

C) ASSESSMENT OF LARGER CAR PARK AREAS

32. PC40 includes a new rule¹⁴ that triggers Restricted Discretionary Activity status for larger car parks and is worded as follows:

“Any development or redevelopment including 20 or more car parking spaces, (except for sites subject to Rules 30.6.2.8, 30.6.2.9 and 30.6.2.10¹⁵ or within a Rural Zone) shall be a discretionary activity (restricted).”

33. Four submitters including Foodstuffs South Island Limited (#85), Ravenswood Developments Limited (#91), McAlpines Limited (#89) and the Warehouse (#92) express concern regarding this rule in so far that the wording is misleading, that the 20 parking space threshold is unjustified, and that the assessment matters are too general.
34. I will address the submitter's concerns in turn later in my evidence.
35. This rule as drafted affords Council discretion to consider a wide range of potential effects from vehicle access and parking to amenity and lighting amongst others.
36. I can understand Council's desire for discretion over larger car parking areas to ensure they operate effectively for all users. The adverse outcomes if these larger car parks are not designed appropriately is disproportionately higher than for smaller parking areas. For example, larger car parks need more careful design considerations to accommodate pedestrian and cycling access into the site from the street, through the car park and to the activities located on a site.
37. Other district plans include a similar rule affording Council discretion for larger car parks. The Christchurch Operative City Plan currently triggers Restricted Discretionary Activity status for activities with 25 or more parking spaces as a component of the high trip generator rule¹⁶. It should be noted that the 25 parking space threshold is removed from the proposed Christchurch Replacement District Plan (pRDP) as it is believed to have triggered unwarranted resource consents. The Selwyn District Plan triggers

¹⁴ Rule 30.8.2

¹⁵ These rules refer to parking spaces on Principal Shopping Street frontages in Business 1 zones where parking will be provided by cash in lieu financial contribution, and temporary parking on a vacant site following demolition of a building.

¹⁶ Volume 3, Part 13, Clause 2.3.8

Controlled Activity status for new car parking areas with more than 20 parking spaces in Business 1 and some Business 2 zones (17.7.2 and 17.7.3) and 40 parking spaces in Business 3 zones. There is no such rule for living zones in the Selwyn District Plan.

38. To assist with the understanding of the scale of activity likely to be subject to this rule I have calculated the size of an activity that would trigger this rule based on applying the minimum parking rates as set out in PC40. I have assumed the activity is not located in the Business 1 zone (where parking requirements are much lower and/or financial contributions are required rather than providing parking). The results are shown in **Table 2**.

39. I also note that the District Plan includes a high trip generator rule¹⁷ which is not currently subject to review which states:

“...any land use in any zone resulting in a total of more than 250 motorised vehicle movements, either entering or exiting the site, per day is a discretionary activity (restricted).”

40. Therefore, to understand where these rules overlap, I have also calculated the size of the activity that is likely to trigger 250 vehicle trips per day based on standard trip rates for activities¹⁸ and these are shown in the right hand column of Table 2.

Table 2 – Activity Size equating to a minimum requirement of 20 car parking spaces and 250 vehicle trips per day

Activity	PC40 Minimum Parking Requirement	Size of activity to trigger 20 parking spaces	NZTA RR453 Daily Trip Generation Rate	Size of activity to trigger 250 vehicle trips per day	Reaches 250 trip threshold first
General retail	3/100m ² GFA	667m ² GFA	84/100m ² GFA	298m ² GFA	Yes
Supermarket	4/100m ² GFA	500m ² GFA	129/100m ² GFA	194m ² GFA	Yes
Large format retail	1/60m ² GFA	1,200m ² GFA	44.8/100m ² GFA	558m ² GFA	Yes
Food and beverage	10/100m ² NFA	200m ² NFA	73.3/100m ² GFA (restaurants)	341m ² GFA (approx. 273 m ² NFA)	No
			362/100m ² GFA (fast food)	69m ² GFA (approx.)	

