

practitioners Southside Health would have required 12 parking spaces under the Residential plan standard in the Hastings District Plan.

The Kapiti Coast District Plan sets a slightly higher standard, with four spaces required per doctor plus one per two staff which would have meant that Southside Health's proposed level of activity would have required fourteen parking spaces. The Nelson District Plan would have required Southside Health to have 10 parking spaces, as this Plan has a requirement of two spaces per practitioner and one space per assistant for health facilities (excluding hospitals), and veterinary clinics.

The recently amended Selwyn District Plan saw the following changes made to the parking requirements for health care facilities:

3 spaces per professional staff member employed onsite at any one time.

In the context of the Selwyn District Plan, it would appear that both the medical practitioners and the nurses employed by Southside Health would be classified as "professionals" as opposed to the term "practitioners" used in some other plans, and this would have meant that 15 car parking spaces were needed.

While the number of car parking spaces required may vary across District Plans, the key issue with respect to the concerns expressed by the traffic consultants and the planning officer is the location of Southside Health at the end of an accessway. This was considered to pose a risk those attending the Centre could face if, because of the absence of on-site parking, they had to walk in from Newnham Street. This suggests that the issues relating to the provision of parking for the Southside Health medical centre were essentially site-specific, and related to the availability of off-site parking opportunities. Such a problem would not necessarily be expected to arise for a similar centre based in a Business 1 Zone or even a Residential Zone in the Waimakariri District where the street environment is more conducive to kerbside parking.

5.6 McAlpines Mitre 10, Southbrook: the retail/garden centre complex at Southbrook was consented in 2006 as a discretionary activity. The initial consent RC065233 issued in July 2006 gave the respective sizes of the retail and garden sections of the business as 2912m² and 3286m². A second consent issued in December gave the size of the retail area was given as 4172m² and the garden centre 2014m² and specified the parking requirements as "not less than 68 staff carparks and 203 visitor car parks". (RC065628 no. 061208110747) The December decision letter gives no indication of the reason for the number of visitor car parks required.

In 2008 the Council gave consent for the addition of a small café to be located adjacent to the main building, and accessed from the garden centre. In considering this application the reporting officer noted: "The café is to be located next to the current north east corner of the store and is targeted primarily at those shopping within the store, although it is acknowledged a small proportion of people may travel to the site specifically to go to the café. The site has an abundance of parking constructed when the retail store was rebuilt. On-site parking will be adequately provided for given the relatively small size of the café and the likely significant double up of people visiting the store and café. This consent also reinstated the original areas of 2912m² for retail and 3286m² for the garden centre. (RC085280 no.080702020352)

Observations confirm the view of the reporting officer in 2008, as the McAlpines Mitre 10 car park at Southbrook is rarely more than 20 – 25 percent occupied. The following photographs taken at approximately 3.30pm on 30 July 2013 illustrate this.



McAlpines Mitre 10 car park showing a limited number of vehicles parked close to the building



A view of the centre of the McAlpines Mitre 10 car park showing a substantial unoccupied area

Irrespective of the respective sizes of the retail and garden centre areas, if both are regarded as retail for the purposes of calculating the number of visitor car parks, the number required by the Plan standard would have been 137 or 138, not 203.

When compared with the requirements for car parking for retail activity, the Waimakariri District Plan would appear to be reasonable. For example, the Hastings and Kapiti District Plans require one space per 33m² for retail shops. The Tauranga District Plan has a similar standard of three spaces per 100m² gross leasable floor area (GLFA) for low-density bulk retailing, although this plan has a lower requirement of two spaces per 100m² GLFA. The Nelson District Plan requires four spaces per 100m² for retail activities, plus one space per 100m² for outdoor display areas. This Plan has a further category of *“large format retail/bulk retail”* which requires 3.5 spaces per 100m² gross floor area, plus 1 space per 100m² for outdoor display area. The recently revised Selwyn District Plan has a lower requirement of 2.5 spaces per 100m² gross floor area

and/or outdoor display area, but this represents one car parking space per 40m² and is still higher than the current requirement in the Waimakariri District Plan.

This comparative analysis suggests that the apparent over supply of parking spaces at McAlpines Mitre 10 in Southbrook is attributable to the fact that a higher number of parking spaces were specified in the December 2006 consent decision than required by the Plan, although the reason for this is not apparent.

