Plan Change 29

Appendix 5

IN THE MATTER OF: Resource Management Act 1991

AND

IN THE MATTER OF: Selwyn District Council Plan Change 29,

Design of Development in the Business 1 zones

EVIDENCE OF JANET HELEN REEVES

1. My full name is Janet Helen Reeves. I am in practice as an Urban Designer on my own account (Context Urban Design Ltd). I was previously employed as the Urban Design Team Leader, Christchurch City Council 1998-2004. I hold a Diploma in Town Planning and a Masters Degree in Urban Design. I am an Associate Member of the New Zealand Planning Institute and a full member of the Royal Town Planning Institute (U.K). I have had over 30 years working experience as an Urban Designer and Town Planner, both in New Zealand and overseas. This experience has included work with national and local government, private consultancies and developers.

2. I have been asked to provide urban design evidence on behalf of Selwyn District Council specifically in relation to visual appearance of large developments, external finish of buildings and signage i.e. proposed assessment matters 16.10.3.1., proposed new Rule 16.12. (Buildings and External Finish) and changes to rule 19.1. (Outdoor Signs General). I have been involved in work in relation to the Plan Change as follows: I prepared a report entitled 'Towards a Higher Standard of Design in Commercial Business Zones, for Selwyn District Council in 2009, the first draft of the Commercial Design Guide and provided a short background report to the Plan Change in relation to colour: 'The Effects of Colour'.

3. I have studied all the submissions and further submissions made in relation to this Plan Change.

4. I will firstly address the assessment matters included in 16.10.3.1. and recommend some changes.

5. I will secondly address Rule 16.12. I will set out the rule as it currently stands, followed by a recommended redraft. The reasons for my recommendation will be discussed as I address each of the matters raised in submissions in turn, i.e. building materials; reflectivity; colour of elevations; colour of roofs and murals.

6. I will then address Rule 19.1.

PROPOSED RULE 16.10

7. Plan Change 29 introduces a rule (16.10) specifically relating to large developments. Under this rule the Council has, when considering a proposal for a large development, discretion to consider a number of matters. I have been asked to comment on the first of these (Clause 16.10.3.1.) relating to visual appearance.

8. People generally know when they see a commercial centre that looks attractive but it is much harder for them to say why they like it. Extracting the elements that are essential to creating a visually appealing commercial centre is extremely difficult. Good design is not a case of meeting a set of rules but instead relies on fusing design principles with design flair. This is a matter I have given a lot of thought to over the past year through my involvement with projects with Selwyn and Waimakariri District Councils and Christchurch City Council.

9. There are a number of elements which seem to be a feature of attractive streets. Two of these are the scale of development and the frequent changes in facades as one passes along the street. With the exception of Rolleston the town centres in Selwyn District all contain buildings which have grown up over the years along the main streets. There are single buildings and small groups of shops of all different designs but all of a height and size that could be termed small or domestic scale.

10. One of the main controls on the building size was the width of allotments, which tended to be quite narrow, typically 20 metres across. This coupled with a practical height limit for commercial development of 2 storeys determined the building envelope. A shop frontage stretching across the ground floor would be divided into an entrance and shop windows. Across a 20m frontage this would typically be a central entrance and shop windows either side, so that the width is vertically divided into 3. Upper floor windows, changes in parapet height, verandah and other design details further subdivide the elevation. These subdivisions articulate the façade and, together with the succession of different buildings, give a sense of rhythm and vitality to the commercial street scene.

11. Leeston is the most intensively developed of the town centres with buildings built on individual allotments and stretching across the whole width of the allotment. This provides lengths of continuous shopping frontages made up of a variety of façade designs (see Appendix 1, Figures 1 and 2). Over time the Business 1 zones are likely to be more intensively developed, with new buildings developed where there are currently gaps or residential properties.

12. Infilling of any of these gaps with large buildings can destroy the cohesive nature of the street. This is not to say that large buildings cannot be accommodated, but that they need to be designed so that they do not appear bulky and therefore out of scale (see Figures 3-6). Reflecting the relatively small individual building size and the variety of detail of the traditional commercial street are important design components in maintaining the character of the town centres in the Selwyn District.

13. All of the buildings in the Rolleston Town Centre have been built in recent years. Being a new town, the typical town centre allotment patterns did not exist. This has enabled long and large buildings to be built. These buildings have little variety along the length of the façade (see Figures 7-9). This is one of the reasons that Rolleston lacks the cohesiveness and character of the other centres.

14. Therefore in my opinion it is necessary and appropriate to ensure that large buildings are broken up into smaller scale modules so that they read as separate buildings and that the modules are articulated with further subdivisions.

15. Where commercial premises have frontages which are not part of an existing commercial street the need for the level of modulation and variety may be less. For example a large format store may have a frontage to a car park or side street (see Figure 10), as well as a main street frontage, or a small freestanding commercial block may be built in a new neighbourhood centre. The ability to take into account the context of a proposed building is provided for in assessment matter 16.10.3.1. (a).

16. I do have a concern with assessment matter 16.10.3.1.(b). in that it refers to the regularity of detailing and that such detailing is consistent with neighbours. Buildings do need to have a good level of detailing if they are to be visually appealing, however, I do not consider that the detailing needs to be regular and consistent with neighbours, since it is not a characteristic of any of the Business 1 zones in the Selwyn District. In fact it is the difference in detailing between one building and another which adds to the character.

Where buildings have consistent details from one module to another they can become monotonous if repeated to often (see Figure 11).

17. Given the discussion above, I do not agree with submissions from Lincoln Land Development (LLD), CDL Land New Zealand Limited (CDL) and Progressive Enterprises that the discretion matters are overly restrictive. Indicating parameters in terms of modulation and articulation does not unduly inhibit building design.

18. A number of submitters consider that the assessment matters preclude variety. I agree that regularity and consistency of detailing with neighbours is not a characteristic of the town centres and therefore I have recommended changes to the wording of the assessment matter.

19. Submissions from Rolleston Square Ltd., Rolleston Retail Ltd. and Roll Ten Investment Ltd. feel that dividing the ground floor facades into modules of 5-10 metres would provide a barrier to particular tenants. This assessment matter applies to the façade only and does not affect the division of space internally. There are numerous examples in the figures I have provided of small and large premises which are subdivided at such intervals. Therefore I find it hard to understand why it should be off-putting to any particular tenants.

RECOMMENDED REVISION TO ASSESSMENT MATTER 16.10.3.1. (a) & (b)

20. It seems that there are two aspects which are important for the Council to have control over. The first is scale and the second is visual variety. The objective is to achieve variety within a pattern. I therefore recommend rewording the assessment matter as follows:

16.10.3.1. The extent to which the development is compatible with its context, both in its scale and its level of visual variety, by:

a) Adopting measures to mitigate any transition in size between it and nearby buildings

b) Design changes along the length of the building to break it down into smaller modules

c) Vertically subdividing ground floor facades (approximately every 5 – 10 metres) with glazing bars, entrances, columns etc. to reflect the traditional street rhythm

d) Articulating the building above ground floor level with design details to provide visual interest and variety between modules

e) Avoiding excessive repetition of design modules

PROPOSED RULE 16.12.

21. Plan Change 29 includes a new rule relating to buildings and external finish as follows:

16.12. BUILDINGS AND EXTERNAL FINISH

16.12.1. In the business 1 zone, buildings and structures shall be a permitted activity if the exterior cladding of any wall or elevation (excluding glazing) complies with the following:

16.12.1.1. It is made from or clad in natural stone or with natural or stained timber; or

16.12.1.2. When graded using the British Standard BS5252:1976 Framework for Colour Co-ordination for Building Purposes, the exterior finish of at least 75% of any elevation (including any signage, whether attached to the elevation, painted on it, or otherwise provided) meets the following standards:

a). Is within greyness groups A and B

b). Is greyness group C, with reflectance value (RV) rating of no more than 40%

16.12.2 In the business 1 zone, buildings shall be a permitted activity if the external finish of the roof complies with the following:

16.12.2.1. All roof areas shall be finished in colours with a reflectance value (RV) rating of no more than 40% and fall within greyness groups A, B and C

RECOMMENDED REVISIONS TO PROPOSED RULE 16.12.

22. I have carefully considered this rule and the matters raised by submitters in relation to it. Consequently I would recommend that the rule be amended to better achieve the Policies and Objectives of the Plan, as proposed to be amended by Plan Change 29. With these changes in place I consider that good urban design in relation to the external finish of buildings can be achieved, while neither stifling creativity nor inhibiting commercial interest.

Recommended revised rule 16.12

16.12.1. In the business 1 zone, buildings and structures shall be a permitted activity if the exterior cladding of any wall or elevation (excluding glazing) complies with the following:

16.12.1.1. When graded using the British Standard BS5252:1976 Framework for Colour Co-ordination for Building Purposes, the exterior finish of at least 75% of any elevation (including any signage, whether attached to the elevation, painted on it, or otherwise provided) is within greyness groups A, B or C or

16.12.1.2. It is made from or clad in natural coloured materials such as stone, timber or brick.

16.12.2.1. All roof areas shall be finished in colours which fall within greyness groups A, B or C

Rule 16.10.2. Add a new assessment matter

16.10.3.x. The extent to which the degree of reflectivity of the finish of the roof or elevations is compatible with adjacent uses and any potential effects on the townscape or views from the distance.

MATTERS RAISED BY SUBMITTERS

Building materials

23. A number of submitters have raised objections to the Council seeking to control building materials. It is my understanding that it is not the Council's intention to restrict building materials, rather rule 16.12.1.1. is merely a means of including those materials which have a natural colour, i.e. not applied in some way. Submitters have not given any indication of what materials might be used for commercial buildings which would not be permitted by the rule. The rule could be made clearer by rewording as I have suggested above.

Reflectivity

24. The Plan provisions as drafted seek to control both colour and reflectivity for walls and roofs. I believe that the prime intention of rule 16.12.1.2. is to control colour rather than

reflectivity. Many of the colours in greyness groups A and B have reflectance values which are much greater than 40%. I believe this anomaly may have arisen from an earlier recommendation that I made which was to exclude colours with a reflectance value of less than 35%, which was a way of excluding the stronger colours in Group C. Had this recommendation been adopted the rule would read *b) Is greyness group C, with a reflectance value of more than 35*%. However, correcting this anomaly may not be within the scope of submissions. On reconsidering the extra colours that would be permitted by not referring to reflectance value at all, I am of the opinion that the rule should be amended so that all reference to reflectance value is deleted.

25. Lincoln Envirotown Trust has pointed out that requiring roofs that have a lower reflectance value may be at odds with the desire to reduce the 'heat island' effect which contributes to global warming. I consider their concern about reflectivity is a valid one. However, if a large visible roof has a highly reflective finish then it could have an adverse effect on neighbouring properties, particularly residential uses or on the wider townscape or on the view towards a town centre from the rural area. In order to avoid this possibility while not encouraging the 'heat island' effect or placing an undue restriction on all commercial premises I suggest that reference to reflectance value is removed from this rule and instead inserted as an assessment matter under rule 16.10.3.

Colour of elevations

26. The purpose of the rules relating to buildings and external finish is to ensure that Business 1 zones are not dominated by buildings with large areas of very strong colour. The rule seeks to control the use of extensive areas of 'extreme colours' which can upset the visual composition of small settlements. Generally developers and occupiers of commercial buildings choose to use colour in a way which is polite and does not shriek out 'look at me'. Although many companies have strong bright colours as their corporate colours, there are only a few who feel the need to use the colour to such an extent that it is overpowering. Finding a means of filtering out these extremes is difficult. The use of vague statements such as recessive or subdued colours could be open to various interpretations. The use of the Greyness Framework is in my opinion an approach which, while not foolproof is robust and relatively easy to understand and administer. The BS 5252 colour system is widely used in New Zealand and a colour chart (BS5252 Colour Range) is readily available from Resene (www.resene.co.nz) (see Appendix 1 for colours that fall within Greyness Groups A, B and C). I believe that there are currently only two

buildings within the B1 zones in the Selwyn District that do not comply with the rule as drafted.

27. In order to illustrate the implications of the rule on the choice of colour for building elevations and roofs, I have looked at some typical situations (see Figures 12-16).

28. A number of submitters have objected to restrictions being placed on the colours of exterior walls, believing that it will not allow variety, deter some potential commercial operators and exclude 'happy' colours. In reading the submissions I feel that there may be a misunderstanding about the restrictions that are imposed by the rules. Firstly, any colour is permitted on 25% of any wall and secondly the rule only excludes stronger colours, which means that a whole range of colours is permitted on 75% of the wall, not just a collection of greys (see Appendix 1). Furthermore, since the rule excludes glazing, elevations which have windows can often have a large part, if not all, of the wall space in a strong colour (see Figure 20 and 21)

29. As any colour can be used on 25% of the building and a good range of colours on the remainder, I do not agree with submissions from LLD and CDL that this rule does not allow for variety. This rule does not prevent Southbridge Plunkett from providing bright 'happy' colours, nor does it prevent national chains from using their own distinctive colour schemes, providing any colour which is strong and bright (i.e. falls within greyness groups 4 or 5) occupies no more than 25% of any elevation. I do not believe that visitors to a building need a large part of it to be painted in the company colour for them to recognise who is in the building (see Figures 17 and 18). Furthermore the rights of a company to advertise itself need to be balanced with the rights of a community to a harmonious townscape. I do not know of any evidence to suggest that those companies who chose strong bright colours for the exterior of their buildings are any more commercially successful than those that don't (e.g Mitre 10 Mega and Bunnings). I note that recently a major supermarket (Countdown) has adopted a colour scheme that is less bright.

