

**Kāpiti Coast District Plan
Proposed Plan Changes
1A, 1B and 1C**

**Section 32 Evaluation
Report**

February 2022

Table of Contents

1.	Introduction.....	3
2.	The Issues.....	3
3.	Response to the Issues: Proposed Plan Changes 1A, 1B, 1C.....	4
4.	Section 32 Requirements.....	4
5.	Purpose of the Plan Changes	5
6.	Relevant Part 2 Considerations.....	6
7.	Relevant Higher-Order Statutory Instruments	6
7.1.	National Policy Statements.....	6
7.2.	New Zealand Coastal Policy Statement (2010).....	9
7.3.	National Standards.....	10
7.4.	Wellington Regional Policy Statement.....	11
8.	Other Relevant Council Plans.....	13
8.1.	Long Term Plan	14
8.2.	Sustainable Transport Strategy.....	14
9.	Planning Documents Recognised by Iwi Authorities	17
10.	Engagement and Feedback.....	18
11.	Further Explanation of the PC1A Issue (Accessible Car Parking)	20
12.	Scale and Significance	23
13.	Reasonably Practicable Alternatives.....	24
14.	Evaluation	25

APPENDIX:

- 1 Plan Amendment 1
- 2 PC1A Amendments
- 3 PC1B Amendments
- 4 PC1C Amendments
- 5 Relevant Plan Objectives and Policies for PC1A and PC1C
- 6 Relevant Plan Objectives and Policies for PC1B

1. Introduction

This evaluation report has been prepared, in accordance with section 32 of the Resource Management Act 1991, to support three proposed changes to the operative Kāpiti Coast District Plan:

- Proposed Plan Change 1A: which proposes provisions to update and replace the Plan’s accessible car parking provisions;
- Proposed Plan Change 1B: which proposes amendments to the Plan’s provisions for managing built development in areas prone to liquefaction, to avoid duplication of and conflict with Building Code requirements for liquefaction; and
- Proposed Plan Change 1C: which proposes provisions to replace the Plan’s cycle parking provisions.

2. The Issues

Proposed Plan Changes 1A, 1B and 1C address three issues arising from changes in national policy that affect some development controls in the operative District Plan. These are:

- Accessible Car Parking:** Clause 3.38 of the *National Policy Statement on Urban Development 2020 (NPS-UD)* directs that all objectives, policies, rules, or assessment criteria that have the effect of requiring on-site car parking in any development must be removed from the District Plan, except in respect of accessible car parks. The clause 3.38 direction applies to all Tier 1, 2 and 3 local authorities. Kāpiti Coast District is part of the Wellington Tier 1 urban environment identified in the Appendix to the NPS-UD. The Plan’s requirements for accessible car parking are currently calculated based on general car parking requirements. Removal of the general car parking requirements has the consequence that no accessible car parking could be required for new developments. This is not the NPS-UD’s or Council’s intention. Having considered the implications of the NPS-UD 2020’s direction, the Council considers that there are sound reasons to include District Plan requirements for accessible car parking. PC1A proposes to reinstate the Plan’s provisions for accessible car parking (with some updating to address multi-unit housing).
- Liquefaction Risks:** Amendments arising from an update to the Building Code will introduce requirements for buildings to meet standards to withstand liquefaction risks. The updated standards were initially imposed in Canterbury, in response to the Canterbury earthquakes and were extended to apply nation-wide in November 2021. The new Building Code standards mean that some of the District Plan’s current requirements relating to liquefaction risk and buildings will become redundant and should be removed to avoid potential duplication or conflicting requirements. The Building Code standards apply only to built development and not to land subdivision. Therefore, no change is required to the Plan’s provisions that seek to manage liquefaction risk for land subdivision.
- Cycle Parking:** The Plan’s requirements for cycle parking are currently calculated based on general car parking requirements. Removal of the general car parking requirements, to comply with clause 3.38 of the NPS-UD, also has the consequence that no cycle parking could be required for

new developments. This is not the NPS-UD's or Council's intention. PC1C proposes to replace the Plan's current provisions for cycle parking.

3. Response to the Issues: Proposed Plan Changes 1A, 1B, 1C

It is important to note that the NPS-UD explicitly states that provisions that have the effect of requiring a minimum number of car parks must be removed from the District Plan without using the RMA Schedule 1 public notification process. This means that these provisions must be removed without the usual process of inviting submissions and further submissions, and no hearing of submissions is possible. The Council will give effect to clause 3.38 of the NPS-UD and remove the general car parking provisions from the Plan by way of 'Amendment No. 1' to the Plan. Proposed Plan Changes 1A and 1C do not address the Plan's general car parking provisions. They address only the reinstatement of the accessible car parking and replacement cycle parking provisions. These replacement Plan provisions are not exempt from the RMA Schedule 1 process and have been proposed separately from Plan Amendment 1.

For completeness, a copy of Plan Amendment 1 is contained in Appendix 1 to this report. The Plan amendments proposed to reinstate the accessible car parking provisions (proposed Plan Change 1A – 'PC1A') are contained in Appendix 2 to this report. There is one substantive change proposed by PC1A in introducing new accessible parking requirements for multi-unit residential developments. This is a current gap in the District Plan that needs to be filled to ensure accessible parking is still provided in the absence of on-site car parking being provided by this type of development. As a NPS-UD Tier 1 local authority, it is reasonable to expect multi-unit residential developments to become more commonplace in the District in the future. The Plan anticipates multi-unit residential development, particularly near District Centres. This approach is consistent with the Plan's objectives and policies and the NPS-UD. It is therefore considered reasonable to also require accessible car parking for multi-unit residential development, to ensure that this form of housing is accessible to people with mobility impairments.

The Plan amendments proposed to remove the potential duplication and conflict with Building Code liquefaction requirements or buildings (proposed Plan Change 1B – 'PC1B') are contained in Appendix 3 to this report.

The Plan amendments proposed to reinstate the cycle parking provisions (proposed Plan Change 1C – 'PC1C') are contained in Appendix 4 to this report.

4. Section 32 Requirements

Section 32 of the Resource Management Act 1991 (RMA) requires, broadly, that before advancing plan provisions a Council must evaluate whether the proposed provisions are the most appropriate way to achieve the purpose of the RMA.

Section 32 (1)(a) of the RMA requires that an evaluation must examine the extent to which any proposed objectives are the most appropriate way to achieve the purpose of the RMA. No new objectives, and no changes to operative Plan objectives, are proposed by PC1A, PC1B or PC1C. The relevant operative Plan objectives for parking and natural hazards remain appropriate.

Section 32 (1)(b) of the RMA requires an evaluation of whether the provisions proposed by PC1 are the most appropriate way to achieve the District Plan objectives. Section 32 (3) clarifies that, for a plan change, this evaluation must consider both the objective of the plan change (the purpose of the plan change) and the operative District Plan objectives, to the extent that those objectives remain relevant. The evaluation is required to:

- identify and consider other reasonably practicable options for achieving the objectives (s. 32 (1) (b) (i)); and
- assess the efficiency and effectiveness of the proposed provisions in achieving the objectives (s. 32 (1) (b) (ii)) and this is most usefully done by comparison with the reasonably practicable alternative options.

The assessment of efficiency and effectiveness required by s. 32 (1) (b) (ii) is required to identify and assess the benefits and costs of the environmental, economic, social and cultural effects anticipated from implementing the proposed provisions. This must include consideration of opportunities for economic growth and employment that are anticipated to be provided or reduced. Benefits and costs are to be quantified, if practicable. The s. 32 (1) (b) (ii) assessment is also required to assess the risk of acting or not acting, *if there is insufficient information* about the subject matter of the provisions.

