

**WAIMAKARIRI DISTRICT
COUNCIL**

SUMMARY OF SUBMISSIONS

**COUNCIL PLAN CHANGE 40
(PC40)**

PARKING

MARCH 2015

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

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SUMMARY OF SUBMISSIONS (DECISIONS REQUESTED AND REASONS)

Agenda 40: Parking

Ref Relief Sought

Blackwell, David

- 83.1 Discuss parking with local business community and Kaiapoi Community Board including service centre parking effects.

Reason A variety of large, well displayed car parking facilities are required for Kaiapoi and Rangiora. Time-restricted parking on central streets and within well designed central car parks are required in conjunction with all day parking. In Kaiapoi, central Red Zoned land should be secured for parking. Parking is required near the new Kaiapoi service centre.

Community & Public Health

- 84.1 Support objective 11.1.2, Policy 11.1.2.3, Policy 11.1.2.4 and Rule 30.6.1.36.

Reason Support Waimakariri District Council acknowledgement of the importance of cycle parking to promote active transport and the focus on pedestrian health and safety. Support the focus on on-site car parking requirements to improve safety and efficiency of road corridor and maintain access to key activity centres.

Foodstuffs South Island Limited

- 85.01 Decline the plan change, subject to the relief sought by submissions 85.2 to 85.27.

Reason Plan change needs to accommodate and recognise operational needs of large retail and vehicle oriented activities such as supermarkets, will result in a lack of certainty, create effects on centres, adds extra regulation, is presumptive and fails to meet RMA requirements.

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

Reason Ability to achieve improved outcomes while enabling anticipated development is questioned and vibrancy and vitality of centres could be undermined particularly in relation to car based large format retail. For example, car park amenity can be provided by other methods, and provisions to avoid on-site parking, limit parking numbers and require parking at the rear of a building does not relate to the functional requirements of supermarkets and could compromise pedestrian/customer safety and accessibility.

- 85.03 Any other relief as required, including consequential amendments.

Reason To address matters raised by Foodstuffs.

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

Reason The definition of parking uses the term 'parking facility' which is not defined and could be interpreted to mean the entire parking area. This could be a problem for partial shared parking. Use of 'on the same site' should also be clarified to refer to either parking spaces or the land use activities.

- 85.05 Clarify or substitute the words 'parking facilities' in Objective 11.1.2 to remove any contradictions within the objective.

Reason In Objective 11.1.2 the term 'parking facilities' should be defined or substituted to remove contradictions. The objective appears to suggest the definition is broad.

- 85.06 Review the initial wording of Policy 11.1.2.1 to read 'Vehicle parking, loading and manoeuvring, whether provided on-site or within shared parking facilities, shall ensure that:...', and revise use of the word 'compromise' in Policy 11.1.2.1 (b).

Reason The initial wording of Policy 11.1.2.1 is confusing and use of the term 'compromise' could be too restrictive. Part (b) means it is difficult to quantify how this is achieved.

- 85.07 Clarify Method 11.1.2.1.2 to set out that developer liaison is a Council responsibility and review reference to motor cycle parking.

Reason Motor cycle parking is mentioned in Method 11.1.2.1.4 but not elsewhere in the plan change, and developer liaison should be a Council responsibility (Method 11.1.2.1.2).

- 85.08 Replace the word 'enabling' with 'encouraging' or 'facilitating' within Policy 11.1.2.2.

Reason Policy 11.1.2.2. requires clarification in regard to the use of the word 'enabling'.

- 85.09 Remove words '...and considers pedestrian safety' in Policy 11.1.2.3(a).

Reason Use of the words '...and considers pedestrian safety' is unnecessary in Policy 11.1.2.3(a) as this is already implied.

- 85.10 Clarify the visibility requirements for pedestrians and vehicle drivers and reword Policy 11.1.2.4 (b), noting that 'footpath' is not defined by the District Plan.

Reason Policy 11.1.2.4(b) is uncertain in relation to pedestrian and vehicle driver visibility.

- 85.11 Replace the term 'avoid' with 'minimise' in Policy 11.1.2.5.

Reason The use of 'avoid' in Policy 11.1.2.5 may be too restrictive in relation to land uses with high demands for parking. It may not be possible for Council to provide sufficient public parking for such uses leading to traffic congestion or use of land will be compromised.

85.12 Review Policy 11.1.2.6 in order to:

- (a) define blind aisle, and
- (b) clarify 11.1.2.6(f) in regard to crossings and
- (c) refer to 'route' rather than 'path' in 11.1.2.6(g).

