

**Form 5**  
**Submission on notified proposal for policy statement or plan, change or variation**

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To** Gisborne District Council

**Name of submitter:** Daniel Kinnoch

**This is a submission on the following proposed change to the following plan (the proposal):**

*Proposed plan change 4*

*Proposed Amendments to the Tairāwhiti Resource Management Plan (Inner Harbour Car Parking)*

**I could not gain an advantage in trade competition through this submission.**

**The specific provisions of the proposal that my submission relates to are:**

- Policy C2.1.4.3 (8)
- Rule C2.1.7.1-J Exemptions from the provision of parking and loading spaces

**My submission is:**

- I support proposed plan change 4; and
- I make the following recommendations to improve the brevity of the proposed new policy and rule:

- The wording of Policy C2.1.4.3 (8) could be improved and simplified, to better emphasise that it is the management of car parking supply that will provide for the 2<sup>nd</sup> through 4<sup>th</sup> bullet points.

E.g.

*8. Manage the supply of parking spaces within the Inner Harbour to:*

- *Provide for parking spaces that meet existing and forecasted demand, while avoiding oversupply;*
- *Encourage compact, mixed use development, in a form that recognises the high amenity value of the waterfront;*
- *Support alternative forms of transport, including walking, cycling, and public passenger transport.*

I prefer to use of the term 'parking spaces' as this is what is used in Part E of the Tairāwhiti Resource Management Plan. The District Plan should endeavour to use consistent language.

- I feel that the current drafting of Rule C2.1.7.1-J is problematic for the following reasons:
  - Part a) of the rule refers to 'site' identified as Waterfront in Appendix H29. This is a singular term. What if the entirety of the land identified as Waterfront does not strictly meet the definition of 'site' under Part E of the Plan? Should be reworded as '*For any sites*'.
  - I recommend that part a) is simplified even further: "*No new parking spaces shall be provided within the area identified as Waterfront in Appendix H29*". Isn't the current reference to 'this Plan' effectively moot? I feel like the wordier it is, the more likely you can find loopholes. E.g. '*beyond those which have already been marked out and established*' – unless you are going to incorporate clear photos or drawings in the Plan, showing exactly what spaces have been established, then what is to stop someone from marking out a new space, and arguing that it has always been there? The use of the words '*no new parking spaces*' would be much clearer.
  - For part b) of the rule, change to "*For ~~the site~~ any sites identified as Inner Harbour Surrounds in Appendix H29 ~~of this plan~~, an exemption of 50% from the standards for ~~on-site~~ parking spaces shown in Figure C2.11 shall apply*".
  - Title of the rule could be changed to '*Exemptions from the provision of parking spaces*' as the definition in Part E for 'parking spaces' seems to encompass loading and passenger vehicle parking.

**I seek the following decision from the local authority:**

- Approval of the proposed plan change, inclusive of changes to the new policy and rule as described above.

**I do not wish to be heard in support of my submission.**

13 January 2017

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**Date**

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