
90	Progressive Enterprises Ltd (PEL) C/- Zomac Planning Solutions Ltd PO Box 103 Whangaparaoa 0943 Attention: Mike Foster
91	Ravenswood Developments Ltd C/- Glasson Resource Management Ltd 24 Weka Street Christchurch 8041 Attention: P Glasson
92	The Warehouse Ltd C/- Planz Consultants Ltd PO Box 1845 Christchurch 8140 Attention: Dean Chrystal

1. INTRODUCTION

- 1.1 My name is Beverley Bray. I hold a Bachelor of Arts and a Bachelor of Regional Planning (Hons) from Massey University. I am a Senior Policy Planner with the Waimakariri District Council and have over 25 years local authority and consultancy planning experience.
- 1.2 My attached report comments on the submissions received and are my professional opinion. Commissioners may or may not reach the same conclusions having considered all the evidence brought before them.
- 1.3 The purpose of this report is to summarise the key issues raised in submissions and to provide recommendations to the Commissioners on the issues raised.

2. SUMMARY

- 2.1 Council Plan Change 40 (PC40) seeks to review District Plan provisions for parking, loading and manoeuvring. The plan change addresses issues relating to demand for, and supply of parking and loading facilities, including cycle parking.
- 2.2 The plan change adds new definitions, new environmental results expected and a new objective; and retains, amends, deletes, replaces and adds relevant policies, explanations, reasons, methods, anticipated environmental results and rules as necessary including amended on-site parking and loading space requirements. In addition, two new figures are added to identify sight lines for pedestrian safety and to illustrate the application of parking and manoeuvring dimensions.
- 2.3 Plan Change 40 specifically reviews Chapters 1 (Definitions), 11 (Utilities and Traffic Management), 13 (Resource Management Framework), 15 (Urban Environment), 16 (Business Zones), 20 (Financial Contributions), 30 (Utilities and Traffic), 31 (Health, Safety and Wellbeing - Rules), and 34 (Financial Contributions), and addresses the following:
 - on-site car parking, cycle parking and loading requirements for activities including a maximum rate for parking provision;

- dimension requirements for loading, and short, medium and long term car parking;
- design and location of parking and loading facilities including function, efficiency, sustainability, safety, amenity, landscaping and pedestrian accessibility;
- town centre development and consolidation, provision of loading and centralised parking facilities, and on-site parking for sites with frontage to identified roads in Kaiapoi and Rangiora town centres;
- financial contribution for off-site parking and loading including town centre sites in Kaiapoi and Rangiora; and
- support of active and public transport modes.

2.4 Full details of the proposal can be found in the section 32 evaluation report which accompanied the notified amendments to the Waimakariri District Plan. I have read the section 32 evaluation and consider that the relevant requirements of Section 32(1) – (4) have been met. For this reason, the opinions I express in this report adopt the section 32 evaluation, including associated proposed changes to the District Plan, as a basis for the further evaluation required under Section 32AA of the Act.

2.5 PC40 was publically notified on the 22 November 2014. Submissions closed on 5 February 2015 and ten submissions were received. A summary of the submissions was publically notified on the 6th of March 2015 with further submissions closing on the 20th of March 2015. One submitter made four further submissions.

2.6 In regards to the further submissions, I consider that the person who made further submissions either represent a relevant aspect of the public interest and/or have an interest in PC40 that is greater than the general public, in accordance with the requirements of clause 8 of schedule 1 of the Resource Management Act 1991 (the Act).

3. CHANGES SINCE NOTIFICATION

3.1 The following changes to the statutory environment have occurred since notification of the plan change on 22 November 2014 and should be considered in the context of determining the appropriateness of the provisions.

3.2 Action 26 of the Land Use Recovery Plan (LURP) provides for zoning to define the Key Activity Centres (KAC) of Rangiora, Kaiapoi and Woodend/Pegasus. The proposed response to this action was made operative on the 20th of April 2015, and includes a definition of and objectives, policies, rules and maps for Key Activity Centres including:

- An amendment to Rule 31.24.2 to extend the existing discretionary activity rule for buildings above 450m² across the Key Activity Centre areas;
- An amendment to Rule 31.20.1.2 to extend the wider Business 1 urban design controls outside of the identified frontage areas across the identified Key Activity Centre areas; and

3.3 Actions 4 (comprehensive residential development) and 47 (recovery and rebuilding) of the LURP also introduced new provisions into the District plan, and were deemed operative on 23 February 2015. Action 4 proposed a number of changes to the provide for more intensive development below minimum allotment sizes where 4 or more dwellings are developed together and at the same time in the Residential 1, 2, and 6 Zones including a reduction of parking requirements for more comprehensive residential developments and consideration of the on-street parking environment. Action 47 proposed changes relating to earthworks, heritage building, vibration and noise, transmission lines, relocation of dwellinghouses and resource consent requirements for two residential units on one site.

3.4 Private Plan Change 20 (Clampett Investments Limited, Kaiapoi) introduced new provisions including:

- Add new Rules 30.6.1.34, 30.6.1.35 and 30.8.1 to provide for car park landscaping and joint off-street parking by activities;

3.5 I consider that the revised amendments outline above do not have a specific bearing on the purpose of PC40, although they are consistent with the direction

of the plan change to provided parking rates that more closely align with demand, consider town centre development, landscaping and shared parking.

4. STATUTORY REQUIREMENTS

- 4.1 Section 74(1) of the Act requires an assessment of the plan change against the Council's functions under section 31, its duty under section 32 and Part 2 of the Act. Section 74 also requires the Council to have regard to any proposed regional policy statement or regional plan and any management plans or strategies prepared under other acts.
- 4.2 Sections 75(1), 75 (3) and 75(4) require the District Plan, and therefore the plan change, to state objectives, policies and rules (if any), and for those provisions to give effect to any operative regional policy statement and to not be inconsistent with any relevant regional plan for specified matters.
- 4.3 Full regard to these sections of the Act has been given in the section 32 assessment for PC40.
- 4.4 The requirements for processing District Plan changes are contained in Part 1 of Schedule 1 to the Act. Following public notification of the change and the lodging of submissions, the Council is required to hold a hearing of the submissions in accordance with schedule 1, clause 8B, of the Act.
- 4.5 After a hearing, the Council is required to give its decisions on the submissions under the process described in clause 10, including the reasons for accepting or rejecting submissions. In doing so, the decision maker must satisfy themselves that the provisions are the most appropriate after having regard to evidence presented at the hearing.

Part 2

- 4.6 Part 2 is overarching and sets out the purpose and principles of the Act. All considerations and assessments are subject to Part 2.
- 4.7 The operative Waimakariri District Plan (2005) was developed under the Act and is deemed to give effect to the purpose of the Act (section 5). The Council

is required to ensure that all proposed changes to the District Plan will also result in outcomes that will achieve the sustainable management purpose of the Act, including section 6 (Matters of National Importance) and section 7 (Other Matters). The overall conclusion of the section 32 report is that the changes proposed in the notified plan change are the most appropriate to provide for the purpose of the proposal and to achieve the objectives taking into account these sections of the Act.

- 4.8 Section 8 (Treaty of Waitangi) requires the Council to take into account the principles of the Treaty of Waitangi. The section 32 report had regard to the Treaty of Waitangi in the determination of the appropriateness of the proposed provisions and found that the principles of the Treaty of Waitangi were taken account of in both the existing and proposed objectives.
- 4.9 Section 74(2A) of the Act requires the Council to take into account any relevant planning document recognised by an Iwi Authority and lodged with the Council. The Iwi Management Plan has been taken into account and has informed the section 32 evaluation, (sections 4 and 5), with both Te Ngai Tuahuriri Runanga and Ngai Tahu consulted prior to notification, under schedule 1 of the Act.

5. SUBMISSIONS

- 5.1 The submission period generated 10 submissions, with the majority of submissions seeking amendments to the proposed plan changes, rather than the overall question of appropriateness in terms of the Section 32 assessment. One submission queried the scope of the plan change as notified.
- 5.2 Key issues raised in the submissions have been grouped together for response in this report. In addition, a recommended response to each submission point is included within Appendix 2 attached to this report. In responding, I have sought expert advice from Abley Transportation Consultants for consideration of technical transportation matters.

5.3 Scope of proposed Plan Change 40 and definitions.

- 5.3.1 Submission 91.02 (Ravenswood Developments Limited) seeks re-notification of the plan change as the proposed new activity definitions may have implications for land uses other than parking. Re-notification as a 'general plan change' is also sought.
- 5.3.2 The proposed new definitions for 'industry', 'office', 'medical centre' and 'warehousing and storage' relate to the use of these categories of activity within Table 30.8 – On-site Parking and Loading Space Requirements. New definitions for 'large format retail', 'principal shopping street' and 'shared parking' are also proposed that relate to other rules and policies for parking in addition to Table 30.8.
- 5.3.3 As described in paragraph 2.1 of the section 32 evaluation report, the Waimakariri District Council is reviewing its plan by way of a 'rolling review'. In a rolling review process, it is important to manage scope matters to ensure that the issues subject to review take primacy and do not create undue complexity within the plan making it difficult to use.
- 5.3.4 The use of the defined terms has been assessed for their potential influence on other District Plan provisions. The terms industry, office, and storage were found to be currently used in the Plan, within policies, explanations and reasons and 'storage' is also used within some rules for hazardous substances, effluent, and amenity requirements.
- 5.3.5 In my opinion the use of the terms does not create a major conflict within the plan, however, for certainty, each of the definitions for 'industry' 'warehousing and storage' and 'office' could be amended to include the words ...*'for the purpose of assessing on-site parking requirements,'* I consider this measure will ensure that the scope of the proposed plan change is in accord with the notification, and that the submission be accepted in part to allow for clarification.

5.4 Definitions

‘Shared parking’

- 5.4.1 Submission 85.04 (Foodstuffs South Island) seeks to clarify the definition of ‘shared parking’ by rewording the term ‘parking facilities’ to ‘parking spaces’ and to clarify whether it is the activity, or the parking spaces, that may be located on separate sites.
- 5.4.2 I agree that the definition would benefit from clarification to cover instances where only part of a facility is shared. In my view, a parking facility would include any manoeuvring area, entry and exit, landscaping, footpaths and other similar associated facilities, and may be shared by more than one user. I consider that this term is appropriate, as ‘parking spaces’ would not provide for other integral aspects.
- 5.4.3 In my opinion, increased flexibility for parking is provided by enabling shared parking where parking or the associated activity may be on the same site, or a separate site. To clarify that ‘shared parking’ may include sharing only part of a parking facility, I recommend the addition of the words *‘or part thereof’*, and *‘whether the activity or facility is located’* (following the word ‘activities’) as shown in Appendix 1.

