# Proposed Plan Change PC40 Parking

Appendix II Full Recommendations on Submissions



# **HEARINGS REPORT BY AGENDA:** 40 **PARKING**

Ref Relief Sought	Recommendation and reasons	Amendment to plan	Blackwell
Blackwell, David			
83.1	Accept in Part		
Discuss parking with local business community and Kaiapoi Community Board including service centre parking effects.	Provision is made for well-designed public parking through restriction of on-site parking on identified town centre sites, provision of parking through financial contribution, and requirements for parking and loading design. Consultation with the Kaiapoi Community Board in regard to parking was undertaken prior to notification of PC40.		
Further subs:			
Community & Public Health			
84.1	Accept		
Support objective 11.1.2, Policy 11.1.2.3, Policy 11.1.2.4 and Rule 30.6.1.36.	No change is required to give effect to this submission point.		
Further subs:			
Foodstuffs South Island Limited			
85.01	Reject		

# Decline the plan change, subject to the relief

sought by submissions 85.2 to 85.27.

The proposed provisions are consistent with the assessed level of demand for supermarkets provided in NZTA Research Report 453 (Trips and parking related to landuse). The lower minimum rates required in Business 1 Zones recognise that alternative methods for managing parking are available, and the recommendation to remove the requirement for a maximum parking rate. Lower minimum rates and restrictions on on-site parking also support other town centre goals such as the achievement of consolidated, vibrant centres with wellconnected retail frontages and activity that is supported by centralised parking.

Amend provisions (including consequential amendments) to recognise functional requirements of supermarkets for car parking and loading.

### Accept in Part

Outside of town centres, maximum parking rates are not recommended, mainly due to limited availability of public transport and expected lower use of transport modes other than private vehicles. Within the Business 1 Zones, land use patterns and availability of other Plan controls reduce the risk of adverse effects from parking over supply, provided parking supply assessment is available for larger parking areas under Rule 30.8.2 or 30.8.1.

The proposed provisions are consistent with the level of demand for supermarkets provided in NZTA Research Report 453 (Trips and parking related to landuse). The lower minimum rates required in Business 1 Zones recognise that alternative methods for managing parking are available, and the recommendation to remove the requirement for a maximum parking rate. Lower minimum rates, and on-site parking restrictions also support other town centre goals such as the achievement of consolidated, vibrant centres with well-connected retail frontages supported by centralised parking.

Provisions for restricting on-site parking relate to identified road frontages in the Business 1 Zones of Kaiapoi and Rangiora, and do not apply to Business 2 Zones. The rules provide for financial contribution to support centralised car parking that is designed and located to encourage vibrant town centres, in lieu of individual on-site parking provision on principal shopping streets.

Further subs:

F90.18

Progressive Enterprises Ltd (PEL) 

Support

### 85.03

Any other relief as required, including consequential amendments.

### Accept in Part

No further relief is identified to address the matters raised in the submission.

Further subs:

F90.19

Progressive Enterprises Ltd (PEL) Support

### 85.04

Replace the term 'parking facilities' with 'parking spaces' in the definition of shared parking and clarify term 'on the same site'.

### Accept in Part

The definition of 'shared parking' requires clarification to be more specific that sharing of part of a parking facility is included. The term 'parking facility' is considered appropriate as shared parking could involve sharing other parts of the facility in addition to parking spaces, for example, paths, lighting and landscaping.

Further subs: F90.20

Progressive Enterprises Ltd (PEL) 

Support

Delete part (c) of Rule 30.6.1.30, and

Amend Rule 30.8.2 (x) to read as follows:

 expected parking demand (including any effects from over supply), parking supply in relation to demand, vehicle trip generation and proposed parking availability;

Amend definition of 'shared parking' to read as follows:

Shared Parking

Shared Parking means any parking facility, or part thereof, that is used by two or more activities, whether the activity or facility is located on the same site, or on separate sites.

Ref Relief Sought	Recomn	nendation and reasons		Amendment to plan	Foodstuffs
85.05	Reject				
Clarify or substitute the words 'parking facilities' in Objective 11.1.2 to remove any contradictions within the objective.	The Plan provisions for loading and accessibility include consideration of safety for loading spaces which is also consistent with the aims for pedestrian accessibility within parking facilities generally. No amendment is required.				
Further subs:	F90.21	Progressive Enterprises Ltd (PEL)	☐ Support		
85.06	Accept				
Review the initial wording of Policy 11.1.2.1 to		Rewording the policy to improve clarity and Plan consistency is supported.		Amend Policy 11.1.2.1 (a) and (b) Vehicle parking, loading and mand site, or within shared parking facilit a. safe and efficient access is pro- b. use of off-site parking facilities of pedestrian, cycle or public tran safety, and the safe, efficient of network; and	euvring provided on- ties, shall ensure that: vided; will not adversely affec sportation, public
Further subs:	F90.22	Progressive Enterprises Ltd (PEL)	☐ Support		
85.07	Reject				
Clarify Method 11.1.2.1.2 to set out that developer liaison is a Council responsibility and review reference to motor cycle parking.		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. Method 11.1.2.1.4 refers to motorcycle parking in relation to a parking strategy for the location and design of a range of parking facilities, including motorcycle parking. Motorcycle mode share is low (1% in 2013 census), trends do not indicate this will increase, and motorcycles can legally use car parking spaces. There is no direction within the Canterbury Regional Policy Statement to increase the use of motorcycles, and therefore no further provision for parking are considered necessary, other than the method proposed.			
Further subs:	F90.23	Progressive Enterprises Ltd (PEL)	☐ Support		
85.08	Reject				
Replace the word 'enabling' with 'encouraging' or 'facilitating' within Policy 11.1.2.2.	Wording requested is consistent with proposed policy and no changes are required.				
Further subs:	F90.24	Progressive Enterprises Ltd (PEL)	☐ Support		
85.09	Reject				
Remove words 'and considers pedestrian safety' in Policy 11.1.2.3(a).	Proposed wording provides clearer direction to the intent of the policy and avoids confusion as to the intent of the word 'safety' in regards to people or the bicycles.				
Further subs:	F90.25	Progressive Enterprises Ltd (PEL)	☐ Support		

