

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.

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 subs:

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

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.

91.04

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

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 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

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.

Reject

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

Delete proposed Policy 11.1.2.4.

Reject

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

91.07

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 Kaiapoi 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

91.09

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.

Further subs:

91.12

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;

and

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.

| <i>Ref</i> | <i>Relief Sought</i> | <i>Recommendation and reasons</i> | <i>Amendment to plan</i> | <i>Ravenswood</i> |
|------------|---|--|---|-------------------|
| 91.13 | Reduce proposed parking requirements of Table 30.8 in accordance with revised proposed definitions for GLFA and PFA. (Submission point 91.12) | <p>Reject</p> <p>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.</p> <p><i>Further subs:</i></p> | | |
| 91.14 | Retain proposed amendments to Table 30.9 | <p>Accept</p> <p>No change is required to give effect to this submission point.</p> <p><i>Further subs:</i> F90.9 <i>Progressive Enterprises Ltd (PEL)</i> <input type="checkbox"/> <i>Support</i></p> | | |
| 91.15 | Delete reference to New Zealand Transport Agency tracking curve standard from Table 30.10 or include appropriate diagrams in the District Plan. | <p>Accept in Part</p> <p>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.</p> | <p>Amend Table 30.10 'manoeuvring space' references to read as follows:</p> <p>Refer to Figure 30.8.</p> <p>Refer to Figure 30.9.</p> <p>Refer to Figure 30.10.</p> <p>Refer to Figure 30.11.</p> <p>Add new Figures 30.8 - 30.11</p> | |
| | | <i>Further subs:</i> | | |

| Ref | Relief Sought | Recommendation and reasons | Amendment to plan | Ravenswood | | | | | | | | | | | | | | | | | | |
|--------------------------------------|--|--|--|--------------------------------------|--|------|-------------|--------------|--|-------|-------------|----------------|--|-----------------------------------|-------------|--------------|--|-----------------------|--|--|--|--|
| 91.16 | Delete Clause (c) of Rule 30.6.1.30. | <p>Accept in Part</p> <p>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.</p> <p>Further subs: F90.10 <i>Progressive Enterprises Ltd (PEL)</i> <input type="checkbox"/> <i>Support</i></p> | <p>Delete part (c) of Rule 30.6.1.30, and</p> <p>Amend Rule 30.8,2 (x) to read as follows:</p> <p>x. expected parking demand, parking supply in relation to demand, vehicle trip generation and proposed parking availability;</p> | | | | | | | | | | | | | | | | | | | |
| 91.17 | Delete from Rule 30.6.1.31 the words ‘...where the site gains access by a right of way or shared accessway.’ | <p>Reject</p> <p>The rule is related to the safety aims of the policy and identifies shared accessways and rights of 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.</p> <p>Further subs:</p> | | | | | | | | | | | | | | | | | | | | |
| 91.18 | Amend proposed Table 30.11 as follows: | <p>Reject</p> <p>The District Plan should not apply any lesser rate of parking than that required by NZS 4121:2001.</p> | | | | | | | | | | | | | | | | | | | | |
| | <table><tr><td>Total Number of Car Parks</td><td>Minimum</td></tr><tr><td>Number of Accessible Car Park Spaces</td><td></td></tr><tr><td>1-20</td><td>(Delete Not</td></tr><tr><td>less than) 1</td><td></td></tr><tr><td>21-50</td><td>(Delete Not</td></tr><tr><td>less than 2) 1</td><td></td></tr><tr><td>For every additional 50 car parks</td><td>(Delete Not</td></tr><tr><td>less than) 1</td><td></td></tr><tr><td>or part of a car park</td><td></td></tr></table> <p>Further subs:</p> | 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 | | | | |
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| or part of a car park | | | | | | | | | | | | | | | | | | | | | | |