Reason The term 'blind aisle' has not been defined, but are permitted for private car parks under NZS AS/NZS2890.1:2004 paragraph 2.4.2(c). 11.1.2.6(f) is not achievable as a vehicle will need to cross a footpath via the vehicle crossing. Part (g) requires more than ground level clearance for obstructions.

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'.

Reason Policy 11.1.2.7(c) appears contrary to Objective 11.1.2 in relation to accessibility within parking facilities. Inclusion of manoeuvring means it will be necessary to separate the route to the loading bay. Policy 11.1.2.7(d) could be construed to mean that a slow moving vehicle is an obstruction and Policy 11.1.2.7(e) does not take into account that the frontage to a service lane needs to be suitable for use by service vehicles.

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

Reason The term 'same locality' Policy 20.1.1.3 (c) requires more certainty to ensure convenient placement of parking.

85.15 Remove wording shown in Figure 30.3 that is additional to the requirements of Standard AS/NZS2890.1:2004.

Reason The reference to Standard AS/NZS2890.1:2004 in Figure 30.3 is not correct as the diagram has been modified to require a splay to the drivers' right.

85.16 Note that Table 30.8 refer to number of spaces to be provided, whereas they should be minimums.

Reason The table infers an exact number; however Rule 30.6.1.30 makes it clear they are minimums.

85.17 Provide technical analysis for the rates used for supermarket parking and loading.

Reason The parking rate for supermarkets in Table 30.8 requires justification as it effects the maximum rate under Rule 30.6.1.30. Loading provisions have not been justified.

85.18 Revise Diagram 30.7 in relation to stall depth to be in accordance with the Abley report and the standard.

Reason Stall depth in Diagram 30.7 is incorrectly indicated.

Ref **Relief Sought**

85.19 Review Rule 30.6.1.30 limiting the extent to which the minimum parking ratios can be exceeded.

Reason No technical analysis is provided for the limitation of parking provision to 130% of the minimum requirement.

85.20 Revise Rule 30.6.1.31 to take situations where loading may not be feasible into account.

Reason Rule 30.6.1.31 does not recognise that it will not always be possible to achieve loading from a service lane if there is inadequate frontage or width in relation to the required service vehicle.

85.21 Revise Table 30.9 to allow disabled spaces to be provided in a manner which shares the additional width provided for by Rule 30.6.1.33.

Reason Contradiction between provisions.

85.22 Reword Rule 30.6.1.36 correct formatting and revise part (k) to correct a minor error.

Reason Formatting is not correct for Rule 30.6.1.36, as parts (e) to (j) are subsections of part (d). Part (k) refers to a bicycle and does not recognise that two or more cycles may be present.

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

Reason Oppose Rule 30.6.2.8 as not providing car parking could lead to adverse outcomes.

85.24 Clarify Rule 30.8.2 in relation to:

- a) extension of existing parking facilities and
- b) provide justification for use of 20 parking spaces or revise threshold and
- c) clarify and focus assessment matters and in particular the meaning of 'location and design', and 'public transport' in relation to accessibility.

Reason Rule 30.8.2 is ambiguous as it is unclear how it is intended to apply to extensions to existing facilities and no technical analysis is provided for the threshold of 20 parking spaces Assessment matters should be more precise.

85.25 Re-evaluate rules relating to categories of consent including Rule 30.9.1.

Reason The categories of consent relating to non-compliance with rules do not take sufficient account of the effects of non-compliance for different rules.

85.26 No decision sought.

Reason Inconsistency between Table 34.1 and Policy 20.1.1.3 in regards to the flexibility in the provision of parking location.

Ref Relief Sought

85.27 Review policies and rules to ensure strong linkage in particular Policies 11.1.2.1, 11.1.2.2, 11.1.2.4, 11.1.2.6, and 11.1.2.7.

Reason Policies and Rules require better linkages, particularly in regard to Policy 11.1.2.1, Rule 30.6.1.30, Policy 11.1.2.2, Policy 11.1.2.4, Policy 11.1.2.6, Policy 11.1.2.7 and Rule 30.6.1.31.

Galbraith, Mrs JK

86.1 Apply a parking restriction in residential lay-byes to prevent permanent parking.

Reason Parking spaces in residential lay-byes should not be permanently occupied as it is not fair on other residents and visitors.

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.

Reason Parking requirement for Industry in Table 30.8 which relates to Rule 30.6.1.28 is not appropriate for self-storage facilities which require large GFA buildings but generate little car parking demand as they do not rely on permanent staff on the site, and visitors park directly in front of their storage units.