¹⁷ Rule 31.22.3

¹⁸ Based on Douglass, M and S Abley (2011) Trips and parking related to land use. NZ Transport Agency research report 453

Activity	PC40 Minimum Parking Requirement	Size of activity to trigger 20 parking spaces	NZTA RR453 Daily Trip Generation Rate	Size of activity to trigger 250 vehicle trips per day	Reaches 250 trip threshold first
Office	1/40m ² GFA	800m ² GFA	26.1/100m ² GFA	958m ² GFA	No
Medical centre	5/100m ² GFA	400m ² GFA ¹⁹	64.1/100m ² GFA	390m ² GFA	Yes
	3/practitioner	7 practitioners	31/prof staff	8 prof staff	No
Hospital	3/5 beds	34 beds	3.1/bed	81 beds	No
Industrial	1/70m ² GFA	1,400m ² GFA	30/100m ² GFA	833m ² GFA	Yes
Warehousing and storage	1/100m ² GFA	2,000m ² GFA	2.4/100m ² GFA	10,417m ² GFA	No
Places of assembly (includes club houses on sports grounds)	10/100m ² NFA	200m ² GFA	Variable trip rate depending on specific activity		N/A

41. The table indicates an even split between activities that would reach the high trip generator threshold of 250 vehicles per day before triggering the 20 parking space threshold and vice versa.
42. Based on my analysis, I would expect that often both the 20 parking space rule and the high trip generator rule will be triggered concurrently for developments. I understand the assessment matters for the parking space threshold rule generally focus on on-site matters such as the layout of the car park, whilst the high trip generator rule assessment matters are mostly concerned with the off-site effects, with some notable exceptions such as *“whether on-site movement of vehicles is affected by the location of structures, topography, or the size and shape of the site”*. I therefore consider it appropriate for both threshold rules to exist in the District Plan as they are generally concerned with different effects. I also believe that a threshold of 20 parking spaces is appropriate as this equates to a sizeable area of car parking (approximately 500m²) where significant consideration needs to be given to the design of the car park to ensure it will operate effectively and provide safe and secure access for pedestrians amongst other design matters.

¹⁹ Gross floor area rate applied for ease of use. Requirement also includes rate based on registered medical practitioner

43. I now turn to the current wording of the parking space threshold rule. Firstly, there are two approaches to this type of rule; that is for the trigger to apply to the 'parking spaces required' which means the minimum number of parking spaces required by another rule in the plan; or 'parking spaces provided' which means the number of parking spaces that are proposed to be provided by the applicant.
44. Given that the main purpose of the rule, as I understand it, is to ensure the layout and design of the car park is safe and appropriate for all users, I believe the trigger should relate to the number of parking spaces that will be provided.
45. As it is currently drafted, the rule applies to any development or redevelopment including 20 or more car parking spaces which means an existing activity with, say, 20 parking spaces that is being extended by one parking space would trigger this rule. I do not consider that this example should trigger the rule as the addition of one space is unlikely to result in significant changes to the operation of the car park. I consider the rule as drafted is overly onerous in this regard.
46. Therefore, I recommend that the rule should exclude large car parks that are only adding a small number of spaces with no other changes proposed to the car park. The reason being that in these situations I do not believe it is appropriate for Council to have discretion over the design of an entire car park that already exists. Therefore I recommend that an exemption to this rule applies where only a small number of parking spaces are added to an existing car park.
47. Turning to the assessment matters, PC40 as notified includes 17 assessment matters which I consider are very wide ranging and unspecific, for example '*public transport*', '*accessibility*' and '*utility services including stormwater management and water quality*'. It is not clear what aspect of public transport is relevant: is it the frequency of bus services or the location, or both? And further, how does this differ from accessibility? This results in the assessment matters affording closer to discretionary status rather than being restricted to parking matters.
48. In contrast, both the Christchurch Operative District Plan and Selwyn District Plan include more specific assessment matters so it is clear to applicants

what the Council is trying to achieve. I believe including more specific assessment matters that are focussed on the aspect of non-compliance that has been triggered will reduce uncertainty for applicants.