| Ref | Relief Sought | Recommendation and reasons | Amendment to plan | Ravenswood |
|--------------|---|---|---|-------------------|
| 91.19 | <p>Amend the first paragraph of proposed Rule 30.6.1.35 to read as follows:</p> <p>'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 where car spaces are in facing pairs, one tree for every five pairs of car spaces provided on site within, or immediately adjacent to, the parking area. Trees shall:...'</p> <p>Delete clause (a) of proposed Rule 30.6.1.35.</p> <p>Further subs:</p> | <p>Accept</p> <p>Tree planting for parking spaces in 'facing pairs' could achieve a similar landscape outcome where the provisions are otherwise met</p> <p>Further subs: F90.11 <i>Progressive Enterprises Ltd (PEL)</i> <input type="checkbox"/> Support</p> | <p>Amend the first paragraph of Rule 30.6.1.35 to read as follows:</p> <p>'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: ...'</p> | |
| 91.20 | <p>Delete clause (a) of proposed Rule 30.6.1.35.</p> <p>Further subs:</p> | <p>Accept</p> <p>Tree planting for parking spaces in 'facing pairs' could achieve a similar landscape outcome where the provisions are otherwise met</p> | <p>Amend the first paragraph of Rule 30.6.1.35 to read as follows:</p> <p>'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: ...'</p> | |
| 91.21 | <p>Delete proposed Rule 30.6.1.36 and replace with diagram.</p> <p>Further subs:</p> | <p>Reject</p> <p>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.</p> <p>Further subs: F90.12 <i>Progressive Enterprises Ltd (PEL)</i> <input type="checkbox"/> Support</p> | | |

91.22

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
- 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:

- ii. 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;
- iii. expected parking demand, parking supply in relation to demand (including any effects from over-supply), vehicle trip generation and proposed parking availability;
- iv. traffic and parking environment around the site including any positive or adverse effects on the provision and use of public transport ;
- v. utility services including stormwater management and water quality; and
- vii. effects on the function, amenity and character of town centre activities.

Further subs:

| <i>Ref</i> | <i>Relief Sought</i> | <i>Recommendation and reasons</i> | <i>Amendment to plan</i> | <i>Ravenswood</i> |
|----------------------|---|---|--|----------------------------------|
| 91.23 | Revise proposals to consider functional requirements of large format retail activities. | <p>Accept in Part</p> <p>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.</p> <p>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.</p> | <p>Delete part (c) of Rule 30.6.1.30, and</p> <p>Amend Rule 30.8.2 (x) to read as follows:</p> <p>x. expected parking demand, parking supply in relation to demand, vehicle trip generation and proposed parking availability;</p> | |
| Further subs: | | F90.13 | Progressive Enterprises Ltd (PEL) | <input type="checkbox"/> Support |

The Warehouse Ltd

92.1

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.

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 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
- 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:

- ii. 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;
- iii. expected parking demand, parking supply in relation to demand (including any effects from over-supply), vehicle trip generation and proposed parking availability;
- iv. traffic and parking environment around the site including any positive or adverse effects on the provision and use of public transport ;
- v. utility services including stormwater management and water quality; and
- vii. effects on the function, amenity and character of town centre activities.

| <i>Ref</i> | <i>Relief Sought</i> | <i>Recommendation and reasons</i> | <i>Amendment to plan</i> | <i>The Wareho</i> |
|------------|---|---|---|----------------------------------|
| | Further subs: | F90.1 | Progressive Enterprises Ltd (PEL) | <input type="checkbox"/> Support |
| 92.2 | <p>Amend Rule 30.6.1.36 (a), (b) and (k) to read as follows:</p> <p>Cycle parking required by Rule 30.6.1.28 shall be constructed:</p> <p>(a) to adequately support the cycle;</p> <p>(b) of durable materials and securely anchored, or weighted, to ground or building;</p> <p>...</p> <p>(k) for long term parking, provide space for a bicycle within a secure, covered, (Delete – storage) facility.</p> | <p>Accept in Part</p> <p>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.</p> | <p>Amend Rule 30.6.1.36.part (k) to read as follows:</p> <p>k. for long term parking, to provide bicycle parking space within a secure, covered facility.</p> | |
| | Further subs: | F90.2 | Progressive Enterprises Ltd (PEL) | <input type="checkbox"/> Support |
| 92.3 | <p>Amend proposed Table 30.8 in regard to long term secure cycle parking for large format retail to better reflect demand and do not use employees as parameter for assessment for food and beverage activities.</p> | <p>Accept in Part</p> <p>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.</p> | <p>Amend cycle parking requirements in Table 30.8 for 'large format retail' to read as follows:</p> <p>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.</p> <p>Amend cycle parking requirements in Table 30.8 for 'food and beverage' to read as follows:</p> <p>1 short term park per 250m2 net floor area plus 1 long term park per 100m2 net floor area.</p> | |
| | Further subs: | F90.3 | Progressive Enterprises Ltd (PEL) | <input type="checkbox"/> Support |

