

IN THE MATTER of Proposed Plan Change 4 to
the Tairāwhiti Plan

BETWEEN Tatapouri Sport Fishing Club
Submitters

AND GISBORNE DISTRICT
COUNCIL

Respondent

**Submission from Tatapouri Sport Fishing Club to Proposed Plan Change 4 to the
Tairāwhiti Plan**

1. This submission has been prepared by Hans van Kregten, MNZPI for the Gisborne Tatapouri Sport Fishing Club (the Club). Hans is an experienced planner with over 30 years' experience working for local government and in private practice in New Zealand.
2. The Club is an incorporated society that leases a building from Eastland Port (Shed 3, Esplanade) in the Gisborne Inner Harbour. The Club has some 4800 members. The building is the base for the Club's activities that includes sports fishing activities, and operating bars, a restaurant, gaming room, a venue centre for small conferences and meeting centre.
3. The Club could not gain an advantage in trade competition through this submission.
4. The Club wishes to present this submission at a hearing. If others make a similar submission, we will consider presenting a joint case with them at a hearing.
5. The Club is concerned about the longer-term effect of Proposed Change 4 on its ability to effectively function in its current building. It believes that the change should not proceed until effective long-term parking provisions are in place for the Inner Harbour area which will be able to adequately cater for the demands that are current now and will arise in the future in this area.
6. Proposed Change 4 does not represent good resource management practice. The section 32 analysis that underpins the proposed change is deficient.

7. The Club's experience is that parking in the Inner Harbour area is already at a premium at peak times (generally Wednesday and Friday evenings, weekends when boating conditions are favourable and during fishing or other events over the summer period).
8. Proposed reductions of car parks and future developments in and around the Inner Harbour will further exacerbate parking issues.
9. It is noted that the proposed change's section 32 analysis is based largely on a 2012 study, and traffic counts conducted during one week in November that year.

The analysis (section 4) uses that information to describe "the current state". This is incorrect, the information is describing the parking situation for one week only more than five years in the past.

10. This historic parking analysis used must be viewed with significant caution. The reasons are:
 - Parking demand is dynamic. Demand in 2018 is unlikely to mirror that of 2012 (the height of the Global Financial Crisis). Tenancies and land uses in the area have changed since that year.
 - The demand in one week in the past is not representative enough to establish long term use patterns. The survey represents the situation at one moment in time. The results of the survey may have been influenced by weather conditions, (absence of) specific events, specific promotions and celebrations. The survey data, accordingly, is not sufficient to describe actual use.
11. The current state analysis is then used (page 14 of the section 32 analysis) to project future demand as from the present.

The section 32 report states:

"TDG have assessed research from New Zealand Transport Agency as well as information gathered from previous parking demand studies to estimate the level of parking required to support growth in commercial and recreation activities anticipated from the Inner Harbour redevelopment. The assessment of potential parking demands is based on a predicted increase in commercial and retail gross floor areas of around 20%."

The report concludes:

"The TDG assessment indicates there is more than enough existing car parking to meet current typical demands. The Inner Harbour design proposes a total of

229 car parks, including 23 boat trailer parks to the road reserve area and to Council-owned land. This will ensure there is enough parking provision to accommodate a future increase in demand and to enable further revitalisation of the area.”

Clearly, where the report talks about ‘current’, it refers to the situation in 2012.

This is not acceptable in 2018.

Further, it is not clear what the prediction of a predicted increase of commercial and retail gross areas of 20 per cent is based on, and what the time horizon for this increase is.

It is not fanciful to assume that if the Proposed Change proceeds, that this increase may well be higher.

12. The Proposed Change will lift current development restrictions through the introduction of a 100% parking exemption area within the waterfront area and a 50% parking exemption area for the remainder of Port Management Zone.

As per new policy 8 that the Change proposes to introduce, the stated purpose of the plan change is to ‘unlock’ potential for development in the area.

This policy 8 states:

“GDC, in partnership with the Eastland Port Company, seeks to transform the Inner Harbour into a high-quality environment in line with other prime waterfront locations around New Zealand. It is considered that the Eastland Port area has a significant economic and amenity potential that can be unlocked and showcased in a more vibrant and integrated manner. Tairāwhiti Resource Management Plan – Part C (C1-C4)”

The policy also states:

“Car parking is a key issue for the Inner Harbour redevelopment. The broad challenge is to ensure that car parking is provided in a way that meets most user needs while supporting the economic and amenity enhancement of the Inner Harbour.”

The issue goes beyond being a ‘broad challenge’. In fact, there is clear tension between the two sub-objectives of this policy.

It must be acknowledged that a removal of parking requirements will likely lead to significant new development that will generate additional car parking demand, and no (waterfront area), or only partial provision (remainder area).

If the economic and amenity enhancement will lead to further development in areas currently used for car parking, it is not clear how both limbs of this policy can be satisfied.

Moreover, the elimination of existing car parks that are associated with existing activities would also comply with the proposed change, as there is no adequate protection in the plan change of the current requirements to provide car parks for existing activities.

Policy 8 is therefore unworkable.