- 5.7 Countdown Supermarket, Ivory Street:** This supermarket decision states that car parking is to be developed in accordance with plans and specifications. The size of the building was given as 3550m² plus a further 250m² of office space on a mezzanine floor. Currently this car park is rarely more than 25 – 35 percent occupied, but the pattern may change with the increasing number of dwellings in and around Rangiora.

The Waimakariri District Plan does not provide for a ratio of car parking spaces to gross floor area for supermarket that differs from its general requirement for retail, while some other District Plans require a higher number of car parking spaces for supermarkets. For example, the Tauranga District Plan requires 4.5 spaces per 100m² GLFA for visitors and a further 1 space per 100m² for staff. The Kapiti District Plan has an alternative requirement of five spaces per 100m² but no separate requirement for staff parking, as does the Nelson District Plan. The Selwyn District Plan relies on its general requirement for retailing and therefore adopts a similar approach to the Waimakariri District Plan but sets a higher threshold.

- 5.8 Kaiapoi Bowling Club, Hinemoa Park:** this consent application involved the relocation of the bowling club to Hinemoa Park, in a Residential 2 Zone in south Kaiapoi, which encountered significant opposition from people living in the neighbourhood. The extent of provision for on-site carparking was one of the more significant issues considered in the Commissioner's decision.

The proposal was for a 412m² clubroom/pavilion which would be available for use by others for a limited number of functions annually as well as members of the bowling club, in conjunction with their use of the two greens. Approximately 49 percent or 200m² of the clubroom was identified as being used for "retail" activity. The District Plan requirement for parking spaces based meant that the complex would have to provide 46 carparking spaces, but the consent application proposed only 36 spaces.

Estimates were provided by transportation experts of the numbers of traffic movements likely to be involved with different levels of activity at the location. A typical maximum daily use was seen as 125 people, up to 75 players and 50 spectators, and it was estimated at an occupancy rate of 2.4 people per vehicle this would generate 103 traffic movement. If the two bowling greens were being fully utilized 128 people would be involved and this was estimated to generate 107 traffic movements per day at 2.4 people per vehicle. For community use the clubrooms were to have the capacity to accommodate up to 180 people, and with an occupancy rate of 3.3 people per vehicle these functions would attract 110 vehicle movements. If the lower occupancy rate of 2.4 people per vehicle was assumed a function involving 180 people would generate 150 traffic movements. When reviewing the estimated traffic movements it is important to recognise that an arrival is one traffic movement and a departure is a second traffic movement so that an estimated 110 traffic movements would involve 55 vehicles arriving and possibly seeking parking space either on-site or off-site in the vicinity of the new bowling green.

In addressing the issue of the discrepancy between the number of parking spaces required by the District Plan of 46 and the proposal to provide 36 spaces the Commissioner stated:

"In considering this matter both Traffic Engineers correctly noted that the District Plan did not provide a parking standard directly applicable to the use of the site. As a consequence, it is arguable that the Plan standard is unhelpful and therefore it is appropriate to consider other means of establishing an appropriate supply. I note that Policy 11.1.1.7 of the Plan requires that sites 'shall provide on-site parking...' and, where off site facilities are used, this should not 'compromise pedestrian and vehicle safety, or the safe and efficient operation of the road network.' The accompanying explanation to the policy notes that hazards created by traffic movement and traffic generation 'can be reduced if each site provides adequate space on site, so that parking...can be contained within the boundaries of the site'. The implication of this is that, at a policy level, the Plan anticipates all parking is provided on site. If this is the intention, it is unusual to say the least. The general approach of most district plans is to establish parking standards that will cater for most parking demand, but there will be some on street overflow. Given the very generic approach to the Waimakariri District Plan parking standards, it is difficult in my view to accept a strict interpretation requiring that all parking occur on site. As a consequence, I am comfortable with the premise that some on street car parking can occur. The issue is, to what extent and the effects that arise from this." (RC125041 no.120731048491)

The Traffic Engineers also provided estimates of the extent of car parking off-site when 180 people were attending a function at the clubrooms as between 19 and 39, and given the relatively infrequency of such events, given as 12 per year, this was considered an acceptable situation.

