

**BEFORE INDEPENDENT HEARING COMMISSIONERS AT
WELLINGTON**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER the hearing of submissions on the
Proposed Wellington City District Plan

**SUPPLEMENTARY STATEMENT OF EVIDENCE OF GARY PAUL CLARK ON
BEHALF OF**

STRATUM MANAGEMENT LIMITED (SUBMITTER 249)

HEARING STREAM 9 – INFRASTRUCTURE

26 JUNE 2024

INTRODUCTION

1 My full name is Gary Paul Clark. I hold the position of Director of Traffic Concepts Limited.

2 I have prepared this supplementary statement in response to Commissioner's Minute 51 and Ms Harriet Fraser's Statement of Evidence dated 20 June 2024.

3 At paragraph 8 of her Statement of Evidence, Ms Fraser notes that "the proposed parking rates for cycles and micromobility devices were based on the Waka Kotahi NZTA Cycle Parking Planning and Design Guide 2019". She notes at her paragraph 10 that the Guide was updated in 2022.

4 The parking rates that are provided in the PDP rely on this Guide which provides no background or evidence on the appropriateness of the suggested rate of one cycle space per dwelling.

5 Rather, the Guide simply replicates rates from Auckland Council (for a 'large' city) and from Christchurch City Council (for a 'medium' city). It provides no guidance as to how appropriate rates might be developed, and does not differentiate between different housing typologies or locations.

6 Of relevance, Mr John Lieswyn was the project lead for the 2022 Guide update. I would have expected Mr Lieswyn to understand the lack of evidence around the rate that has been adopted. Ms Fraser and Mr Lieswyn both rely on the rates provided in the Guide.

7 As part of preparing my evidence and considering the evidential material provided by the Council, I reviewed these documents and drew the conclusion that the cycle parking rates in the Guide were not evidence based. The rates appear to come from Australian guidance around cycle parking and using one space per dwelling as a good starting point. Again, there is no evidence in the Australian guidance. All the guidance also appears to fail to acknowledge the different demands of inner city apartments compared with dwellings located outside the central area.

8 The rates set out in the Guide replicate those of the Auckland and Christchurch Plans. It is not known what evidence underpins these rates and what assessment was involved in setting them. As noted above and in my evidence these rates are a good starting point but do not represent actual demands. Adoption of these rates within other District Plans is not a reason to suggest they are appropriate in the Wellington context or a representation of an actual need.

- 9 I have provided evidence in the way of a small sample survey of apartment buildings in the Wellington central area. This has been provided in a tabulated form to the Hearing Panel.
- 10 These surveys showed that a range of cycle parking demands exist, from one space for every 3.5 apartments up to one space for every 30 apartments.
- 11 Of particular note is that even where there was space for residents to provide cycle parking within a car park the actual demand was low (one space per 10 apartments). This would suggest that the actual demand, even when bicycle parking provision is available, is much less than my recommended one cycle park per four apartments.
- 12 The cost of providing these spaces, both in terms of construction and loss of apartments, is significant. As discussed by Mr Stewart, those costs have to be met somewhere in a project. Mr Stewart also noted that Stratum is cognisant of buyer demands and adjusts its product as needed. This has been the case for on-site car parking which Stratum used to provide at one space per unit and is now provided at 50% or less depending on the development.
- 13 Mr Stewart would like to see no cycle parking requirement for the central area and to let market demand dictate the provision which Stratum is doing with its development in Tory Street. Based on the survey data, a conservative rate of one space for every four units for the City Centre Zone would appear to easily meet the aspirational objectives of the District Plan to encourage cycling.
- 14 I must note that the demands for on-site cycle parking would appear to be closer to one space per ten apartments. This is based on the survey data I have available, and noting that based on that data even with space available for cycle parking, there is not the demand currently to utilise that availability.
- 15 Overall, having reviewed Ms Fraser's evidence, it does not alter my views that the proposed rates are not evidence based and have not been appropriately balanced against the costs that they impose.

Dated 26 June 2024



Gary Paul Clark