13. It is not fanciful to imagine the development of new restaurants, fast food outlets, bars and cafes in the area that will generate significant additional demand in the area. Such demand could well exceed the 20 per cent increase projected in the section 32 report.
14. It is noted that the district plan parking provisions for an inner harbour area in Ahuriri, Napier, which shares some characteristics with the Gisborne Inner harbour area (presence of recreational fishing and boating, bars and restaurants) no exemptions from car parking provisions apply.

No successful implementation examples of Council's lifting car parking restrictions in provincial New Zealand centres have been provided by the Council.

15. The Club notes the statement in paragraphs 2.2 and 2.3 of the section 32 report on consultation.

Section 2.2 states:

“Council has promoted the redevelopment of Inner Harbour for several years. This has included the development of an Inner Harbour masterplan in 2008, and public consultation through the preparation of the 2009 Urban Development Strategy and the 2015 Long Term Plan process.

Building on the previous design and public support, Council renewed its commitment to undertake and complete the redevelopment as one of its major projects in 2015. This involves a comprehensive design process, a construction period and a Plan Change around car parking. The Plan Change aims to ensure consistency between the redevelopment and the Tairāwhiti Plan. Stakeholder engagement has been integral to the design process and car parking issues have largely been resolved through this engagement.”

Section 3.2 states:

“The team adopted a collaborative approach to resolving car parking and other design related issues. This involved having regular community as well as specific stakeholder group meetings. By working closely with stakeholders, the project team has addressed many of the outstanding concerns that stakeholders have had around the Inner Harbour redevelopment.”

From the perspective of the Tatapouri Fishing Club, and as we understand from others in the Inner Harbour area, it should be noted that these statements are not correct. The Club has not agreed with the parking provision plans that the Council has presented. In fact, the Club is quite concerned about these proposals.

16. The analysis in respect of costs/benefits/efficiency/effectiveness as summarized in the table on page 20 of the section 32 report is deficient.

The costs summary states:

“Wharf Shed patrons will be less able to park right next to their destination during peak times.

More pressure placed on all day parking areas on the fringe of the Inner Harbour.”

The problem with this assessment is that it trivialises the parking issue.

The Inner Harbour is a discreet and separated area. It is physically isolated from neighbouring areas (by a river, the very busy State Highway 35, and a major port access road).

No clear and feasible alternative parking facilities are within safe and easy walking distances. Such alternative parking is potentially hundreds of metres away, and may involve crossing major roads, crossing bridges or using a pedestrian tunnel or underpass, i.e. well beyond what can be termed ‘right next door’

There is also an issue, particularly after dark, with safety perception of the pedestrian tunnel and underpass connecting the area with the Gladstone Road bridge and the footpath alongside the Turanganui River alongside the Cenotaph. These pedestrian facilities are unlikely to be used during the hours of darkness, further restricting access to alternative parking facilities for people visiting the Inner Harbour area.

Clearly any alternative parking is located much further away than “right next door” to people’s destinations.

17. The Club does not believe that, in the Gisborne context, access to the Inner harbour by public transport will reduce car parking demand in a noticeable way. This is because of public transport operating times and the nature of the route network.
18. Likewise, the reduction of car parking demand because of increased walking and cycling access will, likely, be minimal at best.
19. The section 32 report's efficiency section states:

"This option is the most efficient. This option responds to the unique conditions of the area by allowing the collaborative design process determine an appropriate number of car parks for the waterfront area. The benefits of reducing parking requirements for the remainder of the Inner Harbour significantly outweigh the costs."

The problem with this assessment is that the collaborative approach thus far has not resulted in the collaboration resulting in an agreement on what is an appropriate number of car parks in the area.

The effectiveness section states:

"This option is the most effective. Reducing car parking requirements for new developments along the waterfront will better support the vision for the Inner Harbour redevelopment. The proposed amendments are also more likely to achieve the Tairāwhiti Plan objectives for efficient and integrated provision of infrastructure, and the promotion of good urban design practice."

The problem with this statement is that it completely ignores the impact on appropriate transport and car parking infrastructure.

20. Despite its serious concerns with the plan change, the Club is not opposed to most of its ultimate objectives. The Club recognises the amenity values of the Inner Harbour, its proximity to historic events of local, national and international significance, and the high cultural values of the area.

The Club sees merit in intensification of activities, and beautification and upgrading of public spaces in the area.

The Club recognises that other Inner Harbour areas around the country and the world have often been redeveloped into attractive precincts that are focal points in established and central parts of urban areas.

However, the disestablishment of existing car parks and the permitting of new developments without the provision of car parking facilities without the availability or development of clear alternative parking provisions that cater for current activities and future demand is not acceptable.

The Club's position is that as a minimum the following is required prior to the promulgation of a plan change that incorporates elements of proposed Change 4:

- Agreement between stakeholders about the car parking provision in the Inner Harbour Area, based on the provision of up to date and reliable parking current information, and more reliable prediction of future car parking demand;
- Agreement with the Council on a longer-term approach to provide additional Council car parking infrastructure to deal with the additional car parking demand resulting from new development. Such an approach should include purchases or leases of land, and potentially the development of a car parking building.
- Such additional parking infrastructure being available.

21. Until such time that these constraints are met, Proposed Plan Change 4 should not be implemented.

On behalf of the Gisborne Tatapouri Sports Fishing Club,

Hans van Kregten MNZPI

16 January 2018