‘Supermarket’

- 5.4.4 Submission 90.01 (Progressive Enterprises Limited (PEL)) seeks the inclusion of the following definition of ‘supermarket’ within the Plan:

‘Supermarket’

‘Supermarket means a retail shop where a comprehensive range of predominantly domestic supplied and convenience goods and services are sold for consumption or use off the premises and includes lotto shops and pharmacies located with such premises and where alcohol licenses are held for each premise.’

It is submitted that this is a widely used industry standard and the plan change is deficient because of the term supermarket is used in Table 30.8, but not defined.

- 5.4.5 Table 30.8 introduces several new categories of activity to provide more targeted requirements for parking, loading and cycle parking. New definitions are proposed for, 'industrial', 'large format retail', 'medical centre', 'office and 'warehousing and storage' as it was considered that the general meaning of these terms may not provide sufficient clarity for assessing parking categories.
- 5.4.6 In the proposed plan change, 'supermarket' relies on the 'ordinary' meaning (in accordance with its purpose and context) to provide reasonable guidance. The Concise Oxford Dictionary defines Supermarket as '*a large self-service store selling foods, household goods etc*'.
- 5.4.7 Abley Transportation Consultants (paragraph 20) support the inclusion of a definition for supermarket to avoid confusion and recognise that the definition for 'large format retail' specifically excludes supermarkets. I consider the ordinary meaning provides a reasonable understanding of supermarket activities, except for the reference to 'large', which could be variably interpreted. The issue of whether an activity selling grocery items on a minor scale is 'large format retail or a 'supermarket' should also be clarified and components that are not 'self-service' such as delicatessen or butchery services also require inclusion.
- 5.4.8 The definition proposed by the PEL submission does not distinguish the size of the premises but does specify that goods are to be consumed or used off the premises, and includes lotto shops, pharmacies and the sale of alcohol within the premise.
- 5.4.9 The submitted definition presents a number of issues. Firstly, the size or scale of the premises is not defined, which creates an interpretation issue for dairy or 'superette' activities. Secondly, the words 'sold for consumption off the premises' does not account for supermarket cafés that offer the sale of food and beverages for consumption in the supermarket. Thirdly, it is implied that alcohol sale is an essential part of the operation. Although many

supermarkets are licensed for the sale of alcohol, I do not consider that this is should be seen as an essential component.

5.4.10 I agree that there is merit in clarifying the meaning of supermarket to assist with parking assessment. In clarifying the size of a supermarket, I note that Rule 31.26.3 (Local Retail Centre – Residential Zone, restricts the gross floor area of a single retail tenancy in a Local Retail Centre, within a LURP greenfield priority area, to no more than 450m². I further note the definition of supermarket within the Proposed Christchurch Replacement District Plan which uses a minimum of 1000m² and that this is consistent with the size of supermarkets located within this District. In respect of the matters above, I suggest the following definition, or to like effect, be included as it would be likely to exclude dairies, grocery stores and superettes.

Supermarket

Supermarket means, for the purpose of assessing on-site parking requirements, a retail premise with a gross floor area of 1000m² or greater where the principal activity is the sale of a comprehensive range of grocery items, predominantly for use and consumption off the premises.

'Industry'

5.4.11 Submission point 91.03 (Ravenswood Developments Limited) requests that the proposed definition for 'industry' be replaced as it is repetitive and 'business activity' is not a term that is defined in the Plan. An alternative definition proposed by the submission reads as follows:

Industry

Industry means the manufacturing, assembly, dismantling, packaging, wholesaling or storage of products or the manufacturing, assembly, dismantling, packaging, of raw materials and other ancillary activities.'

5.4.12 The proposed definition for industry reads as follows:

Industry

Industry means any business activity involving the manufacturing, painting, production, processing, assembly, dismantling, packaging, servicing, testing or repair of any materials, goods, products, machinery or vehicles.

The definition excludes warehousing and storage, as this is separately defined. For clarity, these activities could be specifically excluded from the definition. I note that the use of the terms 'manufacturing', 'assembly', 'dismantling', 'packaging', and 'processing' of 'materials' is not disputed, and that the terms 'warehousing' (as proposed in PC40) and 'wholesaling' (as proposed in the submission) cover the same activities.

5.4.13 I consider that the proposed definition, amended by deleting the words '...means any business activity involving...' and by adding the words '...but excludes warehousing and storage activities', provides a reasonable and clear definition of industry without repetition.

5.5. Objectives and Policies

Objective 11.1.2

5.5.1 Submission 85.05 (Foodstuffs South Island) requests that the term 'parking facilities' be defined or substituted within Objective 11.1.2 to give relief to apparent contradictions between accessibility and loading references.

5.5.2 The term 'parking facilities', as noted in 6.5.2, is a broad term and could include parking for cars, cycles and service delivery vehicles, as well as associated manoeuvring and access areas, footpaths and other components.

5.5.3 The objective provides the aims for parking, loading that does not adversely affect safety or amenity and also requires parking facilities that are accessible and convenient for pedestrians. The objective does not require loading areas to be accessible to pedestrians, especially while loading or unloading is being undertaken, as this would not support safety or accessibility. For this reason I recommend that no change to the proposed objective is necessary for clarity as a result of this submission.

5.5.4 Submission 89.2 (McAlpines Ltd incorporating McAlpines Rangiora Ltd) submits that Objective 11.1.2.(d-g) does not reference Business 2 Zone environments or provide the context for policies or rules that focus on the Business 1 Zone. The submission requests that the objective be amended to read as follows:

Objective 11.1.2

Parking facilities that:

- a. provide for parking demand in an efficient, functional and sustainable manner;*
- b. enhance the amenity and function of town centre and residential environments;*
- c. are safe places for people to use and move through;*
- d. are accessible and convenient for pedestrians **within town centre and residential environments;***
- e. provide safe, secure and convenient cycle parking **to reflect the demand of the activity and zone;***
- f. support greater use of public transport **within town centre and residential environments;***
- g. provide for loading and manoeuvring requirements without reducing amenity or compromising safety; and*
- h. support town centre consolidation and the development of continuous street frontages within identified sites in the Business 1 Zone where parking is principally located within public parking areas and not provided on individual sites.*

5.5.5 The objective focuses on design that includes pedestrian access, cycle parking, public transport, loading, and the relationship between parking and town centre development. These are key 'best practice' objectives and these matters can be assessed based on the proposed activity and the broader outcomes sought for the zone within which the activity is located.

5.5.6 I consider that parking demand is provided for through part (a) of the policy and that no further amendment is required in relation to (e) as cycle parking rates proposed in Table 30.8 reflect estimated demand for activities and zones.

5.5.7 I do not recommend amendment to parts (d) and (f) as it could be implied that outside of town centre and residential environments, public transport will not

be supported and pedestrian access and convenience will not be a relevant consideration.

- 5.5.8 Business 2 Zones provide for a variety of industrial and discrete commercial activities (Policy 16.1.1.5) but also include examples of large format retail and other activities where safe, effective and pedestrian-friendly operation of parking facilities is desirable, for example, the new Pak 'n' Save supermarket and Mitre 10 store. I consider that point (d) should not be amended as submitted, as this would negate consideration of pedestrian access for a activities such as those mentioned, where pedestrian safety and convenience is a relevant consideration. Public transportation services currently include bus routes and stops located outside residential environments and town centres, and I do not consider it appropriate, or in accordance with the direction of Policy 5.3.8 of the Canterbury Regional Policy Statement (CRPS), to restrict the support of public transport as requested. I further note that the location of any park and ride facilities could be outside of the residential environments and town centres.

Policy 11.1.2.1

- 5.5.9 Submission point 85.6 (Foodstuffs South Island) requests clarification of Policy 11.1.2.1, and revision of the word 'compromise', which is considered to be too restrictive as even a slight reduction would be adverse to the policy. Assessment of activities under the policy will be able to take into account any effects that are insignificant, however, for plan consistency, I recommend that 'compromise' be replaced with 'adversely affect' in part (b) of Policy 11.1.2.1.

- 5.5.10 I recommend that the submission be accepted in part and that the policy be amended to read as follows:

*Vehicle parking, loading and manoeuvring provided on-site, or within shared parking facilities, **where shall ensure that:***

- a. safe and efficient access **is** provided;*
- b. use of off-site parking facilities **will not adversely affect** pedestrian, cycle or public transportation, public safety, and the safe, efficient operation of the road network; and*

c. (no amendment)

Policy 11.1.2.2

5.5.11 Submission point 85.08 (Foodstuffs South Island) requests a minor change to replace the word 'enabling' with 'encouraging' or 'facilitating' within Policy 11.1.2.2 for clarification. I consider that 'enabling' and 'facilitating' are synonyms and 'encourage' is already stated at the beginning of the policy. No amendment is recommended to the policy as a result of this submission.

5.5.12 Submission points 89.03 (McAlpines Ltd incorporating McAlpines Rangiora Ltd) and 91.05 (Ravenswood Developments Ltd) also relate to this policy, and are addressed in 5.14 below.

Policy 11.1.2.3 (a)

5.5.13 Submission point 85.09 (Foodstuffs South Island) requests a minor text amendment to remove the words 'and considers pedestrian safety' from Policy 11.1.2.3(a) as this is already implied through the word 'safe'. I consider that clearer policy direction is achieved by specifying 'pedestrian safety', as it could also be implied that 'safe position' relates to either the safety of the bicycle or the cyclist. For these reasons, I do not recommend any amendment as the result of this submission point.

Policy 11.1.2.4

5.5.14 Submission points 85.10 (Foodstuffs South Island) and 91.06 (Ravenswood Developments Ltd) request deletion or clarification of Policy 11.1.2.4 (footpath design and location) because the policy is unclear in relation to pedestrian and driver visibility, would result in inefficient land use and is not necessary for visibility and safety.

5.5.15 The Policy provides for pedestrian access, which was identified as an issue during consultation and also gives effect to the Canterbury Regional Policy Statement in relation to promotion of transport modes with low adverse

effects, addressing the interaction between land use and the transport system, and promoting accessibility and modal choice (Policy 5.3.8).

5.5.16 The Policy addresses the safe interaction between footpaths, parking areas and destinations. I note that submission 85.10 seeks clarification and amendment to part (b) to read '*visibility between vehicles and pedestrians*...'. The policy recognises the movement of pedestrians to and from vehicles and where destinations are reached by walking through a parking facility.