30. Submissions from LLD and CDL, also assert that town centres are not sensitive environments and town centres should stand out and not blend in. I do not agree with this opinion. The B1 zones in the Selwyn District are of differing size and nature, but generally quite small and visible from residential areas, along roads and across rural landscapes to varying degrees (see Figure 15). Large strongly coloured walls and roofs

have the potential to be incongruous and 'stick out like a sore thumb' either as part of the townscape or a backdrop to a rural view (see Figure 19). I believe it is appropriate for Council to introduce a means of assessing such proposals in relation to their particular context. Large areas of strong colours could well be jarring and out of place in neighbourhood centres within new residential developments (which these submitters have an interest in).

31. Submissions from LLD and CDL also allege that it is not colours in themselves which are an issue, but those colours in a particular environment. I agree entirely and this rule provides a trigger for potentially incongruous use of colour to be considered in its context.

Colour of roofs

32. Submitters have stated that roofs in commercial zones tend not to be highly visible and therefore it is unnecessary to control their colour. LLD and CDL also make the point that restrictions on the colour of roofs does not appear to be discussed in the Section 32 report.

33. I agree with submitters that many roofs on commercial buildings are not highly visible being flat or hidden behind a parapet wall. I do however believe that there is a need for the Council to exercise some control over the colour of roofs. It is not fanciful to anticipate a commercial building with a large and visible roof in a B1 zone. If it is of a strong colour it could have the same impact on the townscape as strongly coloured walls. Furthermore if colours are restricted on walls and not on roofs, there may be a tendency for operators to take advantage of the roof as an area to display strong colour. Therefore I think it appropriate for council to have the same control over the colour of roofs as they will over elevations.

Murals

34. Submissions from LLD and CDL suggest that murals would be excluded. I do not agree, as murals would be permitted where any strong colours in Greyness Groups 4 and 5 occupy less than 25% of the elevation. A strongly coloured mural would rightly fall within the ambit of the rule as it could have similar effects to a wall finished in a strong plain colour.

CHANGES TO RULE 19.1. OUTDOOR SIGNS GENERAL

35. Plan change 29 introduces changes to rule 19.1. Which limit the total area of freestanding signage and the proportion of the building elevation occupied by signage. Changes are made to clause 19.1.1.6 and a new clause, 19.1.1.10 is introduced as follows:

Any sign shall be a permitted activity if the following conditions are met:

19.1.1.6 The total freestanding signage per site does not exceed

a) 3m² in area where the site's road frontage is less than 50m; or

b) 6m² in area otherwise

19.1.1.10. Signage does not occupy more than 25% of any building elevation if it is attached to or painted on or otherwise provided on the elevation

36. Clause 19.1.1.6 previously did not restrict the total amount of signage per site, but instead limited the size of any one sign to 3m², so that a site could have say 3 x 3m² free standing signs. The change to the rule reduces the amount of signage that is permitted to 3m² in total for sites with a road frontage of less than 50m, so that a site can have say 1 x 3m² sign or 2 x 1.5m² signs. Where the site has a frontage of 50m or more, the permitted size is 6m², so that there could be say 1 x 6m² sign or 2 x 3m² signs.

37. Although new rule 19.1.1.10 restricts the permitted amount of elevational signage it still allows for a generous amount of signage (see Figures 20 and 21), particularly on large buildings. For example an elevation 7m high by 20m wide could have a 35m² sign (say 20m wide by 1.75m high). (see Figure 22)

38. A problem could arise where a large format store has smaller shops on the street frontage (which is encouraged) and therefore only has a relative small street elevation itself and consequently is restricted in its area of signage. There would however be the opportunity to site signage on other elevations in most situations. Also, it is common in malls for larger premises to have restricted external elevations and for businesses to thrive without the need for large elevational signs (see Figures 23-25).

39. Taken as a whole I consider the provisions relating to signage allow for signage which is more than adequate for businesses to identify and advertise themselves. Signage will still be an integral part of the business zone and I therefore do not agree with LLD and CDL when they say that the rules conflict with policy B3.4.21.

40. The same submitters state that in relation to freestanding signs, there is little consideration of the size of the site and the ability of larger sites to accommodate larger signs. I do not agree that as sites get larger so freestanding signs should get bigger or more numerous. A freestanding sign needs to be of a certain size for people to be able to read it from a distance and this is unrelated to the size of the site.

41. One of the thrusts of Plan Change 29 is to ensure a good interface between commercial premises and the street. Shopfronts that face the street advertise themselves, so there is little need for freestanding signage.

42. LLD and CDL also argue that road frontage is a poor means of determining the amount of freestanding signage a site can support, but do not suggest an alternative. Where a site has two separate road frontages (i.e. not on a corner) there may be a need to have a sign on each frontage. If this situation does occur, then a Resource Consent can be sought.

43. It is reasonable to restrict the amount of signage to avoid clutter and to avoid the situation where there is competition between advertisers so that signs get larger and larger and more and more numerous. A course of action which is eventually counterproductive, conveying confusion rather than clear messages and having an adverse effect on amenity.

CONCLUSION

44. In my opinion the proposed changes to the SDP in relation to Visual Appearance of Large Developments; Buildings and External Finish and Signage, with the amendments I have recommended above, are appropriate and necessary to ensure the maintenance and enhancement of amenity values in relation to these aspects, in the existing and proposed Business 1 zones of the Selwyn District.

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Appendix 5a

1. HIGH STREET, LEESTON
This picture shows the traditional variation in design between adjacent buildings but a consistency of scale. The cream fronted building has an allotment width of 8m, the adjacent brick building has an allotment width of 16m. The façade of each building is subdivided into 3.

2. LARGER COMMERCIAL PREMISES, HIGH STREET, LEESTON
This building has a 40m street frontage. The building is broken down into smaller modules by the step up in parapet height at the centre. The façade is further subdivided by the placement of windows and string courses on the upper floor, the veranda, glazing bars and shop doorways on the ground floor.

3. LEESTON HOTEL, HIGH STREET, LEESTON
Building frontage is 72 m long and visually subdivided into 3 modules by a change in building material and a roof pediment. The elevation is further subdivided by the windows and veranda.

4. MODERN COMMERCIAL PREMISES, ROLLESTON SQUARE, ROLLESTON
Frontage is divided into 3 modules by the 'columns' between the windows which extend from ground to roof level. The building is further subdivided by the veranda and glazing bars.

5. NEW WORLD SUPERMARKET, REMARKABLES PARK, QUEENSTOWN
A wide building broken down into smaller modules. This creates a building of a scale that is appropriate in small towns.

6. THE WAREHOUSE, ALEXANDRA
A large format store broken down into smaller modules by changes in roof profile. The façade is further subdivided by windows and stone columns to provide rhythm along the street. Shop windows on the ground floor level would improve its compatibility.

7. THE WAREHOUSE, ROLLESTON
Little attempt has been made to break up this large building into smaller modules or to articulate the facades. Due to its bulk, bright colour and high profile location it dominates the street scene and is incongruous.

8. ROLLESTON SQUARE, ROLLESTON
Upper level is long with little detail or change in design and reads as one building. However, ground floor is subdivided with glazing bars and columns to provide interest and rhythm.

10. COUNTDOWN SUPERMARKET, COLOMBO STREET, CHRISTCHURCH
This side elevation is well modulated with protruding panels, columns, canopy and changes in colour and materials

9. ROTHERHAM STREET, RICCARTON, CHRISTCHURCH
Building divided along its length into modules which read as separate buildings. Ground floor vertically subdivided. Variety added on upper floor with colour, canopies and horizontal lines on parapet.

11. FERRY ROAD, CHRISTCHURCH
Over repetition of modules. The building reads as one long mass.

12. NEW WORLD SUPERMARKET, LINCOLN
Red lettering and feature panel is within greyness group E. Area of red colour falls within the 25% allowance.

13. SHOPS AT GERALD STREET LINCOLN
Green sign on right is within greyness group E. As the green area is less than 25% of the area of the elevation of the shop, it falls within the allowance.

14. PAK n' SAVE, WAINONI, CHRISTCHURCH
Yellow façade colour is within greyness group D. The yellow colour occupies 40% of the elevation (excluding lower level signage, but including wrap around sides), therefore would not fall within the allowance. The dashed line indicates approximately 20% of the frontage occupied by the yellow colour (this would allow 5% for signage)

15. BEAUREPAIRS, DARFIELD
Orange, yellow and blue colours all fall within greyness group E, therefore not within the allowance. This building marks the entrance to Darfield, it closes the view along the road when approaching from the east and is seen against the backdrop of the Alps.

16. SHOPS AT GERALD STREET, LINCOLN Roof is visible from the street and is within Greyness Group B. Red colour and signage on the veranda falls within Greyness Group E and is within the 25% allowance

17. CORPORATE COLOUR does not need to be extensive to identify the business

18. SIGNAGE does not need to be large to identify the business

Existing garage site on the corner of Gerald Street and West Belt, Lincoln.

Type of use (tyre suppliers) and building that could be developed on the site.

19. BRIGHTLY COLOURED BUILDINGS HAVE THE POTENTIAL TO BE INCONGRUOUS IN A SMALL TOWNSHIP. This imagined example shows how a site at the entrance to Lincoln might appear if a brightly coloured building were erected on the site.

How the building might appear when approaching from the west.

20. SHOPS AT ROBERT STREET, LINCOLN Larger fascia signs in strong colours would fall within the 25% allowance

21. HAMMER HARDWARE, ROLLESTON Existing signage left, and examples of additional signage or colour that would fall within the 25% allowance.

22. In this example 25% of the elevation is shown in a bright colour (Greyness Group E). It could be wall colouring or signage.

23 & 24 .'THE HUB' MALL, HORNBY
Pak'nSave supermarket is located within the mall. Signage is attached to the exterior.

N.B. There is a similar size sign on a third elevation and a sign included in a free standing sign on each of two road frontages.

25. BARRINGTON MALL
Fresh Choice supermarket is located at the end of the mall and is 'sleeved' by shops facing the street.

N.B. Mall currently being extended, this is an old photograph.

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Appendix 6

Report

Selwyn District Council Proposed Plan Change 29 Response to Transportation Submissions

Prepared for Selwyn District Council (Client)

By Beca Infrastructure Ltd (Beca)

11 August 2011

Revision History

Revision N°	Prepared By	Description	Date
A	Rohit Singh/Tracy Allatt	Draft for Client comment	11 July 2011

Document Acceptance

Action	Name	Signed	Date
Prepared by	Rohit Singh		11/8/11
Reviewed by	Nicholas Fuller		11/8/11
Approved by	Melissa Foster		11/8/11
on behalf of	Beca Infrastructure Ltd		

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1 Introduction

1.1 Introduction

1.1.1 My name is Tracy Jane Allatt and I am a Senior Transportation Engineer at Beca Infrastructure Ltd (Beca). I have over 12 years of experience in the transportation industry focused on transport policy development and scheme implementation. I hold the qualifications of Master of Transport Planning & Engineering from the Institute of Transport Studies at the University of Leeds (UK) and a Bachelor of Geography from Staffordshire University. My experience includes over six years of employment in Local Councils in the United Kingdom and six years of experience in the consultancy environment. Almost four years of my work experience have been in New Zealand.

1.1.2 I have considerable experience in the development of transport policies with consideration of wider policies, urban design and the positive impact of active travel on health policies. I have previously worked on behalf of Councils on large Plan Change developments and have addressed the transportation comments received from public submissions on behalf of Local Councils.

1.1.3 Of particular relevance to this Plan Change, I have undertaken a national research project, "The Reallocation of Road Space," which investigates the needs of shoppers and what retailers' think is important in New Zealand shopping centres. The study provided innovation by collecting economic data in nine shopping centres and an understanding of the parking needs of shoppers.

1.1.4 I have been asked by Selwyn District Council (SDC) to review the transportation comments from the public submissions for the proposed Plan Change 29. The relevant evidence from the Reallocation of Road Space study and other relevant studies is presented in the evidence that addresses the topics raised from the public submissions.

1.2 Scope of the Report

1.2.1 Beca have previously prepared a report to support Plan Change 29, 'Selwyn District Council Urban Design Plan Change Report (10 March 2011). This report provided case studies and evidence of the economic benefits of allocating space to active modes and public transport users, in addition to an investigation into shopper parking requirements.

1.2.2 Beca have also undertaken a review of the parking requirements which are part of the Plan Change 12 amendments. The review of this policy is also taken into consideration in my report.

1.2.3 The key reference documents referred to when assessing the Plan Change 29 transport public submissions based on the document issued 22 March 2011 included the following:

- Notified Plan Change 29 –published 22 March 2011;
- Parking in Townships: Review of Parking Rates Letter – 1 July 2011;
- Lincoln Township Parking Study – May 2010;
- Plan Change 12: Integrated Transport Management Section 32 report – 2011;
- Selwyn District Council Walking and Cycling Strategy - January 2009;

- Evidence from national research and local studies in Rolleston, which reflect the views of shoppers; and
- Evidence from the NZTA research report, 'Reallocation of Road Space', an unpublished report (as of 27 July 2011) that discusses the observed economic impacts of reallocating road space to pedestrians, cyclists and public transport.

2 Summary of the Transportation Comments

2.1.1 In total, 16 transportation comments were received from submitters. The transportation submissions accounted for only 16% of the total submission points (a total of 100 submissions points were received by SDC from a total of 24 individual submitters). Overall, this indicates that the transport elements of the urban design plan change were not considered as important to submitters as other elements of the policy.

