

BEFORE THE GORE DISTRICT COUNCIL HEARING PANEL

UNDER the Resource Management Act 1991
IN THE MATTER an Application by GTM Developments Limited for Resource Consent to demolish a scheduled heritage structure and to build and operate a commercial building – 1 Irk Street, Gore

JOINT STATEMENT OF MIKE BRAZIL & PAUL DURDIN

TUESDAY, 2 AUGUST 2016

INTRODUCTION

1. This signed joint statement is prepared in response to a Minute from the Hearing Committee relating to an application by GTM Developments Limited for Resource Consent to demolish a scheduled heritage structure and to build and operate a commercial building at 1 Irk Street in Gore.
2. The Hearing Committee has directed the applicant to provide revised plans of the proposed development and for Mr Durdin and Mr Brazil to consult and prepare a joint statement that responds to the following parking matters:
 - a. the quantum of parking required by the proposed development, having regard to the provisions of Rule 9.5.2(1) of the Gore District Plan.
 - b. the quantum of parking that they consider should be provided by the applicant, either on the site, elsewhere, or by way of a financial contribution, having regard to publicly available parking within the vicinity.
 - c. the practicality of the parking area layout shown on the amended site plan.
3. Revised plans were circulated to Mr Durdin and Mr Brazil on Wednesday 20 July 2016.
4. A conferencing meeting via telephone was held on 28 July 2016, where Mr Brazil and Mr Durdin discussed their assessment of each of the matters listed above, and identified points of agreement and disagreement.

REVISED PROPOSAL

5. The key transport-related changes to the revised proposal include:
 - a. A reduction in the size of the development to 1,416m² comprising 1,261m² GFA of office space and a café capable of accommodating 50 customers.
 - b. An increase in the amount of parking on-site to 21 spaces.

DISTRICT PLAN PARKING REQUIREMENT

6. The minimum off-street car parking requirements for offices and cafés (assessed as a restaurant) are detailed in Rule 5.9.2 of the Gore District Plan, as:
 - a. Offices “one staff park per 50m² of gross floor space or part thereof”, and

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7. Restaurants *“One staff car park per 2 staff or part thereof on the site at any one time, plus one car park per 4 persons to be accommodated in the restaurant”.*
 8. Messrs. Brazil and Durdin agree that the office component of the activity generates a minimum off-street parking requirement of 25.2 car parking spaces.
 9. Messrs. Brazil and Durdin are of the understanding the café will accommodate up to 50 people and require approximately 4 staff. Based on these assumptions, the experts agree that the café component of the proposed development generates a minimum off-street parking requirement of 14.5 car parking spaces (12.5 for visitors and 2 for staff).
 10. Note 2 to Table 5.4 Parking Requirement of Chapter 5: Transportation of the Gore District Plan states *“Note 2: Where an assessment of the required parking standards results in a fractional space, following the addition of any component parts, any fraction under one half may be disregarded, while any fraction over one half shall be counted as one space.”*
 11. Adding of the office and café component parts of the activity results in a minimum parking requirement of 39.7 spaces, which is rounded to 40 spaces based on Note 2.
 12. Therefore, a minimum of 40 off-street car parking spaces are required for the proposed development to comply with the requirements of the Gore District Plan.

QUANTUM OF PARKING THAT SHOULD BE PROVIDED

13. The revised proposal includes 21 off-street parking spaces. As is noted in the following section, Messrs. Brazil and Durdin believe that 20 of these spaces can be considered as useable spaces.
14. The proposed on-site provision therefore represents a shortfall of 20 spaces when considered against the District Plan requirement.

Parking Demand

15. Mr Brazil believes that the research on office spaces in RR453 which is being used to justify deviating from the requirements in the Gore District Plan when calculating actual demand that will be generated by the proposal is inadequate. RR453 has survey data for a 900m² office in Middleton, Christchurch and a 4,032m² office in Waitakere with no office site of a size in between those areas to be of a comparable scale with the proposal. Mr Brazil

considers that more reliable guidance can be found from the District Plans of nearby local authorities, such as Clutha District (one car park required for every 40m²) and Invercargill City (one car park for every 50 m²).