5.5.17 I consider that the provision for safe and effective pedestrian access is reasonable, and use of land for footpaths promotes efficient use of land by encouraging active transport (and reducing demand for car parking). This approach is consistent with other District Plans in the region, for example Policy B2.1.7 of the Selwyn District Plan which includes a similar range of matters. For these reasons I do not recommend amendment of Policy 11.1.2.4 as a result of these submissions.

Policy 11.1.2.6

5.5.18 Submission points 85.12 (Foodstuffs South Island) and 89.04 (McAlpines Ltd incorporating McAlpines Rangiora) request amendment to Policy 11.1.2.6 to clarify footpath crossing, clearance of obstructions, definition of the term 'blind aisle' and to limit application of Crime Prevention through Environmental Design (CPTED) principles outside of town centres and residential areas. Submission point 91.08 also requests clarification of 'blind aisle' and considers the policy to be unnecessary and excessive in its considerations.

5.5.19 New Zealand Standard AS/NZS2890 1:2004 defines 'blind aisle' and gives guidance on the acceptable length for a blind aisle used within a public car park. To clarify the policy, I recommend that the following definition be inserted:

Blind Aisle

Blind Aisle means a parking aisle closed at one end. In car parks open to the public, the maximum length of a blind aisle shall be equal to the width of six 90 degree spaces plus 1 m, unless provision is made for cars to turn around at the end and drive out forwards.

5.5.20 The policy sets out a comprehensive range of matters relating to function, safety and amenity. These are intended to provide guidance for plan users in the design and assessment of parking facilities, and incorporate accessibility matters that were identified during the plan consultation process.

5.5.21 It is my view that design that CPTED principles are relevant where consideration of visibility and placement of vegetation and structures at design stage can reduce the risk of crime. 'Safety conscious' design should also have positive effects for the activity on the site as well as the general public.

5.5.22 I have reviewed the policy for excessive content and consider each of the matters listed to be relevant; however, as Policy 11.1.2.4 specifically address pedestrian access, part (f) could be deleted. Although the proposed policy makes clear reference to parking spaces and intrusion of vehicles over a footpath while parked, I consider that deletion of (f) would also resolve any clarity issues as submitted.

5.5.23 In addition to the above, I consider that the words '*...within the parking area that avoids adverse effects from shadowing or glare*' could be deleted from part (e) as shadowing will be prevented through ensuring visibility, and the Plan contains specific rules for glare in Rules 31.9 and 31.10.

5.5.24 The submissions also request that part (g) be improved by referring to the route rather than the path as there is a need to address overhead obstructions as well as those at ground level. I consider the inclusion of the amendment would assist achievement of accessible parking and access and recommend the text of (g) be amended accordingly.

Policy 11.1.2.7

5.5.25 Submission points 85.13 (Foodstuffs South Island) and 91.9 (Ravenswood Developments Ltd) relate to Policy 11.1.2.7 and identify conflict with Objective 11.1.2 regarding accessibility, the meaning of 'manoeuvring' and 'obstruction' within 11.1.2.7(d) and suggests a rewording of 11.1.2.7 (e) in regard to service lane frontages. Submission point (91.9) considers the policy to be excessive and inefficient, and seeks amendment to the policy to replace the

words '*largest vehicle*' with '*average vehicle*' in part (a), to remove '*local road*' from part (b) and either delete part (c) or amend to add the words '*where practicable*'.

5.5.26 In relation to part (c) it is submitted that the separation of service vehicles from other uses may be contrary to Objective 11.1.2 in relation to pedestrian accessibility. The objective states the main aims for parking provision, including pedestrian accessibility and the policy relates to loading and manoeuvring activities and sets out a range of performance considerations including separation between service vehicles, car parking, pedestrians and cyclists.

5.5.27 I consider that the policy is consistent with the objective for pedestrian accessibility, convenience and safety. From a policy position, I consider that it is possible for parking facilities to make provision for pedestrian accessibility and convenience, and to ensure that separation is achieved to enable safety for people parking and moving within and around a parking facility which incorporates loading.

5.5.28 Part (a) allows each activity to determine the loading requirement based on the largest vehicle it anticipates will use the facility. Loading requirements are variable from activity to activity, and the policy allows flexibility in relation to actual demand. Abley have advised that if '*average vehicle*' were used as a standard, any vehicle larger than the average may be prevented from gaining access to loading facilities due to insufficient area being provided for parking and manoeuvring, or may visit the site and generate adverse effects on safety and efficiency. Abley further note that use of '*largest vehicle expected*' is consistent with the Christchurch District Plan, and provides sufficient control for loading, and should be retained. For these reasons, I recommend retaining part (a) without amendment.

5.5.29 I also consider that part (b) of the policy should be retained although I note that access '*onto or from*' would also be relevant in relation to local roads, and I would recommend that the text of part (b) be amended for consistency. The policy is otherwise clear that local roads are only to be included where reverse manoeuvring would create an adverse effect on safety.

5.5.30 I consider Part (c) would be open to wider interpretation and outcomes would be less certain if the words 'where practicable' were introduced as submitted. I recommend that part (c) be amended as follows to show the relationship between separation and safety requirements and recognise that separation may not be required in all instances, for example where only a few parking spaces are provided.

- c. 'provide **sufficient** separation between service vehicles, car parking, and cyclists **to enable safe use of the facility**...

5.5.31 The submission (85.13) also seeks clarification and rewording of 11.1.2.7(d) to read '*avoid the obstruction of accessways while loading /unloading is taking place*'. This is requested to prevent the interpretation of a slow moving vehicle within an accessway being considered to create an 'obstruction'.

5.5.32 In relation to part (d), I consider that a slow moving vehicle would be using the accessway to gain access to or from the loading space, rather than blocking it, with any delay for other users being relatively short. I think it is unlikely that the policy would be interpreted in the manner submitted, which would occur where vehicles park inappropriately.

5.5.33 The third part of the submission relates to part (e) and I agree that the policy could be amended to ensure that where the service lane or rear access cannot provide physical access for service vehicles, then it would be unreasonable to insist on this.

5.5.34 I also consider that service vehicles that are able to load from a rear or service lane should do so, with alternative loading arrangements provided only for those vehicles that are unable to gain physical access. For these reasons, I recommend amendment to part (e) to read as follows (new text shown in bold):

- d. '*be accessed from the rear of the site or a service lane where a site is located in a town centre and **sufficient** rear or service access is available for **service vehicles expected to use the site**; and ...*'

Reasons for Policies 11.1.2.1 – 11.1.2.7

5.5.35 Submission points 89.05 (McAlpines Ltd incorporating McAlpines Rangiora) and 91.10 (Ravenswood Developments Ltd) request revision of the reasons to Policies 11.1.2.1 to 11.1.2.7. The Foodstuffs submission requests amendment to the third paragraph to include the words '*All parking areas shall...*' to replace the words '*As well as being...*' and to include the words '*within town centres...*' to qualify the statements for parking design.

5.5.36 Amendment is also sought by Ravenswood to be more concise and to delete the word '*direct*' from the third paragraph. I agree that the third paragraph could be amended to be more concise, as pedestrian access could be incorporated within the first sentence, but disagree that the design aspects should be limited to town centres, as parking areas elsewhere could also generate adverse effects where design has not adequately addressed amenity.

5.5.37 The McAlpines submission seeks recognition that Business 2 Zones do not have the same amenity as town centres. While recognising that industrial activities with more utilitarian amenity aspects are located in the Business 2 Zones, it is my view that the parking matters also need to be addressed in relation to activities that require parking for employees, visitors and customers.

5.5.38 I recommend that the third to fifth paragraphs of the reason are amended to read:

...Parking and loading areas can provide safe, efficient, accessible and pleasant, public open spaces.

Loading facilities need to be available to support business activities but should not compromise safety or traffic flow.

*Cycling for transport is encouraged due to the benefits for individuals and the community and **is enabled by the provision of suitable parking**. Major parking areas that service key destinations may also include public transportation facilities such as bus stops.' ...*

Policy 20.1.1.3

5.5.39 Submission point 85.14 (Foodstuffs South Island) requests clarification of Policy 20.1.1.3(c) where 'same locality' is considered too broad and open to interpretation and may lead to parking being provided in inconvenient locations. Submission point 85.26 (Foodstuffs South Island) also notes an inconsistency between Table 34.1 and Policy 20.1.1.3 in regard to the location of parking provided by financial contribution. Both matters are concerned with the use of the term 'locality'.

5.5.40 In relation to the location of parking supplied by financial contribution, I note that this parking would mostly be required for activities within urban areas and smaller settlements. To further clarify Policy 20.1.1.3 (c), I recommend that the wording be amended as follows:

- c. *the parking or loading funded by financial contribution shall be located in the same town or **settlement** as the site to which the contribution relates.*

and further recommend that the wording of Table 34.1 (first column) be amended to read:

*The financial contribution shall be used to provide, upgrade or extend public car parking in the town or **settlement** from which it is collected, and may also be used to contribute towards the cost of public parking facilities that have already been constructed, or the long term lease of parking facilities.*