It is significant that the situation faced when determining the appropriate level of provision for on-site parking in the Kaiapoi Bowling Club application prompted the the Commissioner to not only noted the relatively generic rules controlling the provision of on-site parking in the Waimakariri District Plan, but also highlighted the issue of the intent of the Policy as set out in the Explanation to Policy 11.1.1.7. Although the Policy provides an indication of the standard from the perspective of safety and efficiency that should apply in cases where not all parking is provided on-site, the Explanation appears to rule out any likelihood of there being a need for off-site/kerbside parking, even if the circumstances in terms of protection for pedestrian safety and width of carriageway meant that there were no risks involved.

Redrafting of Policy 11.1.1.7 in the direction suggested by the Commissioner would assist in providing a more flexible approach to the management of parking. Consideration might also be given to providing a different level of requirement for Business 2 Zones and Rural Zones where it could be anticipated that a higher proportion of traffic movements and parking would frequently involve heavy commercial vehicles, and where parking and loading on roadsides in many instances could be expected to carry significant risks to other road users. In this context, and given the rural example cited in the Explanation, it might be reasonable to conclude that this was the kind of activity those drafting this provision had in mind. Alternatively, this Policy and its Explanation could be brought into alignment with Rule 30.6.1.29 which states: *"Sufficient loading and manoeuvring space shall be provided on-site to ensure that no vehicle is required to reverse either onto or off a site where access is to a strategic or arterial road"* by strengthening to requirement to meet the requirements for on-site parking, loading and manoeuvring space on sites where access is from roads at the top of the hierarchy.

6 Landscaping requirements

- 6.1 Rule 30.6.1.28:** *“In Business 1 Zones, where more than five parking spaces are required on site under Rules 30.6.1.22 to 30.6.1.24, within the area where the parking spaces are provided, or with the immediate vicinity, there shall be a minimum of one tree provided on the site, per five parking spaces.”* While Plan Changes 34 and 35 have provided greater direction with respect to landscaping for car parks provided in the Kaiapoi and Rangiora Business 1 Zones outside of the areas where parking behind buildings is to be provided, this rule remains in force across all Business 1 Zones.
- 6.2** In redrafting provisions for the landscaping of carparking areas this Rule will have to be changed. In the first instance, consideration will need to be given as to the style of landscaping, if any, that would be required in the Kaiapoi and Rangiora Business 1 Zones where parking is required to be provided to the rear of buildings. Attention will also need to be paid to the style of landscaping appropriate for the other Business 1 Zones in the District, i.e. Oxford, Woodend, and Ravenswood.
- 6.3** The absence of any landscaping requirements for developments outside of Business 1 Zones could be seen as a significant omission. This does not mean that no attention has been paid to landscaping in some form in recent developments such as the Ivory Street Countdown Supermarket, but it is reliant on either the aspirations of the developer or on the imposition of consent conditions to mitigate adverse effects associated with the development. The importance of landscaping was highlighted in evidence to the Ivory Street Countdown Supermarket hearing by landscape architect Andrew Craig who drew attention to the fact that the proposed building would only cover about half of the site, and that the landscaping of the car parking area would make a major contribution to mitigating the adverse effect on the amenity values of the Residential 1 Zone concerned.



The Ivory Street Countdown Supermarket showing the landscaping along the Ivory Street boundary of the site

- 6.4** The fate of the mature Wellingtonia (*Sequoiadendron Giganteum*) on the site also received significant attention in the Commissioner's report, with detailed directions being given as to how the tree was to be protected during construction. While there may still be concern about whether it survives, because this species has very sensitive

root systems, the fact that it was not a protected tree in the District Plan is of more concern. This means that if the development had been a permitted activity and the developer had chosen to remove it that would have been the end of the matter.



The landscaping around the Wellingtonia (*Sequoiadendron Giganteum*) on the site of the Ivory Street Countdown Supermarket

- 6.5** While there is only limited District Plan protection of existing mature trees in the District, this is not an issue for consideration in relation to the provision of landscaping in parking areas. Some consideration could, nevertheless, be given to the type of plant material considered appropriate. For example, Rule 30.6.1.28 requires the planting of trees in Business 1 Zones other than in Kaiapoi and Rangiora, but does not specify what specie of species are considered appropriate, and leaves open the issue of whether other types of plant material such as indigenous or other shrubs tussocks or flaxes may be more appropriate. It also raises the issue of whether it is appropriate to have small relatively isolated plots or more continuous amenity plantings to screen car parking areas.