49. To achieve this, I suggest that the assessment matters are reduced in number, and better defined or cross references to the specific relevant policies provided instead.
50. Finally, I suggest that this rule could afford Council the discretion it desires over parking space oversupply, which as I understand it, is one of the key reasons for including a 'cap' on parking provision under Rule 30.6.1.30c which I previously discussed and discounted. Assessment matter (x) states "*expected parking demand, vehicle trip generation and proposed parking availability*". This assessment matter could be modified to refer to the extent to which the proposed parking supply exceeds the anticipated parking demand. This would afford Council discretion over larger car parks to consider the effects of applications where the proposed parking provision is higher than the expected parking demand thereby potentially resulting in an oversupply of parking. This discretion would only apply to larger car parks, in other words, 20 spaces or larger due to the drafting of the rule. I believe, however, that car parks smaller than 20 spaces (which would not be triggered by this rule) even if oversupplied in relation to the activity they are serving are unlikely to result in significant effects.

D) LOADING SPACE REQUIREMENTS

51. PC40 proposes to include loading space requirements by activity through amendments to Rule 30.6.1.28. The notified rule refers to loading space dimensions and tracking curves for different vehicle types and then states that these apply based on the '*largest vehicle expected to use the loading space*'.
52. Foodstuffs South Island Limited (#85) states there is no technical analysis and justification for the loading requirements. Ravenswood Developments Limited (#91) seeks a change from accommodating 'the largest vehicle expected to use the site' to 'the average vehicle expected to use the site' as they state it is an inefficient use of resources to require loading requirements based on the largest vehicle. Ravenswood Developments also request that the appropriate truck tracking curves are included within the District Plan

rather than referring to a third party document namely the NZTA On Road Tracking Curves.

53. It is noted that Progressive Enterprises Limited (#90) support the proposed loading requirements as drafted.
54. The 2013 Abley report recommended that the District Plan should include specific provisions where loading and servicing is a significant aspect of development (e.g. retail and industrial activities). Suggested loading rates and vehicle requirements were not provided in the 2013 Abley report.
55. I will address the two concerns raised by submitters in turn, starting with the loading rates themselves, followed by the type of vehicle that must be able to access the loading space.
56. Loading space requirements are generally based on the gross floor area of activities. PC40 proposes different loading requirements for general retail, supermarket and large format retail activities. In **Table 3** below I have compared the loading space rates in PC40 with the comparable rate from Christchurch. I note that the Selwyn District Plan does not specify loading space requirements but rather requires that all loading and manoeuvring is to be carried out on site.

Table 3 – Comparison of Loading Space Requirements

Activity	PC40	Christchurch operative and proposed provision
General retail	1 where GFA is 100m ² or greater	1 HGV bay/1600m ² GLFA for the first 6,400m ² GLFA, 1 HGV bay/5,000m ² GLFA thereafter
Supermarket	1, plus 1 space per 1000m ² of GFA over 2000m ²	
Large format retail	1, plus 1 space per 1000m ² of GFA over 2000m ²	

57. In the Christchurch context, loading space requirements under one half are disregarded. Therefore, only retail activities that are 800sqm GLFA or greater will trigger a requirement for an HGV loading bay. This is clearly a significantly lower requirement than the PC40 provision which would require a loading bay for all supermarkets and large format retail activities

independent of their floor area, and a loading bay for all general retail activities where the GFA is 100m² or greater. I consider that an on-site loading bay is necessary for a supermarket given the frequency and quantity of goods deliveries that are required for this type of activity. Similarly, a large format retail activity is defined in PC40 as any individual shop tenancy with a net floor area of 450m² or greater. Therefore the requirement for a loading bay should be triggered for any large format retail activity or supermarket.