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around at the end and drive out forwards.

e. ensure visibility through natural lighting or illumination within the parking area that avoids adverse effects from shadowing or glare:

- f. (delete)
- g. ensure that parking spaces required for people with disabilities is conveniently located and accessible, and the path route from the parking space to the destination served is also easily accessible for people using mobility devices;

F90.28

Progressive Enterprises Ltd (PEL) Usupport

Foodstuffs

the site: and

### 85.13

Ensure that Policy 11.1.2.7(c) does not conflict with Objective 11.1.2 in relation to accessibility. and clarify the intent of 'manoeuvring' and 'obstruction' within the 11.1.2.7 (d), and reword Policy 11.1.2.7 (e) to include '... service access is available, taking into account the largest vehicle type expected to use the facility'.

### Accept in Part

The policy is consistent with the objective to require parking facilities that are accessible and convenient for pedestrians and safe places for people to move around. Parking facilities can provide for pedestrian accessibility and convenience, and ensure that safe separation is achieved for people parking and moving within and around a parking facility that incorporates loading space.

Part (c) would be open to wider interpretation and outcomes would be less certain if the words 'where practicable' were introduced. Amendment of part (c) to relate separation to safety requirements would recognise that separation may not be required in all instances, for example where only a few parking spaces are provided.

Part (d) as proposed is clear and would not reasonably be interpreted to include vehicles using an accessway as an obstruction.

Part (e) would benefit from further clarification to ensure that where the service lane or rear access cannot provide physical service access, then it is unreasonable to insist on this. however those vehicles that can obtain access from a rear or service access should do so.

Further subs:

F90.29

Progressive Enterprises Ltd (PEL) U Support

### 85.14

Clarify what is meant by 'same locality' in Policy 20.1.1.3 (c).

### Accept

Clarification of Policy 20.1.1.3 (c) and Table 34.1 in regard to the use of 'locality' is supported to the extent that the words 'town or settlement' be used to identify the location for use of financial contributions for parking.

Amend Policy 20.1.1.3 (c), to read 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.

Amend Policy 11.1.2.7 (b), (c) and (e) to read as follows:

avoid reverse manoeuvring onto or from any strategic,

road where this would adversely affect safety:

vehicles, car parking, pedestrians and cyclists

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

c. provide sufficient separation between service

to enable safe use of the facility;

e. be accessed from the rear of the site or a

arterial or collector road, and onto or from any local

Amend Table 34.1 (first column) 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.

Further subs: F90.30

Progressive Enterprises Ltd (PEL) Support

Reject

Amend Rule 30.6.2.8 to minimise rather than eliminate on-site parking.

The use of 'minimised' within the policy and rule would introduce ambiguity in regard to 'minimal' parking and the level identified in Table 30.8 could constitute 'minimal' parking, which is contrary to the intention of providing for parking demand through centralised parking. As both Kaiapoi and Rangiora and expected continued growth, clear guidance and methods are required to provide for public parking, to ensure the outcome of centralised parking is achieved.

Further subs:

F90.39

Progressive Enterprises Ltd (PEL) 

Support

Clarify Rule 30.8.2 in relation to:

- extension of existing parking facilities and
- provide justification for use of 20 parking b) spaces or revise threshold and
- clarify and focus assessment matters and in particular the meaning of

'location and design', and 'public transport' in relation to accessibility.

### Accept

The management of the design and on-site effects of larger parking areas is justified to manage efficient operation for all users, and the rule is similar those within the Selwyn District Plan. Rule 30.8.2 is required in addition to the existing 'high traffic generation' rule due to the rule's assessment of on-site effects not covered by the existing rule framework.

Clarification in regard to the extension of existing parking facilities and the matters to which discretion is restricted would benefit Plan interpretation and reduce potential for resource consent applications for insignificant levels of parking extension.

Amend Rule 30.8.2 to read as follows:

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:

- 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;
  - pedestrian accessibility, cycle access and cycle
  - d. land availability and suitability for parking;
  - 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.

Further subs: F90.40

Progressive Enterprises Ltd (PEL) Support

### Lockbox Storage Rangiora Ltd

### 87.1

Amend Table 30.8 'Industry' to include the words ... (excluding self-storage facilities) and introduce a new category 'Industrial – Self-Storage Facilities' with a nil requirement for parking, loading and cycle parking.

### Accept in Part

Warehousing and storage is the appropriate category to assess parking requirements for self-storage activities under Table 30.8, rather than industrial. The activity class for industry could be amended to specifically exclude warehousing and storage. Parking rates for self-storage where there are no staff present are likely to be lower than proposed and the rule should be amended to reflect lower demand. To aid interpretation of the amended rule, a new definition of self-storage is required.