2.1.2 The transport submissions related primarily three of the published policies. These were:

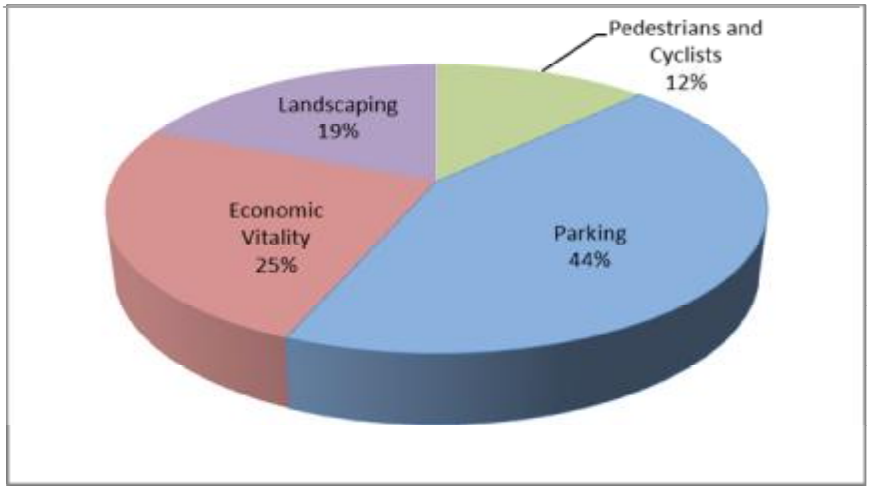
- Policy framework - Policy B3.4.23a;
- Car dependency / large developments and retail fronting public spaces - Rules 16.10 – 16.11; and
- Parking and landscaping Rules 17.6 and 17.7.

2.1.3 Of those submissions, the majority opposed the plan change:

- 25% (4) supported the plan change but requested amendments to be made; and
- 75% (12) opposed the plan change.

2.1.4 The analysis of the transportation comments included assigning topic categories to better understand the key issues, which resulted from the consultation process. These topics and the proportion of submission for each category are highlighted in Figure 2.1.

Figure 2.1: Summary of Transport Submissions



2.1.5 The matters that have been raised are highlighted in the public submissions have been reviewed. A detailed breakdown of the submissions by category is outlined in the following chapters.

3 Pedestrians and Cyclists

3.1 Public Submissions

3.1.1 Submissions received against Section B 3.4.23 are outlined below. The two submissions supported the plan change, but still required minor amendments to the policy wording. The detail of the submissions is outlined in **Table 3.1**.

Table 3.1: Summary of Pedestrian and Cycling Submissions

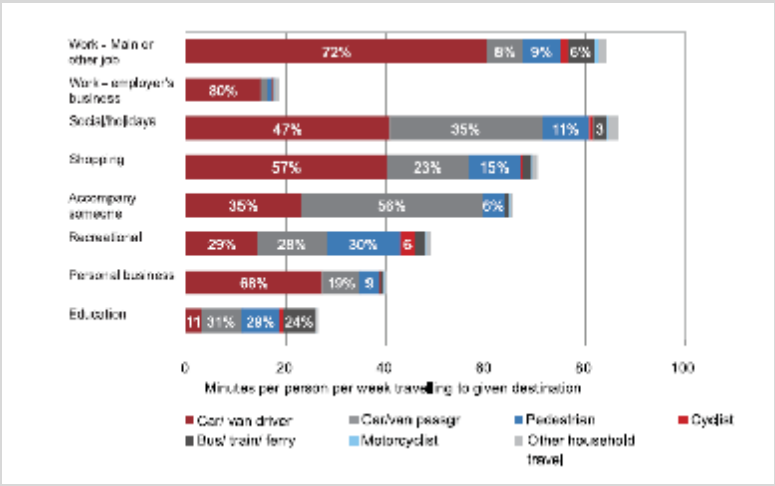
Number	Point	Type	Detail
1	1	Support	Requests inclusion of references to cycling in policy B3.4.23a. Add new paragraph on environmental sustainability under explanation.
10	1	Support in part	Generally supports proposed policies and rules where they are consistent to centres based approach to accommodating growth. But considers Policy B3.4.23a unnecessarily prioritises pedestrian requirements and fails to acknowledge other requirements.

3.2 Transport Comments & Discussion

3.2.1 The first transportation related submission focused on the inclusion of the development of cycle facilities into policy B3.4.23a. The second submission disagreed with the need to prioritise the needs of pedestrians above other users.

3.2.2 As highlighted by the submitter, cars are the dominant travel choice in New Zealand overall. Figure 3.1 (Ministry of Transport, 2009) indicates that more time is spent travelling in cars to shopping centres, which supports the fact that car travel is currently the preferred transport choice for most trips in New Zealand. Historically, design of shopping centres has catered for those travelling by car. This does create a problem for the people who cannot or choose not to driver, as many of the shopping centres often prioritise vehicle access over walking, cycling and public transport trips. Limited accessibility is more of a problem in modern sub-divisions like many of the newer Selwyn townships, compared to established residential areas.

Figure 3.1: Why and how people travel - mode share of time spent travelling (2004-2008)

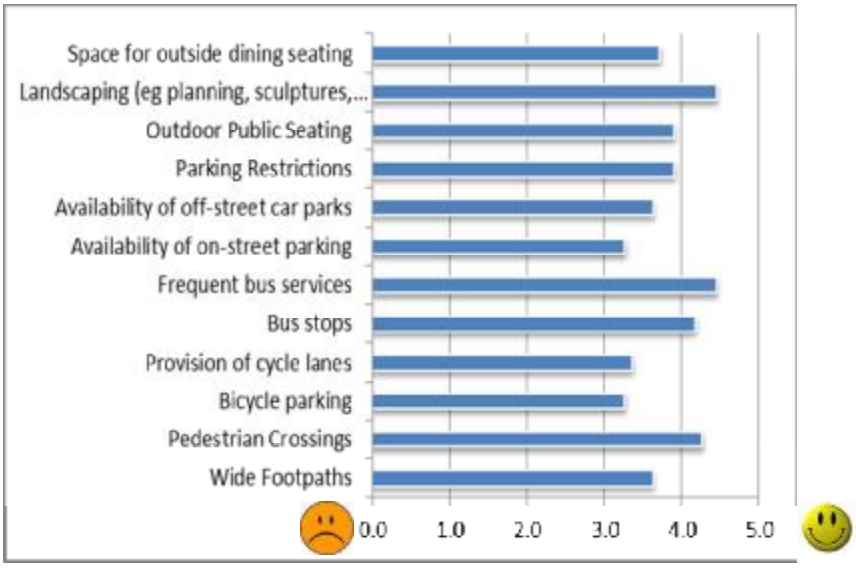


3.2.3 There is no doubt that car travel is an integral part of the transport system, walking is an even more fundamental part of every journey. All trips begin or end with a walking trip and safe, attractive walking environments are required for everyone regardless of their main mode of travel to the site. The national statistics shown in Figure 3.1, indicate that pedestrians account for 11% of users on shopping trips. Typically, walking trips account for 1% of travel to work journeys, therefore this is a relatively large proportion of people who choose to walk to shops, they should be prioritised more in the design of local shopping centres.

3.2.4 Encouraging more walking is embedded in national policies. However, as highlighted in the Wellington Urban Design Strategy (Wellington City Council, 1994), whilst walking can still account for half of all journeys made within an urban area, the design of pedestrian facilities often lags behind the amenity levels provided for those who move by vehicle.

3.2.5 As highlighted above, even drivers walk at some point and safe facilities and attractive facilities are required. Work undertaken with shoppers and retailers in New Zealand identified the preferred design elements for shoppers and elements in local shopping centres. The results are shown in **Figure 3.2.** The shoppers identified pedestrian crossings, frequent bus services and landscaping as the most important design factors. Parking design is considered the least popular of all measures.

Figure 3.2 National Research Design Workshop Shopper Results – Important Design Features (Average Rating)

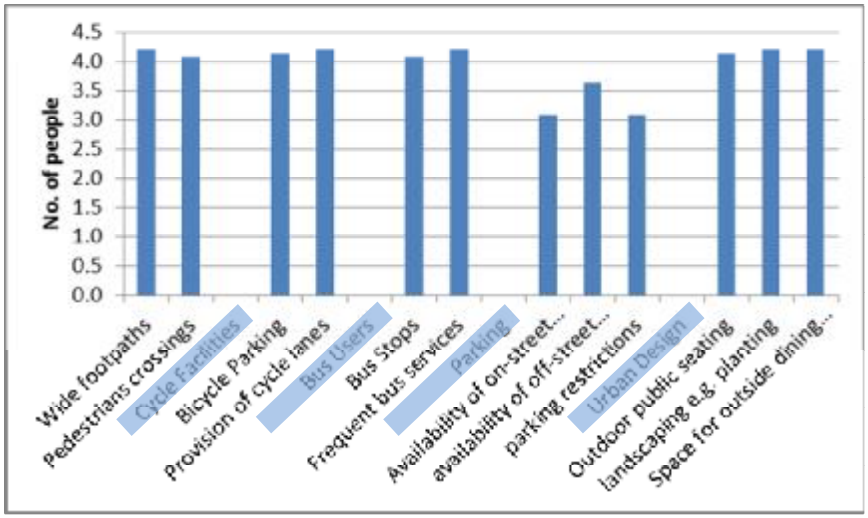


3.2.6 The results of the NZTA Reallocation of Road Space focus groups and retailer survey clearly indicate there are some common themes when considering design elements but retailers over-estimate the importance of parking. Retailers acknowledge the need for wide footpaths and safe crossings, but they also want car parking to be available within the often limited space available along arterial and central shopping centres. On the other hand, shoppers understand the need for compromise in design they would rather have wide footpaths and safe crossings and walk slightly further from parking.

3.2.7 The need for safe crossings was also highlighted in the focus group, as shown in the quote below. 'I would choose a centre where it is easy to get from one side street to the other, and that movement is easy once you're there'.

3.2.8 A workshop conducted in Rolleston involving 14 local residents reflected the findings of the national workshops. The results from the workshop are provided in **Figure 3.3**. Pedestrian facilities and urban design were considered important, as was the provision of cycle lanes.

Figure 3.3: Results of Rolleston Workshop – Important Design Features



3.2.9 In addition, work has been undertaken within Rolleston as part of the development of an area-wide walking and cycling strategy. The key issues highlighted in the Selwyn District walking and cycling strategy (Selwyn District Council, 2009) are:

- Poor connectivity between subdivisions and towns for cyclists;
- Not enough bike stands;
- Lack of space for both parking and cyclists on urban streets;
- Lack of mutual respect and courtesy between cyclists and motorists;
- Need for cycleways, cycle lanes and cycle paths to take people, by reasonably direct routes, to the places they want to go; and
- Need for secure "parking" for employees' cycles at work places

3.2.10 **Figure 3.4** highlights the key expected outcomes from the Selwyn Walking and Cycling Strategy. This Plan Change along with elements of the Plan Change 12 support the development local centres which promote the development of cycle routes and trip end cycle facilities.

Figure 3.4: Excerpt from the Selwyn Walking and Cycling Strategy – Expected Community Outcomes

Key Community Outcome	The Council will: *(the Council's role is in bold)*
A living environment where the rural theme of Selwyn is maintained	**Provide** a district plan which recognises and protects the core values that maintain a working rural environment
Co-ordination of community/social services	**Facilitate** initiatives that keep Selwyn people healthy and active.
A safe living environment	**Identify and where appropriate provide or advocate** for solutions to community safety problems (e g. roading improvements, public space and reserve design, walking and cycleway designs)
Effective and accessible transport system	**Provide** a well maintained, integrated, sustainable and safe District transportation network
	Advocate for improvements to Transit State Highways and Passenger Transport services where community concerns are noted

3.2.11 The Rolleston Neighbourhood Accessibility Plan, undertaken in 2008, also identified that the Rolleston roading and transport infrastructure is 'Car Centric'. The results of the exercise noted that there is very little consideration for other modal options and that the existing provision for pedestrians and cyclists is inadequate.

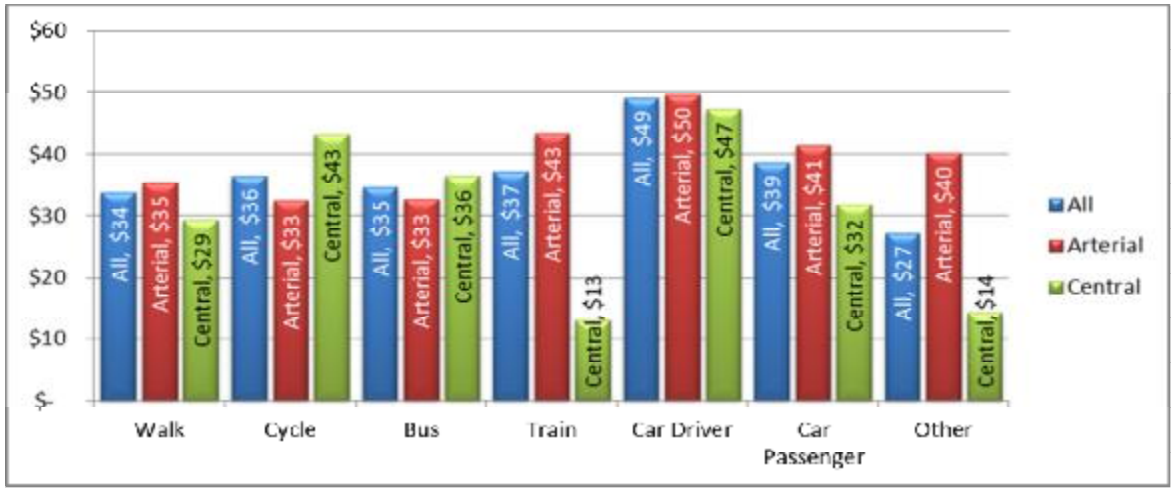
3.2.12 There are significant benefits of encouraging walking and cycling in local areas for local business owners and operators. These include:

- More activity in the local area reducing the risk of burglary and requirements for additional security measures;
- Attraction of more business to the area to support the local economy; and
- Space saving. Providing for pedestrians – pedestrians require less space per person. Tolley (2003) shows that pedestrians require only 0.8m^2 compared to 60m^2 per car travelling at 40km/h

3.2.13 The economic data collected from the NZTA research project, Reallocation of Road Space (ROR) collected data from nine shopping centres across New Zealand. The study resulted in a $ spend per user by travel mode. The data provided in **Figure 3.5** presents the results. The data shows there is not a big difference in the average spends for the main modes of transport. The results of the study show that 'other' users e.g. scooter, skateboard and mobility scooter users are high spenders and have relatively little dedicated space in traditional streetscapes.

