

From: [Alex Devine](#)
To: [DistrictPlan](#)
Cc: [Carolyn Wratt](#); [Douglas Allan](#)
Subject: RE: Hearing 22 - Infrastructure -- Revised Infrastructure Provisions
Date: Friday, 18 December 2020 2:17:11 pm

Dear Fletcher,

Kainga Ora has reviewed the Council's revised version of the recommended infrastructure and energy provisions circulated on 4 December 2020 and makes the following comments in respect of:

1. Table 14.12.5.7 – Required parking spaces and loading bays; and
2. Table 14.12.5.14 – Access and road conditions.

As noted in the Council's memorandum, Kainga Ora is currently in discussions with the relevant infrastructure providers in respect of the provisions relating to the National Grid and the provisions on noise sensitive activities in proximity of transport corridors, and so these comments do not address those aspects of the provisions.

Table 14.12.5.7 – Required parking spaces and loading bays

The Council's revised provisions do not propose any additional changes to Table 14.12.5.7, which sets out the minimum parking spaces and loading space requirements.

For the reasons set out in Kainga Ora's primary planning evidence and summarised below, Kainga Ora seeks that Table 14.12.5.7 be deleted in its entirety, or, in the alternative, that the minimum parking space requirements for minor dwellings be removed and the minimum parking space requirements for one bedroom units forming part of a multi-unit development be reduced to 0.5 per unit.

The reasons for this are as follows:

1. The policy intent of the National Policy Statement on Urban Development ("**NPSUD-2020**") is to enable growth by requiring local authorities to provide development capacity to meet the diverse demands of communities, address overly restrictive rules, and encourage quality, liveable urban environments. The removal of minimum parking standards is specifically targeted in the NPS-UD2020 in recognition of the added development cost associated with carparks and the impact of requiring them on achieving a compact urban form. Policy 11 of the NPSUD-2020 states:

"In relation to car parking:

(a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks"

2. Furthermore, implementation standard 3.38 states:

"If the district plan of a tier 1, 2, or 3 territorial authority contains objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity, the territorial authority must change its district plan to remove that effect, other than in respect of accessible car parks."

3. Therefore, Kainga Ora still seek the deletion of Table 14.12.5.7 (in its entirety) given the direction afforded by Policy 11 of the NPSUD-2020. It is noted that consequential amendments would be required throughout the Proposed District Plan to remove references to minimum onsite parking standards and any rules or assessment criteria for activities which do not meet parking standards as a result of the deletion of Table 14.12.5.7.

Table 14.12.5.14 – Access and road conditions

The Council’s revised provisions do not propose any additional changes to Table 14.12.5.14, which, amongst other things, sets out the minimum road widths for subdivisions.

For the reasons set out in Kainga Ora’s primary planning evidence and summarised below, Kainga Ora seeks that:

1. The minimum road width for a local road serving 8 or more allotments be reduced to a legal dimension of 16m; or
2. In the alternative, that the trigger point for the number of allotments be adjusted upwards to enable a greater number to be serviced without a requirement for a 20m road width.

The reasons for this are as follows:

1. Kainga Ora has sought that a Medium Density Residential Zone (“**MDRZ**”) be introduced into the Proposed Waikato District Plan to encourage a compact urban form that meets housing demand, is well connected and provides access to local services. The retention of the requirement for a 20m wide road at a thresholds point over 8 lots for the Village or Residential Zones adjoining local roads reduces the land available to be developed for residential activities. By reducing the developable land area for individual sites, the potential for a compact urban neighbourhood utilising land efficiently is eroded and the residential uplift of the MDRZ curtailed.
2. As addressed in evidence, the Hamilton City District Plan (Table 15-6a-ii) enables low volume local road servicing between 10-20 fee simple lots to have a legal width of only 16m. This approach is considered a more appropriate threshold – by enabling more efficient use of land through increasing the developable area per lot - than the currently drafted 20m. Alternatively, Kainga Ora would support an adjustment of the trigger number of lots (8 as currently drafted) upwards to enable a greater number of allotments to be serviced without a 20m.

Nga mihi | Kind regards

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