Amend 'Warehousing and storage' section of Table 30.8 to read as follows:

Warehousing and storage (excluding self-storage)

Add new Row to Table 30.8, following Warehousing and storage, to read as follows:

Activity
Parking Spaces to be provided

Self-storage 0.2 spaces per 100m2 gross floor area

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

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

#### Further subs:

### McAlpines Limted Incorporatin McAlpines Rangiora Ltd

### 89.1

Amend provisions sought by submissions 89.2 to 89.7 to ensure Business 2 Zones are excluded from provisions that are more appropriate for town centres.

### Accept in Part

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.

Amend proposed Objective 11.1.2 (d-g) to read as follows:

- (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;
- support greater use of public transport within town centre and residential environments;
- provide for loading and manoeuvring requirements without compromising safety; and ...

### Reject

Parking demand is already provided for as a consideration in part (a) of the policy, therefore no further amendment is required to (e). Pedestrian and public transport considerations may also be relevant in locations other than town centres and residential environments, and the policy should not be limited to prevent consideration of these matters in other areas.

Further subs: F90.14

Progressive Enterprises Ltd (PEL) Support

### 89.3

Amend proposed Policy 11.1.2.3 to read as follows:

Encourage cycle transport by providing cycle parking that:

- (a) Is located in a convenient and safe position and considers pedestrian safety;
- (b) Delete words Physically supports the cycle frame Amend text to read: provides adequate support for the

cycle: and

(c) Provides for cycle security through the provision of robust and lockable stands.

### Reject

The proposed provisions for cycle parking give effect to the provisions of the CRPS to promote accessibility and modal choice as appropriate, and promote transport modes that have low adverse environmental effects. Cycle parking provisions as proposed give clear guidance as to the requirements for cycle parking but allow flexibility for this to be achieved by a range of designs.

Further subs: F90.15

Progressive Enterprises Ltd (PEL) Usupport

Amend proposed Policy 11.1.2.6 (d) to read as follows:

(d) Reduce opportunities for crime by implementing Crime Prevention through Environmental Design (CPTED) principles particularly withing town centre and residential environments; ...

### Reject

CPTED principles, accessibility and other matters as proposed promote safe convenient facilities for all zones, including those for loading.

### Further subs:

### 89.5

Amend Reason for proposed Policies 11.1.2.1 to 11.1.2.7 (paragraph 3) to read as follows:

All parking areas shall designed to provide safe and efficient parking and loading spaces.. parking areas within the town centre should be attractive, pleasant, public open spaces that add to urban amenity. Parking areas withing the town centre should also be safe and convenient for pedestrians to move around, with direct links to surrounding buildings and footpaths.

### Accept in Part

Amendment to the provisions to be more concise is supported, however design aspects, including landscaping, have wider application beyond town centres and should not be restricted only to those locations. Within Business 2 Zones there are examples of activities where attention to design is appropriate, for example supermarkets and large format retail stores.

Amend paragraphs 3-5 of the Reasons to Policies 11.1.2.1 – 11.1.2.7 to read as follows: 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.

#### Further subs:

### 89.6

Amend proposed Rule 30.6.1.30(c) to exclude Business 2 Zones from the parking maximum restriction.

### Accept

Outside of town centres, expert advice has indicated that maximum parking rates are not recommended, mainly due to limited availability of public transport and expected lower use of transport modes other than private vehicles. Within the Business 1 Zones, land use patterns and availability of other controls within the plan reduce the risk of adverse effects from parking over supply, provided assessment of parking supply is available for larger parking areas under Rule 30.8.2 or 30.8.1.

Further subs:

F90.16

Progressive Enterprises Ltd (PEL) 

Support

Delete part (c) of Rule 30.6.1.30, and

Amend Rule 30.8,2 (x) to read as follows:

 expected parking demand (including any effects from over supply), parking supply in relation to demand, vehicle trip generation and proposed parking availability;

Amend Rule 30.8.2 to exclude Business 2 Zone locations from the rule to read as follows:

Amend Table 30.8 in regard to 'Large Format Retail' requirements for cycle parking by adding the following words except where the activity is a building supplies retailer whereby no cycle spaces are required provided any staff demand is catered for on site.

### Accept in Part

Recommendation and reasons

The proposed parking rates are consistent with demand for cycle parking, and the requirements of the District Plan for Selwyn and the Proposed Replacement District Plan for Christchurch City. Amendment of the assessment rate for large format retail to be based on floor area would be more certain and consistent with the assessment criteria for other activities. Similarly, the requirement for 'food and beverage' cycle parking would be more consistent and certain if based on floor area. As building supply retailers sell a range of materials including smaller items, some cycle parking should be provided.

Business 2 Zones include examples of large format retail and other activities where safe, effective and pedestrian-friendly parking facilities are desirable, and it is my view that consideration of design for larger parking areas is appropriate in this zone.

Amend cycle parking requirements in Table 30.8 for 'large format retail' to read as follows:

1 park up to 500m2 gross floor area plus 1 per 1000m2 gross floor area thereafter, and 1 long term park per 1000m2 gross floor area.

Amend cycle parking requirements in Table 30.8 for 'food and beverage' to read as follows:

1 short term park per 250m2 net floor area plus 1 long term park per 100m2 net floor area.

### Further subs:

### 89.8

Amend proposed Rule 30.6.1.36 (a), (b) and (k) to read as follows:

Cycle parking required by Rule 30.6.1.28 shall be constructed:

- to adequately support the cycle:
- of durable materials and securely anchored, or weighted, to the ground or building:...
- (g) for long term parking, provide space for a bicycle within a secure, covered, facility.