Proposed Plan Change PC40
Parking

Appendix III Abley Transportation Consultants Ltd review of
submissions

**IN THE
MATTER**

of the Resource Management Act 1991

**PLAN CHANGE 40 TO THE WAIMAKARIRI
DISTRICT PLAN**

**STATEMENT OF EVIDENCE OF ANN-MARIE HEAD
DATED: 13 OCTOBER 2015**

INTRODUCTION

1. My full name is Ann-Marie Head. I am a Chartered Professional Engineer (CPEng) and registered under the Chartered Professional Engineers Act 2002. This qualification means I have been reviewed by the registration authority and deemed competent to practice in my area of expertise. I am a member of the Institution of Professional Engineers New Zealand (MIPENZ).
2. I hold the technical qualification of Bachelor of Engineering with Honours in Civil Engineering from the University of Canterbury. For the past 14 years, I have worked exclusively in the traffic and transportation field as a consulting engineer. I have developed specialist skills in integrated transport assessments, transport strategy and policy, and the planning, assessment and design of transport networks.
3. I hold the position of Associate within Abley Transportation Consultants Limited. The firm undertakes specialist transportation related commissions for local, regional and central government as well as private sector organisations, individuals and community groups.
4. I have been engaged by Waimakariri District Council to provide transportation planning evidence in relation to Plan Change 40 Parking. In 2013 Abley Transportation Consultants provided a technical evaluation of Council's current District Plan requirements in respect of parking and provided a number of recommendations about potential modifications to reflect desired outcomes for Council and the community.
5. Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the code of conduct for expert witnesses contained in part 7 of the Environment Court Practice Note 2014. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise except where I state I am relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

6. I have been asked by Waimakariri District Council to provide expert transportation evidence regarding Plan Change 40 Parking (PC40).

7. The scope of my evidence is limited to the following particular matters identified by Council as requiring assessment as well as discussion of specific relief sought by submitters:

- A. Car Parking Requirements
- B. Parking Requirements for Specific Activities
- C. Assessment of Larger Car Parking Areas
- D. Loading Space Requirements
- E. Cycle Parking Requirements
- F. Parking Requirements for Educational Facilities
- G. Motorcycle Parking

8. I now discuss each matter in turn.

A) CAR PARKING REQUIREMENTS

9. There are a range of methods available to manage parking supply for developments through District Plan rules. PC40 as notified sets out minimum parking requirements by land use activity¹ and also stipulates a maximum rate or 'cap' on parking supply for larger car parks that are greater than 20 parking spaces². The 'cap' is based on 130% of the minimum parking requirements for each land use activity in all zones. An exception to the minimum and maximum parking requirements applies to sites that have frontage to a Principal Shopping Street within the Business 1 zone where cash in lieu is required instead of on-site parking provision to enable centralised parking facilities to be provided³.

10. Minimum and maximum parking requirements in district plans are employed for different reasons. The majority of district plans in New Zealand apply minimum parking requirements to ensure the majority of the parking demand generated by an activity is accommodated on-site. This approach is intended to reduce the demand for on-street parking and the associated adverse effects on the road network as well as minimising demand for public off-street parking facilities. I acknowledge that due to the variability in parking demand between different activities, and the requirement for each activity to provide car parking to meet its demand (in other words, no shared

¹ Rule 30.6.1.28

² Rule 30.6.1.30c

³ Rules 30.9.3 and 34.2.7

parking is permitted) minimum parking requirements generally result in an overall oversupply of parking particularly where activities are clustered, such as in town centres.