The evaluation is required to contain a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects anticipated from implementing the proposal.

The evaluation of PC1A, PC1B and PC1C in Section 14 of this report is structured under the following headings, derived from these s. 32 requirements:

- Benefits (including anticipated environmental, economic, social, cultural effects)
- Costs (of the anticipated environmental, economic, social, cultural effects)
- Economic growth impacts
- Employment impacts
- Risk (of acting or not acting if information is insufficient)
- Scale
- Significance
- Efficiency
- Effectiveness

5. Purpose of the Plan Changes

PC1A, PC1B and PC1B are ‘amending proposals’ for the purpose of section 32. This evaluation is required to consider the objective or purpose of the proposed Plan changes, in addition to the objectives of the operative Plan. The purposes of the proposed Plan Changes are:

- PC1A:** to continue the Plan’s provisions requiring accessible car parking in new developments, and adding a requirement for multi-unit residential so as to fully meet the needs of all people within the Kāpiti community (and the intention is that PC1A will have immediate legal effect upon public notification);
- PC1B:** to avoid potential duplication or conflicting requirements between the Plan and the Building Code standards for built development on land that is subject to liquefaction; and

- (c) **PC1C:** to replace the Plan’s current provisions for cycle parking in new developments, to enable and encourage cycling as a transport mode within Kāpiti district.

6. Relevant Part 2 Considerations

Section 5 of the Act (which sets out the sustainable management purpose of the Act) is relevant. This evaluation considers whether the proposed Plan Changes will promote sustainable management and enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety, relative to the reasonably practicable alternatives.

For proposed PC1B, recognising and providing for the management of significant risks from natural hazards is a relevant matter of national interest identified in section 6 (h) of Part 2.

For proposed PC1A and PC1C, sections 7 (b), (c) and (f) are relevant considerations to be given particular regard:

Section 7 (b): the efficient use and development of natural and physical resources;

Section 7 (c): the maintenance and enhancement of amenity values (noting the broad definition of ‘amenity values’); and

Section 7 (f): maintenance and enhancement of the quality of the environment.

7. Relevant Higher-Order Statutory Instruments

Under section 75(3) of the RMA, a district plan must give effect to:

(a) any national policy statement; and

(b) any New Zealand Coastal Policy statement (the *NZCPS*);

(ba) any national planning standard; and

(c) any regional policy statement.

The following higher-level planning documents and legislation are potentially relevant to the amendments proposed by PC1A, PC1B and PC1C:

7.1. National Policy Statements

There are currently four national policy statements (in addition to the *NZCPS*):

a) National Policy Statement on Urban Development (2020 – the *NPS-UD*);

b) National Policy Statement for Freshwater Management (2020);

c) National Policy Statement for Renewable Electricity Generation (2011); and

d) National Policy Statement on Electricity Transmission (2008).

Of these, only the *NPS-UD* is potentially relevant to the accessible car parking and cycle provisions proposed by PC1A and PC1C. The *NPS-UD* does not directly address natural hazards such as liquefaction (other than in relation to their impact in constraining land development).

The *NPS-UD* defines a ‘planning decision’ as including any decision on a district plan. The areas zoned

as urban environments within the District Plan, collectively, meet the NPS-UD definition of ‘urban environment’ and Kāpiti District is identified in the Appendix to the NPS-UD as being part of the Tier 1 urban environment of Wellington. The following objectives and policies of the NPS-UD 2020 are relevant to any decisions pertaining to the District’s urban environment:

Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

Objective 2: *Planning decisions improve housing affordability by supporting competitive land and development markets. Objective 3:* *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*

- (a) *the area is in or near a centre zone or other area with many employment opportunities*
- (b) *the area is well-serviced by existing or planned public transport*
- (c) *there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

Objective 4: *New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*

Objective 5: *Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).*

Objective 7: *Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.*

Objective 8: *New Zealand’s urban environments:*

- (a) *support reductions in greenhouse gas emissions; and*
- (b) *are resilient to the current and future effects of climate change.*

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- (a) *have or enable a variety of homes that:*
 - i. *meet the needs, in terms of type, price, and location, of different households; and*
 - ii. *enable Māori to express their cultural traditions and norms; and*
- (b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*

- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) support reductions in greenhouse gas emissions; and*
- (f) are resilient to the likely current and future effects of climate change.*

Policy 6: *When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

 - i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - ii. are not, of themselves, an adverse effect**
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity*
- (e) the likely current and future effects of climate change.*

Policy 9: *Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:*

- (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and*
- (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and*
- (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and*
- (d) operate in a way that is consistent with iwi participation legislation.*

Policy 11: *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; and*
- (b) *tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.*

7.2. New Zealand Coastal Policy Statement (2010)

The purpose of the *New Zealand Coastal Policy Statement 2010* (the **NZCPS**) is to state objectives and policies in order to achieve the purpose of the RMA in relation to the protection and enhancement of the coastal environment of New Zealand. The NZCPS 2010 took effect on 3 December 2010.

The NZCPS is relevant to the extent that its objectives and policies address natural hazards in the coastal environment (including, potentially, liquefaction). The proposed deletion of the Plan provisions managing liquefaction risk in relation to buildings (PC1B) do not conflict with the relevant objectives and policies. That is because the amendments relate only to certain forms of built development and these specific provisions will be replaced by other more relevant Building Act standards, outside the District Plan. The District Plan's policies and rules managing liquefaction risks as they relate to subdivision (including in the coastal environment) are unchanged by proposed PC1B.

The relevant NZCPS objectives and policies that are potentially relevant for PC1B are:

Objective 5: *To ensure that coastal hazard risks taking account of climate change, are managed by:*

- *locating new development away from areas prone to such risks;*
- *considering responses, including managed retreat, for existing development in this situation; and*
- *protecting and restoring natural defences to coastal hazards.*

It is relevant to note that liquefaction risk in the District Plan, including within the coastal environment, is based on the susceptibility of the identified soil types – being peat and sandy soils.;

Policy 24: *Identification of coastal hazards*

- 1) *Identify areas in the coastal environment that are potentially affected by coastal hazards (including tsunami), giving priority to the identification of areas at high risk of being affected. Hazard risks, over at least 100 years, are to be assessed having regard to:*

- (a) *physical drivers and processes that cause coastal change including sea level rise;*
- (b) *short-term and long-term natural dynamic fluctuations of erosion and accretion;*
- (c) *geomorphological character;*
- (d) *the potential for inundation of the coastal environment, taking into account potential sources, inundation pathways and overland extent;*
- (e) *cumulative effects of sea level rise, storm surge and wave height under storm conditions;*

(f) influences that humans have had or are having on the coast;

(g) the extent and permanence of built development; and

(h) the effects of climate change on:

(i) matters (a) to (g) above;

(ii) storm frequency, intensity and surges; and

(iii) coastal sediment dynamics;

taking into account national guidance and the best available information on the likely effects of climate change on the region or district.

PC1B proposes no change to the Plan's identification or description of liquefaction hazard risk in the coastal environment.