### Accept in Part

The proposed rules allow sufficient certainty for cycle parking supply while providing flexibility for different development and site constraints. Amendment of Rule 30.6.1.36, part (k) to remove the reference to 'storage' would allow greater flexibility for the location of long term cycle parking.

Trees provide a means of softening the appearance of hard surface areas when viewed from off the site, 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 accepted practice, as shown by the new Pak n Save development in Rangiora. The proposed rule provides relevant, practical considerations to ensure that trees survive, do not cause nuisance, and achieve landscape benefits.

Further subs:

F90.17

Progressive Enterprises Ltd (PEL) 

Support

Amend Rule 30.6.1.36.part (k) to read as follows:

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

Amend proposed Rule 30.6.1.35 to allow tree planting on site boundaries.

### Reject

Trees provide a means of softening the appearance of hard surface areas when viewed from off the site, 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 accepted practice, as shown by the new Pak n Save development in Rangiora. The proposed rule provides relevant, practical considerations to ensure that trees survive, do not cause nuisance, and achieve landscape benefits.

#### Further subs:

### Ministry of Education

### 88.1

Seek consistency at a national level for district plan school parking requirements, and at a level that supports sustainable transport modes.

### Accept in Part

Variation in classroom format may lead to under assessment of parking requirements. Revision of parking basis to students and staff would also be more consistent with other Canterbury District Plans whilst still reasonably providing for parking demand.

Amend Table 30.8

'Educational facilities excluding pre-schools', 'parking spaces to be provided' column, first paragraph, to read as follows:

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'.

### Further subs:

#### 88.2

Remove senior car parking provisions and take an approach that aligns with the Christchurch City Council District Plan and Auckland Unitary District Plan.

### Accept

Recognise that the requirement of parking for senior students does not encourage use of active or public transport for this age group.

Amend Table 30.8

'Educational facilities excluding pre-schools', 'parking spaces to be provided' column, first paragraph, to read as follows:

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'.

Align pre-school and child care facility car parking with Christchurch City and Auckland Unitary Council requirements, for example 1 space per 10 children plus 0.5 spaces per Full Time Equivalent (FTE) staff.

### Accept

Greater consistency with other District Plans could be achieved by adopting the parking rate submitted for preschools, while achieving a level of parking supply that relates to anticipated demand.

Amend Table 30.8

'Pre-school and childcare facilities', 'parking spaces to be provided' column, to read as follows:

1 car parking space per 10 children and 0.5 spaces per full time equivalent (FTE),

### Further subs:

### 88.4

Reduce car parking for educational facilities excluding pre-schools to align with Christchurch City and Auckland Unitary requirements.

### Accept in Part

Recognise that the requirement of parking for senior students does not encourage use of active or public transport for this age group.

Variation in classroom format may lead to under assessment of parking requirements. Revision of parking basis to students and staff would also be more consistent with other Canterbury District Plans whilst still reasonably providing for parking demand.

Amend Table 30.8

'Educational facilities excluding pre-schools', 'parking spaces to be provided' column, first paragraph, to read as follows:

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'.

#### Further subs:

### 88.5

Provide greater flexibility for schools to provide cycle or scooter parking or use alternative transport modes that relate to the school's circumstances.

### Accept in Part

Cycle parking rates are appropriate to estimated demand, future provision of cycle infrastructure, and support the use of active and sustainable transport (as submitted). Flexibility for schools to provide parking for scooters or allowing scooters to use cycle parks is available.

### Further subs:

### 88.6

Greater flexibility for the provision of cycle parking for each pre-school or childcare facility based on their individual circumstances.

### Accept

Cycle parking provision for pre-schools and childcare facilities is supported and as submitted, there is likely to be greater demand for long-term, rather than short-term parking, therefore the rate should be based on employee numbers.

Amend Table 30.8,

'Pre-school and childcare facilities', 'cycle parking' requirements to read as follows:

1 short term park per 20 full time equivalent employees and 1 long term park for every 3 full time equivalent employees

#### Further subs:

### 88.7

Support dimensions that reflect the ability to safely access parking while reducing impermeable footprint.

### Accept

No change is required to give effect to this submission point.

### Accept

Greater flexibility for pick up and drop off areas and discuss with Council on a case by case basis to provide greater flexibility and require comprehensive traffic assessment of sites at Outline Plan of Works stage. Requirement for drop-off and collection areas could be difficult for existing schools and may require design assessment to ensure safe and efficient traffic management. It is also anticipated that the Ministry of Education will be developing transport planning guidance for primary schools to assist in the management of potential adverse effects. New schools are also likely to differ in their ability to provide for this requirement.

Delete the following words from Table 30.8 'Educational facilities excluding pre-schools', 'parking spaces to be provided' column:

'A separate on-site drop off and pick up area shall be provided where more than 10 parking spaces are required'.

Further subs:

88.9

Reduce ratios for car parking to support active transport and lessen burden and loss of outdoor areas.

### Accept in Part

Variation in classroom format may lead to under assessment of parking requirements. Revision of parking basis to students and staff would also be more consistent with other Canterbury District Plans whilst still reasonably providing for parking demand.

Amend Table 30.8

'Educational facilities excluding pre-schools', 'parking spaces to be provided' column, first paragraph, to read as follows:

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.

Further subs:

## Progressive Enterprises Ltd (PEL)

### 90.01

Include the following industry standard as a definition:

### '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'.

Further subs:

### Accept in Part

A definition of 'supermarket' would assist district plan interpretation and should be included, however alternative wording to that submitted is preferred to avoid ambiguity around the size and range of functions that must or may be undertaken in order to constitute a supermarket.