3.2.14 The data also indicated that cyclists have a high spend of $43 per user in central shopping centres and only represented 2% of the shopping population in the sample set. Therefore the data shows that cyclists are big spenders and if shopping centres are designed to attract cyclists, they could attract more frequent spending trips by cyclists.

Figure 3.5: NZTA Reallocation of Road Space Study (Allatt et al, 2011 (Unpublished) – Economic Impact of Transport Users



3.3 Summary of Recommendations

3.3.1 The discussion above clearly outlines that the need to distribute space more equitably and provide more space for pedestrians and cyclists it is important in both local policies and was highlighted as important by local shoppers in a recent workshop in Rolleston conducted by Beca. It is particularly important in new developments to ensure that high quality pedestrian and cycle facilities are implemented in new schemes. The discussion in the supporting report also outlined the fact that pedestrians and cyclists are important to the economic vitality of shopping centres.

3.3.2 Having said that, the importance of parking is acknowledged and parking provision is being increased within provisions set out in Plan Change 12.

3.3.3 The results from the national and local research indicates that pedestrian space is important to local shoppers and therefore supports the prioritisation of pedestrians and cyclists in local shopping centres. As outlined above, parking provision is included within this Plan Change. However, the emphasis on priority is allocating space more equitably and creating active frontages to encourage more economic vitality in local shopping centres.

3.3.4 The allocation of space and where facilities are provided is the focus of this Plan Change. Both car drivers and sustainable transport users value high quality pedestrian space. Therefore, the more equitable allocation of space outlined in Plan Change 29 achieves national and local objectives, whilst achieving the desired outcomes of local users.

3.3.5 The economic data presented in this chapter also indicates that sustainable transport users currently contribute to the local economic vitality of shopping centres. The data from the national and local study also shows that people who drive also value high quality pedestrian facilities on arrival is shopping centres.

3.3.6 A summary of the recommendations from the pedestrian and cycle submissions is provided in Table 3.2.

Table 3.2: Summary of Pedestrian and Cycling Submission Recommendations

No.	Point	Type	Detail	Recommendation
1	1	Support	Requests inclusion of references to cycling in policy B3.4.23a. Add new paragraph on environmental sustainability under explanation.	**Accept**
10	1	Support in part	Generally supports proposed policies and rules where they are consistent to centres based approach to accommodating growth. But considers Policy B3.4.23a unnecessarily prioritises pedestrian requirements and fails to acknowledge other requirements.	**Modification**

3.3.7 An amendment to B.4.23a is agreed as outlined in Mr Hattam's report. The amended text is highlighted in bold and underlined in the affected policy statements, as below:

- Bullet Point 4 – ensuring that the development supports the urban structure by providing for direct and logical pedestrian **and cycle** routes within and through larger sites and to entranceways and desire lines.

3.3.8 To address the issues raised in the public submission it is recommended that minor changes suggested below are implemented:

- Bullet point 6 –ensuring that the design and layout of **town centres prioritise** the needs of pedestrians **and cyclists** over **those of parked vehicles**.

4 Parking

4.1 Public Submissions

4.1.1 The largest proportion of the transport submissions (44%) was on the topic of parking. This equated to seven of the 16 submissions. The submissions received related to the rules set out in section 16.10 – 16.11 of the Plan Change 29 and Policy B3.4.22 and one of the submissions relate to the safe operation of car parks with the addition of landscaping to car parks outlined in Policy 17.7.

4.1.2 The majority of the comments from the public submissions are on the topic of the location of car parking. Retailers and business owners are opposed to the relocation of car parking to the side and to the rear shopping developments. Each of the submissions is addressed in the discussion below.

Table 4.1: Public Submissions on Parking

No.	Point	Type	Detail
2	Royal New Zealand Plunkett Society	Oppose	Considers that it would be difficult to achieve internalisation of car parking in Southbridge and that the level of commercial activity does not require it.
10	Rolleston Square Ltd	Oppose	Considers that rule fails to recognise that most people arrive by motor vehicle and it is impractical that building entrances should face the street but car parking be located at the rear.
11	Rolleston Retail Ltd	Oppose	Considers that rule fails to recognise that most people arrive by motor vehicle and it is impractical that building entrances should face the street but car parking be located at the rear.
12	Roll Ten Investments Ltd	Oppose	Considers that rule fails to recognise that most people arrive by motor vehicle and it is impractical that building entrances should face the street but car parking be located at the rear.
15	RD and JC Butt	Oppose	The policy does not take into account situations where it is more suitable to have parking in front of the building**.** Delete new policies B3.4.23a and B4.3.6.
15	RD and JC Butt	Oppose	The policy does not take into account situations where it is more suitable to have parking in front of the building. Delete rules 16.9-16.12.
2	Royal New Zealand Plunkett Society	Oppose	Considers that this would create an unsafe environment for children and may make redevelopment unaffordable.
3	Foodstuffs (South Island) Properties Ltd	Oppose	Considers that preventing parking from being established between retail and roads overlooks the function of large format retail and may result in unintended consequences such as compromising pedestrian safety and undermining pedestrian flow. Considers this will be contrary to broader objectives of District Plan. Considers that design and form of business 1 land is not an appropriate way to manage the issue of car dependency and that this should be addressed through public transport and provision for public car parking.

4.2 Transportation Comments & Discussion

LOCATION OF CAR PARKS

4.2.1 To address the comments about the location of car parks, one must first understand the historical development of land use and transport design. Over the last 40 years, the transport and urban landscape has been designed to meet the needs of private car travel. As a direct result of policies that promote car travel, we have seen increased mobility where people travel further to reach goods and services and decreased local accessibility.

4.2.2 A by-product of this approach is that car parking has often been provided at the front of shopping centres either as on-street parking or dedicated off-street parking, which is prevalent in the Selwyn District.

4.2.3 Current car parking design standards (ANZS2890: Parking facilities (Part1: Off-street car parking) do not provide guidance on the geographical location of car parking within development sites. Examples of this car park dominated environment are provided in **Figure 4.1**.

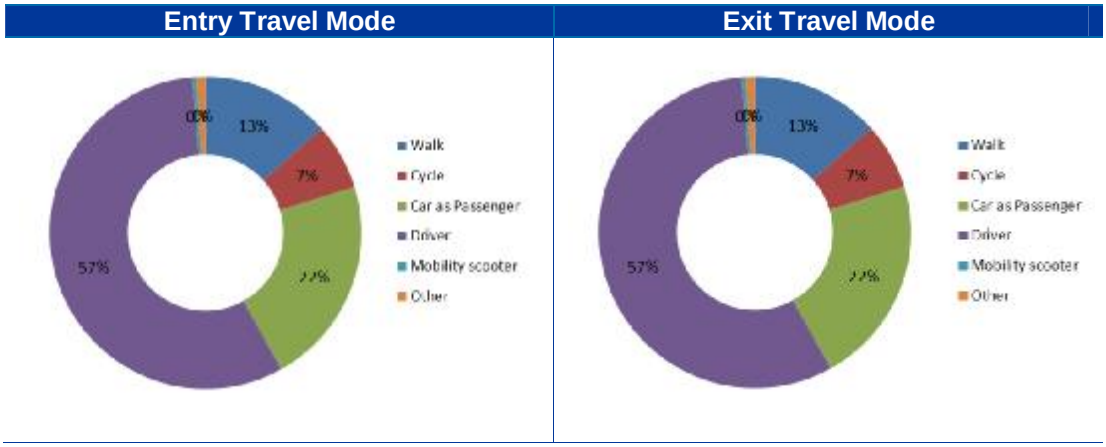
Figure 4.1: Examples of Car Parking Dominated Environments

4.2.4 Parking is often considered vital to retailers in shopping centres around the world. The data collected in the Reallocation of Road Space project in shopping centres along arterial corridors and in central city locations, provided the following results on the use of existing car and cycle parking in our shopping centres;

- A good mix of car parking options are available in the nine centres, but vary from site to site;
- Less cycle parking is available in local shopping centres and there is a lack of awareness of cycle parking from retailers;
- Over 20% of retailers park on-street within walking distance of the shopping centre, only a small proportion park on-street outside the shop. All of this parking directly competes with parking space available for paying customers;
- The majority of retailers park off-street in private car parks; and
- The majority of shoppers currently use on-street parking.

4.2.5 Overall, the data provides a useful baseline to build upon to better understand the use of our local shopping centres. However, this does not provide local evidence. As part of the work commissioned previously by Selwyn District Council, Beca undertook a study of the Rolleston car parks for a one-day snap shot survey, to better understand how people travel to and use Rolleston town centre. The results are shown in **Figure 4.2**.

.Figure 4.2: Existing Travel to Rolleston Town Centre



4.2.6 The shopper survey conducted in Rolleston town centre showed that most shoppers did not drive between different shops in the centre, and instead preferred to walk. The results also showed that pedestrians and cyclists accounted for 20% of all shoppers visiting the centre. The most popular shops visited during the survey period were New World, The Warehouse, and Rolleston Community Centre.

4.2.7 The results also show that 20% of shoppers arrive on foot or by bike and must negotiate the car parks.

4.2.8 A focus group was organised in Rolleston which aimed to provide further discussion on specific subjects related to the design of the town centre. A total of 15 Rolleston residents attended the workshop. Despite the small number of participants a range of viewpoints was engaged, with representation from active groups in the area including Envirotown and the Rolleston Youth Council.

4.2.9 The participants identified that there are currently poor pedestrian and cycle links in Rolleston. The group also highlighted the need for improved access for disabled users, and for safe cycling facilities to and from town centres. Many people in the group liked the option of segregated routes.

4.2.10 The group discussion resulted in an overwhelming need to improve and prioritise pedestrian space, above the needs of providing car parking space. The group discussed the option of providing car parking either above or below the shopping centre or within walking distance of the shopping centre to allow the space outside the shops to be used for pedestrians, cyclists and disabled users and as meeting space. The more detailed feedback from the workshop on parking is provided below:

- Easy access;
- Shade in the summer;
- Speed limit in car parks;
- Footpaths in car parks;
- Generous car park dimensions;
- Angled parking;
- Short term; and
- Allocate parking underneath buildings or above.

4.2.11 The headline outcomes from the above studies indicate that there is some common ground in what retailers and shoppers want in local shopping centres. The key difference between the two user groups being the importance of parking. The retailers consider parking as the most important design feature to attract shoppers. However, the evidence from the shoppers is that they would be willing to forgo parking in the shopping centre, to ensure that a safe and attractive shopping experience.

SAFETY OF CAR PARKS

4.2.12 In terms of safety, there are two considerations: actual safety and perceived safety.

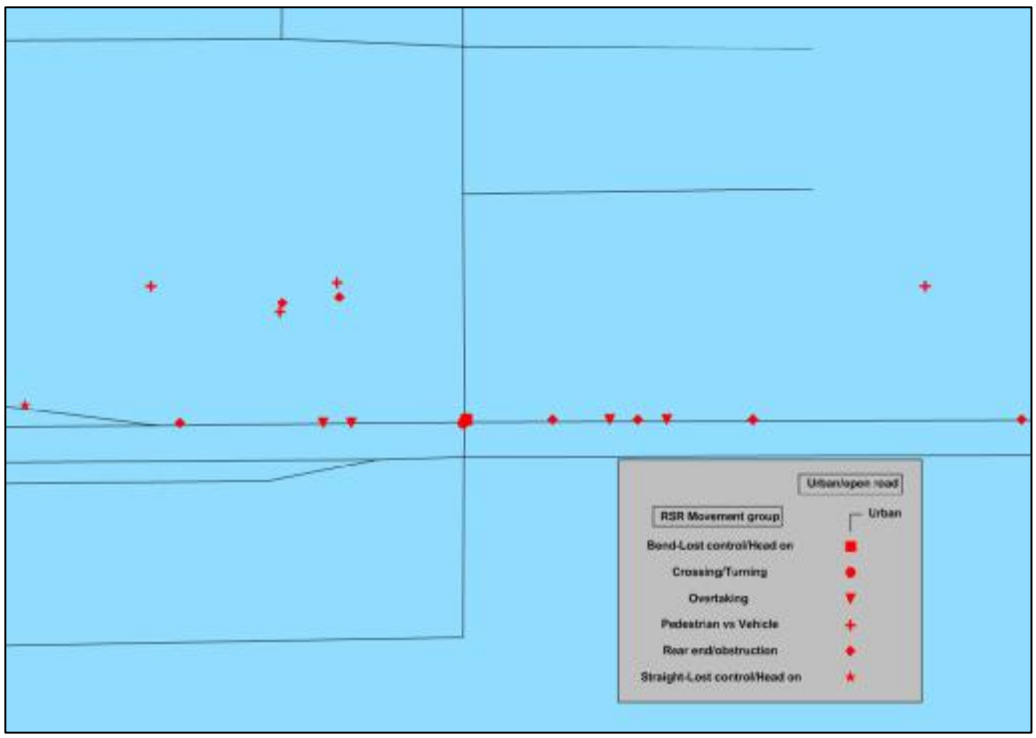
4.2.13 An analysis of car park crashes was undertaken at different types of car parks to understand actual safety of car park design. The two types of car parking facilities analysed were:

- Off-street car parks on Moorhouse Avenue and Merivale, Papanui Road.
- On-street car parking at Merivale Shopping Centre.

4.2.14 During the 2006-2010 period crashes involving parked vehicles accounted for 10% of all crashes occurring on New Zealand roads. These include collisions with parked vehicles, vehicles entering or leaving a parking bay and pedestrians entering or leaving a vehicle.