Policy 25 Subdivision, use, and development in areas of coastal hazard risk

In areas potentially affected by coastal hazards over at least the next 100 years:

(a) avoid increasing the risk of social, environmental and economic harm from coastal hazards;

(b) avoid redevelopment, or change in land use, that would increase the risk of adverse effects from coastal hazards;

(c) encourage redevelopment, or change in land use, where that would reduce the risk of adverse effects from coastal hazards, including managed retreat by relocation or removal of existing structures or their abandonment in extreme circumstances, and designing for relocatability or recoverability from hazard events;

(d) encourage the location of infrastructure away from areas of hazard risk where practicable;

(e) discourage hard protection structures and promote the use of alternatives to them, including natural defences; and

(f) consider the potential effects of tsunamis and how to avoid or mitigate them.

The combination of the Plan provisions (amended by proposed PC1B) and the updated Building Code provisions will be effective in avoiding increasing risks associated with liquefaction.

7.3. National Standards

The Council amended the District Plan in June 2021 to give effect to the *National Planning Standards*. proposed PC1A to PC1C adopt the standardised format adopted by the District Plan and standardised definitions where relevant.

There are also nine *National Environmental Standards* in force, but none of the standards relates to the amendments proposed by PC1A – PC1C. For completeness, the national standards are:

a) National Environmental Standards for Air Quality (2004);

b) National Environmental Standard for Sources of Drinking Water (2007);

c) National Environmental Standard for Telecommunication Facilities (2016);

d) National Environmental Standard for Electricity Transmission Activities (2009);

e) National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (2011); and

f) National Environmental Standard for Plantation Forestry (2017);

g) National Environmental Standards for Freshwater (2020);

h) National Environmental Standards for Marine Aquaculture (2020); and

- i) National Environmental Standards for Storing Tyres Outdoors (2021).

7.4. Wellington Regional Policy Statement

The Operative Wellington Regional Policy Statement 2013 (RPS) provides an overview of the resource management issues in the Wellington region, and the ways in which integrated management of the region’s natural and physical resources will be achieved.

The issues addressed by PC1A – PC1C fall within the following RPS chapters:

- Accessible car parking provision: Regional form, design and function (Chapter 3.9)
- Managing liquefaction risk: Natural hazards (Chapter 3.8)

Issue 1 in Chapter 3.9 includes the statement that *‘poor quality urban design can adversely affect public health, social equity, land values, the vibrancy of local centres and economies, and the provision of, and access to, civic services’*. The provision of accessible car parking is relevant in meeting the public health and social needs of people and communities.

Issue 1 in Chapter 3.8 includes the statement *‘natural hazard events in the Wellington region have an adverse impact on people and communities, businesses, property and infrastructure’*. Issue 2 is that *‘people’s actions including mitigation measures and ongoing development in areas at risk from natural hazards can cause, or increase, the risk and consequences from natural hazards’*.

The relevant RPS provisions, responding to these issues, are summarised below:

Table 1: Relevant RPS objectives and policies

Accessible Parking Provision:	
Objective 22	A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and: <ul style="list-style-type: none"> (a) ... (b) an increased range and diversity of activities in and around the regionally significant centres to maintain vibrancy and vitality; (g) a range of housing (including affordable housing); (h) ... (i) integrated land use and transportation; (j) ... (k) ... (l) essential social services to meet the region’s needs.
Policy 30 Maintaining and enhancing the viability and vibrancy of regionally significant	District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of the regional central business district in Wellington city and the: <ul style="list-style-type: none"> (a) Sub-regional centres (including Paraparaumu town centre) (b) ...

centres	
Policy 54	When considering an application for a notice of requirement, or a change, variation or review of a district or regional plan, for development, particular regard shall be given to achieving the region’s urban design principles in Appendix 2 (including considerations of choice in transport options, creating urban environments that provide opportunities for all, especially the disadvantaged, ensuring public spaces are accessible by everybody, including people with disabilities, and good connectivity).
Policy 57 Integrating land use and transportation	When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy: (a) ... (b) connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas; (c) whether there is good access to the strategic public transport network; (d) provision of safe and attractive environments for walking and cycling; ...
Comment:	Provision of accessible car parking and cycle parking, within the built urban environment, is important in enabling all people to provide for their economic, social, cultural wellbeing and their health and safety. Proposed PC1A and PC1C are considered to give effect to Objective 22 and the related policies.
Natural Hazards:	
Objective 19	The risks and consequences to people, communities, their businesses, property and infrastructure from natural hazards and climate change effects are reduced.
Objective 20	Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events.
Objective 21	Communities are more resilient to natural hazards, including the impacts of climate change, and people are better prepared for the consequences of natural hazard events.
Policy 29	Regional and district plans shall : (a) identify areas at high risk from natural hazards; and (b) include policies and rules to avoid inappropriate subdivision and development in those areas.

Policy 51	<p>When considering an application for a resource consent, notice of requirement, or a change, variation or review to a regional or district plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to:</p> <ul style="list-style-type: none"> (a) the frequency and magnitude of the range of natural hazards that may adversely affect the proposal or development, including residual risk; (b) the potential for climate change and sea level rise to increase the frequency or magnitude of a hazard event; (c) whether the location of the development will foreseeably require hazard mitigation works in the future; (d) ... (e) any risks and consequences beyond the development site; (f) ... <ul style="list-style-type: none"> a. avoiding inappropriate subdivision and development in areas at high risk from natural hazards; (g) ... (h) ...
Policy 52	<p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to:</p> <ul style="list-style-type: none"> (a) the need for structural protection works or hard engineering methods; (b) whether non-structural or soft engineering methods are a more appropriate option; (c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future; (d) the cumulative effects of isolated structural protection works; and (e) residual risk remaining after mitigation works are in place, so that they reduce and do not increase the risks of natural hazards.
Comment:	<p>The amendments proposed by PC1B do not create any new or residual risk in terms of the relevant RPS matters. That is because the deleted provisions will be replaced by more relevant, updated, national building standards under the Building Code that have been explicitly formulated to respond to liquefaction risks. The Plan provisions to manage natural hazard risk for land subdivision remain unchanged and, being settled operative provisions, must be considered to be consistent with the RPS.</p>

8. Other Relevant Council Plans

8.1. Long Term Plan

The Council's Long Term Plan (2021-2041) addresses four aspects of wellbeing: social, cultural, economic and environmental wellbeing. The overall goal is for a vibrant and thriving Kāpiti with healthy, safe and resilient communities.

Underlying all of the outcomes for wellbeing is the outcome that Mana Whenua and Council have a mutually mana-enhancing partnership.

The stated outcome for community wellbeing is that *'communities are resilient, safe, healthy and connected. Everyone has a sense of belonging and can access the resources and services they need'*. This is explained as meaning that:

'Our communities (groups and individuals) have access to services and facilities necessary to meet their basic needs to cope with the demands of, and unforeseen disruptions to, their daily lives. They have access to adequate permanent shelter; necessary health services; food; water; education; transport options and networks (roading, rail, cycle, sea and air); telecommunications; and social networks, that they may prosper and thrive to fulfil their potential.'

Proposed Plan Changes PC1A, PC1B and PC1C will contribute positively to achievement of the community outcomes and the overall vision.

8.2. Sustainable Transport Strategy

The Sustainable Transport Strategy 2008 was prepared some time ago but its objectives remain relevant. In particular, it includes a set of relevant principles, including:

Sustainable Transport Principle 2

In moving to a sustainable transport system and as a way of reducing and spreading environmental and economic risk, emphasis must be given to the following hierarchy of transport users, until such time as each travel mode is capable of delivering balanced benefits across the four areas of wellbeing:

- *pedestrians;*
- *people with physical mobility problems;*
- *cyclists;*
- *public transport users;*
- *people accessing health and services within and outside the District;*
- *commercial/ business users;*
- *car borne shoppers and visitors;*
- *car borne commuters;*
- *car borne general travel.*

Sustainable Transport Principle 3

Communities should have access to a physical network and travel service that offers them the widest possible range of travel modes giving access to essential civic and economic centres, social infrastructure and enjoyment of the local environment.