The landscaped areas in the Blackett/Ashley Streets car park has used ground cover, carax and two indigenous trees in each of its planted plots.

The large Business 2 Zone McAlpines Mitre 10 car park features limited landscaping, using flaxes and low growing shrubs beside the exit roadway



Although limited in area, this landscaping is healthy and assists in defining the exit route

7 Conclusion

7.1 Attention should be paid to the following:

- Amending Policy 11.1.1.7 to remove the requirement for all parking requirements to be met on-site, with consideration to be given to setting a different plan standard for Business 2 and Rural Zones from those required for Business 1 and Residential Zones. The separate plan provisions for Business 6 (Pegasus) have not been reviewed and it is assumed that they will be retained.
- Amending Rule 30.6.1.28 to align it with the landscaping requirements introduced in Plan Changes 34 and 35, for the Kaiapoi and Rangiora Business 1 Zones. This will require consideration to be given to what landscaping, if any, will be required for cases where building owners provide parking behind their buildings, as well as urban design/landscaping provisions appropriate for the Woodend, Ravenswood and Oxford Business 1 Zones.
- Introduce more comprehensive landscaping requirements for large car parking areas irrespective of the Zone in which these are located.

7.2 Review the on-site parking space requirements (Table 30.8):

Concern has been expressed about the generic nature of the provisions in Table 30.8, and this approach differs significantly from the approaches being adopted in other District Plans. From the limited number of comparisons between plans provided in this assessment of the District Plan effectiveness with respect to parking, it is noteworthy that in some instances at least there is very little difference in the number of parking spaces required even the formulae for reaching these conclusions differ.

The following table provides some general observations of the District Plan provisions in Table 30.8 and how these relate to those in other Plans canvassed.

Activity	Parking Spaces to be provided	Comments
Dwellinghouse	2 spaces per dwellinghouse except in Residential 6A and Business 1 Zones at Pegasus where 1 space per dwellinghouse shall be provided.	<p>Provide parking requirements for comprehensive developments</p> <p>Selwyn provides an exception for units forming part of a comprehensive residential development.</p> <p>Council's Rivertown Villas research project identified a lack of space for visitor parking as a difficulty being encountered by residents.</p> <p>Kapiti requires 1.5 per dwelling unit (including garages or carports) for multi-UNITED residential developments.</p>
Accommodation involving the payment of a tariff	1 space per 5 beds provided	<p>This could be taken to include hotels, hostels, motels and private hospital and resthome accommodation, although bar and dining areas would be assessed separately for premise including these activities.</p> <p>Kapiti requires for:</p> <p>Motels 1 per unit plus 1 per 2 staff</p> <p>Hotels 1 per guest room plus 1 for every 2 staff and 1 per 4m² bar space</p> <p>Hostels 1 per bedroom plus 1 per 2 staff</p> <p>Hospitals 7 per 10 beds</p> <p>Selwyn requires for:</p> <p>visitor accommodation the greater of 1 space per unit or 1 space per five beds</p> <p>Carehomes 1 space per 3 clients</p>
Facilities designed to cater for more than 10 people at any one time (except for retail activity, accommodation involving the payment of a tariff or education facilities)	1 space per 10 persons catered for, or 1 space per 10m ² net floor area, whichever is greater	<p>Plans adopt a range of terms relating to floor space: gross floor area, gross leasable floor area, gross public floor area, and net floor area. Selwyn uses gross floor area and public floor area. Gross leasable floor area is seen as being more appropriate for multi-story complexes as it removes stairwells and similar from the calculations.</p> <p>The WD Plan's definition of net floor area also has a number of exclusion including stairwells and lift shafts.</p> <p>Viastrada for Artisan used this calculation to produce an extreme number of car parks, but could be seen to have applied the requirement inappropriately. This formula also appears to have contributed to the Plan requirement for 46 parking spaces for the Kaiapoi Bowling Club, although the decision report did not specify how this conclusion had been reached.</p> <p>Selwyn provides a formula for Places of Assembly and/or Recreation activity which is similar: 10 spaces per 100m² public area or 1 space per 10 seats, whichever is the greater.</p> <p>This plan has separate provisions for Food and Beverage and for its towns the requirement is 3.5 spaces per 100m² PFA for the first 150m² then 15 spaces per 100m² thereafter. Also the greater of 1 space or 15% of the total spaces required for the activity shall be marked on-site to provide minimum level of staff parking.</p>
Education facilities	1 space per 20 students over 16 years on site at any one time	<p>This provision would appear inadequate, as it does not provide for parking for pre-schools or children's daycare centres, and focuses only on older students.</p> <p>It is silent on the requirements for pre-school and children's daycare centres.</p>

