



## **SUBMISSIONS**

# **QUEENSTOWN LAKES DISTRICT COUNCIL PROPOSED DISTRICT PLAN**

## **Amendments to Accessible Parking**

December 2021

## Privacy Statement

When a person or group makes a submission or further submission on a District Plan or Plan Change this is public information.

Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to QLDC.

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## Amendments to Accessible Parking Provisions

### Submitter Details

**First name:** Duncan **Last name:** Edwards

**Organisation:** Age Concern Southland

(Queenstown branch)

**On behalf of:** The older persons in the Wakatipu basin

**Preferred method of contact:** Email

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I could not  
Gain an advantage in trade competition through this submission

I am not  
directly affected by an effect of the subject matter of the submission that :  
a. adversely affects the environment, and  
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

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**Would you like to present your submission in person at a hearing? \***

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

## Consultation Document Submissions

Proposed Change to Rule 14.2.4.1(viii) - Car Spaces for People with Disabilities (Operative District Plan Section 14 - Transport)

Support

- Oppose
- Neutral

**I seek the following decision from the Local Authority**

Re-assess the proposals to allow for the needs of the local community

**My submission is**

Detailed in attached document.

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Proposed variation to Rule 29.5.5 - Mobility Parking spaces (Proposed District Plan Chapter 29 - Transport)

- Support
- Oppose
- Neutral

**I seek the following decision from the Local Authority**

Re-assess the proposals to allow for the needs of the local community.

**My submission is**

Detailed in the attached document

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Attached Documents

File
Age Concern Submission on Amendments to Accessible Parking Provisions

## Submission on Amendments to Accessible Parking Provisions

In principal I agree with the QLDC proposed direction to reduce parking, and can see that this will have beneficial effects on reducing vehicle use and increasing active transport options. However, I argue that there is still a strong need to recognise and address the accessibility needs to the mobility impaired and the elderly. In particular, these needs are neglected with the number of car parks proposed under both the proposed changes to Rule 14.2.4.1(viii) of the Operative District Plan Section 14 and the proposed changes to Rule 29.5.5 of the Proposed District Plan Chapter 29. I address these changes as one, as I see the issues to be almost identical for both proposal documents. I make no comment here on impact of the proposed changes on mobility car parking across the board, and only focus on core services for the elderly with mobility problems (e.g. residences, healthcare services). I make no comment on the need for mobility parking for other demographics, for example at education facilities, day care facilities or event venues, as these are outside of the scope of my role. However, I expect much of what I say would also apply to these facilities.

The policy and planning documents, referred to in details available online about the proposed changes, note that there should be ongoing provision of mobility carparks at current rates, though I would argue that there is a growing need for mobility carparks. These documents also note that access and movement throughout the district for people with disabilities is not unreasonably restricted. I would argue that the proposed number of mobility carparks is such a restriction. The Queenstown Lakes District is in a period of demographic change, as an increasing number of people choose to retire here. As the Baby Boom generation ages into retirement, this demand is only increasing, and this will impact the need for mobility parks. Many of the Baby Boom generation have mobility issues. The exact number is unknown, though a very crude estimate of the local population, 65 years or older, who have a physical disability is approximately 800 residents. This crude estimate is determined by applying the percentage of the New Zealand population identifying as physically disabled in the 2006 census (the last time this question was asked), to the local population 65 years and older the 2018 census. Note this is likely to be an underestimate of demand for mobility parking, as this does not count people under 65, visitors, nor allow for the increase in the resident population since Covid-19.

Nationally there is a move towards inclusiveness for people with disabilities, including mobility issues. Indications of this include the recent Health and Disability System Review, the response to this from disabled people, and the planned formation of the Ministry for Disabled People in 2022. By continuing with the proposed ludicrously-low number of mobility parks, there is a very real risk of Queenstown as being seen to be a bit backward by national standards. Also nationally, existing standards around construction note that specific building types, such as medical centres should provide greater numbers of accessible car parks than the minimum required<sup>1</sup>. This is not addressed in the mobility parking proposals. For example, the proposed changes for mobility parking for elderly persons housing are exactly the same as the proposed changes for mobility parking at homestays (1-10 units/bedrooms no spaces required, 11-50 units/bedrooms 2 spaces required). Yet, elderly persons are more likely to require mobility parking than visitors are. Mobility tends to decrease with age, and the number of elderly person's requiring mobility parks is likely to be greater than for other populations. Also, elderly person's age-similar friends are likely to have the same need for mobility parks, so a number will also be required for visitors. Yet, currently no parks are proposed for visitors to elderly person's housing. A similar situation holds for Elderly Care Homes where the residents of almost all have

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<sup>1</sup> New Zealand Building Standards – Design for Access and Mobility – Buildings and Associated Facilities (2001)

mobility problems, and so need a greater number of mobility parks provided. They will also need mobility parks for their age-similar visitors.