The Strategy explains that: *‘Different travel modes have varying effects on each wellbeing area. The key challenge is that travel by private vehicle has been the major emphasis for the last 100 or so years. This has influenced the form of transport networks and the level of investment in other modes. Urban areas have generally developed in a form that services private vehicle use, although the Wellington region has been less affected than some New Zealand cities. Emphasising capacity for private vehicles in the design of networks has a two-fold effect:*

- *massive environmental effects and risks. Private vehicles may not necessarily be unsustainable but the use of fossil fuels is recognised as hugely problematic, to the extent that the adverse effects are now considered unacceptable;*
- *a reduction in choice about travel as travel corridors have been designed to cater for vehicles. Issues of safety and usability for pedestrians and cyclists increase costs to households for local travel choices because of the need to invest in and maintain private vehicles and spend on fuel. The effect is a reduction in social wellbeing, including health.*

If balance between areas of wellbeing is to be achieved, then a recalibration of the level of emphasis on different transport modes is needed. The challenge is to restore the balance between modes in order to increase choice, reduce social and household costs, and to reduce environmental impacts. While the exploration and development of alternative fuels is gathering pace, the single most effective present method to reduce environmental impacts is to encourage a switching of modes.’

The Strategy intends that District’s transport and access network will be developed in a way that:

- increases the connectivity between and within communities;
- reduces use of fossil fuels as an energy source and as a source of greenhouse gases;
- increases the range of transport mode choices;
- recognises and provides, where possible, for improved and safe access for people with disabilities, older people and children;
- improves access to a range of social, cultural and recreational services, the District centres and to recreation areas, provided the latter is consistent with natural character and wider environmental goals;
- is integrated seamlessly across all transport modes; and
- ensures each major community has access to an integrated passenger transport system across all modes of travel.

Proposed PC1A and PC1C will contribute to achieving the outcomes intended by the 2008 Strategy.

The 2008 version of the Strategy is expected to be superseded in the near future. Relevant provisions from the draft *Sustainable Transport Strategy 2020* include:¹

Outcome 1: Improved Access, Connectivity and Integration

In Kāpiti communities will benefit from a transport network and travel service that offers the widest possible choice, giving access to essential civic and economic centres, social infrastructure and recreational opportunities. Transport and land use will be better integrated and the design of new development will support good transport connections internally and to the wider transport network. In identifying transport solutions no mode should have priority over any other. Delivery programmes will not start on the premise that road building will be the most efficient way of enabling people and businesses to access the goods and services that matter to them. Space will be allocated on the network to match the needs of all user groups so people can easily get around the district by their preferred means, and have an enjoyable journey.

¹ Sourced from the Kapiti Coast District Council website on 25 January 2022 at: <https://www.kapiticoast.govt.nz/media/37567/sustainable-transport-strategy-2020.pdf>

Outcome 2: Safe and Resilient Communities

By adopting a vision zero and safer systems approach people feel safe using a mode of their choice. At the same time the health and wellbeing of communities is improved as a result of increased activity, improved access to key social infrastructure and the ability to appropriately manage the effects of and respond to transport based emissions. Kāpiti will be able to respond quickly and restore essential transport connections after a disruptive event including natural disasters, accidents and major entertainment events. Resilience will be built into the network including alternative routes and effective and reliable options for mode choice, as well as ensuring construction standards and emergency measures are in place to ensure that damage is as limited as possible and recovery is swift.

Outcome 3: Supporting a Vibrant and Thriving District

The town centres and local businesses are supported by the transport network, parking management strategies and projects, and people and goods can easily and reliably move around.

The draft 2020 Strategy intends that District's transport and access network will be developed in a way that identifies specific focus areas, including:

Focus Area 1: The Transport Network

The physical form of the transport network will have major impacts on transport choice. The transport network will need to develop in a way that:

- increases the connectivity of communities;*
- integrates transport modes;*
- improves access to the District centres, recreation areas, school services and employment opportunities;*
- increases mode choice;*
- improves safety, particularly for vulnerable road;*
- ensures resilience; and*
- delivers high quality design that respects the environment and amenity*

Focus Area 2: Integrating Land Use and Development

When considering the need to travel and travel patterns, the relationship between land use and transport is a fundamental one. Land use can affect travel patterns, particularly if alternatives to the private car are unviable, and the ability to travel somewhere easily and ensure access to goods and services can impact on decisions to locate new development.

There is a need to ensure that the right infrastructure is delivered in the right place at the right time. In identifying priorities for infrastructure development Council will take account of future growth and ensure:

- Infrastructure to support the growth identified in the District Plan and Development Management Strategy is planned through:*
- closely aligning the Sustainable Transport Strategy, Development Management Strategy and Economic Development Strategy;*
- ensuring that specific infrastructure to serve specific developments is provided through the resource consenting process;*
- reflecting the outcomes of the Sustainable Transport Strategy and Development Management Strategy in the AMP and LTP;*

- *inputting into District Plan Change and review and structure plan development processes; and*
- *ensuring that new development connects effectively into the existing transport network; and*
- *new developments are planned in a way that either reduces the need to travel or encourages alternatives to the private car, and that they support the development of identified infrastructure projects.*

Proposed PC1A and PC1C will contribute to achieving the outcomes intended by the draft 2020 Strategy.

9. Planning Documents Recognised by Iwi Authorities

There are four documents recognised by iwi authorities in the Kapiti Coast District. These comprise:

- Proposed Ngāti Raukawa Ōtaki River and Catchment Iwi Management Plan 2000;
- Nga Korero Kaupapa mo Te Taiao: Policy Statement Manual for Kapakapanui: Te Runanga O Ati Awa ki Whakarongotai Inc;
- Te Haerenga Whakamua – A Review of the District Plan Provisions for Māori: A Vision to the Future for the Kāpiti Coast District Council District Plan Review 2009-12 – 2012; and
- *Whakarongotai o te moana o te wai’* Kaitiakitanga Plan for Te Atiawa ki Whakarongotai (2019).

The Ōtaki River and Catchment Iwi Management Plan 2000 is not directly relevant for proposed PC1A – PC1C. As proposed PC1A – PC1C apply to the entire district, the other documents are potentially relevant and are considered below:

Nga Korero Kaupapa mo Te Taiao

The document outlines the vision, intent and objectives for compliance with tikanga standards for protection and management of the environment as determined by Te Runanga O Ati Awa ki Whakarongotai Inc with respect to disposal and treatment of effluent, stormwater runoff, heritage protection and management, and representation. The content of the proposed Plan Changes does not address any of the above matters.

Te Haerenga Whakamua

Input from tangata whenua was an important part of developing the PDP, with 23 meetings held from December 2010 through October 2012 between Council staff and a Tangata Whenua working party nominated by Te Whakaminenga o Kāpiti.

The Tāngata Whenua Working Party was established in 2010 as a mechanism for iwi to participate in the review of the District Plan and to represent the District’s three iwi (Te Āti Awa ki Whakarongotai, Ngāti Raukawa ki te Tonga and Ngāti Toa Rangatira). The mandate for the working party was to review all aspects of the District Plan on behalf of Te Whakaminenga o Kāpiti and recommend to this forum the direction for iwi policy and Māori world view within this process. This process resulted in the document Te Haerenga Whakamua being approved by Te Whakaminenga o Kāpiti and endorsed by Council in 2012. None of the proposed PC1A – PC1C provisions is identified as being inconsistent with Te Haerenga Whakamua. The proposed provisions will support community wellbeing and resilience.