McAlpines Limited 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.

Reason Proposed changes support pedestrian accessibility, connectivity, urban design, amenity, safety, active and public transport and redevelopment and growth of town centres through centralised parking. This is not opposed for the Business 1 and Town Centres; however the inclusion of Business 2 zones is not suitable or applicable.

89.2 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;
- (f) support greater use of public transport within town centre and residential environments;
- (g) provide for loading and manoeuvring requirements without compromising safety; and ...

Reason Proposed Objective 11.1.2 does not reference Business 2 Zone environments and requires amendment to better reflect the context of policy and rule provisions that focus on Business 1 Zones.

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.

Reason Cycling is encouraged due to multiple benefits. However, park provision must recognise the function of the surrounding environment and that of the Business 2 Zone.

89.4 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; ...

Reason CPTED provisions are primarily aimed at town centres and are not necessary for Business 2 Zones.

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.

Reason The Reasons for Policies 11.1.2.1 to 11.1.2.7 emphasise amenity and benefits of cycle transport but fail to recognise the function and nature of the activity and surrounding environment. The Business 2 Zone at Southbrook does not have the same function or amenity as the Town Centre which should be recognised.

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

Reason The introduction of a parking maximum of 130% within Rules 30.6.1.30 and 30.8.2 is opposed outside of town centres and especially in relation to the Business 2 Zone where the location and size of stores my reduce customer numbers travelling by active or public transport, and where there are lower amenity expectations. The proposed rules would generate consents for breach of maximum parking spaces and the policy framework would allow these to be granted.

Ref Relief Sought

- 89.7 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.

Reason Cycle parking requirements are excessive and presumptive

- 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:

- (a) to adequately support the cycle;
- (b) 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.

Reason Rules 30.6.1.35, 30.6.1.36 and Table 30.8 require landscaping in parking areas and cycle parking. Landscaping should be reduced or allowed to be concentrated along the site frontage or internal boundaries where there is a public interface. Cycle parking requirements are excessive and prescriptive and not suitable for large format commercial and industrial areas.

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

Reason Landscaping within car parks can prove more cumbersome and should be located on site boundaries.

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.

Reason Higher parking requirements for schools will place pressure on school land and discourage more sustainable forms of travel.

- 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.

Reason The proposal increases the required rate of parking for over 16 years students from 1 per 20 to 1 per 5. Students of this age are well placed to bus, walk and cycle, which are modes that should be encouraged to be established as life habits. Other District plans make no specific allowance for senior student parking.

- 88.3 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.

Reason Parking requirements for pre-school and day care facilities should not provide extensive parking where other education oriented facilities could be utilised.

Ref ***Relief Sought***

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

Reason Plan change requires more parking than other plans.

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.

Reason Support emphasis on providing student and staff cycle parking for education facilities as the use of active transport is supported, however greater flexibility is required to provide for active transport modes depending on each school's circumstances.

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

Reason Cycle parking for pre-school and childcare facilities should relate to staff rather than attending children.

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

Reason Safety is paramount in relation to internal movement and access.

88.8 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.

Reason The required drop off and pick up areas for schools could be problematic for existing schools needing to expand classroom space.

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

Reason Proposed parking ratios could be a burden to schools and result in loss of outdoor field areas. A reduction in ratios would support active transport and reduce loss of space.

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’.

Reason Plan change is deficient as there is a rule reference to supermarket in Table 30.8 but no definition of that term.

90.02 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.

Reason Proposed Policy 11.1.2.6 (i) and (ii) does not recognise the operational requirements of supermarkets for car parking at the front or the premises.

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.

Reason Chapter 16: Business Zones, Environmental Results Expected section does not recognise the requirements of supermarkets.

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

Reason Proposed Policy 16.1.1.3, second bullet point 'Parking' does not recognise the requirements of supermarkets.

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

Reason Support proposed Rule 30.6.1.28 as these changes reflect the standards applied by Progressive Enterprises Limited at its stores.

90.06 Adopt Tables 30.9, 30.10 and Figure 30.7.

Reason Support changes to Tables 30.9, 30.10 and Figure 30.7 as they are sensible, well proven and acceptable practice.

90.07 Delete Rule 30.6.1.30(c).

Reason Rule 30.6.1.30 (c) is illogical and lacks technical basis. Developers and supermarkets would not over-provide customer car parking due to land and formation costs. The standard used by Countdown supermarkets is 1 car space per 20m² GFA.