58. For smaller tenancies consisting of general retail activities, the size of the vehicle expected to visit the site will be a consideration. For example, smaller retail activities could be serviced by large vans or 8m rigid trucks. Therefore I consider the proposed loading rate for general retail is appropriate.
59. Turning to the type of vehicle to be accommodated, I note that the Christchurch Operative City Plan (for loading requirements in the Central City) and the pRDP for the remainder of the city uses similar wording to that proposed in PC40; that is *"all loading areas shall be sufficient to accommodate the largest vehicle that is expected to use the loading space..."*
60. Given there is a precedent in the Christchurch City District Plan, I believe the proposed PC40 approach provides sufficient control to ensure loading and servicing of activities can occur without adverse effects. In terms of the request by Ravenswood Developments to require the loading spaces to only accommodate the 'average vehicle expected to use the site', this could result in larger vehicles not being able to visit the site due to manoeuvring constraints, or alternatively larger vehicles will visit the site with consequent adverse effects on the safe and efficient operation of the site and the surrounding transport network as these larger vehicles may be required to carry out reverse manoeuvres to service the site.
61. Finally, in response to Ravenswood Developments' request for the truck tracking curves to be included in the District Plan rather than referencing a third party document. I support the use of industry standard tracking curves such as the NZ Transport Agency tracking curves. The matter of whether the curves should be reproduced in the District Plan is a process matter

rather than a transport consideration and I therefore have no further comment.

62. In summary, I recommend some modifications to the proposed loading rates for retail activities. I also recommend that the reference to 'largest vehicle expected to use the site' be retained with reference to the size of the loading bay and the manoeuvring space required.

E) CYCLE PARKING REQUIREMENTS

63. McAlpines Limited (#89) consider that the minimum requirements for cycle parking are excessive for large format commercial and industrial areas where cycle demand is considerably lower. They therefore request that cycle parking is not required for building supplies retailers except to cater for staff cycle parking demand. The Warehouse Limited (#92) state that the provision of cycle parking based on staff numbers will be difficult to predict. They go on to state that they consider the staff cycle parking demand rate at large format retail activities is significantly lower than the proposed rate.
64. I have compared the proposed cycle parking requirements for large format retail activities in **Table 4**. I have also worked out the cycle parking requirements for a 5,000m² GFA Mitre10 Mega store.

Table 4 – Cycle Parking for Large Format Retail Activities

	Operative Plan	PC40	Christchurch pRDP	Selwyn District Plan (operative)
Cycle parking requirements	No requirement	1 space per 500m ² GFA plus 1 per 1000m ² GFA thereafter, and 1 long term space per 5 FTE employees	1 visitor space/1000m ² GLFA and 1 staff space/750m ² GLFA (Trade supplier activity)	Minimum of 2 spaces then 1 space for every 5 car parking spaces required, to a maximum of 10 cycle spaces
Requirement for a 5,000m² GFA Mitre10	Nil	6 for visitors 4-6 for staff (based on 20-30 FTE staff)	5 for visitors 7 for staff	10 cycle spaces

65. The table indicates that the PC40 cycle parking rate for large format retail activities is similar to both the Christchurch and Selwyn requirements. The rates reflect that there will still be some demand for customer cycle parking,

albeit at a lower rate than other retail activities due to the nature of the goods being sold.