		<p>Selwyn requires for education (excluding pre-schools) 1 space per full time equivalent staff member, plus 1 space per 8 students over 15 years of age, and visitor/set down parking at: Primary schools 1 space per 6 students, all other education facilities: 1 space per 20 students under 15 years of age. It should be noted that this provision will cover Lincoln University, but not research facilities which have a separate requirement of 1 space per 1.5 full time equivalent staff. Consultation with the Ministry of Education suggests that the Selwyn provision for Preschools of 0.26 spaces per child, (including drop-off and staff parking) is supported.</p> <p>Nelson requires 1 space per staff member plus 1 space per 12 students for pre-schools and primary schools.</p> <p>Consideration could be given to requiring staff parking spaces for primary and secondary schools, separate from a more general requirement for “all activities employing staff”.</p> <p>The WD Plan would appear to be towards the liberal end of the spectrum with a lower general requirement for retail parking requirements with 1 per 45m² of net floor area. Other plans checked used gross floor area, which means that the areas listed in the WD Plan definition for “net floor area” are included in the calculations.</p> <p>The Selwyn Plan distinguish between general retail and “slow trade” or “bulk goods retail”, and in each Plan the parking required for the slow/bulk retailing is greater than the general requirement for in the WD Plan.</p> <p>Selwyn requires 5 spaces per 100m² for general retail (1 per 20m²), and 2.5 spaces per 100m² for slow/bulk retail (1 per 40m²).</p> <p>In the WD Plan restaurants/café are treated as “retail activities”. Other plans make separate provision for these – the Selwyn provisions are set out in the comments relating to the parking provisions required in the WD Plan for facilities catering for 10 or more people.</p> <p>Consideration could be given to addressing the issue of staff parking within Business 1 Zones as a separate matter.</p> <p>Given the possibility that businesses once established might increase their staff level over and above that initially anticipated consideration might be given to increasing this requirement for Business 2 Zones and Rural Zones – this could be a way of increasing the surveillance of activities employing staff in rural areas.</p> <p>The Nelson Plan requirement for 1 parking space per staff member for pre-schools and primary schools is noted in relation to education parking for educational institutions.</p> <p>Consideration could also be given to the assessment of offices on the basis of floor area rather than trying to anticipate at the outset the number of people likely to be employed. Tauranga and Selwyn require 2.5 spaces per 100m² GFA. Nelson requires 1 space/30m² GFA (or 3.3 spaces per 100m² GFA.) Hastings require 1 space per 50m² GFA for Administrative, commercial and professional office areas,</p>
Retail activities	1 per 45m ² net floor area of retail area, except in the Business 1 Zone at Pegasus where 1 space per 100m ² of net floor area shall be provided.	
All activities employing staff	1 space per 2 employees in attendance at any one time, with a minimum of 1 parking space	

Sporting grounds, playing fields and golf courses	10 spaces per ha used for the activity	<p>and this is also the default requirement for all commercial activities, commercial service activities, suburban commercial activities for which an alternative requirement is not specified, as well as emergency service facilities.</p> <p>Consideration could be given to some refinement of this provision. The major difference between the WD Plan provision and the other plans reviewed is that Sports Courts, Sports Fields, Swimming Pools, and Golf Courses have separate parking requirements. Nelson requires 1 space/50m² for court area + 1 space/200m² court area for staff parking; for sports fields 15 spaces/ha pitch area + 1 space for staff parking; golf course 4 spaces per 100m² GFA of clubrooms. Tauranga has a classification of "bars/licensed clubrooms" which requires 12 spaces/100m² GFA + 1 space/100m² staff parking. Given that most golf clubhouses double as function centres the calculation of parking requirements based on some measure of clubhouse capacity would seem reasonable. The issue that then arises is whether clubrooms for bowling clubs that have catering/bar facilities should be viewed similarly.</p>
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