90.08 Adopt proposed Rule 30.6.1.33 and proposed Table 30.11.

Reason Support Rule 30.6.1.33 and the addition of Table 30.11 as they are sensible and accepted practice.

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

Reason Support Rules 30.8.1 and 30.8.2 as they represent sustainable resource management practice provided Rule 30.6.1.30(c) is deleted.

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

Reason Rule 30.9.3 is too stringent. There may be circumstances where on-site parking on a site with principal shopping street frontage is justified for operational reasons.

Ref Relief Sought

- 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.'

Reason Proposed Rule 31.21.1.2 (a) is unclear and may not meet the operational requirements of supermarkets. Progressive Enterprises Ltd has two supermarkets located in the Business 1 Zone that may be affected by this rule.

Ravenswood Developments Ltd

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

Reason Proposed requirements for parking numbers, space, manoeuvring and loading requirements are excessive and will result in inefficiencies of land use.

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

Reason The Plan Change introduces new definitions that relate to land uses other than parking.

- 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.'

Reason Definition of 'industry' relies on the term 'business activity' which is not defined.

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

Reason The car parking requirements for warehousing and storage are too restrictive and will result in inefficient land use and excessive parking requirements.

- 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.

Reason Support proposed Policies 11.1.2.2 and 11.1.2.3 which encourage public transport use and cycle transport provided this does not take priority over private transport options.

- 91.06 Delete proposed Policy 11.1.2.4.

Reason Proposed Policy 11.1.2.4 (footpath design and location) will result in inefficient land use within parking areas and is not necessary for visibility and safety.

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

Reason Proposed Policy 11.1.2.5 specifies avoidance of on-site parking where sites have frontage to a principal shopping street. This does not take account of commercial reasons for parking provision and will lead to creation of uneconomic business areas.

91.08 Delete Policy 11.1.2.6.

Reason Proposed Policy 11.1.2.6 uses unclear terms such as 'blind aisle', contains excessive and unnecessary urban design requirements, and does not consider costs of these measures.

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.'

Reason Proposed Policy 11.1.2.7 has excessive requirements that will be inefficient. Manoeuvring for the largest vehicle expected to use the facility is excessive.

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.

Reason The Reasons for Policies 11.1.2.1 to 11.1.2.7 are excessive in length and intent.

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

Reason Rule 30.6.1.28 requires loading for the largest vehicle expected to use the loading space, which is inefficient and inappropriate.

- 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.'

Reason The use of gross floor area (GFA) as the basis for parking assessment in Table 30.8, which is too broad and will not reflect the activity accurately.

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

Reason Table 30.8 car parking requirements are excessive.

- 91.14 Retain proposed amendments to Table 30.9

Reason Support reductions in parking space dimensions in Table 30.9 which enable more efficient use of resources.

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

Reason Reference to truck tracking curves in Table 30.10 needs to be supported by a diagram in the District Plan.

- 91.16 Delete Clause (c) of Rule 30.6.1.30.

Reason Proposed Rule 30.6.1.30 (parking maximum) is not appropriate and should be at the discretion of the land owner.

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

Reason Proposed Rule 30.6.1.31 is excessive in relation to rights of way or shared accessways and is inconsistent with Policy 11.1.2.7(b) which does not refer to rights of way or shared accessways.

- 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 or part of a car park	(Delete Not less than) 1

Reason The requirement for accessible parking spaces in proposed Table 30.11 should require 2 accessible spaces per 100 overall spaces, not 3 as stated.

- 91.19 Amend the first paragraph of proposed Rule 30.6.1.35 to read as follows (Amended text shown in CAPITALS):

'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:...

Delete clause (a) of proposed Rule 30.6.1.35.

Reason Proposed Rule 30.6.1.35 is excessive and onerous, and should allow for trees to be grouped as pairs of trees facing car parks.

- 91.20 Delete clause (a) of proposed Rule 30.6.1.35.

Reason Proposed Rule 30.6.1.35 is excessive and onerous, and should allow for trees to be grouped as pairs of trees facing car parks.

- 91.21 Delete proposed Rule 30.6.1.36 and replace with diagram.

Reason Cycle parking design requirements are excessive in proposed Rule 30.6.1.36 and are open to interpretation.

- 91.22 Delete proposed Rule 30.8.2.

Reason Proposed Rule 30.8.2 is excessive, unnecessary and will result in reconsideration of matters covered in other rules. Consideration of 'land availability and suitability for parking' are not justified.