Methods

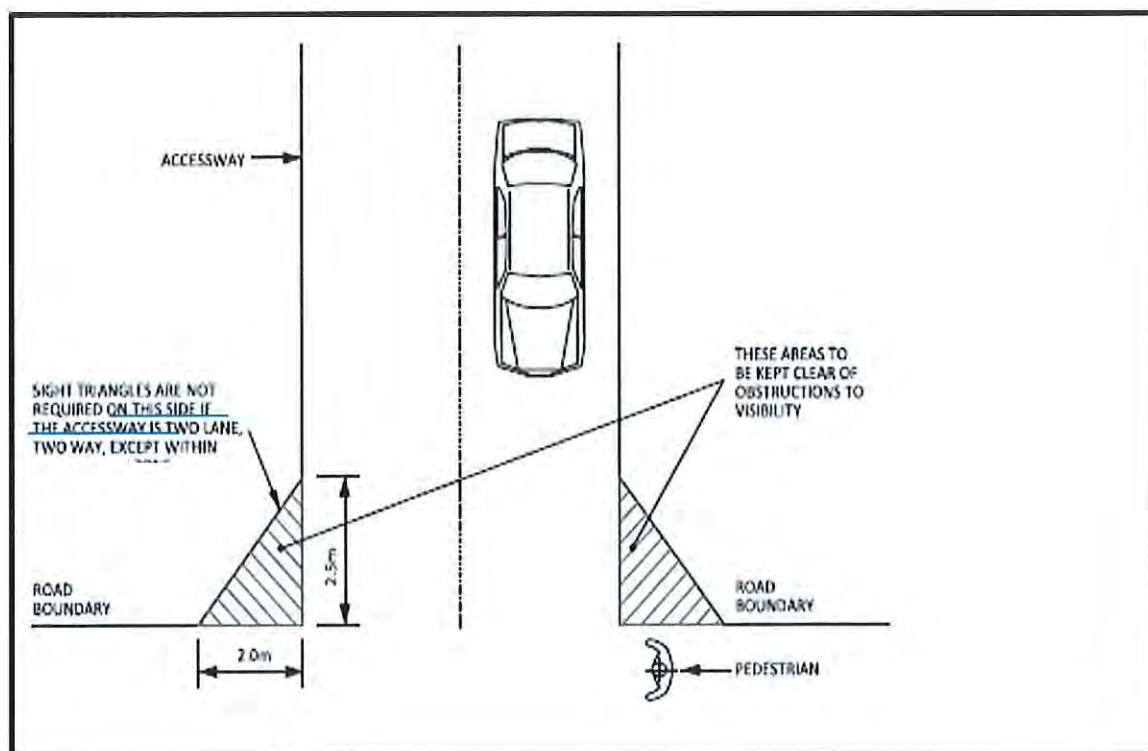
5.5.41 Submission Point 85.7 relates to lack of specific provision for motorcycle parking and requirements for development liaison. Method 11.1.2.1.4 refers to the development and adoption of a parking strategy for the location and design of a range of parking facilities including those for motorcycles. Abley note that motorcycle mode share is low (1% in 2013 census), trends do not indicate this will increase, and that motorcycles can legally use car parking spaces. There is no direction within the CRPS to increase the use of motorcycles, and for these reasons I consider that no further provisions are considered necessary to provide for motorcycle parking other than the method proposed.

5.5.42 Method 11.1.2.1.2 does not imply that developer liaison is required to be undertaken, but that it is a method which may be used to assist in achieving the policies, particularly for shared facilities.

5.6 Clarification of Rules and Figures

5.6.1 Submission 85.15 (Foodstuffs South Island) relates to Figure 30.3 and requests that additional wording to the NZ Standard in relation to Business Zones be removed. The wording has been amended slightly to reflect the terminology used in the District Plan, particularly 'accessway' instead of 'driveway' and 'road boundary' instead of 'property boundary'. I agree that the setbacks in the standard should be applied, and therefore recommend removal of the words '...except within any Business Zone' and adding the word 'adapted' to the figure reference, as shown below:

Figure 30.3: Minimum Sight Lines for Pedestrian Safety



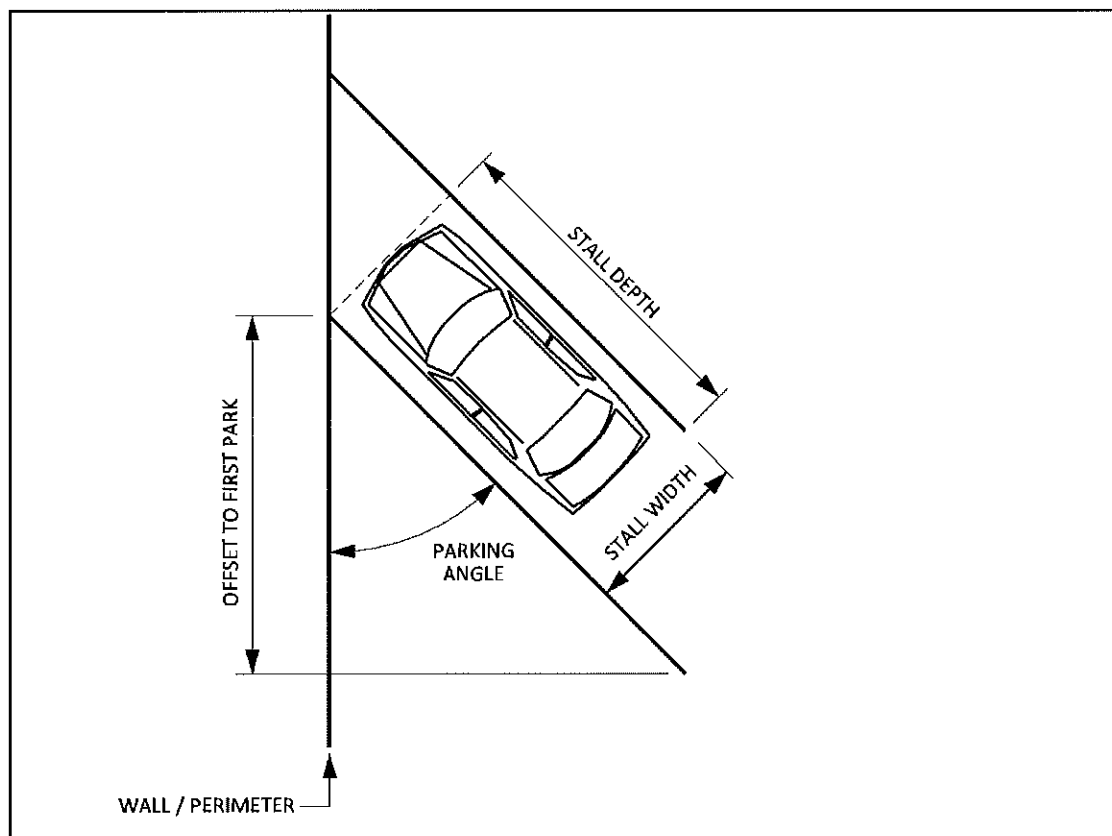
Reference: Figure 3.3 adapted from AS/NZS2890.1:2004 Parking facilities Part 1: Off-street Parking

5.6.2 Submission point 85.16 (Foodstuffs South Island) requests that Table 30.8 be amended to clarify that the parking rates are the minimum requirement. I recommend that the submission point be accepted and that the word 'minimum' be added to the table heading to read as follows:

*Table 30.8: On-Site Parking and Loading Space **Minimum** Requirements*

5.6.3 Submission point 85.18 (Foodstuffs South Island) identifies incorrect indications in Figure 30.7 in relation to stall depth. I agree that the stall indications have been incorrectly shown in relation to the figure supplied in the Abley 2013 Report and recommend revising Figure 30.7 as follows:

Figure 30.7: Parking Space and Manoeuvring Dimensions



5.6.4 Submission point 85.25 (Foodstuffs South Island) for Rule 30.9.1 queries the consent status for rule non-compliance and seeks better alignment with the significance of the non-compliance. PC40 focusses on the management of

parking including any positive or adverse effects, rather than the matters covered in the wider rules referred to in the submission, which relate to transport, utility servicing or other issues that are covered by Rule 30.9.1.

5.6.5 I consider that the proposed Rule limits the matters for discretion to those reasonably related to parking, while allowing a similar level of assessment to Rule 30.9.1 for any effects from non-compliance, including the ability to approve or decline an application. For these reasons, I do not recommend any amendment as a result of this submission.

5.6.6 Submission 85.27 (Foodstuffs South Island) identifies policies and rules that are not well-connected. These are summarised in the following table (comments and recommendation following beneath each policy/rule set):

Policy	Rule
11.1.2.1. <i>Envisages shared parking</i>	30.6.1.30 <i>Rule precludes sharing of spaces.</i>
The policy and explanations proposed for shared parking facilities identify potential benefits for activities and land use. Alternative means for parking and loading is provided for as a matter of consideration where on-site parking provision is not achieved under Table 30.8. (Rule 30.8.1(xi)). It is my view that consideration of any positive or negative effects from shared parking is provided through the proposed policy and rule without amendment.	
11.1.2.2 <i>Enables use of parking to support public transport</i>	<i>Not linked to a rule to enable public transport parking</i>
Rule 30.8.2 provides for larger car parking areas as a discretionary activity (restricted). It is anticipated that 'park and ride' and any other facilities that support public transport would be assessed under this rule with reference to the relevant policies. The assessment matters listed include 'public transport' to ensure scope is available to address the policy matters in Policy 11.1.2.2.	
11.1.2.4 <i>Expects footpath provision for parking facilities</i>	<i>Not linked to a rule requiring footpaths</i>
Policy 11.1.2.4 sets out features that would support safe pedestrian access within parking facilities, including footpaths that are safe from vehicle	

movements, and constructed to be accessible. The policy is implemented by requiring accessible parking spaces for disabled persons in Rule 30.6.1.33 and Table 30.11. Rule 30.6.1.21 also provides sight distances from accessways to improve pedestrian safety and Rule 31.21.1.2 requires pedestrian access directly from the road frontage to buildings within Rangiora and Kaiapoi Business 1 Zones.

Footpaths are otherwise not specifically required for smaller parking areas where reasonable accessibility may otherwise be provided. Within larger facilities, Rule 30.8.2 (discretionary activity (restricted)) provides scope for assessment of footpath provision, design and accessibility. I consider that these rules link to the policy and avoid requiring footpaths in every situation, including those of a scale that does not justify separate footpaths.

11.1.2.6 <i>Seeks limitation of long 'blind aisles'</i>	<i>Not followed up by a rule for limiting blind aisles</i>
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I have recommended the inclusion of a definition for blind aisle as a response to submission point 85.12, including guidance on the appropriate maximum length of a blind aisle within a public car park, and consider that this would also give effect to this submission point in regard to Policy 11.1.2.6.

11.1.2.7 <i>Policy refers to strategic, arterial, collector, and local roads</i>	<i>30.6.1.31 – Rule does not mention local roads but does include rights of way</i>
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Rule 30.6.1.31 currently applies to strategic and arterial roads, and it is proposed to extend this to apply to collector roads also. The addition of rights of way and shared accessways promotes the forward exit of vehicles where there is more than one property served and I consider that this recognises the increased potential risk relating to reverse entry and exit, and the improved visibility offered by forward moving vehicles, which would encourage safety. Policy 11.1.2.7 promotes safe and efficient loading activity, and recognises the need to consider local roads where there could be an adverse safety effect.

I do not consider that the policy and rule create conflict within the plan as local roads may be able to provide for some reverse manoeuvres without adversely affecting safety, however the circumstances to define this would be complex to define within the rule, and for this reason, I consider that the matter is more appropriately provided as a policy consideration to support resource consent applications and their assessment. No amendment is recommended.