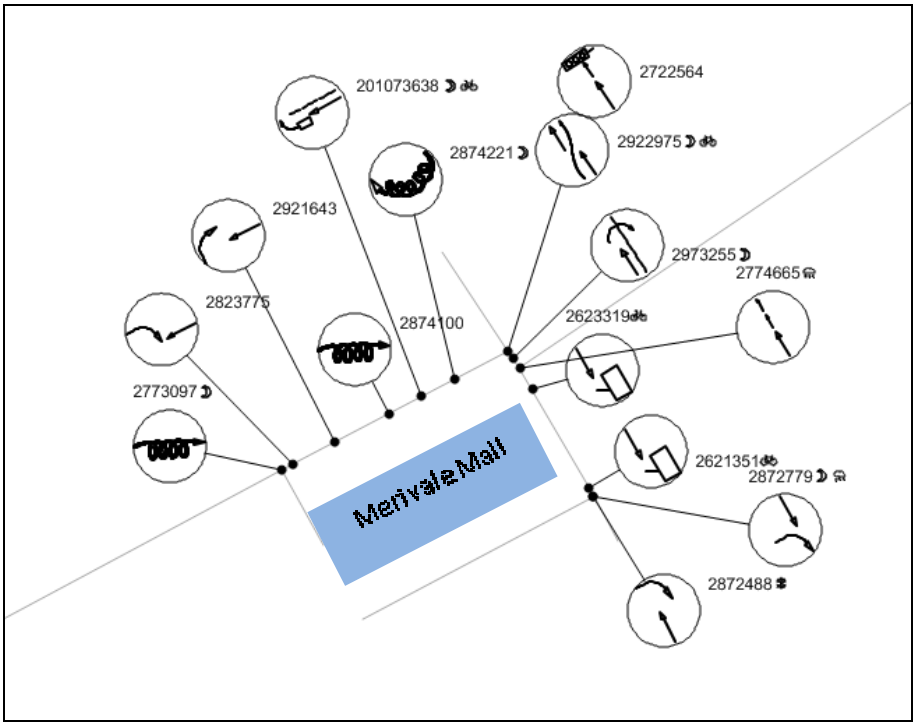
4.2.15 Five crashes were recorded within the Pak'nSave (Moorhouse Ave) car park during the last five years (2006-2010). Three of these crashes involved collisions between pedestrians and manoeuvring vehicles, each of which resulted in a serious or minor injury. The two remaining non-injury crashes involved collisions between manoeuvring vehicles. The data is shown in Figure4.3.

Figure 4.3: Pak'nSave Car Park Crashes, Moorhouse Avenue (Christchurch) 2006-1010



4.2.16 No crashes were recorded in the car park at Merivale mall, although there were two collisions between cyclists and parked vehicles on Papanui Road, adjacent to the shop frontages. The crash records are presented in Figure 4.4. This would indicate that the on-street parking is more hazardous to pedestrians and in this case, cyclists.

Figure 4.4: Papanui Road Crash Analysis Christchurch 2006-2010



4.2.17 In terms of perceived safety, the design of car parks, use of the area and the links to and from the local shopping centres play a vital role. Merivale Mall car park represents a good example of well used off-street parking which has good natural surveillance.

4.2.18 The rules set out in this policy for parking and within the additional policy principles for the design of shopping centres in this Plan Change, should create permeable environments with good lighting and natural surveillance. The design of good car parks to the side and rear of shopping centres will allow for parking provision and also reduce the number of conflicts with pedestrians and cyclists using the shopping area. Thus reducing the crashes involving pedestrians and cyclists alluded to in the above crash analysis.

SAFETY OF CAR PARK AND LANDSCAPING

4.2.19 ANZS2890: Parking facilities (Part1: Off-street car parking) notes that “when providing trees and shrubs, safety aspects such as sight distances should be considered during the life of any landscaping features”. However the guide does encourage the judicious placement of trees as this provides shade and screening for both surface car parks and structures, and general improvement in the appearance of an area. It also notes the advantages provided by landscaping with regard to delineating pavement areas.

4.2.20 Minimum sight lines for pedestrian safety at car park entrances and exits: 2m X 2.5m sight triangles at the exit of the driveway near the edge of the footpath and property boundary to be kept clear of obstructions to visibility.

4.2.21 Therefore the landscaping outlined in Policy 17.7.1 and 17.7.2 if designed according to current design standards should not cause any safety issues for pedestrians using the car park and surrounding pedestrian network.

PARKING RESTRICTIONS AND PLACEMENT IN SMALL TOWNS

4.2.22 This aspect of the submission has been addressed by Ms Wolfer's evidence, in which, she has undertaken a study of Southbridge to address this and other issues raised by the submitter. In her evidence, Ms Wolfer concludes that there are no particular circumstances which would make it appropriate to exclude Southbridge or specific business activity from the principles outlined in this Plan Change.

4.2.23 To supplement the evidence Ms Wolfer provides, I also consider that the principles have some leeway for the provision of parking and the requirements for parking would be dependent on the scale of the resource consent application.

4.3 Recommendations and Required Changes

4.3.1 The policies set out in the Plan Change aim to create more liveable and economically viable shopping centres. Although parking is an important part of the transport provision, space should be more equitably divided and create high quality environments for those who are shopping in local centres.

4.3.2 The research clearly shows that retailers overestimate the importance of parking and underestimate the importance of factors like good pedestrian design and urban design for shoppers. The location and design of parking can be made attractive at the side and rear of shopping centres as part of economically successful shopping areas. Good signage and awareness of this parking will ensure that shoppers will use rear parking and provide the opportunity to create high quality active frontages at the front of developments.

4.3.3 In terms of safety, the evidence presented in this report would suggest that on-street parking creates the most conflict with pedestrians and cyclists and that well used and designed rear car parks provide safe alternatives for shoppers. Good car park and shop design which is outlined in the Plan Change policies, will create shopping centres with permeable routes.

4.3.4 On-street car parking can be used if adequate space for manoeuvring and good visibility is provided for vehicles entering and exiting the parking spaces. Good visibility is also required for vehicles to see pedestrians and cyclists. **Figure 4.5** shows a good example of a wide area available for vehicle manoeuvre, good sight lines and minimised conflicts for through cyclists and pedestrian priority at the designated zebra crossing.

Figure 4.5: Example of On-Street Angled Parking

4.3.5 A summary of the recommendations from the pedestrian and cycle submissions is provided in **Table 4.2**. As outlined in **Table 4.2**, it is recommended that all of these submissions are rejected.

Table 4.2 Summary of Parking Recommendations

No.	Point	Type	Detail	Recommendations
2	Royal New Zealand Plunkett Society	Oppose	Considers that it would be difficult to achieve internalisation of car parking in Southbridge and that the level of commercial activity does not require it.	Reject
10	Rolleston Square Ltd	Oppose	Considers that rule fails to recognise that most people arrive by motor vehicle and it is impractical that building entrances should face the street but car parking be located at the rear.	Reject
11	Rolleston Retail Ltd	Oppose	Considers that rule fails to recognise that most people arrive by motor vehicle and it is impractical that building entrances should face the street but car parking be located at the rear.	Reject
12	Roll Ten Investments Ltd	Oppose	Considers that rule fails to recognise that most people arrive by motor vehicle and it is impractical that building entrances should face the street but car parking be located at the rear.	Reject
15	RD and JC Butt	Oppose	The policy does not take into account situations where it is more suitable to have parking in front of the building**.** Delete new policies B3.4.23a and B4.3.6.	Reject
15	RD and JC Butt	Oppose	The policy does not take into account situations where it is more suitable to have parking in front of the building. Delete rules 16.9-16.12.	Reject
2	Royal New Zealand	Oppose	Considers that this would create an unsafe environment for children and may make redevelopment unaffordable.	Reject
3	Foodstuffs (South Island) Properties Ltd	Oppose	Considers that preventing parking from being established between retail and roads overlooks the function of large format retail and may result in unintended consequences such as compromising pedestrian safety and undermining pedestrian flow. Considers this will be contrary to broader objectives of District Plan. Considers that design and form of business 1 land is not an appropriate way to manage the issue of car dependency and that this should be addressed through public transport and provision for public car parking.	Reject

5 Parking and Landscaping

5.1 Public Submissions

Submissions received against Section Policy 17.7.1 are outlined in **Table 5.1**.

Table 5.1: Public Submissions on Parking and Landscaping

Number	Point	Type	Detail
5	2	Not Stated	Notes concern about changes to rules.
10	7	Support	Supports rule 17.6 and considers controlled status for development and redevelopment of parking is appropriate. Supports the principle of landscaping of car-parks (rule 17.7) but considers that rules impose obligations in respect of design and layout that are unnecessary and that the section should be amended to reflect what is practicable.
15	6	Oppose	Considers that rules are micromanagement and they do not allow for good site design. Considers rule 17.7 will prevent exposure of business to passing traffic.

5.2 Transportation Comments & Discussion

5.2.1 The landscaping issues covered in this report relate to the location of landscaping in terms of safe operation within and at entry/exit points within car parks.

5.2.2 ANZS2890: Parking facilities (Part1: Off-street car parking) notes that “when providing trees and shrubs, safety aspects such as sight distances should be considered during the life of any landscaping features”. However the guide does encourage the judicious placement of trees as this provides shade and screening for both surface car parks and structures, and general improvement in the appearance of an area. It also notes the advantages provided by landscaping with regard to delineating pavement areas.

5.2.3 Minimum sight lines for pedestrian safety at car park entrances and exits should provide 2m X 2.5m sight triangles at the exit of the driveway near the edge of the footpath and property boundary to be kept clear of obstructions to visibility.

5.2.4 Therefore, if the landscaping outlined in Policy 17.7.1 and 17.7.2 is designed according to current design standards should not cause any safety issues for pedestrians using the car park and surrounding pedestrian network.

5.2.5 With regard to rule 17.7.1.2, it is recognised that positioning trees near car park access points can result in visibility deficiencies and associated safety risks for road users. Improperly placed trees can also result in poor lighting from street lights in the area, causing further safety concerns. In my consideration, the use of landscaping to provide a buffer between the road and the car park is suitable as long as its height does not exceed 1m. The use of landscaping at parking accesses should be avoided in view of visibility and safety concerns for vehicles and pedestrians.

5.3 Recommendations & Required Changes

5.3.1 Car parking design standards allow for low level planting and trees can be provided within the development if they do not create problems for vehicles sight lines. In terms of transport

requirements, as long as the basic car park design standards are adhered to the design standards can be maintained.

5.3.2 A summary of the recommendations from the pedestrian and cycle submissions is provided in **Table 5.2**. As outlined in **Table 5.2**, it is recommended on a transport and parking basis that all of these submissions are rejected.

Figure 5.2: Recommendations for Parking & Landscaping Submissions

Number	Point	Type	Detail	Recommendation
5	2	Not Stated	Notes concern about changes to rules.	**Reject**
10	7	Support	Supports rule 17.6 and considers controlled status for development and redevelopment of parking is appropriate. Supports the principle of landscaping of car-parks (rule 17.7) but considers that rules impose obligations in respect of design and layout that are unnecessary and that the section should be amended to reflect what is practicable.	**Reject**
15	6	Oppose	Considers that rules are micromanagement and they do not allow for good site design. Considers rule 17.7 will prevent exposure of business to passing traffic.	**Reject**

6 Economic Vitality

6.1 Public Submission

Submissions received against Section B 3.4.23 and Policy 16.10.3.3 are outlined below. The detail of the submissions is outlined in **Table 6.1**

Table 6.1 Economic Vitality Public Submissions

Number	Point	Type	Detail
11	1	Oppose	Considers that the policy fails to take into account the constraints that exist in the Rolleston Town Centre; in particular the part which seeks to bring activity to street frontages by means of the position of buildings and active frontage is overly prescriptive. Impractical to expect car users to walk to the street front to enter buildings and not possible to put active frontage on front as well as rear of buildings. Fails to recognise that majority of people who visit the town centre do so by car.
12	1	Oppose	Considers that the policy fails to take into account the constraints that exist in the Rolleston Town Centre; in particular the part which seeks to bring activity to street frontages by means of the position of buildings and active frontage is overly prescriptive. Impractical to expect car users to walk to the street front to enter buildings and not possible to put active frontage on front as well as rear of buildings. Fails to recognise that majority of people who visit the town centre do so by car.
13	1	Oppose	Considers that the policy fails to take into account the constraints that exist in the Rolleston Town Centre; in particular the part which seeks to bring activity to street frontages by means of the position of buildings and active frontage is overly prescriptive. Impractical to expect car users to walk to the street front to enter buildings and not possible to put active frontage on front as well as rear of buildings. Fails to recognise that majority of people who visit the town centre do so by car.
4	1	Oppose	Considers that the methods are not the most appropriate method for achieving the purpose of the act or the District Plan's policies and methods. Considers that rules may present a hurdle to achieving the most appropriate outcomes and may stifle economic development and vitality. Notes that high quality development is not achieved by compliance with a rigid set of rules and that design and form of development in the business 1 zone would be better managed through an effects assessment on a site specific basis and if necessary through non-statutory measures.

6.2 Transport Comments &Discussion

TRANSPORT PATTERNS AND EXPECTATIONS

6.2.1 The problems created by the predict and provide planning approach have provided us with the opportunity to encourage more walking and cycling trips to support local community centres/shops by reallocating road space and creating areas that people want to visit.

6.2.2 There is a wealth of research on the economic benefits of sustainable transport users and the reallocation of road space. Much of this research is based on providing evidence that investing in walking, cycling and public transport will achieve wider transport policy objectives to reduce congestion and reduce the impact on health. Some of the key findings from this research are outlined below:

- Useful research on the needs of shoppers and the perception retailers have of their shoppers needs have been conducted overseas. These studies indicate that that the impact of car trips and the need for parking is widely overestimated;
- The removal of traffic lanes does not necessarily result in increased traffic congestion and results in a significant reduction in crashes;
- Reallocating road space to other modes of transport also provides benefits for the wider community;
- European studies show that on average, business owners overestimate car use by approximately 20%;
- European studies show that on average, business owners underestimate walking trips to local shopping centres by 13 to 19%; and
- The retention of on street car parking is a priority for retailers, although parking is a relatively low priority for shoppers (composition of shops is the priority).