Whakarongotai o te moana o te wai Kaitiakitanga Plan

This Plan identifies the key kaupapa, huanga and tikanga values, objectives and policies of Te Ātiawa ki Whakarongotai to guide kaitiakitanga. The document is internally focused, in order to support the kaitiaki practice of the iwi, but also to inform other agencies. The provisions of proposed PC1A – PC1C do not alter any of the provisions of Chapter 2 or 2A of the District Plan as they relate to kaitiakitanga. None of the provisions of proposed PC1A – PC1C conflicts with any of the objectives, tikanga or five-year priorities set out in *Whakarongotai o te moana o te wai*.

10. Engagement and Feedback

Council staff engaged with representatives of the disability community before drafting proposed PC1A (accessible car parking), given the known importance of accessibility to the community. Council has also been engaging with mana whenua, through iwi authorities. No feedback has been received from mana whenua on the three proposed Plan changes.

Council made available to the community draft versions of PC1A, PC1B and PC1C in November 2021 and invited feedback by 17 December 2021. Feedback was received from two organisations over the consultation period: from Landlink Limited (a land development and surveying consultancy) and from Greater Wellington Regional Council (**GWRC**). The feedback supports the proposed Plan provisions requiring accessible car parking and cycle parking and highlighted the following points:

- (a) PC1A aligns with Policy 1.7 of the Regional Land Transport Plan 2021 in contributing to ensuring the transport network is continually improved to make travel easier for people with mobility constraints as a priority in transport network planning and design;
- (b) Waka Kotahi is developing guidance on the provision of accessible car parking and the Plan's provisions should be reviewed if the guidance becomes available;
- (c) PC1C will contribute to the regional mode shift target of the Regional Land Transport Plan 2021;
- (d) The proposed wording of TR-PARK-P8 is subjective and doesn't provide certainty for implementation in relation to general residential development;
- (e) Further measures to support mode shift were suggested by GWRC, as follows:
 - a) Provide one cycle park per dwelling without a garage for medium density and multi-unit residential land uses;
 - b) Consider parking provision for micro-mobility devices;
 - c) Staff cycle parking should be covered and excluded from public access;
 - d) Make clear that cycle spaces are a minimum and more can be provided if desired;
 - e) Include minimum dimensions for cycle parks;
 - f) Consider a staff cycle parking minimum for churches, cinemas, halls, conference facilities etc;
 - g) Consider using an advisory note directing plan users to Waka Kotahi's Cycle Parking Planning and Design guidelines 2019;
 - h) Ensure consistency with accessible parking changes by modifying two policies MUZ-P1 and GIZ-P1 to include both cycle parking and accessible car parking;

- i) In addition to PC1A and PC1C, Council should develop a comprehensive parking management plan.

The wording of PC1A and PC1C was amended, as a result of the above suggestions, by:

- specifying in Rule TR-PARK-R19 that cycle parking provided for staff must be covered and not accessible to the public;
- clarifying that the standards are a minimum requirement;
- including an advisory note referring to the Waka Kotahi best practice guidance; and
- in proposed PC1A, amending Policies MUZ-P1 & GIZ-P1 to include both accessible parking and cycle parking requirements.

The following suggestions have not been incorporated into the proposed plan change content at this time, for the following reasons:

- (a) One cycle park per dwelling without garage for medium density housing and multi-unit residential – this issue is addressed in design guides currently in the district plan.
- (b) Provision for micro-mobility devices - This is because there are no current rental operators providing large-scale provision of these devices in Kāpiti, and therefore current and future uptake of these devices is hard to predict with data not currently available to support making changes at this time. Public notification of the proposed plan change will provide the opportunity for submissions, and this could be revisited depending on the submissions and evidence that is received.
- (c) Minimum dimensions for cycle parks – dimensions are currently specified within the proposed plan change content.
- (d) Staff cycle parking requirement for churches, cinemas, halls, conference facilities – This is because the proposed cycle parking standards have been drafted using Waka Kotahi: NZ Transport Agency – Cycle Parking Planning and Design: Cycling Network Guidance technical note, dated 1 May 2019². Appendix 1 of the guidance recommends that for a ‘town’ the requirement for long stay cycle parking for places of assembly is ‘nil’. Cycle parking for these facilities is still required for visitors with 1 cycle park required per 50m² gross floor area of the facility.
 - (e) Parking Management Plan – the Council is separately considering the preparation of a parking management plan.
- (f) Clarifying requirements for general residential development: Table 6A in Rule TR-PARK-R18 is clear that the only requirement for accessible car parking for residential development is for multi-unit residential development and for supported living accommodation. It is not considered necessary to include an advice note stating that there are no accessible car parking requirements for other residential development.

² [Cycling parking planning and design: Cycling Network Guidance technical note - published May 2019 \(nzta.govt.nz\)](https://nzta.govt.nz)

Council staff meet regularly with the Kāpiti Accessibility Advisory Group, whose members represent people who have disabilities, to discuss issues of interest or concern to the disability community. The Council raised to the attention of the Advisory Group the issues raised by NPS-UD when work commenced on the topic (in June 2021). A meeting was held with the Advisory Group in August 2021 where the NPS-UD 2020 accessible carparking issues were discussed. A package of information about the NPS-UD 2020 and Plan provisions was pre-circulated prior to the meeting and the clear feedback from the Advisory Group members was of concern at the prospect that there would be no requirement to provide accessible parking spaces within new developments as the district grows and changes.

Members of the Advisory Group emphasised at the meeting that public transport in the Kāpiti district is not always available to meet the transport needs of people who have disabilities. They advised that the individual needs of people with disabilities often require that they drive their own car, or rely on friends or family or companion drivers, for transport between home and work, appointments, shopping, recreation and social gatherings. The Advisory Group members expect that demand for parking by people with mobility impairment will continue to grow, as the district grows. They explained that ordinary car parking spaces do not meet the needs of people whose mobility impairments mean that they need additional space at the side or rear of specialists to accommodate specialist equipment.

The feedback received at the meeting was clear that there is strong demand currently for the existing number and location of accessible parking spaces (and at times that this supply, in some locations, is insufficient).

11. Further Explanation of the PC1A Issue (Accessible Car Parking)

CCS Disability Action is a non-governmental organisation that has been providing services to and advocating on behalf of people with disabilities and their families since 1935. It was founded originally as the 'Crippled Children's Society'. CCS Disability Action is New Zealand's largest pan-disability support and advocacy organisation. CCS Disability Action administers New Zealand's Mobility Parking Permit scheme.

Holders of Mobility Parking Permits are able to park in designated mobility parking spaces (being, for the Plan's purposes, 'accessible parking spaces'). These parking spaces are wider than general parking spaces, with space to allow drivers and passengers who have mobility impairments to get in and out of vehicles, including by using wheelchairs. To be eligible for a permit, a person must:

- (a) Be unable to walk and always require the use of a wheelchair; or
- (b) Have a medical condition or disability that severely restricts his/her ability to walk distances (including, for example, someone who uses mobility aids or experiences severe pain or breathlessness); or
- (c) Have a medical condition or disability that means s/he cannot be left unattended and requires physical contact or close supervision to safely get around (for example, a person who experiences disorientation, confusion, or severe anxiety)³.