5.7 Maximum Parking Provision

- 5.7.1 Submission points 85.02, 85.19 (Foodstuffs South Island), 89.06 (McAlpines Limited incorporating McAlpines Rangiora), 90.07, and 90.9 (Progressive Enterprises Ltd), 91.16 (Ravenswood Developments Ltd) and 92.01 (The Warehouse Ltd) relate to Rule 30.6.1.30 (c) which imposes a maximum parking rate of 130 percent of the minimum parking rate set out in Table 30.8 for larger car parks.
- 5.7.2 It is submitted that there is no technical basis for the limitation, it is not logical or appropriate, does not relate to the functional requirements of supermarkets and that parking should be at the discretion of the landowner. It is also submitted that developers and supermarkets would not over-provide parking due to costs, with the standard for Countdown supermarket provision being 1 car per 20m² of GFA. Submission 90.9 submits that Rules 30.8.1 and 30.8.2 should be adopted provided the maximum parking requirement in 30.6.1.30(c) is removed.
- 5.7.3 Outside of town centres, and especially within Business 2 Zones, it is submitted that maximum rates are not appropriate because of the location and size of stores, lower amenity expectations and predicted lower numbers of customers using active and public transport. It is also submitted that an alternative option would be to provide a specific maximum ratio for department stores such as The Warehouse, as insufficient account has been taken of variation in parking demand for larger format retail activities.
- 5.7.4 The purpose of the proposed maximum parking rate is to encourage efficient use of land and the use of modes of transport other than private cars by avoiding over supply of parking, and any consequent amenity effects arising from large expanses of under-used car parking. The Rule is part of a suite of provisions that include requirements for the supply, location and design of parking spaces and associated manoeuvring areas.
- 5.7.5 Further advice was sought from Abley Transportation Consultants (Abley) in regard to the appropriateness of applying a maximum parking rate of 130% above the minimum parking rate stated. Abley verified the use of maximum

rates to regulate parking over-supply in town centres, but outside of that area, it was not considered an appropriate control principally because of the limited availability of public transport (at present) and expected lower use of transport modes other than private vehicles.

5.7.6 Abley also noted that within the Business 1 Zone, a significant proportion of sites would have parking that is controlled through 'principal shopping street' frontage rules that apply in Kaiapoi and Rangiora. Outside of this 'frontage' area, the risk of parking oversupply was considered to be slight due to the 'residential' size of many sites, which constrain the ability to provide large areas of on-site car parking.

5.7.7 The Abley assessment further considered that a range of other controls for parking supply, design and location are available or proposed to manage significant parking over-supply.

5.7.8 In response to the submissions and the technical advice from Abley, I consider that there are existing controls within the Plan, and proposed for inclusion in the Plan, that will reasonably manage parking supply including the assessment of larger car parking facilities under Rule 30.8.2 and where parking conditions are not met, under Rule 30.8.1.

5.7.9 Proposed Rule 30.8.2 includes: '*expected parking demand, vehicle trip generation and proposed parking availability*' and '*effects on the function, amenity and character of town centre activities*' as matters to which discretion is restricted. I consider that the first matter could be amended to ensure discretion is available to address the supply of parking compared with expected demand as an alternative to specifying a particular maximum rate. The second matter would also allow assessment of the effects on town centres from parking supply that is significantly higher than likely demand.

5.7.10 I consider that this approach should afford greater flexibility for a range of activities to provide for their parking needs while retaining the ability to assess and manage the impact of any significant over supply of parking spaces.

5.7.11 In consideration of the above submission it is recommended that proposed Rule 30.6.1.30 (c) be deleted and Rule 30.8.2 be amended to read as follows:

- x. expected parking demand, **parking supply in relation to demand**, vehicle trip generation and proposed parking availability;

5.8 Parking Rates

- 5.8.1 Submission points 85.17 (Foodstuffs South Island), 87.1 (Lockbox Storage Rangiora Ltd), 90.5 (Progressive Enterprises Ltd), 91.04, 91.12 and 91.13 (Ravenswood Developments Ltd) relate to the minimum rates for parking set out in Table 30.8 and applied by Rule 30.6.1.28.
- 5.8.2 Submission point 90.5 supports the changes to 30.6.1.28 as well proven and accepted practice. Alternatively, Foodstuffs South Island (85.17) submitted that there was no technical basis for the rates for supermarket parking and loading, and justification is required as the minimum rate sets the level of the maximum rate.
- 5.8.3 The parking rates for supermarkets were based upon the rates recommended in the Waimakariri District Plan Review: Car Parking 2013 Report (Abley Transportation Consultants). In justifying the rates used in this report, Abley have advised that the 2013 report was informed from other District Plans and considering the NZTA Research Report 453¹. Abley chose to set the minimum standard slightly lower than the average parking rate (at 4.0 rather than 4.2 spaces per 100 m² GFA to minimise the potential for parking oversupply for supermarkets that have lower parking demand, but to also ensure the majority of parking demand could be accommodated on the site.
- 5.8.4 Abley further noted that submission point 85.17 is incorrect in that the 50th percentile rate from the NZTA report was 4.2 spaces per 100m² GFA and not the recommended 4.0m per 100m² GFA.
- 5.8.5 As discussed above, it is proposed to delete the maximum parking requirement, which should alleviate the concern of the submitter in regard to parking rates for supermarkets, and it is my view that no amendment to the proposed minimum parking rates is required to give relief to the submission.

¹ Douglass, M and Abley, S (2011) Trips and parking related to land use. NZ Transport Agency research report 453

- 5.8.6 Submission point 87.1 (Lockbox Storage Rangiora Ltd), agrees that the introduction of further categories to Table 30.8 is useful to avoid unnecessary resource consents, but identifies issues for self-storage activities where there may be a large building area with little or no parking requirement for staff and where clients park immediately adjacent the storage units. It is requested that amendment be made to add a separate category of activity with a nil parking rate.
- 5.8.7 Abley Transportation consultants have advised that they consider 'warehousing and storage' to be the most similar category to self-storage, rather than 'industrial' as submitted. As discussed in paragraph 6.5.12 above, in relation to submission point 91.03, I recommend that the definition of 'industry' be amended to exclude warehousing and storage. This should give partial relief to the submission.
- 5.8.8 Having considered the submission, the parking requirements for 'warehousing and storage' proposed and the a survey of Christchurch self-storage facilities in the New Zealand Trips Database² and parking demand rates (NZ Research Report 453, Abley considered that a minimum parking requirement of 0.2 spaces per 100m² GFA, (with no requirement for cycle parking or loading), would provide sufficient on-site parking, and that the term should be defined to ensure the rate would not apply to other staffed storage operations with higher demand for parking.
- 5.8.9 I agree that the proposed rates may exceed expected demand for self-storage activities. The rate recommended by Abley provides a better alignment between parking supply and demand, encourages more efficient use of self-storage sites and avoids undue generation of resource consent applications for parking dispensations. I also consider that a new definition for 'self-storage facilities' should be introduced for clarity in assessing the correct parking rate category, and I recommend the following amendments:

Add a new definition of self-storage facility to read as follows:

² The New Zealand Trips Database is the pre-eminent source of trip generation and parking demand data that is administered by the Trips Database Bureau

Self-storage

Self-storage means the rent or hire of individual self-service storage space within a warehouse facility, or within separate storage units principally for the storage of personal possessions.

Amend Table 30.8 by adding the words '**(excluding self-storage)**' after 'Warehousing and storage' and by adding a new category of activity called '**self-storage**' for which the 'parking spaces to be provided' will be **0.2 spaces per 100m² gross floor area**.

5.8.10 Submissions 91.01, 91.04, 91.12 and 91.13 (Ravenswood Developments Ltd) relate to the proposed rates for parking and loading. The submission points state that the requirements are excessive and will result in inefficiencies in land, particularly in regards to 'warehousing and storage', and that the use of 'gross floor area' as the basis for assessment is too broad and will not accurately reflect parking demand for activities.

5.8.11 The submission points seek that the use of GFA (gross floor area) be replaced by GLFA (gross leasable floor area) for supermarkets, large format retail and general retail categories of activity, and by PFA (public floor area) for food and beverage activities within Table 30.8. GLFA, and PFA exclude various utility areas from the calculation of floor area. The submission requests that parking requirements be reduced in accordance with these measures, that definitions for the new measures be included, and that overall reductions (unspecified) are made.

5.8.12 The proposed rates impose minimum standards for parking supply that have been based on the recommendations supplied in the Abley 2013 report³. Those recommendations were informed by a comparison of other District Plan parking rates and considering the 50th percentile parking demand rate from the NZTA Research Report.

5.8.13 In relation to supermarkets, the Abley 2013 report recommended setting the minimum standard slightly lower than the average parking rate to minimise the potential for oversupply. For each of the categories mentioned in the

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submission, the rates proposed in the plan change are consistent with or lower than the NZTA report rates, and for the Business 1 Zones in particular, apply a lower standard to reflect that people may visit more than one site when parked, take more journeys by walking, cycling or public transport, and that there is a greater supply of public parking in this Zone.

5.8.14 The proposed parking rates use GFA for the group of activities mentioned, except for 'food and beverage' where net floor area (NFA) is used to recognise the relationship between parking demand and the floor area that is accessible to the public. This is consistent with the NZTA parking demand rates which adopts the measure that would be most relevant for the calculation of parking demand. For the above reasons, I consider that the rates proposed are reasonable and unlikely to result in inefficient land use, particularly in consideration of the lower rates for Business 1 Zones, and the ability for shared parking to be considered as an option, and I recommend that no amendment is required to Table 30.8 in relation to these submissions.

5.9 Accessible Parking Spaces

5.9.1 Submission points 85.21 (Foodstuffs South Island), 90.8, (Progressive Enterprises Ltd) and 91.18 (Ravenswood Developments Ltd) relate to accessible parking (Table 30.11 and Rule 30.6.1.33). The submission points request revision of Table 30.9 to allow accessibility parking to share the additional parking width, amendment of the rates within Table 30.11, and otherwise support the provisions for accessible parking.

5.9.2 Where two accessibility car parking spaces are provided beside each other, Figure 7 in NZS 4121:2001 Design for Access and Mobility – Buildings and Associated Facilities provides for the sharing of the extra parking space width that is required for access to and from the vehicle. In addition, AS/NZS 2890: Part 6 provides similar details for 'shared area'. I agree that Table 30.9 could be clarified to refer to the sharing arrangements shown in Figure 7 of NZS 4121:2001 where two accessibility parks are located together, and recommend the Table be amended accordingly.