11. More recently, some councils, particularly those with more urban development demands, have shifted to maximum parking requirements in particular locations. In general the maximum parking requirements only apply in town centres or higher density areas rather than throughout a district as proposed by PC40.
12. There are a number of reasons why maximum parking requirements may be set. Maximum parking requirements can be applied to maximise development density, minimise the use of land for car parking and vehicular access, and to encourage the use of alternative modes such as public transport, cycling and walking. However, in my opinion maximum parking requirements should only be applied where there is a high level of accessibility to alternative transport modes, such as in town centres.
13. Minimum parking rates, are just that, minimums and it is expected that owners / developers will choose to supply an appropriate amount of parking for the particular activity at some level either at or above the minimum parking requirement.
14. Parking demand varies between activities in the same land use category. Whilst floor area is the main predictor of parking demand for a land use activity, a number of factors influence actual demand including the location of the activity and the particular service offering. If a maximum parking rate is to be applied, then it is important that the rate is set at an appropriate level to ensure developments can still operate effectively without significant effects on the surrounding transport network, for example parking overspill on to the street (causing adverse effects on the operation of the transport network), or into adjacent developments.
15. In my opinion, the application of maximum parking requirements throughout the Waimakariri District is not appropriate because outside of Business 1 zones there is generally limited alternative transport provision and a lack of public on and off street parking facilities to accommodate overspill parking.

16. The 2013 Abley report⁴ recommended that minimum parking requirements be retained, albeit with changes to land use activities and particular rates. It also recommended that within the Business 1 Zones, alternative parking arrangements may be appropriate and should be investigated further by Council. In this respect, I believe the proposed financial contribution in lieu of on-site car parking provision on sites in Business 1 Zones that have a Principal Shopping Street Frontage⁵ is appropriate and likely to be effective. This in effect leaves only the remainder of the Business 1 zones, in other words, Business 1 land parcels that do not have Principal Shopping Street frontages as candidates for applying maximum parking rates.
17. I have assessed the number and area of land parcels that are within the Business 1 zone but do not front a Principal Shopping Street. A summary of the results is shown in **Table 1** below.

Table 1 – B1 land parcels that do not front Principal Shopping Streets

| Location | No. of parcels | Area (m ²) | % of total B1 parcels | % of total B1 area |
|----------|----------------|------------------------|-----------------------|--------------------|
| Rangiora | 122 | 90,447 | 44% | 45% |
| Kaiapoi | 34 | 30,682 | 30% | 47% |
| Total | 156 | 121,129 | 40% | 45% |

18. The table indicates that less than half of the land parcels in B1 zones do not have frontage to a Principal Shopping Street and therefore will be permitted to provide on-site parking under PC40. As these lots are on the fringe of the town centre zones, they tend to consist of residential sized lots which, if developed are unlikely to provide a significant oversupply of parking due to their limited size.
19. I believe that if maximum parking requirements were to be pursued, then more research would need to be carried out to identify parking maximums at an appropriate rate to ensure that development does not shift into other less restrictive zones with lower access to alternative modes.

⁴ Waimakariri District Plan Review: Car Parking, 13 September 2013

⁵ Rule 34.2.7

20. I also consider that other rules proposed in PC40 (for example, the 20 parking space threshold rule⁶) can provide an appropriate level of control for Council to manage potential oversupply of parking within the B1 zones but also throughout the District. I therefore support the minimum parking requirements by activity⁷ and recommend that the proposed 'cap' on parking requirements⁸ is removed.
21. As an aside, Business 2 zones are defined in the Plan as "*industrial and commercial areas which are characterised by large scale buildings, low density of development and industrial type activities*"⁹. This type of development is not conducive to a high use of alternative transport modes. Again, I believe it would be inappropriate to apply a cap on on-site parking for this type of land use when there are limited realistic transport alternatives.

B) PARKING REQUIREMENTS FOR SPECIFIC ACTIVITIES

22. Foodstuffs South Island Limited (#85) raises concerns regarding the proposed minimum parking requirement for supermarkets particularly in relation to the proposed 'cap' on parking provision.
23. Although not specifically mentioned by Foodstuffs, the concern raised in the submission is likely to be compounded because supermarket activity is currently not defined in the Plan. However, the on-site parking and loading requirements¹⁰ include supermarkets as an activity for calculating parking requirements. Retail Activity is already defined in the Plan. A definition for Large Format Retail is proposed in PC40 and it is noted the definition specifically excludes supermarkets. For the avoidance of confusion, I recommend that a definition for supermarkets is included within the district plan.
24. PC40 as notified sets out a minimum parking rate for supermarkets of 4 spaces per 100m² gross floor area (GFA) except within the Business 1 zone where a much lower rate of 2 spaces per 100m² GFA is required. This is based on a recommendation in the Abley 2013 report regarding appropriate minimum parking rates for different activities. This recommendation was

⁶ Rule 30.8.2

⁷ Rule 30.6.1.28

⁸ Rule 30.6.1.30c

⁹ Chapter 16 Business Zones

¹⁰ Table 30.8

based on the principle that minimum parking requirements would apply throughout the district except possibly within town centre zones, where it was recommended that alternative methods for managing parking (for example, maximum parking requirements, or cash in lieu) be considered.