Applicants for permits must provide a doctor's written confirmation of eligibility on the above grounds. Permit holders can be vehicle drivers, passengers in vehicles, young people, older people, wheelchair users or people who are perambulatory but have mobility impairments. The disabilities that qualify for eligibility can be visible or not readily apparent.

³ Sourced from the CCS Disability Action website (eligibility criteria for Mobility Parking Permit) - <https://www.ccsdisabilityaction.org.nz/mobility-parking/applications-and-renewal/>

Permit holders generally need parking spaces located close to the activities and facilities they seek to access, with safe and accessible connecting paths. The absence of, or shortage of, accessible parking spaces close to businesses and community facilities can dissuade them from accessing those businesses and facilities or make it difficult for them to access the goods and facilities that support their wellbeing. The alternative of a taxi is not readily available to all holders of Mobility Parking Permits due to the cost and inconvenience relative to private car use and, in some locations including parts of the Kāpiti District, the difficulty of actually getting a taxi.

Accessible parking spaces are available on public roads (generally close to community facilities and shops within the District’s centres of Paraparaumu, Raumati, Waikanae, Ōtaki and Paekakariki and managed by the Council) and on private land (in compliance with historical and current Plan requirements).

There are currently approximately 2,200 holders of Mobility Parking Permits living in the District (approximately 4% of the District’s population). This rate is higher than the nationwide rate of 3.2% of the population holding permits. The majority of permit holders within the District are older people. Over 90% of permit holders are aged over 60 years and more than half are aged over 80 years as shown in Figure 1 below.

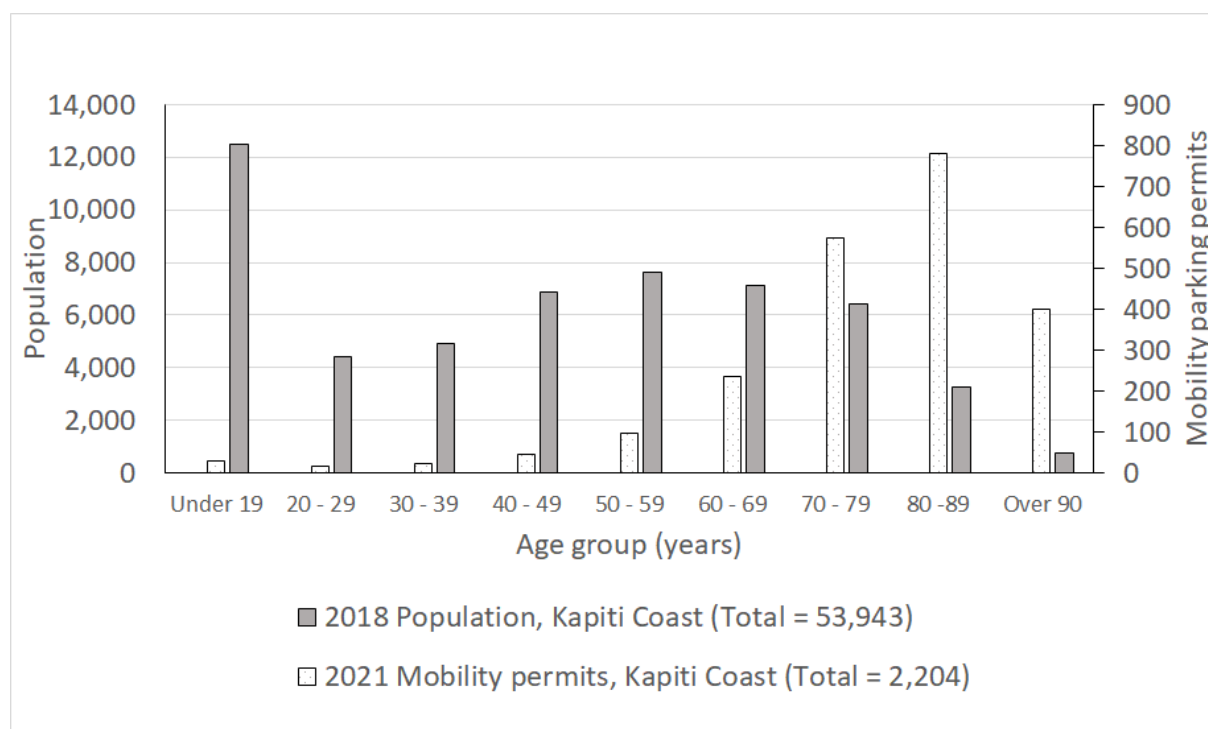


Figure 1: Proportion of Mobility Parking Permit Holders as a Proportion of Total Population (Kāpiti Coast District)⁴

The District has an ageing population and the cohort of older people is expected to grow in the future as indicated in Figure 2:

⁴ Data provided by CCS Disability Action, New Zealand Census Data 2018

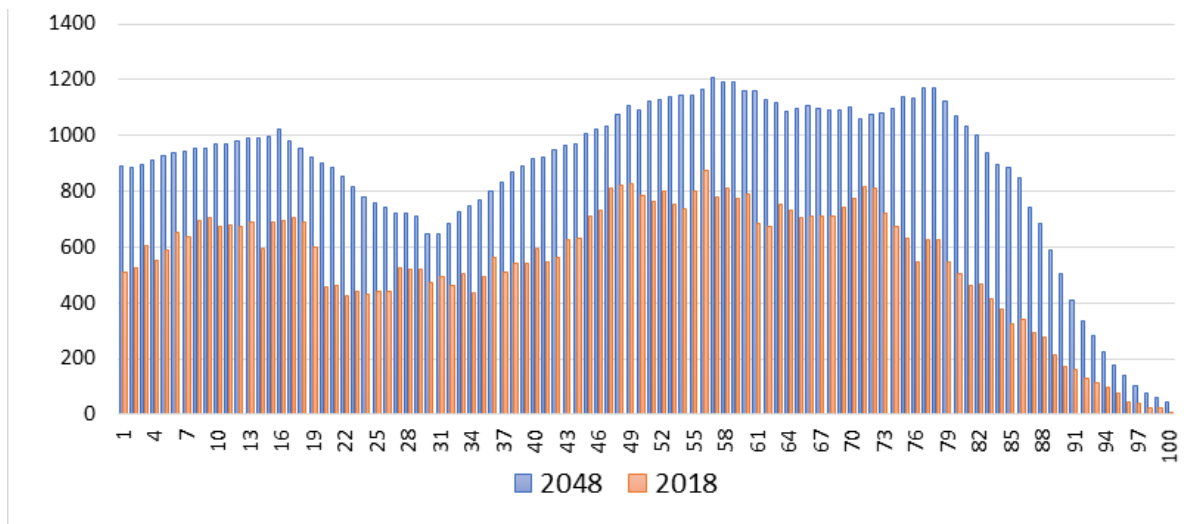


Figure 2: Comparison of Population by Age (Kāpiti Coast District) 2018-2048⁵

The Council’s population projections estimate a District population of 70,176 by 2031 (approximately 11,900 more people than in 2021) and 80,731 by 2041 (approximately 22,470 more people than in 2021). Within that growth, the population of people aged over 60 years is expected to increase by approximately 5,680 people by 2031.

Assuming similar rates of need for (or eligibility for) Mobility Parking Permits (4% of the population), this suggests that there will be an increase in demand for permits of approximately 900 over the next 20 years. Even if the rate of eligibility varies, the correlation of mobility impairment with ageing suggests there will be ongoing and growing demand for accessible parking within the District that will not be met by the existing pool of available public and private accessible parking spaces.

