

# Addendum to Section 32 Report

## NELSON CITY COUNCIL

### **Nelson Resource Management Plan**

#### Proposed Plan Change 21.5

- i) Parking in area bounded by Collingwood St, Riverside, Malthouse Lane, Harley St and Hardy St
- ii) Reduction in mandatory parking in other City Fringe areas (and other zones) by resource consent

### **Addendum to Section 32 Report for Plan Change 21 (Document 946546)**

16 October 2010



## Addendum to Section 32 report, proposed Plan Change 21 (Parking & Related Changes) to the Nelson Resource Management Plan

This addendum relates to the Section 32 report (document #941088) for proposed Plan Change 21, and is the section 32 assessment for Plan Change 21.5. That assessment was missing from the section 32 report released when Plan Change 21 was notified on 25 September, 2010. Plan Change 21.5 was re-notified 19 October 2010.

### 3.2.4A Plan Change 21.5

#### i) Parking in area bounded by Collingwood St, Riverside, Malthouse Lane, Harley St and Hardy St

The broad alternative options are:

1. Option 1 – Status Quo – leave parking requirements for this area as they are (that is, City Fringe with parking levels specified as in Appendix 10 of the NRMP).
2. Option 2 – rezone area as City Centre (as proposed in Heart of Nelson Strategy).
3. Option 3 – leave zoning as City Fringe at present, amending only the parking rule so that City Centre parking requirements apply.

These alternative options are assessed in Table 3A.

**Table 3A Plan Change 21.5 – Parking in area bounded by Collingwood St, Riverside, Malthouse Lane, Harley St and Hardy St**

	Option 1 - Status Quo - do not proceed with the Plan Change	Option 2 – Rezone the block as City Centre	Option 3 – Leave zoning as City Fringe, amending just parking requirement to match City Centre
<b>Benefits</b>	<p><u>Economic</u> Small financial saving from not having this Plan Change, and subsequent share of reporting, hearing etc costs.</p> <p><u>Environmental</u> Businesses are required to provide on-site parking for the demand they generate. This reduces pressure on on-street parking.</p>	<p><u>Economic</u> Rezoning this area City Centre (i.e. CBD) was signalled in the Heart of Nelson Strategy (C38 &amp; p50). The objective is to grow the CBD over time. That would provide more places where shops could establish, potentially at lower rents.</p> <p>Rezoning as City Centre would remove the need to provide parking to the levels specified in the Nelson Resource Management Plan. This would have economic benefits in terms of being able to develop more of the site, and in some cases could make uneconomic developments economic.</p> <p><u>Environmental</u> Changing the zoning to City Centre, and with it, removing the mandatory parking requirements, would significantly improve urban form and result in developments with more attractive street frontages. It is likely to also encourage redevelopment and improvements in the area.</p>	<p><u>Economic</u> Like option 2, this option would have economic benefits for development or redevelopment in this area, but without the potential economic impacts on the City Centre (since allowing retailing in this block is not part of this option).</p> <p><u>Environmental</u> Similar environmental benefits to Option 2.</p>