25. The Abley 2013 report was informed by comparing parking rates for activities from other district plans (including the Selwyn District Plan) and considering the 50th percentile parking demand rate from NZTA Research Report 453¹¹. The Selwyn District Plan minimum parking rate for retail activities¹² (which includes supermarkets) is 4.5 spaces per 100m² GFA and the NZTA Research Report identifies the average parking demand rate for supermarkets to be 4.2 spaces per 100m² GFA. The Abley 2013 report recommended a minimum parking rate of 4.0 spaces per 100m² GFA for supermarkets to ensure the majority of parking demand is accommodated on site. A minimum parking requirement enables a developer to decide the most appropriate parking supply provided it is above the minimum standard. In this respect, the Abley 2013 report recommended setting the minimum standard slightly lower than the average parking rate to minimise the potential for an oversupply of parking at some supermarkets that may have a lower parking demand.
26. The Foodstuffs submission asserts that PC40 applies the 50th percentile parking demand for supermarkets from the NZTA Research Report 453 as the minimum parking requirement. This is incorrect. The average parking demand rate from the research is 4.2 spaces per 100 m² GFA whereas the proposed rate is slightly lower at 4.0 spaces per 100 m² GFA to provide flexibility for a developer to provide parking spaces at a level that will support the location and particular needs of a development.
27. As I recommended earlier, if the proposed maximum parking requirement as a percentage of the minimum requirement is removed, then I do not see any reason to modify the minimum parking requirements for supermarkets as set out in PC40.
28. Lockbox Storage (#87) state that although the addition of more activity categories for calculating parking requirements is appropriate, there is no category that accurately applies to self-storage facilities with regard to their

¹¹ Douglass, M and Abley, S (2011) Trips and parking related to land use. NZ Transport Agency research report 453

¹² Supermarkets fall under retail activities in the Selwyn District Plan.

particular car parking, loading and cycle parking demand. They assert that *'self-storage activities typically require large building GFAs and generate little to no car parking demand as they do not rely upon permanent staff on-site, and the infrequent visitors to the site all park directly in front of their storage unit to load or unload their goods'*. The submitter requests an exemption from car parking, loading and cycle parking requirements for self-storage facilities.

29. In my opinion, the 'Warehousing and storage' category in PC40 is the most similar in nature to self-storage facilities rather than Industrial activity as set out in their submission. As stipulated in PC40, warehousing and storage activities require 1 car parking space per 100m² GFA, 1 loading space plus 1 space per 1000m² GFA over 2000m² GFA and 1 long term cycle parking space per 1000m² GFA. As there are no permanent staff on site at such a facility, a lower car parking rate may be more appropriate.
30. Based on a survey of a self-storage facility in Christchurch that is provided in the New Zealand Trips Database¹³ and parking demand rates provided in NZTA Research Report 453 I suggest that a minimum parking requirement of 0.2 spaces per 100m² GFA would be appropriate for self-storage facilities. If this rate were applied, then self-storage facilities would need to be defined to ensure the lower parking rate only applies to self-storage facilities as opposed to industrial storage facilities with permanent staff that will have higher parking demands. Due to the nature of self-storage facilities, loading will take place directly outside each unit and therefore I do not believe that specific loading space requirements are necessary. Finally, turning to the cycle parking requirements for self-storage facilities. Given the nature of self-storage facilities, it is unlikely that people will visit these by bicycle and generally no permanent staff are situated on site. Therefore I am satisfied that the cycle parking requirements for self-storage activities can be nil.
31. In summary, I support the differentiation of self-storage facilities into a separate category with 0.2 car parking spaces per 100m² GFA and no loading or cycle parking requirements.

¹³ 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