Add new definition for 'supermarket' to read as follows:

### 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.

Delete the words 'locate to the rear of the buildings or the rear portion of any vacant site within Business 1 Zones...' from Policy 11.1.2.6.

### Reject

The proposed policies and rules give relief to accessibility issues identified during consultation in regard to the positioning of parking between footpaths and retail entrances and clarify the intent of the existing rule within the Plan, which currently restricts forward placement of car parks. Pedestrian and customer safety and accessibility are also managed through other policies and rules that allow consideration of any adverse effects and proposed amendments to Rule 31.21.1.2 (a) are consistent with these provisions. Should any new supermarket wish to establish in a Business 1 Zone, it would be appropriate for the effects of that development, including those relating to transport, safety and town centre amenity, to be assessed.

#### Further subs:

### 90.03

Delete sub clause (b) from Chapter 16, Environmental Results Expected, or, add the words 'Except with respect to supermarkets' at the beginning of the sub clause.

### Reject

Chapter 16 Expected Environmental Results currently includes the expectation that car parking in Business 1 Zones should be to the rear or side of a building or buildings.

As both Kaiapoi and Rangiora and expected continued growth, clear guidance and methods are required to provide for public parking, to ensure the outcome of centralised parking is achieved. The proposed amendment assists in achieving this outcome.

It would be appropriate for any new supermarket wishing to establish on-site parking adjacent to a principal shopping street to have the effects of the development, including those relating to transport, safety and town centre form, function and amenity, to be assessed through resource consent.

#### Further subs:

### 90.04

Delete second bullet point from Policy 16.1.1.3, or, add the words 'supermarkets are exempt from this subpolicy'.

### Reject

Pedestrian connectivity is already provided for within the Environmental Results Expected. The proposed amendment is consistent with policy for pedestrian connectivity and is appropriate supermarkets which can have large car parking areas with high numbers of users and frequent vehicle movements.

### Accept

Adopt changes to Rule 30.6.1.28 as they reflect well proven and accepted practice, including cycle provisions.

No change is required to give effect to this submission point.

Further subs:

90.06

Accept

Adopt Tables 30.9, 30.10 and Figure 30.7.

No change is required to give effect to this submission point.

Further subs:

90.07

Accept

Delete Rule 30.6.1.30(c).

Outside of town centres, expert advice has indicated that maximum parking rates are not recommended, mainly due to limited availability of public transport and expected lower use of transport modes other than private vehicles. Within the Business 1 Zones, land use patterns and availability of other controls within the plan reduce the risk of adverse effects from parking over supply, provided assessment of parking supply is available for larger parking areas under Rule 30.8.2 or 30.8.1.

Further subs:

90.08

Adopt proposed Rule 30.6.1.33 and proposed Table 30.11.

Further subs:

90.09

Accept in Part

Retain proposed Rules 30.8.1 and 30.8.2 provided 30.6.1.30(c) is deleted (see Submission 90.7).

Outside of town centres, expert advice has indicated that maximum parking rates are not recommended, mainly due to limited availability of public transport and expected lower use of transport modes other than private vehicles. Within the Business 1 Zones, land use patterns and availability of other controls within the plan reduce the risk of adverse effects from parking over supply, provided assessment of parking supply is available for larger parking areas under Rule 30.8.2 or 30.8.1.

Delete part (c) of Rule 30.6.1.30, and

Amend Rule 30.8,2 (x) to read as follows:

 expected parking demand (including any effects from over supply), parking supply in relation to demand, vehicle trip generation and proposed parking availability;

Amend Rule 30.9.3 so that the activity status is full discretionary.

### Reject

The District Plan rules 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 multidestination shopping, and meet other amenity outcomes (through attention to design).

Non-complying activity status signals that on-site parking is not anticipated. Where there is an operational requirement for on-site parking, application for resource consent would allow for assessment of the effects of such a proposal including the effects on town centre development.

#### Further subs:

### 90.11

Amend Rule 31.21.1.2 (a) by either deleting it entirely or by adding the following sentence: 'Supermarkets are exempt from this requirement.'

### Reject

The proposed policies and rules give relief to accessibility issues identified during consultation in regard to the positioning of parking between footpaths and retail entrances and clarify the intent of the existing rule within the Plan, which currently restricts forward placement of car parks. Pedestrian and customer safety and accessibility are also managed through other policies and rules that allow consideration of any adverse effects and proposed amendments to Rule 31.21.1.2 (a) are consistent with these provisions. Should any new supermarket wish to establish in a Business 1 Zone, it would be appropriate for the effects of that development, including those relating to transport, safety and town centre amenity, to be assessed.

### Ravenswood Developments Ltd

### 91.01

Consider requirements for parking numbers, space, manoeuvring and loading requirements in relation to efficient land use.

### Reject

The proposed rates using gross floor area were adopted from the Waimakariri District Plan Review: Car Parking report (2013 Abley Transportation Consultants) and provide rates that are consistent with or lower than those identified in NZTA Research Report 453, Trips and parking related to land use (Douglass and Abley 2011), especially within the Business 1 Zone, to reflect that people may visit more than one activity when parked, and where journeys by other transport modes are expected. The use of GFA is consistent with the NZTA parking demand rates, which should provide for reasonable parking supply and efficient use of land in conjunction with other proposed and existing rules. Net floor area is a term that is already used and defined in the plan and is also consistent with the NZTA proposed rates.