	<b>Option 1 - Status Quo - do not proceed with the Plan Change</b>	<b>Option 2 – Rezone the block as City Centre</b>	<b>Option 3 – Leave zoning as City Fringe, amending just parking requirement to match City Centre</b>
<b>Costs</b>	<p><u>Economic</u> Requiring high parking levels can be economically inefficient – more land can be required than necessary. Also, the opportunity for other uses of that land is foregone. Very high levels of parking may make a proposed development uneconomic, and affect whether or not it proceeds. If a business needs fewer carparking spaces than required by the Plan, it can face high consenting costs to get parking reduced.</p> <p><u>Environmental</u> With different zoning and parking requirements applying either side of Collingwood St, a lopsided streetscape is developing. With parking mandatory on the eastern side of Collingwood St, buildings are often set back from the street to accommodate parking. The need to fit in significant levels of parking can also influence the architecture. Sometimes buildings are put on stilts in order to accommodate the mandated parking underneath, which can negatively affect the streetscape, informal surveillance for safety, and can create spaces that attract crime, graffiti and rubbish. The levels of mandated parking also result in less efficient use of land and a less compact centre. The Heart of Nelson Strategy (C38 &amp; p50) has signalled this area to become part of the CBD (City Centre) in the near future and its built form, compactness and walkability will become more important.</p>	<p><u>Economic</u> Small financial cost of undertaking this part of the Plan Change, and subsequent share of reporting, hearing etc costs. Given the economic recession, which is affecting the vitality of the City Centre and seeing a number of business closures, expanding the extent of the City Centre zoning at this time might adversely affect the economic health of the present CBD. The objectives and policies of both the NRMP and the Heart of Nelson Strategy are strongly directed at maintaining and enhancing the vitality of the City Centre and ensuring it remains the commercial and cultural centre of the city. Expansion of the City Centre area too rapidly or when the economy is weakened could worsen the economic health of the City Centre and dilute the 'mainstreet' environment. Properties in the rezoned area would be subject to the special rate that provides public carparks and other inner city amenity improvements.</p> <p><u>Environmental</u> Removing the mandatory requirement for businesses to provide parking to the levels specified in the NRMP could displace customer and staff parking into other areas. Advice to Council (Appendix 4 of the section 32 report for Plan Change 21) is that there would be 'relatively small changes of on-street parking on nearby streets' and that this 'should be monitored and appropriate action taken if there are any spill over problems'. For customers, there is also capacity within the parking squares and metered on-street parking.</p>	<p><u>Economic</u> Small financial cost of undertaking this part of the Plan Change, and subsequent share of reporting, hearing etc costs. As noted above, avoids the potential economic impacts on the City Centre from retail flight.</p> <p><u>Environmental</u> Similar environmental benefits to Option 2.</p>
<b>Benefit &amp; Costs Summary</b>	The status quo option has potentially significant economic and environmental costs, which on balance outweigh the benefits.	There are economic and environmental benefits for this option but in the middle of an economic recession there are potentially significant economic risks. On balance the costs outweigh the benefits.	There are positive economic and environmental benefits from Option 3 and the benefits outweigh the costs, and without the economic risks of Option 2.

	<b>Option 1 - Status Quo - do not proceed with the Plan Change</b>	<b>Option 2 – Rezone the block as City Centre</b>	<b>Option 3 – Leave zoning as City Fringe, amending just parking requirement to match City Centre</b>
<b>Effectiveness and Efficiency</b>	The Status Quo is not an efficient or effective way of addressing the operative issues and achieving the objectives, since the barriers to getting consented reductions or other changes in parking works against outcomes that may be better economically or environmentally.	Rezoning to City Centre would be an efficient and effective way to address the operative issues and achieve the objectives. <u>Efficiency</u> As noted above, it is economically more efficient if unused carparks are avoided, and it can also stimulate redevelopment. In terms of waste of land and underutilised carparks, it is less efficient when businesses provide their parks individually. When parks are provided collectively in one or several sites, greater utilisation can occur. A denser city centre is more efficient in terms of servicing, compactness and walkability, and for the cross benefit from one business to another. <u>Effectiveness</u> Rezoning would be an effective way of resolving some of the issues affecting this area. But in the current recession, and without further research, a complete rezoning could affect the effectiveness - and efficiency - of the objectives and policies that aim to keep the City Centre strong and vibrant.	Option 3 is an efficient and effective way to address the operative issues and achieve the objectives. <u>Efficiency</u> The proposed exemption just for mandatory parking is very efficient as it addresses the main problem identified at present (particularly when this is done in concert with the design and appearance controls proposed in Plan Change 21.6), but without affecting other rules unnecessarily. This approach allows for a staged implementation. Once the retail/city centre advice is received and the economic health of the City Centre improves, this option allows Option 2 to be implemented in the future. <u>Effectiveness</u> The changes are simple, targeted and effective.
<b>Risk of Acting or Not Acting if there is uncertainty or insufficient information</b>	Not applicable	There is uncertainty at present as to the possible effects on the vitality and performance of the existing City Centre area if the City Centre zoned area were to be expanded. The danger is that it could lead to retail flight from the main shopping streets, further weakening the strength and vibrancy of the core City Centre already affected by economic recession. The Council has opted to seek further professional advice from a retail/town centre expert as to the timing and the way the HONS recommendation as to City Centre expansion is implemented.	Not applicable
<b>Conclusion</b>			<b>This option is the most appropriate (and flexible) for achieving the objectives of the Plan.</b>

**ii) Reduction in mandatory parking in other City Fringe areas (and other zones) by resource consent**

The broad alternative options are:

1. Option 1 – Status Quo – leave the resource consent requirements for reducing parking levels as they are now.
2. Option 2 – amend discretionary rule to allow for a reduction (up to 10%) in parking as a non-notified restricted discretionary activity if accompanied by a travel management plan for the site. The change applies to rest of the City Fringe, and in all other zones.