5.9.3 I do not consider that any amendment to Table 30.11 is required as the table is sourced from section 5.3.2 of NZS 4121:2001, and the District Plan should

not apply any lesser rate than that required by the standard. For this reason, I recommend that Table 30.11 is retained without amendment.

- 5.9.4 I agree that Table 30.11 and Rule 30.6.1.33 should be retained, in accordance with submission point 90.8.

5.10 Supermarket and Large Format Retail Requirements

- 5.10.1 Submission points 85.01, 85.02, 85.03, (Foodstuffs South Island) and 91.23 (Ravenswood Developments Ltd) relate to the parking and loading needs of supermarkets, large format retail, and vehicle oriented businesses and proposed restrictions on the location and number of parking spaces. It is requested that amendments be made to recognise the operational needs of the above activities, or decline the plan change, to provide certainty, support centres (such as Ravenswood), reduce regulation and meet the requirements of the Act.

- 5.10.2 The submission points have also been addressed within other sections of this report and amendments have been recommended to provisions relating to the matters raised above. Abley have also assessed the proposed plan change in relation to the operational needs of large format and vehicle oriented activities and verify that the rates for parking are informed by a parking comparison with other relevant district plans, and NZTA Research Report 453 (Trips and parking related to landuse). A lower minimum rate is applied within the Business 1 Zone where alternative methods for managing parking would be available. Abley conclude that if a maximum parking rate is not applied, the minimum parking rates in Table 30.8 can be retained.

- 5.10.3 The provision of lower minimum parking rates within the Business 1 Zone also supports other town centre goals, such as the achievement of a consolidated, vibrant, town centre with well-connected retail frontages supported by centralised parking. I agree with the Abley assessment, and consider the proposed provisions (with amendments recommended in this report) will reasonably provide for the needs of large format and vehicle oriented business activities while also considering the management of possible adverse effects.

5.11 Car Parking Dimensions

5.11.1 Submission points 85.18 (Foodstuffs South Island), 90.05, 90.06 (Progressive Enterprises Ltd), and 91.14 (Ravenswood Development Ltd) relate to parking dimensions. Submission 85.18 has been addressed in section 5.6.3 of this report. All of the remaining submissions support Rule 30.6.1.28, Figure 30.7 (Parking Space and Manoeuvring Dimensions), Table 30.9 (Parking Space Dimensions) and Table 30.10 (Loading Space Dimensions) and no amendment is requested.

5.12 Street Parking

5.12.1 Submission 86 (J.K Galbraith) requests that use of residential parking lay-byes are time-restricted to be more equitable to all residents. On-street parking time restriction and enforcement is not managed by the District Plan, and therefore, no amendments are recommended as a result of this submission.

5.13 Parking Requirements for Education Activities.

5.13.1 The Ministry of Education have made a number of submission points in regards to parking for schools, pre-schools and child care centres. (Submission points 88.1 to 88.9). The submission points seek greater consistency between councils for parking provision, reduced parking requirements, especially for students over 16 years, and more flexibility for schools to determine the provision of facilities and their layout (such as cycle parking and on-site drop off areas).

5.13.2 In respect of car parking rates, the Ministry would prefer that the rates are reduced to be consistent with those of Auckland Unitary Council and Christchurch City Council. It is submitted that this will free up school land for outdoor activity, support the use of active transport, and with regard to students over 16 years, recognises that students of that age are well placed to bus, walk or cycle to school. For pre-schools and child care centres, it is submitted that extensive parking is unnecessary where other education facilities could be utilised.

5.13.3 The Ministry requests the following amendments to parking rates:

- (a) remove separate requirement for car parking for students over 16 years,
- (b) 1 car parking space per 25 students (Year 8 and below) and 0.5 spaces per 25 students (year 9 and above) together with 0.5 spaces per FTE staff.
- (c) for pre-school and childcare, 1 car parking space per 10 children and 0.5 spaces per full time equivalent (FTE),
- (d) remove requirement for a separate drop off and pack up area, especially in regard to new existing facilities.
- (e) amend cycle parking requirements to allow greater flexibility for individual schools and to be based on staff numbers in relation to pre-schools and childcare.

5.13.4 Abley have assessed the submission points and in particular, a comparison with Proposed Replacement District Plan (CPRDP) for Christchurch City Council parking provisions for education. The assessment agreed with the submission in respect of senior student parking, revision of pre-school/child care parking rates, consistency with the recently developed Christchurch Proposed Replacement District Plan and the difficulty for some schools to meet the drop-off area requirement. The proposed cycle parking rates were considered to be appropriate.

5.13.5 The submission points raised by the Ministry support the aims of the plan change to provide sufficient on-site parking to meet reasonable demand whilst encouraging the uptake and use of active and public transport options for both staff and students. As noted by Abley, adoption of active transport by school students encourages the formation of life habits that incorporate active transportation. The various submission points seek to further refine the provisions in line with Ministerial aspirations for school and preschool development and operation.

5.13.6 The proposed rates for classrooms are based on classrooms to provide a more certain base for calculating parking avoiding demand changes from shifts in student and staff numbers. In light of the submission and advice from Abley, however, I recognise that classroom format changes may affect the calculation and that the rate has a different basis to other District Plans in Canterbury. For consistency with the CPRDP, I recommend the amendment

of parking requirements for schools to read: '1 car parking space per 25 students (Year 8 and below) and 0.5 spaces per 25 students (year 9 and above) together with 0.5 spaces per FTE staff'.

5.13.7 I agree that on-site drop off and collection areas may require site specific assessment to ensure safe and efficient traffic management, and that existing and new schools are likely to differ in their ability to provide for this requirement. I anticipate that the Ministry of Education will be developing transport planning guidance for primary schools in the near future, which would assist in management of potential adverse effects. For these reasons, I recommend deletion of the requirement for on-site drop of and pick up areas.

5.13.8 Abley recommend that the submission for pre-school and childcare parking and cycle parking is reasonable, as the outcome would be similar to the proposed rate, and is consistent with other local District Plans. I note that the Abley recommendation takes into account the submissions from the Ministry of Education and the recent review process for the CPRDP in relation to parking requirements. For these reasons, I recommend that the requirement for 'pre-school and childcare facilities' be replaced by: '1 car parking space per 10 children and 0.5 spaces per full time equivalent (FTE)' and '1 short term park per 20 full time equivalent employees and 1 long term park for every 3 full time equivalent employees' for cycle parking to reflect greater demand for employee long-term cycle parking.

5.13.9 It is my view that the cycle parking rates are appropriate and encourage the use of cycles as transport for students, staff and visitors. The support of active and sustainable transport is a matter acknowledged by the submitter, and required under the Canterbury Regional Policy Statement. I consider the rates to be reasonable in consideration of the characteristics of the towns and settlements, and the planned development of new infrastructure that will support cycle use. In regard to other active modes such as scooters, I consider that schools will not be prevented from making provision for scooter parking, or allowing scooters to use the cycle parks.

5.13.10 I also consider that the rates are otherwise consistent with anticipated demand and have been assessed by Abley Transportation Consultants, and therefore do not require amendment.

5.14 Cycle Parking

5.14.1 Submission points 84.01 (Community and Public Health, Canterbury DHB), 85.22 (Foodstuffs South Island), 89.03, 89.07, 89.08 (McAlpines Ltd incorporating McAlpines Rangiora), 90.05 (Progressive Enterprises Ltd), 91.05, 91.21 (Ravenswood Development Ltd), 92.02 and 92.03 (The Warehouse Ltd) support or seek amendment to proposed requirements for cycle parking.

5.14.2 The submission from Community and Public Health support provisions that promote active transport and focus on pedestrian health and safety and traffic safety. Submission point 90.5 also supports changes to Rule 30.6.1.28 including cycle parking. No amendments are requested as a result of these submission points.

5.14.3 Amendment is sought to Policies 11.1.2.2 and 11.1.2.3 to recognise the equal importance of private transport with active and public transport (submission point 91.05). Specific changes are also sought to Policy 11.1.2.3 (b) to replace the words *'Physically supports the cycle frame,'* with *'Provides adequate support for the cycle,'* and to amend part (c) by adding the words *'through the provision of robust and lockable stands'* (submission point 89.03).

5.14.4 In regard to private transport (submission point 91.05), the proposed policies follow the direction of Canterbury Regional Policy Statement Policy (CRPS) 5.3.8 (Land use and transport integration (Wider Region)) that require Council to set out objectives and policies to promote accessibility and modal choice as appropriate, and to promote transport modes that have low adverse environmental effects. The use of private motor vehicles is recognised through Plan provisions for transport, access and parking and I consider that no further amendment is required as the promotion of active and public transportation modes through policy is appropriate both in terms of the

sustainable management of the district's resources, and to give effect to the CRPS.

5.14.5 The amendments to Policy 11.1.2.3 (b) and (c), (submission point 89.03) are requested to recognise the function and amenity of the surrounding environment and especially that of the Business 2 Zone in relation to cycle parking.

Policy 11.1.2.3

Encourage cycle transport by providing cycle parking that:

- a. *is located in a convenient and safe position and considers pedestrian safety;*
- b. *~~physically supports the cycle frame;~~ **Provides adequate support for the cycle;** and*
- c. ***provides for cycle security through the provision of robust and lockable stands.***

5.14.6 The proposed policy describes cycle parking that links to the objective 'to provide safe, secure and convenient cycle parking' (Objective 11.1.2). Support of the cycle frame is specified in part (b) to avoid cycle parking solutions that support the wheel only which may result in damage to the bicycle wheel, and reduce options for secure locking of cycles. Part (c) broadly requires security, but does not limit this to construction of stands, and would also allow consideration of other matters, such as location and lighting. Security applies more widely than theft and also relates to damage.

5.14.7 In my view, the policy provides the appropriate level of guidance for cycle parking and the proposed amendments would reduce the ability to achieve the aims of the objective. In particular, I consider 'adequate support for the cycle' to be ambiguous, and open to wide interpretation, and the requested addition to (c) to be unnecessary. For these reasons, I do not recommend amendment of proposed Policy 11.1.2.3 as a result of the submission point.

5.14.8 Submission points 89.07 (McAlpines Ltd Incorporating McAlpines Rangiora) and 92.3 (The Warehouse Ltd) relate to cycle parking rates in Table 30.8 and Rule 30.6.1.28, and request that Business 2 Zone locations be excluded from

the rule by adding the following amendment to Table 30.8, 'cycle parking' column, (Large Format Retail):

'...except where the activity is a building supplies retailer whereby no cycles spaces are required provided any staff demand is catered for on-site.'