#### Further subs:

#### 91.02

Re-notify plan change as a general plan change rather than one specifically relating to parking.

### Accept in Part

The introduction of new definitions does not create a major conflict within the plan, however further clarification would ensure that the scope is sufficiently confined to matters principally related to parking in relation to of 'industry' 'warehousing and storage' and 'office'. Re-notification of the plan change as a 'general' plan change is not considered necessary as the scope is able to be restricted.

Amend definitions of 'industry' 'warehousing and storage' and 'office' to include the words ...'for the purpose of assessing on-site parking requirements, ....'.

#### Further subs:

### 91.03

Delete proposed definition of 'industry' and replace with the following: (Industry) 'means the manufacturing, assembly, dismantling, packaging, wholesaling or storage of products or the processing of raw materials and other ancillary activities.'

### Accept in Part

The definition of industry does not require a reference to business activity, and could more specifically exclude reference to warehousing and storage, as these activities are subject to a separate definition. The proposed definition is reasonable and concise.

Further amend the definition of industry to read as follows:

### Industry

Industry means, for the purpose of assessing on-site parking requirements, the manufacturing, painting, production, processing, assembly, dismantling, packaging, servicing, testing or repair of any materials, goods, products, machinery or vehicles but excludes warehousing and storage activities.

Reject

Amend the parking requirement for warehousing and storage to 1 space per 200m2.

The proposed rates (using gross floor area) were adopted from the Waimakariri District Plan Review: Car Parking report (2013 Abley Transportation Consultants) and provide rates that are consistent with or lower than those identified in the NZTA Research Report 453, Trips and parking related to land use (Douglass and Abley 2011), especially within the Business 1 Zone, to reflect that people may visit more than one activity when parked, and where journeys by other transport modes are expected. The use of GFA is consistent with the NZTA parking demand rates, which should provide for reasonable parking supply and efficient use of land in conjunction with other proposed and existing rules. Net floor area is a term that is already used and defined in the plan and is also consistent with the NZTA proposed rates.

Further subs:

91.05

Reject

Amend proposed Policies 11.1.2.2 and 11.1.2.3 so that private transport is given equal recognition and importance to public and cycle transport options.

Proposed approach encourages safe and effective pedestrian access, encourages active transport and consequent reduction in demand for car parking, and is consistent with the provisions of the Selwyn District Plan (Policy B2.1.7).

Further subs:

F90.4

Progressive Enterprises Ltd (PEL) 

Support

91.06

Reject

Delete proposed Policy 11.1.2.4.

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.

Further subs:

F90.5

Progressive Enterprises Ltd (PEL) Support

Delete proposed Policy 11.1.2.5 and delete all other restrictions on car parking in front of business buildings.

### Reject

District Plan rules provide 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 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). As continued growth is expected for both Kajapoj and Rangiora. it is reasonable to include clear guidance and methods to provide for public parking that supports consolidated town centres.

Further subs:

F90.6

Progressive Enterprises Ltd (PEL) Support

91.08

Delete Policy 11.1.2.6.

### Accept in Part

Definition of blind aisle and their intended length would add clarity to the policy, part (f) could be deleted as the matters are also covered in Policy 11.1.2.4 and part (e) could be clarified as shadowing effects and glare are otherwise provided for. CPTED principles, accessibility and other matters as proposed promote safe convenient facilities for all zones, including those for loading. The use of largest expected vehicle caters more accurately for actual loading demand and should be retained and the use of local roads (with minor clarification) is limited to situations where safety might be adversely affected. Part (c) would be open to wider interpretation and outcomes would be less certain if the words 'where practicable' were introduced, and proposed wording is therefore supported. Part (d) as proposed is clear and would not reasonably be interpreted to include vehicles using an accessway as an obstruction. Part (e) would benefit from further clarification to ensure that where the service lane or rear access cannot provide physical service access, then it is unreasonable to insist on this, however those vehicles that can obtain access from a rear or service access should do so.

Further subs:

F90.7

Progressive Enterprises Ltd (PEL) Support

Add new Definition to read as follows:

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.

Amend Policy 11.1.2.7 (b) and (e) to read as follows:

- b. avoid reverse manoeuvring onto or from any strategic. arterial or collector road, and onto or from any local road where this would adversely affect safety;
- e. 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

Amended text to read:

Revise Policy 11.1.2.7(a) as follows: provide safe and efficient vehicle movements for the average vehicle type expected to use the facility' and remove all references to local roads and from Policy 11.1.2.7(b) and delete 11.1.2.7 (c) or reword as follows: 'provide for separation between service vehicles, car parking, pedestrian and cyclists where practicable.'

### Accept in Part

Policy 11.1.2.7 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 to meet the reasonable demand for loading. The use of 'largest vehicle expected' is consistent with the Christchurch District Plan. and provides sufficient control for loading.

Further subs: F90.8

Progressive Enterprises Ltd (PEL) 

Support

### 91.10

Delete the word 'direct' from the last sentence of the third paragraph (pedestrian safety and access) and delete last two sentences of final paragraph (landscaping) from the Reason for Policies 11.1.2.1 to 11.1.2.7.

### Accept in Part

Amendment to the provisions to be more concise is supported, however design aspects, including landscaping, have wider application beyond town centres and should not be restricted only to those locations. Within Business 2 Zones there are examples of activities where attention to design is appropriate, for example supermarkets and large format retail stores.

Amend paragraphs 3-5 of the Reasons to Policies 11.1.2.1 - 11.1.2.7 to read as follows: 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.