The calculations for the proposed number of mobility parks seem flawed, and do not allow for current or anticipated future demand for mobility parking. The number of mobility carparks proposed seem to be crude translations of existing, per-other-park allocations, and the proposed changes to expression of mobility parking requirements would lead to a reduction in the number of mobility parks. Currently, the number of mobility parks required is determined as a proportion of other car parks. As such the proposed translation of determining mobility parks as a proportion of building residents would seem reasonable on the surface. However, this does not accurately indicate the number of building users, which is usually substantially higher. To gauge this for yourself, consider the number of employees at a supermarket versus the number of consumers at the supermarket. The number of building residents (e.g. employees) does not provide an accurate indication of the need for parking from the users of the facility (e.g. consumers). I would hazard a guess that current parking levels at most supermarkets are calculated on expected use, rather than number of employees. The proposals also require a large step of a large number of residents/room/units/employees before a mobility park is allocated. These numbers are very unlikely to apply to the needs of the district. I suggest that the proposals be adjusted so that increasing use of a facility is counted in finer grained, smaller steps, with mobility parks allocated at each step. This would align more realistically with expected development in the region. After all, this is the Queenstown Lakes District, not New York.

Some of the proposed number of mobility parks are nonsensical. For example, the proposals include 1 mobility park for a 250 bed hospital and 2 mobility parks for a 500 bed hospital. In comparison, lakes District Hospital currently has 4 mobility parks for a total of 59 beds across the entire complex, including the Maternity wing, Emergency Department, and Arvida Care Home. Under the proposed mobility parking requirements, the hospital would require no mobility parks, and would only require 1-2 parks when it has quadrupled in size (depending on what aspect of the proposals you focus on). This is an unrealistic expectation of need. Similar limitations apply to the proposals for Health Care Services and Community Care Activities, where the proposed numbers are also likely to be too low.

The proposals note that the details can be changed at a later date, though this seems to gloss over the fact that very few, if any, developers are going to willingly re-allocate developed land to mobility parking. This is assuming that it is even possible, because if all land has been built upon, then there will be no option to add mobility parks in the future. Similarly, allowing developers to determine the number of mobility parks above the minimum is likely to lead to an undersupply, as such use of land returns little profit. As such, I fear that profit will take precedence over the needs of the community.

I suggest that if the QLDC are unable to give this issue the full assessment it requires, that new proposals are drafted, with higher mobility parking requirements, rather than proposed lower mobility parking requirements. It is going to be much easier to reallocate an unused mobility park for development than it is to take over an already developed space to add a mobility park. All in all, I implore the QLDC to hold off on the mobility car parking proposals, and give priority consideration to the needs of the community both now and in the future.

Duncan Edwards

Age Concern Queenstown

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## Amendments to Accessible Parking Provisions

### Submitter Details

**First name:** Jonathan **Last name:** Sanders

**On behalf of:**

**Preferred method of contact** Email

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I could not

Gain an advantage in trade competition through this submission

I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

**Would you like to present your submission in person at a hearing? \***

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

### Consultation Document Submissions

Proposed variation to Rule 29.5.5 - Mobility Parking spaces (Proposed District Plan Chapter 29 - Transport)

- Support
- Oppose
- Neutral

**I seek the following decision from the Local Authority**

Airbnb/Holiday Homes 'Residential Visitor Accommodation' with max of 12 guests = no need to build an accessible car park. Any more than 12 guests they can provide an accessible park.

**My submission is**

My concern is with the need to build a accessible car park for 'holiday home' short term accommodation. I understand the Council calls this 'Residential Visitor Accommodation'

After speaking to a Council Planner when I called up, they informed me that the newly proposed rules would require an accessible car park for an 'airbnb' style home if more than 5 guests are proposed. This seems crazy as 6 guests is not much and most holiday homes cater for 6 - 10 guests and so only need one or two car parks for guests.