A third option was also considered. This was similar to Option 2, but to allow a greater percentage parking reduction as a non-notified restricted discretionary activity, for example, 20% or 30%. This option was not considered in greater detail because of the criterion “the risk of acting (or not acting) if there is uncertainty or insufficient information”. The costs and benefits of this option are similar to Option 2, but larger in magnitude. However, the effectiveness of travel management plans in achieving such large reductions in parking demand is not proven. It was considered prudent at this stage to limit the more detailed evaluation to options 1 and 2. Once more data is forthcoming, the option of a larger allowable reduction as a restricted discretionary activity could be explored in the future.

[Note that the changes to the controlled activity rule/parking standards for Short Term Living Accommodation is dealt with under PC21.7, Table 4.]

These alternative options are assessed in Table 3B.

**Table 3B Plan Change 21.5 ii – Reduction in parking by resource consent**

	<b>Option 1 - Status Quo - do not proceed with the Plan Change</b>	<b>Option 2 – Allow 10% reduction as restricted discretionary activity, if have travel management plan</b>
<b>Benefits</b>	<p><u>Economic</u> Small financial saving from not having this Plan Change, and subsequent share of reporting, hearing etc costs.</p>	<p><u>Economic</u> The change would help ensure the parking provided better matched the expected demand and need, making more efficient use of the land resource, avoiding unnecessary overheads, and doing so with a more time and cost effective process.</p> <p><u>Environmental</u> Introducing the concept of a Travel Management Plan for a site and allowing consequent reductions in carparks provided will boost the number of people cycling, walking or carpooling to work, which reduces congestion on the roads and the amount of land that has to be given over to parking and roading.</p>
<b>Costs</b>	<p><u>Economic</u> Consenting cost to get consideration of other parking options or reductions under status quo. Requiring higher parking levels than necessary is economically inefficient – more land is required for a development than necessary, or the opportunity for other uses of that land is foregone. Very high levels of parking may make a proposed development uneconomic, and affect whether or not it proceeds. A very high supply of easily available</p>	<p><u>Economic</u> Small financial cost of undertaking this part of the Plan Change, and subsequent share of reporting, hearing etc costs.</p> <p><u>Environmental</u> There is a risk that the Travel Management Plan may not be implemented or not implemented properly, and that parking demand may be greater than the consented level. This is a monitoring and compliance issue, and is no different to other consents with conditions attached to them. A failure to</p>

	<b>Option 1 - Status Quo - do not proceed with the Plan Change</b>	<b>Option 2 – Allow 10% reduction as restricted discretionary activity, if have travel management plan</b>
	<p>parking can tip the balance in favour of people bringing their car, as opposed to sharing a ride, or walking, cycling or getting the bus. This can add to congestion on the roads, with the economic cost of that, and of resultant roading upgrades or new roads.</p> <p><u>Environmental</u> Large areas of paved carpark have environmental downsides, in terms of the amenity and appearance of the city, making it more spread out than it needs to be, and harder for shoppers and others to get around. Parking requirements on smaller sites can overly influence the architecture of developments and negatively affect streetscape. Under the status quo, no recognition or allowance is given where provision is made for other travel modes. A site where cycle parks and showers are provided, and perhaps a quarter of the staff cycle to work, or where staff carpool, has to provide the same number of carparks as a site where this does not occur.</p>	<p>implement a Travel Management Plan could lead to enforcement action and/or having to provide extra parking.</p>
<b>Benefit and Costs Summary</b>	The status quo option has potentially significant economic and environmental costs	There are positive economic and environmental benefits from pursuing this Plan Change, and the benefits outweigh the costs.
<b>Effectiveness and Efficiency</b>	<p>The status quo option is an inefficient and ineffective way to meet the objectives of the Plan.</p> <p><u>Efficiency</u> Requiring full discretionary consent in all cases where reduced parking is sought is expensive and time consuming.</p> <p><u>Effectiveness</u> It is effective in regulating parking and its effects, but with a high degree of rigidity. It is not necessarily effective in providing good economic or environmental outcomes.</p>	<p>The Plan Change option is an efficient and effective way to address the operative issues and achieve the objectives.</p> <p><u>Efficiency</u> The proposed change to the rules provides a more efficient and flexible approach to match parking provided to need/demand. It is an efficient way of achieving the Plan's objectives.</p> <p><u>Effectiveness</u> The proposed change is effective in achieving the objectives of the Plan.</p>
<b>Risk of Acting or Not Acting if there is uncertainty or insufficient information</b>	Not applicable	Not applicable
<b>Conclusion</b>		<b>This option is the most appropriate for achieving the objective of the Plan.</b>