### Further subs:

### 91.11

Reword Rule 30.6.1.28(b) to replace the word 'largest' with the word 'average'.

### Reject

Use of the term 'largest vehicle expected' provides sufficient control for loading, is consistent with the Christchurch District Plan and offers greater flexibility to provide for actual demand for loading.

Replace GFA for general retail, supermarket and large format retail with 'GLFA' (Gross Leasable Floor Area) and provide definition as follows:

'Gross Leasable Floor Area (GLFA) means the total sum of any floor areas (within the external walls for buildings or boundary for outdoor areas) designed or used for tenant occupancy but excluding:

- common lift wells and stairwells, including landing areas;
- common corridors and halls (other than foodcourt areas);
  - common toilets and bathrooms;
  - any parking areas required by the plan;

and for the purpose of calculating car parking requirements, in addition to the exclusions above, the following shall also be excluded:

- common seating areas, including food court seating areas;
- lobby areas;

Replace 'GFA' for food and beverage with 'PFA', and provide (Christchurch City Council) definition: 'means the sum of all floor areas contained within the external walls of any building or within the boundaries of any outdoor area available for the use of the general public in association with the activity, excluding any areas used for:

- lift wells, including the assembly area outside the lift doors for a maximum depth of 2 metres;
  - stairwells, including landing areas:
  - · toilets and bathrooms;
  - · parking areas required by the Plan.'

Further subs:

### Reject

The proposed rates using gross floor area were adopted from the Waimakariri District Plan Review: Car Parking report (2013 Abley Transportation Consultants) and provide rates that are consistent with or lower than those identified in NZTA Research Report 453, Trips and parking related to land use (Douglass and Abley 2011), especially within the Business 1 Zone, to reflect that people may visit more than one activity when parked, and where journeys by other transport modes are expected. The use of GFA is consistent with the NZTA parking demand rates, which should provide for reasonable parking supply and efficient use of land in conjunction with other proposed and existing rules. Net floor area is a term that is already used and defined in the plan and is also consistent with the NZTA proposed rates.

Reduce proposed parking requirements of Table 30.8 in accordance with revised proposed definitions for GLFA and PFA. (Submission point 91.12)

### Reject

The proposed rates using gross floor area were adopted from the Waimakariri District Plan Review: Car Parking report (2013 Abley Transportation Consultants) and provide rates that are consistent with or lower than those identified in NZTA Research Report 453, Trips and parking related to land use (Douglass and Abley 2011), especially within the Business 1 Zone, to reflect that people may visit more than one activity when parked, and where journeys by other transport modes are expected. The use of GFA is consistent with the NZTA parking demand rates, which should provide for reasonable parking supply and efficient use of land in conjunction with other proposed and existing rules. Net floor area is a term that is already used and defined in the plan and is also consistent with the NZTA proposed rates.

#### Further subs:

91.14

Retain proposed amendments to Table 30.9

ubs: F90.9

Accept

No change is required to give effect to this submission point.

Further subs:

Progressive Enterprises Ltd (PEL) Support

### 91.15

Delete reference to New Zealand Transport Agency tracking curve standard from Table 30.10 or include appropriate diagrams in the District Plan.

### Accept in Part

Incorporation of diagrams for truck tracking curves sourced from standards and national organisations would assist plan interpretation. It is noted that references may also be incorporated where referenced appropriately.

Amend Table 30.10 'manoeuvring space' references to read as follows:

Refer to Figure 30.8.

Refer to Figure 30.9.

Refer to Figure 30.10.

Refer to Figure 30.11.

Add new Figures 30.8 - 30.11

parking availability:

Delete part (c) of Rule 30.6.1.30, and

Amend Rule 30.8,2 (x) to read as follows:

x. expected parking demand, parking supply in relation

to demand, vehicle trip generation and proposed

Delete Clause (c) of Rule 30.6.1.30.

### Accept in Part

Outside of town centres, expert advice has indicated that maximum parking rates are not recommended, mainly due to limited availability of public transport and expected lower use of transport modes other than private vehicles. Within the Business 1 Zones, land use patterns and availability of other controls within the plan reduce the risk of adverse effects from parking over supply, provided assessment of parking supply is available for larger parking areas under Rule 30.8.2 or 30.8.1.

Further subs: F90.10

Progressive Enterprises Ltd (PEL) Support

# Reject

91.17

Delete from Rule 30.6.1.31 the words '...where the site gains access by a right of way or shared accessway.'

The rule is related to the safety aims of the policy and identifies shared accessways and rights or way as a particular situation where risk is elevated due to the number of potential users. Local road situations vary in the ability to accommodate reverse manoeuvring and are more appropriately considered through policy direction.

### Further subs:

91.18

Amend proposed Table 30.11 as follows:

Total Number of Car Parks Minimum Number of Accessible Car Park Spaces 1-20 (Delete Not

less than) 1

21-50 (Delete Not less than 2) 1

For every additional 50 car parks (Delete Not less than) 1

or part of a car park

### Reject

The District Plan should not apply any lesser rate of parking than that required by NZS 4121:2001.

Delete proposed Rule 30.8.2.

### Accept in Part

The management of the design and on-site effects of larger parking areas is justified to manage efficient operation for all users, and the rule is similar those within the Selwyn District Plan. Rule 30.8.2 is required in addition to the existing 'high traffic generation' rule due to the rule's assessment of on-site effects not covered by the existing rule framework.

Clarification in regard to the extension of existing parking facilities and the matters to which discretion is restricted would benefit Plan interpretation and reduce potential for resource consent applications for insignificant levels of parking extension.