It is also submitted that the rates for long term cycle parking for large format retail are excessive and should better reflect the practical demand requirements and avoid the use of employees as a measure for retail and food and beverage activities.

5.14.9 Abley have assessed the submissions against the provisions for large format retail in the Selwyn District Plan and Christchurch City Proposed Replacement District Plan and concluded that the proposed rates are consistent with demand for customer cycle parking. A further assessment of the proposed rates against a notional 5000m² retail development identified a requirement to provide six visitor parks (eg three, two-cycle stands) and four to six staff parks based on 20-30 FTE staff. This compares with 5 visitor and 7 staff parks and ten cycle parks for the Christchurch and Selwyn Plans (respectively).

5.14.10 The submission to amend the assessment rate from FTE staff numbers to floor area is generally supported by Abley, and I consider that this is consistent with the Plan structure. The equivalent rate for large format retail staff parking (to generate 5 spaces for 25 FTE staff) is one space per 1000m² GFA. This is consistent with the Christchurch Plan rate of 1 per 750m² GLFA, as GLFA would result in a smaller area being assessed.

5.14.11 In regard to the food and beverage category, a 250m² (net floor area) facility with five staff would require one short term and one long term parking space. The Christchurch Plan rate is one space per 100m² public floor area, plus one space per 200m² outside area, which, when applied, is consistent with the levels proposed. Abley have recommended that short term cycle parking be provided at the rate of one per 250m² net floor area and one per 100m² net floor area. In order to provide greater certainty, as requested, I recommend

that the long term cycle parking rate for large format retail and food and beverage be amended to read:

Large format retail

1 park up to 500m² gross floor area plus 1 per 1000m² gross floor area thereafter, and 1 ~~per~~ long term park per ~~5 full time equivalent employees~~ **1000m² gross floor area.**

Food and beverage

1 short term park per 250m² net floor area plus 1 long term park per 5 ~~full time equivalent employee~~ **100m² net floor area.**

5.14.12 Based on the above Abley assessment, and in consideration that building supplies retailers sell a range of materials including smaller items, I do not recommend any other amendments to Table 30.8 or any amendment to Rule 30.6.1.28 in relation to submission points 89.09 and 92.3.

5.14.13 Submission points 85.22 (Foodstuffs South Island), 89.08 (McAlpines Ltd incorporating McAlpines Rangiora), 91.21 (Ravenswood Developments Ltd) and 92.02 (The Warehouse Ltd), relate to proposed Rule 30.6.1.36 and seek amendments to the text of the rule, to clarify the format of the rule, to ensure it is clear that one stand may provide parking for more than one bicycle, to replace the entire rule with a diagram for greater certainty. Reasons for the submissions include rule clarity and certainty, that the proposed rules are excessive and do not relate to large format retail.

5.14.14 Abley have reviewed the proposal in view of the submissions and (formatting issues aside) consider the rules allow sufficient certainty for cycle parking supply while providing flexibility for different development and site constraints.

5.14.15 I agree with the Abley view that flexibility is provided for innovative design whilst providing usable and safe cycle parking. I do not agree with the submitted amendment as 'adequately' is open to interpretation and support for the frame (rather than the wheel) is a better option for locking bicycles securely and avoiding damage to the wheel.

5.14.16 Requested changes to part (b), introduce the word 'weighted' as an alternative to 'anchored'. In my opinion this is not certain and may lead to the provision of unstable stands and not provide for safe securing of cycles. For these reasons, I consider that the proposed Rule should be retained without amendment.

5.14.17 It is requested that the word 'storage' be deleted from part (k). The deletion may provide greater flexibility for long term storage, and I support this amendment and the requested minor amendment to (k) to allow for more than one bicycle. I recommend (k) be amended to read:

'for long term parking, to provide bicycle parking space within a secure, covered facility.'

5.15 Loading

5.15.1 Submission points 85.20 (Foodstuffs South Island) 91.11, 91.15 and 91.17 (Ravenswood Developments Ltd) request that NZTA truck tracking curves be provided in the Plan rather than referenced, that proposed Rule 30.6.1.31 recognise that forward exit from a site will not always be able to be achieved due to site and road constraints, and that the words '*... (or) where the site gains access by a right of way or shared accessway*' be deleted from the policy. It is submitted that the rule is excessive and beyond the scope of Policy 11.1.2.7, which does not refer to right of ways or shared accessways.

5.15.2 Policy 11.1.2.7 is discussed in 5.5.33 above, and amendment of the policy is recommended to recognise that access may not always be possible. In regard to sites identified in Rule 30.6.1.31, I consider that if forward entry and exit is not achievable due to the combination of site frontage, service lane width, and/or the type of service vehicle required for the activity, it would be appropriate that this is assessed through resource consent under Rule 30.8.1 to establish the significance of any adverse effects, especially safety effects, and any possible mitigation. I also consider that it would be difficult to identify appropriate mitigation measures within a rule that would be effective and certain. For these reasons, it is my view that the rule should be retained as proposed in response to submission point 85.20.

5.15.3 Proposed Rule 30.6.1.31 promotes the forward exit of vehicles where there is increased risk from reversing movements. Policy 11.1.2.7 also provides for safe vehicle movements and avoidance of reverse manoeuvring to and from higher order roads, and local roads where safety would otherwise be compromised. The rule relates to both the function of the access road, the number of vehicles exiting from a single point onto the road, and the number of users who may be present on a shared accessway, particularly young children. In my view, the rule is related to the safety aims of the policy and identifies shared access as a particular situation where risk is elevated due to the number of potential users.

5.15.4 In regard to proposed Rule 30.6.1.28(b), it is requested that the word 'largest' be replaced with the word 'average'. My comments on Policy 11.1.2.7 are reiterated in regard to this request and I recommend that the rule be retained without amendment.

5.15.5 Clause 30(1) of Schedule 1 of the Resource Management Act 1991 (RMA) sets out the documents that may be incorporated by reference into the Plan including standards and the recommended practices of national organisations. The inclusion of the references are therefore appropriate, however the insertion of specific diagrams for truck tracking could be useful for plan users, and I recommend that these be included for each of the four vehicle classes referred to in Table 30.10 and that 'manoeuvring space' references in that Table be amended as follows:

Table 30.10: Loading Space Dimensions

Vehicles to be accommodated	Length of Loading Space	Width of Loading Space	Manoeuvring Space
Small Rigid Truck	6.5m	3.5m	Refer to tracking curve for small rigid truck *Figure 30.8
Medium Rigid Truck	9m	3.5m	Refer to tracking curve for medium rigid truck * Figure 30.9
Large Rigid Truck	12m	3.5m	Refer to tracking curve for large rigid truck *

			Figure 30.10
SemiTrailer (Articulated Truck)	19m	3.5m	Refer to tracking curve for Semi Trailer* Figure 30.11

~~*Refer to New Zealand Transport Agency (2007): On-Road Tracking Curves~~

5.16 Design and landscaping requirements

5.16.1 Submission points 89.8, 89.9, (McAlpines Ltd incorporating McAlpines Rangiora), 91.19 and 91.20 (Ravenswood Developments Ltd) request amendments to Rule 30.6.1.35 and submit that the rule is excessive, should allow for pairs of parks in regard to tree planting. A reduction in landscaping requirements, especially within the car parking area itself is requested, with any landscaping concentrating on site frontages or internal boundaries where there is a public interface.

5.16.2 The requirement for one tree per five parking spaces is an existing one within the Plan, however the current Plan rule provides little guidance or certainty for the placement or type of trees and the long term outcome in regards to survival or landscaping. The landscaping requirements are intended to provide practical guidance on the outcomes that are sought from tree planting within parking facilities. 'Immediately adjacent to' allows some flexibility for planting in a landscaping strip outside of the formed park, but where landscape benefits would still be achieved.

5.16.3 The submission points request that planting should be required around boundaries where there is a public interface and not within the car parking area itself. The proposed plan incorporates a rule for over 5 car parks where trees must be provided, and a rule for larger car parks where a range of design matters, including landscaping, are considered.

5.16.4 In regard to Rule 30.6.1.35, trees provide a means of softening the appearance of hard surface areas as well as providing shade in summer. For larger parking areas, where the visual effects from hard surfacing are likely to be greater, there are benefits in providing visual relief and shading for cars in summer, through the provision of trees within the parking area itself. This is

common practice, as shown by the new Pak 'n' Save development in Rangiora. For these reasons, I do not consider any amendment to Rule 30.6.1.35 is required in regard to tree location.

5.16.5 I do not consider that the rules are excessive as they are relevant, practical considerations to ensure that trees survive, do not cause nuisance, and achieve landscape benefits. I agree that tree planting for parking spaces arranged in 'facing pairs' could achieve a similar landscape and other amenity outcomes (such as shading) providing the provisions are otherwise met. For this reason, I recommend that the first paragraph of Rule 30.6.1.35 be amended to read as follows:

30.6.1.35 Where more than five car parking spaces are required on a site under Rules 30.6.1.28 to 30.6.1.33, a minimum of one tree shall be planted and maintained per 5 parking spaces, **or per 5 facing pairs of parking spaces**, within, or immediately adjacent to, the parking area. Trees shall: ...'

5.17 Business 1 Zones – On-site parking and parking location

5.17.1 Submission points 83.1 (Blackwell), 85.01, 85.02, 85.11, 85.23,(Foodstuffs South Island), 89.1 (McAlpines Ltd incorporating McAlpines Rangiora), 90.2, 90.3, 90.4, 90.10, and 90.11 and (Progressive Enterprises Ltd), 91.07 (Ravenswood Development Ltd) relate to restrictions on, and the location of, on-site parking within the Business 1 Zone.

5.18 On-site parking

5.18.1 The Blackwell submission seeks discussion of parking issues with the local business community and Kaiapoi Community Board, the provision of well-designed central car parking in Kaiapoi, the purchase of Red Zoned land for parking, and parking near the new Kaiapoi service centre.

5.18.2 I note that Community Boards and Kaiapoi Promotions Association were consulted as part of the plan change preparation. In regards to centralised parking, the proposed management of central parking including restriction of individual on-site parking and financial contributions to support the provision

of public car parks, together with rules for car park design, should enable the outcome sought. Other matters in the submission are outside of the scope of this plan review but may be implemented through other Council actions such as the development of a strategy for the development of public parking, and town centre development. No amendments are recommended as a result of this submission.