It seems like the rules are designed to make people supply accessible car parks to larger accommodation premises like hotels and motels - this is absolutely fine in my opinion as these larger-scale complexes can cater to people with accessible needs and have level entries (or elevators), and often have accessible units with larger bathrooms etc. These places operate at a scale that means they should have to provide accessible parking.

As for airbnbs/holiday homes, they are not designed to cater for the accessible needs from the ground up as they are usually existing homes. Example - there are often internal and external stairs (no elevators), and standard widths for hallways/doors etc. They are standard residential homes and retrofitting them to cater for accessible needs would be ridiculously expensive.

Forcing someone to build an accessible car park if they want to rent their holiday home out short-term, when structurally the property is not suited to accommodate for these users in the first place makes no sense. i.e. all well and good that an accessible car park is provided - then the person with mobility needs is forced to walk down two flights of stairs to get into the house - makes no sense.

Unlike a motel/hotel etc where it is assumed - there is no 'expectation' from the market that an airbnb home is to be accessible. If someone has queries about this, they will ask the host before booking. In fact airbnb hosts would often specifically advertise if a property is accessible as a benefit to their listing.

I would encourage the Council to actually look around airbnb etc at the homes that are available for rent, and get a picture of just how many of those are truly 'accessible' structurally. Requiring accessible parks there makes no sense at all. If the Council is going to require accessible parks, they may as well require elevators to be installed, mobility toilets etc.

There's probably a balance to be had, however.

If some is providing a large-scale airbnb home then perhaps they should provide an accessible car park. However given the nature of holiday homes for the reasons I have outlined - I strongly believe that 90% of 'Residential Visitor Accommodation' homes should be exempt from this requirement. Perhaps say an airbnb that can cater for more than 12 guests should need to provide an accessible park. If an airbnb host is operating at that scale - then that can be a fair part of their business. But the majority of airbnbs should not need to provide any accessible car parks given they use standard homes.

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Attached Documents

File
No records to display.

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## Amendments to Accessible Parking Provisions

### Submitter Details

**First name:** Brian **Last name:** Fitzpatrick

**Organisation:** Remarkables Park Limited

**On behalf of:** Remarkables Park Limited

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** b.fitzpatrick@remarkablespark.com

**Daytime Phone:** \*

**Mobile:** 021946952

I could not  
 Gain an advantage in trade competition through this submission  
 I am not  
 directly affected by an effect of the subject matter of the submission that :  
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 b. does not relate to the trade competition or the effects of trade competitions.  
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**Would you like to present your submission in person at a hearing? \***

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

File

Brian Fitzpatrick (Remarkables Park Limited) – Accessible Parking Nov 21



# FORM 5: SUBMISSION

ON NOTIFIED PROPOSED DISTRICT PLAN OR PLAN  
CHANGE OR VARIATION OR POLICY STATEMENT



Clause 6 of Schedule 1, Resource Management Act 1991



**TO** // Queenstown Lakes District Council

Name of submitter [full name]

This is a submission on the following proposed policy statement (or on the following proposed plan or on a change proposed to the following policy statement or plan or on the following proposed variation to a proposed policy statement or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing policy statement or plan) (the **proposal**):



**NAME OF** // Proposed or existing policy statement or plan and (where applicable) change or variation

I could /  could not\*\*

gain an advantage in trade competition through this submission.

I am /  am not\*\*

directly affected by an effect of the subject matter of the submission:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

\* Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

\*\* Select one.



**SPECIFIC PROVISIONS** // Of the proposal that my submission relates to are:

[give details]



**MY SUBMISSION**

[Include: whether you support or oppose the specific provisions or wish to have them amended; and reasons for your view]

\*If your submission relates to a proposed policy statement or plan prepared or changed using the collaborative planning process, you must indicate the following:

- > whether you consider that the proposed plan or policy statement or change fails to give effect to a consensus position and therefore how it should be modified; or
- > in the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan or policy statement should be modified.

\* This paragraph may be deleted if the proposal is not subject to a collaborative planning process.

**I SEEK THE FOLLOWING DECISION // From the local authority**

[give precise details]

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

I will / will not\*\* consider presenting a joint case with others presenting similar submissions.

\* In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.

\*\* Select one.

**SIGNATURE**

\*\*Signature

[or person authorised to sign on behalf of submitter]

Date

\*\* A signature is not required if you make your submission by electronic means.