6.2.3 To understand local behaviour, a study was undertaken to examine travel patterns to the Rolleston shopping centre. Results from the shopper origin destination survey provide some useful insights into shoppers' behaviour at Rolleston Town Centre. A total of 79% of shoppers drove to the centre, while 21% either walked or cycled. Of those walking, Tennyson Street (North), along with Rolleston Drive (West), were popular entry/exit points for pedestrians and cyclists. The majority of people travelled to the centre for one specific purpose i.e. to visit one shop. The majority of the people surveyed were spending less than 30 minutes in the shopping centre. Based on the results of the workshop, this could be because there is nothing attracting people to staying in the shopping centre longer.

6.2.4 It was identified that there were currently poor pedestrian and cycle links in Rolleston, the group highlighted the need to improve access for disabled users. The experience of one regular wheelchair user was recounted in the discussion. The person in question has to ride on road until they can get back onto the footpath to visit Rolleston Town Centre. The group also considered the need for safe cycling facilities to and from town centres. Many people in the group liked the option of segregated routes.

ECONOMIC VITALITY

6.2.5 The spending patterns of various transport users in these local shopping centres is an important matter for the business owners and should influence their interest in improving shopping centres to attract customers. To make the case for reallocation of road space, we need to demonstrate the economic importance non-car users to their business. A number of factors were considered in the economic analysis of shoppers by mode in this study. Where data has been collected from retailers, the data has been reviewed compared to the observed spending patterns. The key questions that were of interest in this process were:

- The importance of passing trade;
- The average user spend per trip;
- A comparison of the economic spends from sustainable transport users and car drivers and passengers; and
- The spending profile by travel mode per trip.

6.2.6 A study conducted in the UK which assessed the economic impact of urban design (Cabe, 2007) found that:

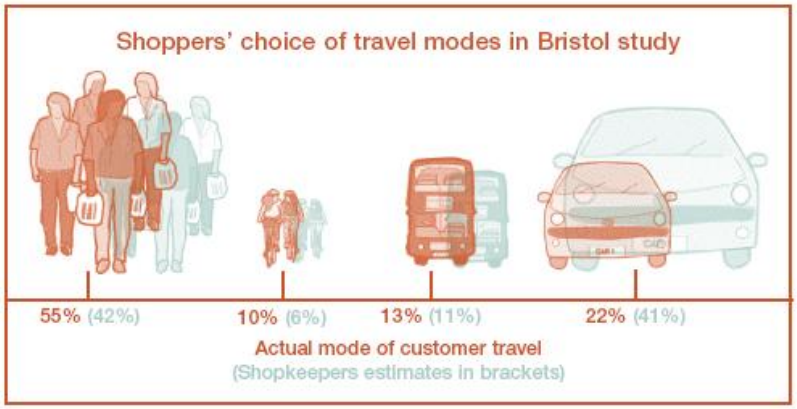
- On average, pedestrians were willing to pay more taxation to fund better street design;
- Pedestrians using streets with a lower standard of urban design were willing to pay more taxation to upgrade the streetscape than pedestrians using streets with good urban design;
- Better streets result in higher market prices;
- The research shows that in London an achievable improvement in street design quality can add an average of 5.2 per cent to residential prices; and
- The research shows that in London an achievable improvement in street design quality can add an average of 4.9 % to retail rents.

6.2.7 A study conducted in Graz, Austria (1991) evaluated the reality of how shoppers travelled in Graz, compared to the perception of how business owners thought people travelled. The results showed that business owners underestimated how many customers walked, cycled and used public transport. **Figure 6.1** shows the results of the Graz Survey

Figure 6.1: Results of Shopper Travel Surveys – Graz, Austria (Source: Sustrans, 2006 – from Traffic Restraint and Retail Vitality, Sustrans, 2003)

This study was replicated in a local shopping centre along an arterial road in Bristol, UK (Sustrans, 2006). The study involved interviewing 126 retailers and 840 customers. The results again show that business owners overestimate the impact of car travel. The results are shown in **Figure 6.2**.

Figure 6.2: Results of Shopper Travel Surveys – Bristol, UK (Source: Sustrans, 2006)



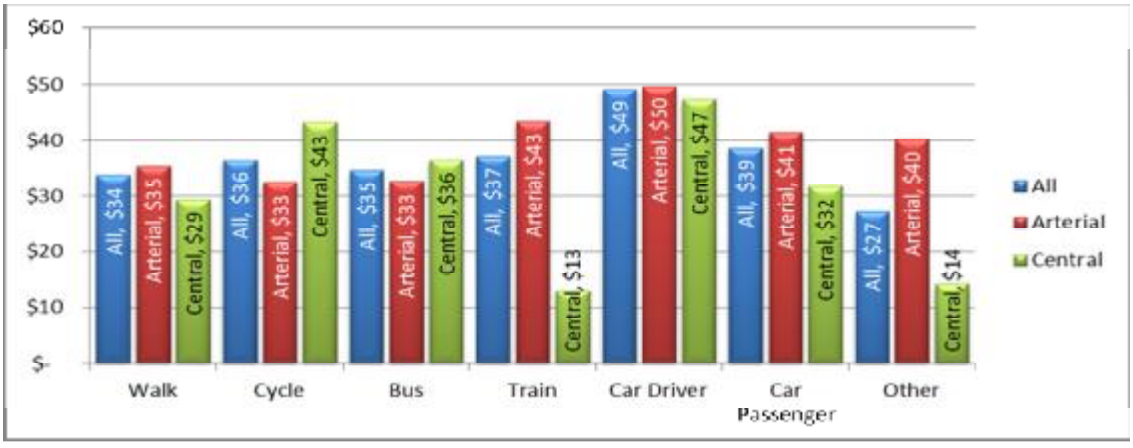
6.2.8 Other key results from the survey showed that 86% of shoppers lived within 2 miles, compared to the perceived estimate of local trade from retailers of only 12%. The results of the shopper and retailer surveys in Graz and Bristol show that, on average, actual car usage was just over half of what retailers estimated it to be, and that retailers underestimated use of walking, cycling and public transport.

6.2.9 A summary of the key economic outcomes from the NZTA research study (Allatt et al, 2011 unpublished) are presented below:

- Passing trade accounts for less than 30% of the total trade in the study sites;
- Retailers considered that local trade was the bulk of the trade for their business, which was reflected in the data collected from shoppers;
- Sustainable transport users account for 40% of the total spend in the shopping centres and represent only 37% of the total people spending in the area;
- The results shows that the highest average spend was by the 'other' category users with $40 spend person in arterial shopping centres; and
- Cyclists spend money. Although they only account for 2% of the sample data set they spend the second highest amount of sustainable transport users and only $4 less than car drivers per trip.

6.2.10 The summary of the economic spend results in the New Zealand study is provided in **Figure 6.3**. A further analysis of data is provided below.

Figure 6.3: NZTA Reallocation of Road Space Study (Allatt et al, 2011 (Unpublished) – Economic Impact of Transport Users



6.2.11 The New Zealand data shows that car drivers spend the most money per trip. This being said, the data clearly shows that sustainable transport users contribute a significantly to the economic activity in New Zealand shopping centres.

6.2.12 **The data shows a relatively high spend was by the 'other' category users with $40 spend person in arterial shopping centres.** This is one of the most surprising results of the study. The use of scooters for school trips has become fashionable and the arterial shopping centres will often be located on the route to and from school, this could be a critical consideration in why the spend was so high. Also, the prizes available for completing the survey (an i-pod and a camera were the prizes) would most likely attract the younger market who use these less conventional modes of transport.

6.2.13 Train users tend to spend more in arterial shopping centres. Train users account for the highest average spends for sustainable transport users. These results would seem to indicate that train users spend at the beginning and end of the journey rather than spending money in a central shopping area. This data is not as relevant to the Selwyn District as the data collected on other modes of transport.

6.2.14 **Cyclists have the second highest average spend for sustainable transport users**. Cyclists spend only $4 less per trip than car drivers in central city locations. The key thing to note is that cyclists only account for 2% of the users in the study sample selection, but provide spending power.

6.2.15 Pedestrians spend more in arterial shopping centres. Pedestrians spend $6 more per person in arterial shopping centres than in central shopping centres. This could be as a result of the shopping centres being more conveniently located for homeward bound journeys and are within close proximity to home. Central city locations often involve longer walks and would often require people to use other modes of transport, unless living within the central city.

6.2.16 Car driver and car passenger spend is consistent across all shopping centres. The data shows that car drivers spend, on average, $10 more than car passengers. This is likely to be because car drivers have more flexibility to carry more than car passengers. The critical factor for car passengers is when that car trip is available e.g. is the shopping centre at the end of the car journey followed by a walking trip.

6.3 Recommended & Required Changes

TRANSPORT PATTERNS AND EXPECTATIONS

6.3.1 There is only limited space available along 'transport corridor', in which we need to provide for everybody using the space. There is no question that the car is the most popular mode of transport and is an extremely important part of our present day lifestyle. However, the demand on the transport network is increasing and the use of local areas along arterial routes have changed dramatically. There is an expectation to provide high quality transport and urban design for people living within the residential communities centred on these local shopping centres.

6.3.2 The concepts are not new, the findings of the Appleyard & Lyntell study (1969) discovered that social interaction perception of community reduced as traffic volumes increased (Tolley, 2003). This, coupled with the findings of other studies indicating that "Streets that are busy with bicyclists and walkers are considered human scaled environments and foster a sense of neighbourhood and community" (Strawser, 2004), create a case for providing an attractive environment to encourage walking and cycling. The planning policies of the last three decades have created local shopping environments that are dominated by the needs of the private motor vehicle rather than those on foot or travelling by bicycle.

6.3.3 New Zealand research (McIndoe et al, 2005) highlighted that one of the key problems of creating areas with high quality urban design is the need for developers to minimise the cost of new developments and their limited appreciation of the wider benefits of good quality urban design. Often, the benefits of good urban design are not realised in the short term and therefore do not immediately benefit the developer. This situation can create a situation where "the market will provide poorer urban design than is socially optimal" (Mcindoe et al, 2005). Therefore the introduction of policies to ensure that quality urban design is considered in new designs is vital.

ECONOMIC VITALITY

6.3.4 The research indicates that sustainable transport users form a good proportion of the spend in local shopping centres (40% of spend in the NZ economic transport study). The research results are indicating that pedestrians are more frequent visitors to shopping areas and spend similar amounts of time and money to car drivers. International studies also indicate that high quality urban design has a positive long term economic benefit in local shopping centres.

6.3.5 The overseas studies (from the UK and Austria) show that retailers often underestimate the proportion and hence value of sustainable transport users on their business. While the New Zealand retailers surveyed appear to better understand the modes of transport their customers use, the shopper surveys show that sustainable transport users make up at least a third of all customers and also visit shops more frequently, than car drivers. Even though sustainable transport users have a lower level of spend (at $34 per visit) than car drivers (at $47 per visit) they are nevertheless a significant customer base. As demonstrated in European cities, as New Zealand cities, like Auckland and Wellington, become denser they are likely to become an even greater proportion of customers and hence reallocation of road space to encourage such users to a local shopping area is going to be increasingly important in the future.

6.3.6 The New Zealand surveys showed that the majority of shoppers, especially in arterial shopping centres, intended to visit the centre and hence that passing trade trips are relatively low; with an average of less than 30% shoppers not intending to shop. One argument put forward for on-road parking outside shops, especially in arterial shopping centres, is that 'passing by trade' is less likely to stop if parking is not readily available outside the shops. But in such centres passing trade is less than 15%, so this is not a strong enough reason to retain such parking, rather than reallocating it to other transport modes. Even in arterial shopping areas many customers are using off-road parking, so being able to park outside the shop you want to visit is no longer expected by many customers.

6.3.7 **Table 6.2** presents the recommendations from this discussion of the submissions. Many of the issues outlined in these submissions have been addressed in the amendment to the policy suggested in response to the submission from Progressive Enterprises Ltd (Submitter 10 Submission point 1). The policy wording has been amended and will address the comments received by both submitters.

- Bullet point 6 – ensuring that the design and layout of **town centres prioritises** the needs of pedestrians **and cyclists** over **those of parked vehicles**.

Table 6.2: Economic Vitality Recommendations

No	Point	Type	Detail	Recommendation
11	1	Oppose	Considers that the policy fails to take into account the constraints that exist in the Rolleston Town Centre; in particular the part which seeks to bring activity to street frontages by means of the position of buildings and active frontage is overly prescriptive. Impractical to expect car users to walk to the street front to enter buildings and not possible to put active frontage on front as well as rear of buildings. Fails to recognise that majority of people who visit the town centre do so by car.	Modification
12	1	Oppose	Considers that the policy fails to take into account the constraints that exist in the Rolleston Town Centre; in particular the part which seeks to bring activity to street frontages by means of the position of buildings and active frontage is overly prescriptive. Impractical to expect car users to walk to the street front to enter buildings and not possible to put active frontage on front as well as rear of buildings. Fails to recognise that majority of people who visit the town centre do so by car.	Modification
13	1	Oppose	Considers that the policy fails to take into account the constraints that exist in the Rolleston Town Centre; in particular the part which seeks to bring activity to street frontages by means of the position of buildings and active frontage is overly prescriptive. Impractical to expect car users to walk to the street front to enter buildings and not possible to put active frontage on front as well as rear of buildings. Fails to recognise that majority of people who visit the town centre do so by car.	Modification
4	1	Oppose	Considers that the methods are not the most appropriate method for achieving the purpose of the act or the District Plan's policies and methods. Considers that rules may present a hurdle to achieving the most appropriate outcomes and may stifle economic development and vitality. Notes that high quality development is not achieved by compliance with a rigid set of rules and that design and form of development in the business 1 zone would be better managed through an effects assessment on a site specific basis and if necessary through non-statutory measures.	Reject

7 Summary & Conclusions

7.1 Pedestrian and Walking Submissions

7.1.1 The discussion of the pedestrian and walking submissions outlines that the need to prioritise pedestrians and cyclists is important in both local policies and was highlighted as important by local shoppers in a recent workshop conducted by Beca. This is particularly important in new developments to ensure that high quality pedestrian and cycle facilities are implemented in new schemes. The discussion in the supporting report also outlined that pedestrians and cyclists are important to the economic vitality of shopping centres

7.1.2 The results from the national and local research indicates that pedestrian space is important to local shoppers and therefore supports the prioritisation of provision for pedestrians and cyclists in local shopping centres. As outlined above, parking provision is included within this Plan Change. However, the emphasis on priority is allocating space more equitably and creating active frontages to encourage more economic vitality in local shopping centres.