5.18.3 In regard to submission point 89.01 and the request that the redevelopment and growth of centres through centralised parking is not applicable to Business 2 Zones, I note that the principal shopping streets to which Rule 30.6.2.8 applies are located within the Business 1 Zones of Kaiapoi and Rangiora and will not apply to Business 2 Zones.

5.18.4 Submissions also seek deletion or amendment of proposed provisions to avoid on-site parking adjacent to principal shopping streets because they do not meet the needs of supermarkets, provide flexibility and could lead to under supply of parking in relation to demand. It is sought that Policy 11.1.2.5 be deleted or that on-site parking should be 'minimised' instead of 'avoided', and within Rule 30.6.2.8 that on-site parking be 'minimised' rather than eliminated. It is also requested that Rule 30.9.3 which requires non-compliance with the above rules to be assessed as a non-complying activity, be revised to discretionary activity status to recognise that in some circumstances, parking on-site may be appropriate.

5.18.5 Abley consultants have reviewed the submissions and recommend that alternative parking arrangements are appropriate in the Business 1 Zones and that financial contribution in lieu of on-site parking would be effective. The Rangiora Town Centre Parking Strategy, 2011⁴, also supports the provision of centralised parking, limitation of on-site parking on individual sites and use of financial contributions to support parking provision.

5.18.6 The proposed provisions intend to manage parking supply in relation to expected demand, and to support a consolidated growth of town centres in a way that encourage foot traffic along retail frontages. The policies and rules

⁴ Section 3.5 'Key Theme 2, Improving Access', Rangiora Town Centre Parking Strategy, 2011

encourage building development in preference to parking on individual sites enabling more intensive development in the centre of towns.

5.18.7 In my view, the District Plan rule provides clear guidance to the expected outcomes for parking and the anticipated form of Kaiapoi and Rangiora town centres as they develop. Centralised parking areas will be able to provide for parking demand in a clearly identifiable way, and support traffic safety by reducing the number of vehicle crossings over footpaths for individual on-site parking, encourage multi-destination shopping, and meet other amenity outcomes (through attention to design).

5.18.8 I consider that the use of 'minimised' within the policy and rule could undermine the intention of the provisions. As minimum parking requirements are identified in Table 30.8, it could be argued that the level identified in that table would constitute minimal parking that was suitable to be provided on a site. As both Kaiapoi and Rangiora expect continued growth, I consider that it is reasonable to set out clear guidance and methods to provide for public parking that supports consolidated town centres.

5.18.9 It is my view that the provisions implement the Canterbury Regional Policy Statement's requirement for territorial authorities to ensure consolidated, well-designed and more sustainable urban patterns (Policy 5.3.1 – Regional growth (Wider Region)), and the safe, efficient use of transport infrastructure where demand for transport is reduced where appropriate (Policy 5.3.5 – Land use and transport integration (Wider Region)).

5.18.10 I further note that the area identified as 'Principal Shopping Streets' are aligned with rules that control the design and position of buildings that are consistent with the proposed restrictions for on-site parking. Given the type of building form anticipated, I consider it less likely that a new supermarket may wish to establish on a site with an identified frontage, but should that be the case, a consent assessment for a non-complying activity would be appropriate to determine the both transport effects, and effects on the form, function and amenity of the town centre. For these reasons I recommend that the provisions are retained without amendment.

5.19 Parking location

- 5.19.1 Outside of the identified frontage area, the District Plan controls the location of parking in relation to buildings in the Key Activity Centre areas to require the location of parking to the rear and side of development. The proposed amendment to Rule 31.21.1.2(a) further clarifies the anticipated location and is supported by new Policy 11.1.2.6.
- 5.19.2 Submission points 90.2, 90.3, 90.4, 90.11, 91.07 and 85.02 request deletion or amendment to Policies 11.1.2.6, 16.1.1.3, Chapter 16 Environmental Results Expected, and Rule 31.20.1.2 (a) as they are not considered to relate to the operational needs of supermarkets or commercial parking provision, could compromise pedestrian and customer safety and accessibility, and may discourage development.
- 5.19.3 Proposed Policy 11.1.2.6 (i) provides for parking to the rear of buildings in the Business 1 Zone together with other policies that support safe pedestrian access, amenity and efficient, effective design and layout. Chapter 16 Expected Environmental Results currently include the expectation that car parking in Business 1 Zones should be to the rear or side of a building or buildings, and Policy 16.1.1.3 sets out the characteristics for the Zone, which include 'limited off-street parking'.
- 5.19.4 Plan change consultation identified the positioning of parking between footpaths and retail entrances as an accessibility issue, especially for those with impaired mobility. I consider that the existing policies and rules give relief to this issue. The proposed amendment to Rule 31.21.1.2 seeks to clarify the Rule and does not introduce a new requirement. Pedestrian and customer safety and accessibility are also managed through other policies and rules that would allow consideration of any adverse effects. I consider that the proposed amendment is consistent with policy for pedestrian connectivity and is appropriate for supermarkets which often have large car parking areas with high numbers of users and frequent vehicle movements. Should any new supermarket (or similar activity) wish to establish in a Business 1 Zone, in my view, it would be appropriate for the effects of that development, including those relating to transport and town centre amenity, to be assessed. For these reasons I do not recommend deletion of, or

amendment to, the proposed provisions for parking location in the Business 1 Zone.

5.20 Assessment of larger parking areas

5.20.1 Submission points 85.24 (Foodstuffs South Island), 89.7 (McAlpines Ltd incorporating McAlpines Rangiora), 91.22 (Ravenswood Developments Ltd), and 92.01 (The Warehouse Ltd) relate to proposed Rule 30.8.2 which establishes the requirement for a discretionary activity (restricted) activity assessment for any development or redevelopment of more than 20 car parking spaces (excluding Rural Zones, temporary car parks and sites on principal shopping streets).

5.20.2 The submissions seek deletion of the rule, exclusion of Business 2 Zones, clarification of the rule and assessment matters in regard to 'location and design' and 'public transport' justification for the threshold, and the effect on minor extensions to parking areas where the threshold would be triggered.

5.20.3 As discussed in 5.5.8 above, Business 2 Zones include examples of larger parking areas for employees, customers and visitors where safe, effective and pedestrian-friendly parking facilities are desirable. It is my view that consideration of design for larger parking areas is appropriate in this zone to ensure the desired outcomes are achieved.

5.20.4 Abley have reviewed the justification for the rule and threshold, the assessment matters and the management of new and existing parking area development and consider the management of design and on-site effects of larger parking areas is justified for efficient operation for all users, and note that the rule is similar those within the Selwyn District Plan.

5.20.5 Rule 30.8.2 was also compared with the existing high traffic generator rule (not reviewed) in the Plan which requires consent for more than 250 vehicle movements and it appeared that resource consent would often be required for activities of more than 20 car parking spaces due to high traffic generation. Abley considered Rule 30.8.2 is required in addition to the high traffic generation rule due as it provides for assessment of on-site effects.

5.20.6 In regard to the operation of the rule for new or existing development, I agree with the Foodstuffs submission that the addition of a small number of parking spaces to an existing facility should not necessarily trigger the rule. Abley also recommend that minor extensions to parking areas be exempt from the rule and suggest some alternative means to avoid the undue generation of resource consents.

5.20.7 In regard to the submissions and the options recommended by Abley, I consider that the threshold of 20 spaces and above is a reasonable size to require assessment of parking area design against policies for which discretion is reserved. The matters of discretion indicate the areas where there is scope to consider effects from the parking area. I consider that they are not so broad as to be indistinguishable from a discretionary activity in practice, however there is some overlap and amendment is possible without unduly limiting consideration of relevant effects.

5.20.8 Within Rule 30.8.2, 'Location and design' would encompass the overall parking facility and consideration of its surroundings. 'Public transport' considerations would depend on the specific activity and could include a park and ride facility primarily provided to support use of public transportation, the location of a bus stop within a larger parking area, or a parking proposal with potential to adversely affect public transport operations – for instance, by the location of an access point near a bus stop. 'Accessibility' may overlap with public transport, but also signals that the design should consider a range of potential users and their access needs. Inclusion of 'land availability and suitability for parking' allows consideration of site constraints or opportunities that may influence the design of a parking facility, or its location.

5.20.9 It is my view that it would be reasonable to limit the scope of the rule to exclude minor redevelopment through the introduction of an exemption for less than ten new parks to distinguish 'minor' rather than 'significant' redevelopment. I also consider that other options for identifying when a redevelopment becomes significant could be difficult, as there are many variables that could be involved such as surface, pedestrian access, access way location, circulation patterns. For these reasons, I recommend amendment of Rule 30.8.2 to read as follows:

Rule 30.8.2

The provision of 20 or more new car parking spaces on any site other than within the Rural Zone, excluding:

- a. sites subject to Rules 30.6.2.8, 30.6.2.9 and 30.6.2.10, or*
- b. any extension to an existing car parking facility where no more than nine parking spaces are added within any five year period*

is a discretionary activity (restricted).

In considering any application for resource consent under 30.8.2, the Council shall, in deciding whether to grant consent, and in deciding whether to impose conditions, restrict the exercise of its discretion to the following matters:

- i. location and design including;*
 - a. layout, visibility and surface treatment for vehicle access, parking, loading, turning and circulation;*
 - b. amenity and landscaping including matters specified in 30.6.1.34;*
 - c. pedestrian accessibility, cycle access and cycle parking;*
 - d. land availability and suitability for parking;*
 - e. public safety and security including Crime Prevention through Environmental Design principles;*
- ii expected parking demand, parking supply in relation to demand (including any effects from over-supply), vehicle trip generation and proposed parking availability;*
- iii traffic and parking environment around the site including any positive or adverse effects on the provision and use of public transport ;*
- iv. utility services including stormwater management and water quality; and*
- v. effects on the function, amenity and character of town centre activities.*

6. RECOMMENDATION

- 6.1 It is recommended that PC40 is approved with the amendments related to the submissions attached as Appendix I.
- 6.2 Section 32AA, in the context of Clause 10(2)(ab) of the Act, requires that the decision maker confirm that any changes to the proposal that are to be evaluated after the original section 32 report was prepared are evaluated under the provisions of Section 32(1) to (4), including confirming that any amended objectives meet the purpose of the Act and that the policies, rules

and other methods are efficient and effective in achieving the objectives. It is my view that the changes detailed above, and in Appendix II to this report, will be appropriate to give effect to the Act and the objectives of the proposal where appropriate.