66. In terms of ease of use, the number of FTE staff may not be known at the time of consent and therefore District Plans tend to be moving towards floor area rates. The PC40 cycle parking rates in Table 4 for the Mitre 10 example result in a similar quantity of cycle parking as both the Christchurch and Selwyn rates. Therefore, I recommend that the proposed PC40 cycle parking requirement for large format retail activities is appropriate, however it would be more user friendly to base staff cycle parking rates on Gross Floor Area rather than FTE staff. In this respect, I recommend a long term cycle parking requirement of 1 space / 1000m² GFA for general retail, large format retail and supermarkets.
67. For food and beverage activities, the proposed long term cycle parking rate of 1 park per 5 FTE employees is similar to a rate of 1 cycle park per 100m² Net Floor Area.
68. With regard to the design of cycle parking, PC40 includes a new rule outlining the manner in which cycle parking should be located and designed²⁰. This rule sets out the criteria that the cycle stands should meet along with the location of the cycle parking and specific requirements for short term (casual) versus long term (secure) cycle parking. A number of submitters commented that they consider the cycle parking design requirements are excessive. In particular, McAlpines (#89) and The Warehouse Limited (#92) request that the wording of part a) of the rule be modified to refer only to 'adequately supporting the cycle' and that the word 'storage' within part k of the rule be removed. Ravenswood Developments (#91) request that the cycle parking design rule be deleted and replaced with diagrams showing the space dimensions. In addition, Foodstuffs point out that the formatting of the rule appears to be incorrect.
69. Putting aside the formatting of the rule, which can easily be rectified, I believe the provision of the cycle parking design and location rule as drafted, provides the flexibility for cycle parking to meet development and site constraints whilst ensuring that the cycle parking is appropriate for the particular needs of the users. Further, the particular design of the cycle stand is not specified which allows for innovative cycle stand designs that

²⁰ Rule 30.6.1.36

are still usable. In particular, the reference to requiring cycle parking to support the cycle frame, not the wheel only, will over time reduce the quantity of cycle stands that only support one wheel. These stands are known as 'wheelbenders' by people who cycle as they provide insufficient support to the whole bicycle. This can result in the bicycle falling over or people locking their cycle in alternative locations that may block pedestrian and vehicular access. Therefore I recommend that part a) of the rule remains as notified in PC40.

70. I agree that the word 'storage' in part k) of the rule serves no purpose and can be removed without changing the intent of the rule.

F) PARKING REQUIREMENTS FOR EDUCATIONAL FACILITIES

71. The Ministry of Education (Ministry) submitted a number of comments regarding the proposed car and cycle parking and drop off area requirements for educational facilities. In general, the Ministry's approach nationally is to maintain a level of consistency in the approach to parking facilities. Substantial consultation has recently been carried out between Christchurch City Council and the Ministry in developing the car and cycle parking requirements for the Christchurch pRDP. **Table 5** provides a comparison of the Waimakariri Operative Plan requirements, PC40 as notified, and the Christchurch pRDP²¹.

Table 5 – Car Parking for Educational Facilities

Activity	Operative Plan	PC40	Christchurch proposed Replacement District Plan
Educational facilities	1 space per 20 students over 16 years on site at any one time 1 space per 2 employees in attendance	3 spaces per classroom 1 space per 5 students over 16 years of age A separate on-site drop off and pick up area shall be provided where more than 10 parking spaces are required	1 space per 25 students (year 8 and below) 0.5 spaces per 25 students (year 9 and above) 0.5 space per FTE staff

²¹ Schedule 1 to Decision 7 Transport (Part) Christchurch Replacement District Plan decision dated 7 August 2015.

Activity	Operative Plan	PC40	Christchurch proposed Replacement District Plan
Pre-school and childcare facilities	1 space per 2 employees in attendance 1 space per 10 persons catered for, or 1 space per 10m ² net floor area, whichever is greater	1 space per 5 children	1 space per 10 children 0.5 space per FTE staff