There is limited scope for expanding the supply of accessible parking spaces within public road space in the District’s centres (given the requirement that accessible parking spaces need to be close to facilities and services).

It is reasonable to expect that, where new facilities and services are developed to meet the demands of the growing population (including business, hospitality, recreational, healthcare, educational and community services) there will be a need for access by a growing number of people with mobility impairments (permit holders). It is also reasonable to expect that this need will not be met by relying on the current pool of accessible car parking spaces or future kerbside public parking alone. Accessible parking spaces require more land than standard car parking spaces.

There is a risk that, without regulatory intervention requiring the provision of suitably designed and located accessible parking spaces, people with mobility impairments will not be able to fully provide for their social, cultural, economic or recreational wellbeing or for their health and safety (recalling that these are the objectives of the RMA, the NPS-UD 2020, the Plan and the Council’s Long Term Plan).

The Council is also concerned that without an ability to require the provision of accessible parking, particularly in future retail shopping facilities, cultural and community facilities and places of employment, rights of people with disabilities to participate fully in all aspects of society may be

⁵ Kapiti Coast District Council population projections prepared by Sense Partners September 2021

impaired. The meeting with the Accessibility Advisory Group emphasised that even one development without appropriate accessible parking could prejudice people reliant on mobility parking and prevent or discourage them from accessing the facilities or services that development provides.

12. Scale and Significance

Having regard to the relevant PDP objectives and the relevant provisions of the higher order documents, strategies and other relevant documents discussed in Sections 7 to 9 of this report, this section evaluates the scale and significance of the effects of the proposed PC1A – PC1C amendments:

PC1A	Scale and Significance:
<p>Reinstatement of accessible car parking requirements and insertion of accessible car parking requirements for multi-unit residential development</p>	<p>The proposed amendments affect the entire District, so can be considered to have wide scale implications. The development of well-functioning urban environments and accessibility for all members of the community are significant issues highlighted in the NPS-UD and in the RPS and District Plan objectives and policies. In this respect, the provision of accessible car parking is a significant issue for the District. The proposed amendments largely carry forward existing Plan requirements and, in this respect, there is little change proposed and the significance of the proposed change is actually low. No person has opposed the proposed amendments signalled in the draft made available for feedback.</p>
PC1B	
<p>Deletion of policy provisions relating to liquefaction hazard risk for new buildings</p>	<p>The proposed amendments affect the entire District where peat or sand is the soil type, so can be considered to have wide scale implications. The management of significant risks of natural hazards is a matter of national importance and, accordingly, the issue is significant. However, the effect of the proposed amendments is that there will be no lessening of rigour in managing the significant risks of liquefaction (the Building Code amendments have now effectively replaced and improved upon the provisions of the Plan that are proposed to be deleted). In this respect, the significance of the proposed amendments is low.</p>
PC1C	
<p>Replacement of the Plan requirements for cycle parking</p>	<p>The proposed amendments affect the entire District, so can be considered to have wide scale implications. However, the proposed amendments replace the current Plan's cycle parking requirements with updated levels, and will ensure the provisions can be used following the withdrawal of accessible parking provisions (the current basis for the calculation of cycle parking requirements). In this respect, the significance of the proposed amendments is low. No person has opposed the proposed amendments signalled in the draft made available for feedback.</p>

--	--

13. Reasonably Practicable Alternatives

Having concluded (in Section 12 above) that the proposed amendments have low significance, it is reasonable to simplify the evaluation by limiting the number of alternative options considered and by making the evaluation at the broad district-wide scale identified. For PC1A and PC1C, the ‘status quo’ of retaining the current Plan provisions are not considered reasonably practicable alternatives. That is because the removal of general car parking requirements directed by Clause 3.38 of the NPS-UD means there will be no basis for requiring accessible car parking or cycle parking and the remaining policy references will be incomplete or incoherent as they relate to accessible car parking and cycle parking.

Plan Change:	Reasonably Practicable Alternatives Considered:
PC1A Accessible Car Parking	<p>Option 1: Delete all Plan references to accessible car parking and rely on the Building Code and accessible car parks available on public roads and public land.</p> <p>Option 2: Make the amendments detailed in PC1A requiring accessible car parking for a range of new developments.</p>
PC1B Liquefaction Risk for New Buildings	<p>Option 1: Status quo (retain current Plan provisions without change).</p> <p>Option 2: Make the amendments detailed in PC1B and rely on the amended Building Code to manage liquefaction hazard risk.</p>
PC1C Cycle Parking	<p>Option 1: Delete all Plan references to cycle parking and rely on cycle parking available on public roads and public land, and the voluntary provision of on-site cycle parking.</p> <p>Option 2: Make the amendments detailed in PC1C requiring cycle parking for a range of new developments.</p>

14. Evaluation

In the following evaluation, cells within the table highlighted with shading indicate the option that is superior against each consideration:

PC1A Accessible Car Parking	Option 1: Delete all Plan references to accessible car parking and rely on the Building Code and accessible car parks available on public roads and public land.	Option 2: Make the amendments detailed in PC1A requiring accessible car parking for a range of new developments.
Benefits and Costs: Environmental	Neutral: There are no environmental effects additional to those identified under social effects below.	Neutral: There are no environmental effects additional to those identified under social effects below.
Benefits and Costs: Economic	The absence of a requirement for accessible car parking would mean reduced site development costs.	The development of required accessible car parking spaces will incur costs similar to historical site development costs.
Benefits and Costs: Social	<p>Clause D1.1 of the Building Code includes the objective to 'ensure people with disabilities are able to enter and carry out normal activities and functions within buildings'.</p> <p>Clause D.1.3.2 of the Building Code requires at least one accessible route from a building's car park <i>where car parking is required to be provided</i>.</p> <p>Clause D1.3.6 requires accessible car parking spaces to be:</p> <ul style="list-style-type: none"> (a) provided in sufficient numbers, (b) located to avoid conflict with other vehicles and people, (c) easy to find using standardised signs. <p>NZS4121:2001 is deemed by the Building Act 2004 to be an acceptable solution for the provision of accessible car parking. NZS4121 requires not less than 1 accessible space where 1-20 ordinary parking spaces are provided, 2 spaces per 21-50 ordinary parking spaces, and 1 per additional 50 ordinary spaces. It is not relevant where no ordinary parking spaces are required.</p> <p>Given that car parking spaces occupy land and are a cost to develop, it is likely that no or fewer accessible car parking spaces than currently required by the District Plan would be provided under the Building Code and NZS4121.</p>	The Plan provisions will ensure that a sufficient number of accessible parking spaces is provided in new developments to meet the future needs of people within Kāpiti District who rely on accessible parking spaces to access services and facilities.