7.1.3 The allocation of space and where facilities are provided is the focus of this Plan Change. Car drivers and sustainable transport users value high quality pedestrian space. Therefore the policy more equitable allocation of space outlined in Plan Change 29 achieves National and local objectives, whilst achieving the desired outcomes of local users.

7.1.4 The economic data presented in this chapter also indicates that sustainable transport users currently contribute to the local economic vitality of shopping centres. The data from the national and local study also shows that people who drive also value high quality pedestrian facilities on arrival is shopping centres.

7.1.5 To reflect the comments from the public submissions, minor changes to the policy wording have been suggested as outlined below.

7.2 Parking

7.2.1 The policies set out in the Plan Change aim to create more liveable and economically viable shopping centres. Although parking is an important part of the transport provision, space should be more equitably divided and create high quality environments for those who are shopping in local centres.

7.2.2 The research clearly shows that retailers overestimate the importance of parking and underestimate the importance of factors like good pedestrian design and urban design for shoppers. The location and design of parking can be made attractive at the side and rear of shopping centres as part of economically successful shopping areas. Good signage and awareness of this parking will ensure that shoppers will use rear parking and provide the opportunity to create high quality active frontages at the front of developments.

7.2.3 In terms of safety, the evidence presented in this report would suggest that on-street parking creates the most conflict with pedestrians and cyclists and that well used and designed rear car parks provide safe alternatives for shoppers. Good car park and shop design, which is outlined in the Plan Change policies, will create shopping centres which create permeable routes to and from local shopping centres.

7.2.4 On-street car parking can be used if adequate space for manoeuvring and good visibility is provided for vehicle entering and exiting the parking spaces. Good visibility is also required for vehicles to see pedestrians and cyclists.

7.3 Parking and Landscaping

7.3.1 Car parking design standards allow for low level planting and trees can be provided within the development if they do not create problems for vehicles sight lines. In terms of transport requirements, as long as the basic car park design standards are adhered to the design standards can be maintained.

7.3.2 As outlined in **Table 5.2**, it is recommended on a transport and parking basis that all of these submissions are rejected.

7.4 Economic Vitality

7.4.1 There is only limited space available along 'transport corridor', in which we need to provide for everybody using the space. There is no question that the car is the most popular mode of transport and is an extremely important part of our present day lifestyle. However the demand on the transport network is increasing and the use of local areas along arterial routes have changed dramatically. There is an expectation to provide high quality transport and urban design for people living within the residential communities centred on these local shopping centres.

7.4.2 The concepts are not new, the findings of the Appleyard & Lyntell study (1969) discovered that social interaction perception of community reduced as traffic volumes increased (Tolley, 2003). This coupled with the findings of other studies indicating that "Streets that are busy with bicyclists and walkers are considered human scaled environments and foster a sense of neighbourhood and community" (Strawser, 2004) create a case for creating an attractive environment to encourage walking and cycling. The planning policies of the last three decades have created local shopping environments that are dominated by the needs of the private motor vehicle rather than those on foot or travelling by bicycle.

7.4.3 New Zealand research (McIndoe et al, 2005) highlighted that one of the key problems of creating areas with high quality urban design is the need for developers to minimise the cost of new developments and their limited appreciation of the wider benefits of good quality urban design. Often, the benefits of good urban design are not realised in the short term and therefore do not immediately benefit the developer. This situation can create a situation where "the market will provide poorer urban design than is socially optimal" (Mcindoe et al, 2005). Therefore the introduction of policies to ensure that quality urban design is considered in new designs is vital.

7.4.4 The research indicates that sustainable transport users form a good proportion of the spend in local shopping centres (40% of spend in the NZ economic transport study). The research results are indicating that pedestrians are more frequent visitors to shopping areas and spend similar amounts of time and money to car drivers. All of the other international studies also indicate that high quality urban design has a positive long term economic benefit in local shopping centres.

7.4.5 The overseas studies (from Bristol, UK, Graz Austria) show that retailers often underestimate the proportion and hence value of sustainable transport users on their business. While the New Zealand retailers surveyed appear to better understand the

modes of transport their customers use, the shopper surveys show that sustainable transport users make up at least a third of all customers and also visit shops more frequently, than car drivers. Even though sustainable transport users have a lower level of spend (at $34 per visit) than car drivers (at $47 per visit) they are nevertheless a significant customer base. As demonstrated in European cities, as New Zealand cities, like Auckland and Wellington, become denser they are likely to become an even greater proportion of customers and hence reallocation of road space to encourage such users to a local shopping area is going to be increasingly important in the future.

7.4.6 The New Zealand surveys showed that the majority of shoppers, especially in arterial shopping centres, intended to visit the centre and hence that passing trade trips are relatively low; less than 30%. One argument put forward for on-road parking outside shops, especially in arterial shopping centres, is that 'passing by trade' is less likely to stop if parking is not readily available outside the shops. But in such centres passing trade is less than 15%, so this is not a strong enough reason to retain such parking, rather than reallocating it to other transport modes. Even in arterial shopping areas many customers are using off-road parking, so being able to park outside the shop you want to visit is no longer expected by many customers.

7.5 Overall Conclusions

7.5.1 Transportation comments only contributed a small proportion of the issues raised in the public submissions. They represented only 16% of all submissions.

7.5.2 The New Zealand data shows that car drivers spend the most money per trip. This being said, the data clearly shows that sustainable transport users contribute a significantly to the economic activity in New Zealand shopping centres. Another key outcome from the research reviewed in this study is that all of the shoppers identify safe and high quality pedestrian, urban design features and cycle facilities (to a lesser extent) as key improvement s in local shopping centres, regardless of travel choice.

7.5.3 The allocation of space and where facilities are provided is the focus of this Plan Change. Both car drivers and sustainable transport users value high quality pedestrian space. Therefore, the more equitable allocation of space outlined in Plan Change 29 achieves National and local objectives, whilst achieving the desired outcomes of local users and retailers.

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Plan Change 29

Appendix 7

IN THE MATTER	**Resource Management Act 1991 ("RMA")**
AND	
IN THE MATTER	**Proposed Plan Change 29 to the Selwyn District Council District Plan**

STATEMENT OF EVIDENCE OF TIMOTHY JAMES HEATH ON BEHALF OF SELWYN DISTRICT COUNCIL

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8 August 2011

Introduction

1. My name is Timothy James Heath.

2. I am a Property Consultant and Analyst for the company Property Economics Limited, based in Auckland. I hold a double degree from the University of Auckland – Bachelor of Arts 1991 (Geography major) and Bachelor of Planning 1993.

3. I am a registered member of The Property Council of New Zealand and proprietor and founding Director of Property Economics Limited, a consultancy providing property research services to both the private and public sectors throughout New Zealand. I have undertaken this work for sixteen years, with the last nine of these as Director of Property Economics Limited.

4. I advise local and regional councils throughout New Zealand in relation to retail, industrial and business land use issues as well as strategic forward planning. I also provide consultancy services to a number of private sector clients in respect of a wide range of property issues, including retail and economic impact assessments, industrial market assessments, and forecasting market growth and land requirements for the retail and industrial sectors.

5. I am fully familiar with the Selwyn District Council commercial environment and wider Christchurch market, having undertaken detailed retail, commercial and industrial assessments across the region for private sector clients, and Waimakariri, Selwyn and Christchurch Council's over the last 10 years. Much of this work involved determining growth for the city and its implications in respect of forward land use planning.

6. I have been engaged by Selwyn District Council (SDC) to provide economic evidence on if proposed Plan Change 29 (PC29) can be supported from an economic sense and has an overlay of retail commercial market realities to ensure future development in the town centres of the district and vision for the centres is practical from a retail economics perspective and will result in a positive enhancement of the town centre environments within the District.

7. I have read and agree to comply with the Environment Court's Code of Conduct for expert witnesses outlined in the Environment Court's Consolidated Practice Note 2006. I have complied with this practice note in preparing this statement of evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not

omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Plan Change 29

8. Proposed Plan Change 29 is concerned with the provisions in the District Plan relating to new development in the Business 1 zone. It is proposed to introduce three new policies of which my evidence focuses on the first, being how the Council expects new commercial development to be integrated with its surroundings.

9. The Plan Change also proposes to introduce new rules to implement this policy. These include:

- A requirement for development to provide a minimum amount of active commercial frontage.
- Restrictions on the placement of parking and fencing for business development.
- Minimum standards for landscaping of car parks and blank walls.
- Controls on site layout for larger development.
- Limits on the use of bright colours on building facades.
- Amendments to the rules for signage in the Business 1 zone.

10. The reasons for PC29 include Council being concerned about the quality of the public realm which has been created by a number of recent developments, particularly in Rolleston which has been the subject of the most intense development in recent years.

11. The Council considers that new business development is not creating public areas with the expected level of amenity and that connections between developments are not adequate (direct and attractive to use).

12. This is resulting in sub-optimal social, economic and environmental outcomes including:

- Poor relationship between commercial buildings and public space
- Lack of high quality public space in places where people are present
- Lack of vitality and activity
- Lack of accessibility (poor linkages and loss of opportunity for walking and cycling)
- Car dependency
- Loss of economic opportunity
- Reduced opportunity for mixed use development

- Effectiveness of Council Investment in Facilities

13. Changes promoted by Council via PC29 aims to reverse some of these outcomes and ensure higher quality retail centres are developed in the future that better reflect the environment of Selwyn and the aspirations of its community.

Centres as Community Focal Points

14. The first element of proposed PC29 discusses the importance of centres as community focal points and how the quality of public space is an important component of a centre's success. While the quality of the 'public realm' is important, in my view centres are often defined by the success (or otherwise) of the commercial elements of a centre such as retail and other commercial tenants, the built form (i.e. quality of the buildings), and the interface / integration these have with the public realm.

15. Quality environments are more than simply 'nice' public areas. They are created, and a by-product of, a centre being successful across a number of important commercial elements, and it is the integration of these elements that often define a centre and determine its relative success in the community it serves.

16. For example, a centre with low quality retail stores, attracts fewer shoppers, and therefore generates less retail sales and in turn trades at lower level retail productivities comparatively. A flow-on effect of lower commercial activity is often lower levels of community usage in the public realm of such centres. This leads to less of the community enjoying public spaces as less people are using the centre, and lowers the viability and economic and social benefits of capital investment in the public spaces of that centre as such money is likely to be better spent elsewhere in the District, i.e. where the people are shopping or enjoying public space.

17. This shows the importance and value of a centre's economic and social function to the community. Economic and social function must go hand-in-hand as they are both people reliant, and as commercial activities generate most visits to a centre (or alternatively is the main reason behind most visits to a centre), and therefore without this economic function the social value of a centre is greatly diminished. As a general rule, the lower a centre's economic / commercial function the lower the centre's social value to the community as less people visiting, less vibrancy, less economic activity generated, etc.

18. Poor performing centres often not only have poor integration, but are generally limited in their land uses provided. A limited range of land uses and activities, i.e. retail only, limits the opportunities and range of reasons for people to visit the centre, and as a result can only provide a limited benefit to the community it services. Centres generally need to have a diversity of land uses to be a successful centre and include activities, services and facilities from sectors of commercial, community, religious, social, residential, retail and transport. While it is not essential every centre has elements across all these sectors, as it will depend on the role and function of the centre within the wider centre network of the area, a centre should encompass a diversity of uses across a number of these sectors. The larger the centre's role and function, the more sectors are likely to be represented.

Centre Concentration

19. PC29 also discusses the concept that more concentrated centres result in more people shopping longer in a smaller area and therefore encourages consumers to spend more. In my experience there is not a direct correlation between length of time in a centre and average shopper expenditure. Retail expenditure is not directly driven by being a more concentrated centre but by having a wide range of activities and uses (retail, commercial and social). People will stay longer and spend more if they have the opportunity and desire to do so. For this to occur there needs to be a multitude of reasons to stay and shop, and a good quality environment (in respect of offer, built form and public realm).

20. Public spaces are important to centres and tend to work better and experience increased centre usage if there are 'people oriented' commercial activities integrated in and on their fringes. However, while providing these 'people oriented spaces' is important, it does not necessarily translate into commercial advantages. It is generally a by-product of having commercial activity already available in a centre. Typically public space is better utilised when supported by commercial activities, e.g. restaurants around the outside of a town square. This is common practise in many European civic spaces and shows how a strong integration of 'people activities' and public space can increase commercial activity, usage and sense of place for the community, and often 'sets the scene' for the centre / city as a whole.

21. Good community space needs to be located where people will use it, or closely linked to commercial areas where people unwittingly know they are using it which adds to the social

value of the space and other users of the space. There is no point in locating a space for people-watching where there are no people to watch, however, in my opinion, many public spaces developed in NZ centres have unfortunately been quite good at this with little consideration to people (i.e. who will use it, when will they use it, how will they use it), with often little to no integration with the centre's commercial activity.