72. The first difference to note is that the units of measurement differ between the various plans. In particular the Christchurch provisions both base the parking requirements on students and staff. In contrast, PC40 provisions are based on classrooms and the number of older students.
73. As explained by the Ministry, PC40 requires a fourfold increase in parking for senior students from 1 per 20 students in the Operative Plan to 1 per 5 students in PC40. The Ministry goes on to assert that senior students are generally well placed to adopt more sustainable modes of travel such as taking the bus, cycling and walking and these modes should be encouraged to establish life habits. Therefore, requiring a higher proportional number of parking spaces for senior students is counter to this aim. The Ministry suggests that other district plans are moving away from the provision of parking for senior students and this is reflected in the Christchurch pRDP rates which do not include a specific requirement for senior students and in fact provide a lower parking rate for older students. I understand that this reflects that older students are more capable of travelling by modes other than the private car. I agree with the Ministry's approach that there should be no specific parking requirements for senior students (i.e. 16 years and older).
74. Similarly, the Ministry asserts that the requirement for 3 parking spaces per classroom is significantly higher than the corresponding rates in the Christchurch pRDP. Converting the Christchurch pRDP rates to a 'per classroom' rate works out to be approximately 1.5 parking spaces per classroom (assuming a classroom accommodates approximately 25 students and 1 FTE staff). Therefore, I agree with the Ministry that the PC40 notified rate appears to be overly onerous.

75. Further to this, I understand that education is moving to 'pod' style teaching facilities rather than discrete classrooms. This makes a rate based on classrooms less appropriate. I therefore agree that a parking rate based on 'students and FTE staff' is the most appropriate metric. The Christchurch pRDP includes a car parking requirement for schools of 1 space /25 students (year 8 and below) and 0.5 spaces/25 students (year 9 and above) along with 0.5 spaces per FTE staff. I see no reason why these rates should not be adopted for the Waimakariri district.
76. Turning to pre-school and childcare facilities, PC40 requires 1 car parking space per 5 children which is based on the average parking demand for preschools from research²². The equivalent Christchurch pRDP rate is 1 space per 10 children and 0.5 spaces per FTE staff. Again, the Ministry suggests the Christchurch pRDP rate is more appropriate and should be adopted.
77. I understand that, in general, adult to child ratios at pre-schools and childcare centres are between 4 to 10 children per adult (depending on the ages of the children and the size of the centre). Therefore, for each 4 to 10 children the Christchurch pRDP would require 0.5 parking space for staff. Therefore the Christchurch pRDP rate equates to approximately 1.5 – 2 spaces per 10 children (including the staff requirement) which is 0.75 to 1 space per 5 children. This rate is similar, albeit slightly lower than the PC40 proposal and the average parking demand stated in the research.
78. Pre-school and childcare staff will generate demand for all day parking, whereas parking for children will generally operate as drop off / pick up spaces. Therefore, in my opinion, it is more appropriate to cater for staff parking by including a specific parking requirement for staff. Therefore, I recommend that the parking rate should be 1 space per 10 children and 0.5 spaces per staff member.
79. I will now turn to the matter of requiring a separate drop off / pick up area for educational facilities excluding pre-schools²³ as required by PC40. The Ministry's submission states that this is not generally a requirement in other district plans and could be problematic for existing schools which have a need for additional classroom space. The Ministry would prefer to assess

²² Douglass, M and Abley, S (2011) Trips and parking related to land use. NZ Transport Agency research report 453

²³ Table 30.8

pick up and drop off areas on a case by case basis rather than including them as a requirement.

80. I understand there has been a major mode shift to car passenger, particularly for primary school students in the last 10 to 20 years. This has affected the need for solutions to accommodate these additional vehicle trips.
81. In my opinion, although the provision of a separate on-site setdown space may be appropriate for new schools, existing schools may not have the land area to provide a setdown space, let alone separately from car parking areas (as stated in PC40). In addition, existing schools may already have other arrangements for student setdown, for example, in on-street locations. I also consider that, depending on the design and layout of the school and adjacent local road network, on-site setdown spaces may require vehicles to enter and exit the school property which may increase potential vehicle / pedestrian conflicts. Some schools are also encouraging other modes of travel which do not involve students being dropped off within the school grounds, for example park and walk. Further, research²⁴ indicates that few school sites have sufficient area to accommodate the setdown traffic flows and parking needs in off-street locations. In addition, the wording of PC40 is not clear on the size of the drop off / pick up area and what is meant by 'separate'. I believe this may lead to drop off / pick up areas being poorly designed, and potentially unusable, in order to meet the rule.
82. The above matters indicate to me that although adequate setdown space is an important requirement, particularly for new schools, there are a number of design considerations that will be specific to each school and surrounding environment. I recommend therefore that the requirement for a separate on-site drop off and pick up area should only apply to new schools and not expansions to existing schools.
83. I am also aware that the Ministry currently has a project to develop transport planning guidance for primary and intermediate schools. This guidance will include, amongst other transport matters, good principles of design for set down / pick up areas.