**YOUR DETAILS // Our preferred methods of corresponding with you are by email and phone.**

Electronic address for service of submitter [email]

Telephone [work]

[home]

[mobile]

Postal Address

[or alternative method of service under section 352 of the Act]

Post code

Contact person [name and designation, if applicable]

**NOTE // To person making submission**

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- > it is frivolous or vexatious:
- > it discloses no reasonable or relevant case:
- > it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- > it contains offensive language:
- > it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



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## Amendments to Accessible Parking Provisions

### Submitter Details

**First name:** Emma **Last name:** Turner

**Organisation:** Paterson Pitts Group

**On behalf of:** Paterson Pitts Group

**Preferred method of contact:** Email

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**Would you like to present your submission in person at a hearing? \***

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File
Mobility Parking Submission



## Mobility Parking submission

### 1.1 Specific Provisions

#### 1.1.1 Operative District Plan

Change to Rule 14.2.4.1(viii)

#### 1.1.2 Proposed District Plan

Change to Rule 29.5.5

### 1.2 Submission (support/oppose)

1. Support retaining Mobility Parking provisions within the ODP as it is beneficial for community members who rely on accessible parks for their health and wellbeing as well as being consistent with the NPS-UD direction.
2. Support retaining Mobility Parking provisions within the PDP as it is beneficial for community members who rely on accessible parks for their health and wellbeing as well as being consistent with the NPS-UD direction.
3. Support activity-based approach to Mobility Parking as the standard park ratio will no longer be an effective method to require accessible parks in the District Plan.
4. Oppose the variation as a whole, as the intention of maintaining the status quo in an activity-based form has not been achieved. Where more than one activity is proposed for a site the variation results in more accessible parks than what was required prior to the variation. This will have unintended consequences of requiring future developments to provide significantly more mobility parking than what is required under the current rule.

For example, if a site was to be developed with three different activities such as unit style visitor accommodation (11 units), a commercial recreation activity (28 people) as well as a restaurant (over 250m<sup>2</sup>) each of these activities will be considered separately and require a set number of mobility of car parks.

Under the PDP rules prior to the variation, the total standard car parks required would be 39. As Rule 29.5.5 prior to the variation allows for “activity or activities” this allows the mobility parking to be grouped together, the mobility car parks required are therefore considered under the ratio of non-accessible spaces to mobility spaces and for 11-100 non-accessible spaces, 2 mobility spaces would be required.

However, when separated out per activity:

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**CHRISTCHURCH:**

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**CROMWELL:**

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Cromwell 9342.

**T** 03 445 1826

**QUEENSTOWN:**

P.O. Box 2645,  
Queenstown 9349.

**T** 03 441 4715

**WANAKA:**

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Wanaka 9305.

**T** 03 443 0110

- The VA component is 11 units (other zones 29.5.5.6) requiring 2 spaces for 11-200 units resident/guest and as over 10 requires 1 staff/visitor = 3 mobility spaces.
- Commercial rec (28 persons) requires 1 mobility space.
- Restaurant (over 250m<sup>2</sup>) requires 2 resident/guest and 1 staff visitor = 3 mobility parks

For this example, the total mobility carparks required under the variation is seven spaces rather than the two required when calculated as a ratio of standard carparks because of the three activities being considered separately by the varied rule rather than grouped together as per the current rule. This results in a significant increase in the mobility parking requirements which is contrary to the purpose of the proposal which is *“Ensuring that the mandated removal of the minimum parking standards does not alter the current requirements for accessible parking.”*

Therefore, the approach of the variation needs to be reassessed so that mobility parking provision is at the same or a similar level that is currently required.

### 1.3 I seek the following decision

1. That Mobility Parking provision is retained within the ODP.
  2. That Mobility Parking provision is retained within the PDP.
  3. That Mobility Parking provision is determined by activity.
  4. That the variation is reconsidered against the status quo so that there is no significant increase in parking requirement as a result of the variation. This could be achieved by (in no particular order):
    - a. The addition of an exemption to the rule (both ODP and PDP) which states *“where two or more activities are located on one site the activity with the greater mobility parking requirement is the number of mobility parks which are required”* or other wording of similar effect, or
    - b. The addition of an exemption in the advice notes section (both ODP and PDP) which states *“where two or more activities are located on one site the activity with the greater mobility parking requirement is the number of mobility parks which are required”* or other wording of similar effect, or
    - c. Mobility carparking provision is reassessed so that all activities are based on floor area of the activity or persons using the facility, and the rule reworded to include combining the metrics together, or
    - d. Any other planning approach which achieves the outcome sought.
-