22. By contrast, blank walls or car parking detracts from public space and often represents a lost opportunity for 'people interest activities'. This is not just a matter of aesthetics; it is also about the amount and type of activity that takes place, and the amount of commercial activity it can generate for a centre which if not managed properly can lead to lost opportunities for a centre.

23. This can also occur when a large tenancy occupies a long mainstreet frontage, but the store maybe internalized and offer little amenity and value to the mainstreet it is located on, i.e. Countdown Kilbirnie in Wellington which occupies a significant amount of the mainstreet but 'turns its back' on the street with a long blank wall and trades to a carpark at the back of the block.

24. Long blank walls and extensive carparks remove the ability to provide commercial stimuli on mainstreets, unnecessarily adds to the length of a centre, and prevents additional commercial opportunities from drawing customers into, or maintain the interest of existing shoppers on, a mainstreet. As a result, typically less retail expenditure occurs, the appearance and quality of the centre can be compromised and importantly keeping consumers' interest in a varied retail / commercial environment is weakened. It is also usually a sign of a centre in decline when mainstreet space should be in demand by specialty stores and such space at a premium in a centre.

'Anchor' Tenants

25. Proposed PC29 also discusses the preferred location of anchor (major) tenants in a centre and how access to these is ideally via walking past a number of specialty stores instead of straight into an anchor store from a carpark as it provides a wider benefit to other smaller / finer grain specialty retail and commercial activity in a centre.

26. A key 'no no' in most centres and mall design is to allow shoppers into / out of a centre's major anchor store without passing other stores if possible. Mall owners, retail developers

and centre designers try to avoid this as it adversely affects the trading performance of smaller 'feeder' stores. At the end of the day retailing is a simple and practical science – the more shoppers (ala wallets) that walk past a store's front door, the more people are likely to go in a purchase an item, and the more sales the store will do. This hasn't changed and is still fundamental to a centre's success (even more so now with the emergence of Internet retailing). Often the better this is achieved in a centre / mall, the better the performance of that centre or mall as a whole, the better the environment, built from, offer, quality, etc, and the positive flow-on benefits this brings.

Carparking

27. There is also a need to ensure any link between a carpark and shops and / or the mainstreet is of good quality, safe, inviting, short, with possibly some activity. People will spend more time in a town and will increase the amount of activity only if the economic fundamentals of a centre are in place, i.e. quality and range of offer / stores, quality of environment, quality of amenity, range of activities, parking in close proximity to key stores, etc. As discussed earlier in this statement, more shoppers walking past a store's front door equals higher store productivity and sales within the store, and the flow-on benefits this generates such as increased local employment, higher rents, increased demand for space, higher wages, re-investment into buildings / store fitouts / public realm, increase in local GDP, etc.

28. PC29 also identifies carparking as not the most important determinant of whether a centre is successful. It states "people also value the amenity a centre offers and are mostly attracted by the mix of shops. They seek opportunities for shopping as a leisure experience (not just a chance to run errands) and the amenity of the centre is important for this". While this has an element of truth, there must be a balance achieved where carparking is not compromised and amenity is not lost. The vast majority of people travel to a centre in a car, and this is unlikely to change in the foreseeable future, so cars are a very important component to a centre's success. Ultimately, both are very important to the success of a centre. Note the more successful the centre, the more carparking is required so it is not all bad – and therefore the integration, number, access and location of carparking in a centre needs to be managed carefully.

Council Investment Options

29. In regard to Council investment options and actions that can achieve better outcomes for centres, Council, investors, developers, retailers and the community should work together to maximise resources, opportunities and ultimately benefits. All have different skill sets and resources that when utilised properly can add value to the formation of centre and generate increased long term benefit, i.e. community 'buy-in' to a centre will increase usage and performance over the longer term to the benefit of all.

30. Some of the actions required will be things that Council is best placed to deliver, i.e. perhaps the provision of large areas of public space. Others are things that private sector developers maybe best placed to deliver. Ultimately, a combination of all is required to get the best results for the townships. However, what is considered very important for Council to understand is 'investment' should not always be translated as a 'cost' due to the wider positive economic and social benefits and advantages investment in a centre can generate.

31. Council investment should also not be one dimensional and focus only on community facilities and public realm. Centres aren't one dimensional and therefore investment shouldn't be as well. For example investment in securing a strong retailer to a centre could have significant economic and social flow-on benefits for a centre and community.

32. Centre investment opportunities will differ from centre to centre as their respective 'needs' and 'weaknesses' that need to be addressed will vary. Council need to be proactive and monitor centres on an on-going basis to keep abreast of emerging performance issues to ensure any capital investment opportunities and remedies are known and focused, i.e. targeted in the right areas.

LFR Store Size Threshold

33. An important component of PC29 is the determining of an appropriate threshold between large format retail (LFR) and small specialty retail. 450m2 is what Property Economics typically apply as a 'cut-off' between smaller finer grain / boutique specialty retailing and LFR, and is comfortable this threshold is an appropriate level to adopt for Selwyn.

34. Historically, 500m2 has been the traditional benchmark, but this has come down a fraction in recent years as LFR centres have developed in smaller provincial areas and some of the

more 'typical' LFR tenants have adopted slightly smaller store footprints to reflect the smaller market they are servicing in these areas. It is also common now for a few stores below this threshold to be developed. These are predominantly cafes or bars to allow the LFR centre to 'feed' and 'water' shoppers so to speak, which improves shopper wellbeing and does not generate any adverse effects if their store numbers are capped at an appropriate maximum (depending on total centres size).

35. A detailed breakdown of some mature and successful LFR centres spread across NZ is provided in Appendix 1 which outlines the basis for the 450m2 threshold as being appropriate to adopt for PC29 for LFR.

Pedestrian Routes

36. PC29, in relation to Pedestrian Routes, raises concerns about the current level of pedestrian integration in and around the centre, and states; *"Councillors have made it clear that the poor level of integration in the town centre in Rolleston is of concern to them. Developments have been carried out with limited regard to the ability to walk between them".*

37. This is common among centres with multiple individual owners, and developments are usually carried out on an individual basis and sometimes in an ad hoc manner, not in consideration of the overall centre as a whole or master plan (if there is one), or how the centre functions, etc.

38. Individual development in centres is often undertaken on a specific cost / benefit basis to the developer, rather than factoring the costs or benefits to the community or centre as a whole as a result of that development. This is simply identifying a fact rather than a problem, but it provides sound rationale for Council to implement a master plan / vision for centres in the District as community costs and benefits should already be factored into such a plan with appropriate controls in place to guide future centre development based on community needs and aspirations.

Submissions

39. Submissions in relation to my area of expertise tend to be broadly based around two points. First, was around the perceived cost of compliance and effect of this on the commercial

activity, and second around the marketability of centres and stores if corporate colours were restricted in the manner proposed.

40. Neither of these issues identified above raise valid concerns in my view, and appear to be based on perception rather than reality.

41. Higher performing centres generate more sales and operate at higher productivity levels than low quality centres. This is usually more than enough to offset any increases in cost of compliance which in real terms and, in my opinion, are far from onerous. In most shopping mall developments there are far more restrictions on retailers on what they can and cannot do with their stores, have compulsory marketing fees, large common areas to make a contribution to maintain, minimal standard of store fitout, etc. Also Selwyn is a fairly self-contained market in terms of location and has the potential to reduce retail leakage significantly if a better quality centre, offer and environment was developed, which would again offset any potential increase in cost of compliance. It is on this basis this issue is seen as a perception rather than a reality and as such appears largely unfounded.

42. In relation to PC29 impacting the marketability if corporate colours are restricted is considered largely generic and unsubstantiated. What is becoming increasingly important in the retail market is to offer the consumer a 'point of difference' and less of 'more of the same' in terms of centres and stores. Selwyn needs to offer unique stores and experience rather than provide the 'same old same old' retail offer. Also, in my experience, retailers are willing to change their store appearance to secure a position in a market to ensure they capture or grow market share, i.e. The Warehouse in Remarkables Park, Queenstown. It is also my understanding based on Janet Reeves' evidence that the corporate colours are not overly restricted by the proposed rules, and as such I do not have any concerns in relation to this matter from a commercial perspective, and I suggest the vast majority of retailers wouldn't have either.

Conclusion

43. Higher quality centres typically perform better and at higher retail productivities, e.g. Merivale, Christchurch. They attract more shoppers and visitors to the centre as higher level of amenity and better quality centre environment is provided. Better quality shops tend to equate to some higher priced goods sold which elevates the average purchase price point and average shopper spend in a centre.

44. Walking does typically translate into more localised shopping (proximity being the main driver), but also the likelihood that other retail / commercial facilities / public realm and community facilities are more frequently utilised.

45. In my experience, in centres with multiple individual owners (both on-shore and off-shore), to obtain cohesive development within an overall vision or master plan for a centre, it is better for Council to manage this through the District Plan with guidance from a rule suite that sets the tone and framework for which the development can occur rather than individual assessments on an ad hoc basis as they arise. This is seen as a proactive approach to development of centres in Selwyn rather than continually providing reactive assessments on an on-going basis. This is considered to provide greater certainty of outcomes for all those with a vested interest, primarily the community, retailers, Council and private sector investors.

46. Good economic fundamentals in a centre typically equal good performing centres and higher levels of economic and social wellbeing afforded to the community. Good quality centres also perform their economic role and function in the community better than low quality / under performing centres, and as such getting the economic elements of a centre right is crucial to the viability of the centre and has a direct effect on the level of social amenity and wellbeing generated.

Tim Heath

8 August 2011

APPENDIX 1 – LFR Threshold Analysis

The benchmark for the minimum size of LFR stores has traditionally been around the 450-500m² plus threshold. To help determine a typical LFR store size range and appropriate minimum LFR store size Property Economics has assessed nine mature and successful LFR centres from around the country, and broken down their tenancy composition in more detail.

Note the figures in following paragraphs are based on information derived from the Property Council of New Zealand's NZSCD 2009/10 Edition, and previous Property Economics retail audits.

- **Manukau Supa Centa, Auckland**

Manukau Supa Centa has nearly 44,000m² of retail GFA and currently has 7 key anchor tenants (i.e. stores greater than 2,000m² gross), and 16 additional LFR stores. The 16 LFR tenants have a combined GFA of 13,260m², at an average tenancy size of 830m² gross. Many of these stores are below 1,000m² GFA in size, but within the 400-1,000m² range.

Stores within this range equate to around 70% of the Manukau Supa Centa's LFR tenants, showing a strong level of demand in the 450m² plus store size range.

- **Albany Mega Centre, North Shore**

Albany Mega Centre has 5 key anchor tenants, each with GFA greater than 2,500m², and 24 additional LFR stores. The 24 LFR stores have a combined gross floorspace of 15,710m², at an average of 655m² gross, again indicating a strong LFR tenancy demand for 450m² plus store sizes.

- **Harvey Norman Centre, Auckland**

This LFR centre has 21,700m² of retail GFA and included 5 anchor stores with a GFA greater than 1,000m². The Harvey Norman Centre has 4 LFR stores ranging from 460m²-520m² GFA - namely Tile NZ (460m²), Plastic Box (520m²), Hannahs (510m²) and Godfreys (490m²).

It is also worth noting some of these LFR stores are both trade and retail focused, i.e. they service both sectors of the market. For example, Godfreys has industrial machines and a maintenance and repair area.

- **Ronwood Centre, Manukau**

Ronwood Centre is a small LFR centre with only one tenant with GFA greater than 1,000m² (DSE Power Centre). The centre totals 5,170m² GFA and is comprised of five LFR tenancies. Four of the tenants are under 1,000m² GFA, with two of these between 400m²-500m² GFA. This shows 80% of tenants in this centre being within the 400-1,000m² store size range.

- **Wellington Airport Retail Park, Wellington**

This LFR centre has a total retail GFA of 19,400m². The Warehouse, Briscoes and Number 1 Shoes are the only three stores with GFA greater than 1,000m² in the Centre. There are 10 other LFR stores in the centre, meaning 80% of LFR stores in this centre are below 1000m².

- **Northridge Plaza, North Shore**

Northridge Plaza has a retail GFA of 6,900m² and has no tenants with GFA greater than 1,000m². The biggest LFR store within the Plaza is an Asian Supermarket with GFA of 820m². The majority of tenancy sizes are between 450m²-600m², including Pumpkin Patch, Bed Factory and Arbuckles.

- **Bay Central Shopping Centre, Tauranga**

The Bay Central LFR centre contains 11,500m² retail GFA and is the LFR centre in close proximity to the Tauranga CBD, and has three major tenants over 2,000m² each, one being a non-retail tenant NZ Post occupying 2,950m² GFA. Briscoes and Rebel Sports are the other two retail anchor tenants.

This centre has an average tenancy size of 680m² excluding the NZ Post tenancy. Nine of the tenants have a GFA under 500m², signalling the demand for some slightly smaller LFR store sizes.

- **Porirua Mega Centa**

This centre is arguably the primary LFR destination in the Wellington region. These stages total 17,955m² GFA and encompass 28 retail stores, an average store size of 640m² GFA. If The Warehouse of 6,820m² GFA was removed from the calculation, the average store size is 412m² GFA over the remaining 27 tenancies.

This confirms the strong demand for LFR tenancies between 400m²-1,000m², and that these tenancies form an integral component of LFR centres.

- **St Lukes Mega Centre, Auckland**

This LFR centre encompasses 7,210m² of retail GFA across 10 tenants. There are two major tenants over 1,000m², namely Noel Leeming 2,240m² and Hill & Stewart 1,120m². The average tenancy size of the remaining eight stores is 430m², again underlining the need for LFR tenancy sizes of between 400m²-1,000m².

From the analysis above it is clear that stores between 400-1,000m² are 'normal' LFR tenants, and in my opinion 450m2 is considered an appropriate LFR threshold.