²⁴ Douglass, M and Abley, S (2011) Trips and parking related to land use. NZ Transport Agency research report 453

84. Turning to cycle parking requirements, for ease of use it is desirable for car parking, cycle parking and loading requirements within the Plan to apply the same units of measurement for each activity. In this respect, cycle parking for pre-school and childcare facilities should be based on children and staff rather than students as PC40 is currently drafted.
85. In general the Ministry supports the requirement to provide cycle parking for education facilities and pre-schools. The Ministry states that for pre-schools and childcare facilities, long term cycle parking demand (from staff working at the facility) will be much greater than short term cycle parking (i.e. from caregivers dropping off or picking up children). Therefore, I agree with the Ministry that a rate per staff member is appropriate.
86. Therefore, except for a minor wording change to refer to children rather than students for cycle parking for pre-school/childcare facilities, I believe the rates are generally appropriate.
87. In summary, I recommend that the car and cycle parking rates for educational facilities be based on those agreed in the Christchurch pRDP. In addition, I recommend that the requirement for an on-site drop off / pick up area should only apply to new and not existing schools.

G) MOTORCYCLE PARKING

88. The only reference to motorcycle parking in PC40 is the inclusion of a method regarding a parking strategy which states *"Development and adoption of guidance for the location and design of public parking facilities, on-street parking, and public cycle and motorcycle parking"*²⁵. Foodstuffs South Island Limited (#85) comment that motorcycle parking is not mentioned elsewhere in the plan change however they do not seek any specific modifications.
89. The motorcycle mode share for journeys to work to the Waimakariri District from the most recent census in 2013 is 1%. There are no national or local policies or trends that lead me to believe that motorcycle use will increase in the future. Motorcycles can legitimately use regular car parking spaces although I acknowledge that the use of the space is less efficient as specific motorcycle parking can be located in areas that are not useable for car parking.

²⁵ Parking Strategy 11.1.2.1.4

90. Due to the low mode share for motorcycling, and the lack of policy direction to increase the use of motorcycles / scooters, I do not believe that requiring specific motorcycle parking for land use activities is necessary. Therefore, aside from the reference in the parking strategy method I previously outlined, I do not recommend any other changes to the District Plan to support motorcycling.

SUMMARY AND CONCLUSIONS

91. In my evidence I have considered particular matters identified by Council as requiring assessment and discussion of the specific relief sought by submitters. My conclusions are provided in the following paragraphs.
92. I consider that the provision of centralised parking facilities within town centres facilitated through application of financial contributions for town centre sites with Principal Shopping Street frontages is appropriate. These areas are the focus of intensive activity in the District and subsequently have the highest accessibility to alternative modes. Furthermore, the type of development lends itself to sharing centralised car parking arrangements due to multi-purpose trip making.
93. Outside of town centres, I do not believe the cap on parking supply as a percentage of the minimum parking requirement is appropriate as it is a blunt instrument that may not have the desired effect of minimising the incidence of parking oversupply due to the range of factors that influence the parking demand of a particular activity. Instead, I believe there are other provisions within PC40 that will discourage parking oversupply, in particular through the assessment matters for larger car parking areas. Therefore I recommend that the proposed cap on car parking supply is removed.
94. I recommend specific changes to some of the car parking, cycle parking and loading requirements in response to specific relief requested by submitters.
95. Finally, I conclude that motorcycle parking as a specific requirement in the District Plan is not necessary.

Ann-Marie Head

13 October 2015