16. On this basis, Mr Brazil considers the Gore District Plan better reflects the appropriate parking requirements demand for the proposal. This results in an overall requirement of 41 car parks for the proposal; based on 26 car parks for the office and 2 for café staff and 13 for café customers.
17. Mr Durdin disagrees. He reaches this position based on his analysis of RR453, and first principles analysis, both of which suggest that parking demand is likely to be higher than the minimum parking requirements of the Gore District Plan.
18. Mr Durdin notes that Table 8.11 of RR453 shows the average parking generation rate for commercial premises / offices in New Zealand of 2.7/100m² GFA is comparable with Australian parking requirements of 2.5/100m² GFA, which are assumed to satisfy 85% of parking demand¹, and lower than UK and US parking generation rates.
19. Based on the parking rates specified in Mr Durdin's statement of evidence derived from RR453, he estimates that peak parking demand will be in the order of 34 spaces for the office component and 13 vehicles for the café.
20. Mr Durdin considers these are a fair and reasonable figures to use in the analysis for the proposed development, given a first principles calculation based on floor area per employee and propensity to drive to work suggests the amount of parking generated by the office component alone could be as high as 66 parking spaces.

Short Term v Long Term Parking

21. Messrs. Brazil and Durdin are of the shared view that short-term parking demands generated by the proposed development can largely be accommodated on-street.
22. Messrs. Brazil and Durdin are of the shared view that there is insufficient on-site parking supply to meet the long-term parking demands generated by employees of the proposed development. Mr Brazil considers that 8 vehicles will need to park off-site, whereas Mr Durdin considers this will be at least 14 vehicles. The disparity comes from the different approaches taken to estimating parking demand between the experts.

¹ 85% satisfaction equates to a parking demand of 2.94/100m² GFA or 37 vehicles for the office component.

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23. Regardless, Messrs. Brazil and Durdin are of the shared view that there is sufficient capacity within the receiving environment to accommodate this level of additional long-term parking. Mr Durdin notes that practical capacity would be reached if an additional 14 vehicles parked on street in unrestricted parking spaces. Mr Brazil notes that that the practical capacity calculations and associated assumptions have been derived from Auckland data and may not strictly apply to Gore. However, he accepts that the long term parking demand from proposed development that is not satisfied on site, would increase the likelihood of such parking occurring on streets outside the town centre that have a residential function.
 24. Messrs. Brazil and Durdin are of the shared view that the parking demand and supply relationship in Gore is nearing a point where intervention and/or enhanced management will be required to avoid adverse effects from establishing. The proposed development only serves to bring the need for intervention / management forward.
 25. On this basis, Messrs. Brazil and Durdin are of the shared view that the applicant should provide financial contribution for a shortfall of 5 parking spaces. The value of 5 parking spaces has been arrived at based on 50% of the average estimated reliance of long-term on-street parking associated with the proposed development i.e. 50% of $((7 + 14) / 2)$. Any additional parking spaces that could be provided for on an alternative site, and linked to the resource consent by way of condition, could be discounted from the financial contribution.
 26. The recommendation for a financial contribution, and the scale of contribution, is based on the need to avoid encumbering all of the costs associated with parking management in the Gore Town Centre in the future to Council and/or the next developer that is unable to accommodate all parking on-site.

PRACTICALITY OF PARKING LAYOUT

27. The design of the revised parking layout has been reviewed. Overall, the modified car parking layout is a significant improvement over that which formed the original application.
28. Messrs. Brazil and Durdin are in agreement that parking space #15 appears to occupy the access easement, and therefore should not be considered to contribute to the on-site parking supply.
29. Further, Messrs. Brazil and Durdin are in agreement that parking spaces #1 and #16 are technically non-compliant with the District Plan requirements for

accommodating the movement of the design vehicle; however, these spaces can be retained and considered to contribute to the overall on-site parking supply. In reality, these spaces are most likely to be used by smaller vehicles in the fleet that have less onerous tracking paths than the design vehicle.

30. Messrs. Brazil and Durdin believe that parking space #1 should be marked as reverse in only, a reversing from the space will result in the front of the vehicle swinging across part of the footpath, which we note will require the acceptance of an undesirable outcome.

DATE: 2 AUGUST 2016

Mike Brazil	
Paul Durdin	