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.

Amend Rule 30.8.2 to read as follows:

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
- 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:

- ii. location and design including;
  - layout, visibility and surface treatment for vehicle access, parking, loading, turning and circulation;
  - amenity and landscaping including matters specified in 30.6.1.34;
  - 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;
- 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
- effects on the function, amenity and character of town centre activities.

Revise proposals to consider functional requirements of large format retail activities.

Accept in Part

Outside of town centres, expert advice has indicated that maximum parking rates are not recommended, mainly due to limited availability of public transport and expected lower use of transport modes other than private vehicles. Within the Business 1 Zones, land use patterns and availability of other controls within the plan reduce the risk of adverse effects from parking over supply, provided assessment of parking supply is available for larger parking areas under Rule 30.8.2 or 30.8.1.

The proposed provisions are consistent with the assessed level of demand for supermarkets provided in NZTA Research Report 453 (Trips and parking related to landuse). The lower minimum rate required in Business 1 Zones recognises that alternative methods for managing parking are available, and the recommendation to remove the requirement for a maximum parking rate. Lower minimum rates, and restrictions on on-site parking also support other town centre goals such as the achievement of consolidated, vibrant centres with well-connected retail frontages supported by centralised parking.

Further subs:

F90.13

Progressive Enterprises Ltd (PEL) 

Support

Delete part (c) of Rule 30.6.1.30, and

Amend Rule 30.8.2 (x) to read as follows:

 expected parking demand (including any effects from over supply), parking supply in relation to demand, vehicle trip generation and proposed parking availability;

The Wareho

The Warehouse Ltd

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Amend proposed Rule 30.6.1.30 (c) to read as follows:

(c) where the number of on-site car parking spaces required is 20 or greater, the number of parking spaces provided on site, excluding business 2 zones shall not exceed 130% of the required number specified in Table 30.8.

or provide a specific parking ratio for department stores such as The Warehouse.

and Amend proposed Rule 30.8.2 to read as follows:

Any development or redevelopment including 20 or more car parking spaces, (except for sites subject to Rules 30.6.1.28, 30.6.2.10 or within a Rural or Business 2 Zone shall be a discretionary activity (restricted).

Outside of town centres, maximum parking rates are not recommended, mainly due to limited availability of public transport and expected lower use of transport modes other than private vehicles. Within the Business 1 Zones, land use patterns and availability of other controls within the plan reduce the risk of adverse effects from parking over supply, provided assessment of parking supply is available for larger parking areas under Rule 30.8.2 or 30.8.1.

The management of the design and on-site effects of larger parking areas is justified to manage efficient operation for all users, and the rule is similar those within the Selwyn District Plan. Rule 30.8.2 is required in addition to the existing 'high traffic generation' rule due to the rule's assessment of on-site effects not covered by the existing rule framework.

Delete Rule 30.6.1.30 (c) , and amend Rule 30.8.2 (x) to read as follows:

 expected parking demand (including any effects from over supply), parking supply in relation to demand, vehicle trip generation and proposed parking availability;

Amend Rule 30.8.2 to read as follows:

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
- 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:

- ii. location and design including;
  - layout, visibility and surface treatment for vehicle access, parking, loading, turning and circulation;
  - amenity and landscaping including matters specified in 30.6.1.34;
  - 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;
- 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

Ref	Relief Sought
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Recommendation and reasons

Amendment to plan

The Wareho

			<ul> <li>v. effects on the function, amenity and character of town centre activities.</li> </ul>
Further subs:	F90.1	Progressive Enterprises Ltd (PEL)   Support	
92.2	Accept i	n Part	
Amend Rule 30.6.1.36 (a), (b) and (k) to read as follows:	The proposed rules allow sufficient certainty for cycle parking supply while providing flexibility for different development and		Amend Rule 30.6.1.36.part (k) to read as follows:
Cycle parking required by Rule 30.6.1.28 shall be constructed:  (a) to adequately support the cycle;  (b) of durable materials and securely anchored, or weighted, to ground or building;	remove t	traints. Amendment of Rule 30.6.1.36. part (k) to he reference to 'storage' would allow greater for the location of long term cycle parking.	<ul> <li>k. for long term parking, to provide bicycle parking space within a secure, covered facility.</li> </ul>
(k) for long term parking, provide space for a bicycle within a secure, covered, (Delete – storage) facility.			
Further subs:	F90.2	Progressive Enterprises Ltd (PEL)   Support	
92.3	Accept i	n Part	
rm secure cycle parking for large format retail better reflect demand and do not use supplyees as parameter for assessment for large for certain a activities supplyees activities.		osed parking rates are consistent with demand for king, and the requirements of the District Plan for and the Proposed Replacement District Plan for arch City. Amendment of the assessment rate for at retail to be based on floor area would be more and consistent with the assessment criteria for other Similarly, the requirement for 'food and beverage' king would be more consistent and certain if based area. As building supply retailers sell a range of including smaller items, some cycle parking should ed.	Amend cycle parking requirements in Table 30.8 for 'large format retail' to read as follows:  1 park up to 500m2 gross floor area plus 1 per 1000m2 gross floor area thereafter, and 1 long term park per 1000m2 gross floor area.  Amend cycle parking requirements in Table 30.8 for 'food and beverage' to read as follows:  1 short term park per 250m2 net floor area plus 1 long term park per 100m2 net floor area.
Further subs:	F90.3	Progressive Enterprises Ltd (PEL)   Support	