PC1A Accessible Car Parking	Option 1: Delete all Plan references to accessible car parking and rely on the Building Code and accessible car parks available on public roads and public land.	Option 2: Make the amendments detailed in PC1A requiring accessible car parking for a range of new developments.
Benefits and Costs: Cultural	This option will not necessarily fulfil the community wellbeing and accessibility aspirations articulated in the relevant statutory and non-statutory documents.	This option will fulfil the community wellbeing and accessibility aspirations articulated in the relevant statutory and non-statutory documents.
Economic Growth & Employment Impacts	Neutral: This option will potentially free up (only small) areas of sites for development. However, the District-wide impact is unlikely to be significant.	Neutral: This option will potentially constrain (to a small degree only) the areas of sites available for development. However, the District-wide impact is unlikely to be significant.
Risk	Although there is some uncertainty about how the development market would respond to the removal of accessible car parking requirements, the risk is that this would fail to fully achieve the community wellbeing and accessibility aspirations articulated in the relevant statutory and non-statutory documents.	The risk of failure to fully achieve community wellbeing and accessibility aspirations is minimised.
Scale & Significance	District-wide scale with high (adverse) significance due to the narrowed range of land use activities for which accessible car parking can be required, compared with current Plan requirements.	District-wide scale with low significance.
Efficiency	Fewer Plan rules may enhance efficiency in processing development proposals. The absence of requirements for accessible car parking could (marginally) enhance the efficiency of use of land. However, an insufficient supply and distribution of accessible car parking spaces near facilities and services will result in inefficiencies for people with disabilities participating in society.	The proposed provisions are largely similar to the current Plan provisions, so there would be almost no difference in efficiency in administering the Plan. While the requirement for accessible car parking within development sites may reduce the area of land available or the efficiency of development of land, there would be no material loss in this respect relative to the current Plan requirements. A sufficient supply and distribution of accessible car parking spaces near facilities and services will optimise the efficiency of access for people with disabilities and enable them to participate fully in society.
Effectiveness	Ineffective in achieving the objectives of the Plan, higher order documents and the Long Term Plan.	Will contribute positively to achieving the objectives of the Plan, higher order documents and the Long Term Plan.
Overall Conclusion	The proposed PC1A amendments are a more efficient and effective way of addressing the issues identified for PC1A and will contribute to achieving the sustainable management purpose of the Act and the community wellbeing and accessibility outcomes sought by the Plan and the Long Term Plan, and will meet the purpose of PC1A.	

PC1B Liquefaction Risk for New Buildings	Option 1: Status quo (retain current Plan provisions without change).	Option 2: Make the amendments detailed in PC1B and rely on the amended Building Code to manage liquefaction hazard risk.
Benefits and Costs: Environmental	Neutral: There are no adverse environmental effects.	Neutral: There are no adverse environmental effects (because the potential adverse effects associated with liquefaction hazard risk will be satisfactorily addressed by the amended Building Code).
Benefits and Costs: Economic	The Plan requirements impose some additional costs for some new buildings in locations prone to liquefaction. These costs may be in addition to costs associated with complying with the Building Code.	The Building Code requirements impose some additional costs for some new buildings in locations prone to liquefaction.
Benefits and Costs: Social	Neutral: There are no social effects additional to the environmental effects discussed above.	Neutral: There are no social effects additional to the environmental effects discussed above.
Benefits and Costs: Cultural	Neutral: There are no cultural effects additional to the environmental effects discussed above.	Neutral: There are no cultural effects additional to the environmental effects discussed above.
Economic Growth & Employment Impacts	Neutral: There are no economic or employment impacts additional to the environmental effects discussed above.	Neutral: There are no economic or employment impacts additional to the environmental effects discussed above.
Risk	Neutral: There is minimal risk (each building development within a liquefaction-prone area is assessed individually and the actual and potential risk is addressed).	Neutral: There is minimal risk (each building development within a liquefaction-prone area is assessed individually and the actual and potential risk is addressed).
Scale & Significance	District-wide scale and low significance.	District-wide scale and low significance.
Efficiency	Retaining the Plan requirements in addition to the now-operative amended Building Code may result in confusion, conflict or duplication between standards imposed. The specific requirements for individual sites are not prescribed but must be considered and individually addressed through specialist assessment and design. Resource consent is required in addition to the requirements of the Building Code to manage the same natural hazard risk.	The potential for confusion, conflict or duplication between standards imposed is minimised. The required standards are prescribed clearly. Resource consent is no longer required for an activity that is adequately managed under the Building Code.
Effectiveness	The provisions are less prescriptive than the Building Code but should, after appropriate specialist assessment, require similarly effective building design solutions to address the risks for buildings on land prone to liquefaction.	The standards are based on recent research and experience and are expected to result in effective building design solutions to address the risks for buildings on land prone to liquefaction.
Overall Conclusion	The PC1B amendments are a more efficient and effective way to address the actual and potential risks to new buildings on land prone to liquefaction and will meet the purpose of PC1B, the relevant Plan objectives, and will contribute to achieving the sustainable management purpose of the Act.	

PC1C Cycle Parking	Option 1: Delete all Plan references to cycle parking and rely on cycle parking available on public roads and public land.	Option 2: Make the amendments detailed in PC1C requiring cycle parking for a range of new developments.
Benefits and Costs: Environmental	This option is likely to result in the provision of no or fewer cycle parks within developments, which would not encourage the transport mode shift outcomes sought by the Plan and higher order planning documents.	This option will contribute positively to enabling and encouraging the transport mode shift outcomes sought by the Plan and higher order statutory planning documents.
Benefits and Costs: Economic	Neutral: The absence of a requirement for cycle parking within developments will (marginally only) reduce development costs.	Neutral: Requiring cycle parking within developments will incur cost (although at a similar rate as historically required by the Plan).
Benefits and Costs: Social	Neutral: There are no social effects additional to the transport mode shift effects discussed above.	Neutral: There are no social effects additional to the transport mode shift effects discussed above.
Benefits and Costs: Cultural	Neutral: There are no cultural effects additional to the transport mode shift effects discussed above.	Neutral: There are no cultural effects additional to the transport mode shift effects discussed above.
Economic Growth & Employment Impacts	Neutral: The absence of a requirement for cycle parking within developments will not materially reduce development costs or materially alter District-wide economic growth or employment potential.	Neutral: Requiring cycle parking within developments will not materially increase development costs or materially alter (constrain) District-wide economic growth or employment potentially.
Risk	Neutral: There are no risks additional to the transport mode shift effects discussed above.	Neutral: There are no risks additional to the transport mode shift effects discussed above.
Scale & Significance	District-wide scale with higher (adverse) significance due to the likelihood that no or limited cycle parking would be provided, compared with the outcome under current Plan requirements.	District-wide scale and low significance due to being a continuation and improvement of current Plan requirements.
Efficiency	Fewer Plan rules may enhance efficiency in processing development proposals. The absence of requirements for cycle parking will not necessarily affect the efficiency of use of land. However, an insufficient supply and distribution of cycle spaces near facilities and services will result in inefficiencies for people whose preferred mode of transport is cycling.	The proposed provisions are similar to the current Plan provisions but a number of improvements are proposed, so there would be almost no difference in efficiency in administering the Plan. The requirement for cycle parking within development sites will not materially reduce the area of land available or materially improve the efficiency of development of land. Sufficient supply and distribution of accessible cycle parking spaces near facilities and services will optimise the efficiency of access for people whose preferred mode of transport is cycling.

PC1C Cycle Parking	Option 1: Delete all Plan references to cycle parking and rely on cycle parking available on public roads and public land.	Option 2: Make the amendments detailed in PC1C requiring cycle parking for a range of new developments.
Effectiveness	Will not be effective in achieving the community wellbeing, accessibility and transport mode shift outcomes sought by the Plan and other planning documents.	Will contribute positively to achieving the community wellbeing, accessibility and transport mode shift outcomes sought by the Plan and other planning documents.
Overall Conclusion	PC1C is a more efficient and effective way to address the issue, will contribute to achieving the sustainable management purpose of the Act and the community wellbeing and accessibility outcomes sought by the Plan and Long Term Plan.	