

# Whakatāne District Council District Plan

## Section 32 Evaluation

For:

### **Proposed Plan Change 5 to Operative District Plan Chapters 3, 5, 13**

On:

Amendments to Accessible Parking Provisions Required  
as a Consequence of Implementing the National Policy  
Statement on Urban Development 2020

31 March 2022

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## 1.0 Executive Summary

- 1.1 The National Policy Statement on Urban Development 2020 (NPS-UD) mandated that all provisions requiring a minimum number of car parks and directs be removed from District Plans. These provisions were removed from the Whakatāne District Plan (District Plan) on 1 December 2021.
- 1.2 Although the NPS-UD does not direct the removal of accessible parking, a consequence of the removal of minimum parking provisions from the District Plan is that the District Plan no longer contains any provisions requiring accessible parking. This is because these were expressed as a ratio of minimum parking standards and with the removal of minimum parking provisions, the provisions requiring accessible parking have therefore also been removed.
- 1.3 This proposal will reinstate accessible parking standards in the District Plan. The proposed requirements are the same as those that were in the District Plan prior to the mandated removal of the minimum parking standards. This proposal will enable the Council to assess during the consenting process whether is appropriate for a development to provide accessible parking.

## 2.0 Introduction

- 2.1 The National Policy Statement on Urban Development 2020 (NPS-UD) directs that all provisions requiring a minimum number of car parks be removed from the District Plan. These provisions were removed from the Whakatāne District Plan (District Plan) on 1 December 2021.
- 2.2 The NPS-UD does not direct the removal of accessible parking requirements. In recognition of the fact that accessible parking requirements were linked to minimum car parking requirements in many District Plans, the Ministry for the Environment’s Car Parking factsheet<sup>1</sup> notes that (p3) *‘to provide for situations where car parking is not supplied, territorial authorities should consider setting an absolute minimum of accessible car parks.’*
- 2.3 The District Plan contains no rules or requirements regarding the provision of accessible car parks but assumes that accessible parking will be provided based on minimum car parking rules. Prior to the removal of minimum parking provisions in the District Plan, these were expressed as a ratio of minimum parking standards in line with New Zealand Standard Design for Access

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<sup>1</sup> Ministry for the Environment (2020) Car parking factsheet

and Mobility – Buildings and Associated Facilities (NZS 4121:2001), which must be complied with under the Building Act 2004. In particular, Table 1 of the NZS 4121:2001 states:

*Table 1: Number of accessible car parks required under NZS 4121:2001*

Total number of car parks	Number of accessible car park spaces
1 – 20	Not less than 1
21 -50	Not less than 2
For every additional 50 car parks or part of a car park	Not less than 1

2.4 This means that as long as more than one car park is proposed in a development, then under NZS4121:2001 and the Building Act, at least one accessible car park must also be provided even with the removal of minimum parking requirements from the District Plan. However, now that minimum car parking requirements have been removed from the District Plan, in a situation where no car parks are proposed, the Council can no longer require the provision of accessible car parks when assessing a resource consent application.

2.5 The proposed Plan Change 5:

- Identifies where accessible parking must be provided and sets an absolute minimum number of accessible car parks in those situations
- outlines eighteen minor changes to the District Plan that will enable the provision of accessible parking to be considered where appropriate during the consenting process.

2.6 The proposed changes to the District Plan are outlined in **Appendix 1**.

## 3.0 Structure of the Report

3.1 This report provides an analysis of the policy response proposed by the variation as required by section 32 of the Resource Management Act (RMA), using the following sections:

- a. A description of the **Consultation** requirements and summary of the feedback received
- b. An overview of the applicable **Statutory Policy Context**
- c. A description of the **Non-Statutory Policy Context**
- d. A description of the **Resource Management Issue** being addressed by the Proposal
- e. An assessment of the **scale and significance** of the environmental economic, social and cultural effects that are anticipated from the implementation of the proposal
- f. An **Evaluation** against s32 of the RMA, including:
  - Whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (Section 32(1)(a))

- Whether the provisions (policies and methods) are the most appropriate way to achieve the objectives of the proposal (Section 32(1)(b), including
  - i. Identifying other reasonably practicable options for achieving the objectives;
  - ii. Assessing the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of risk of acting or not acting; and
  - iii. Summarising the reasons for deciding on the provisions.

## 4.0 Consultation

### *Legislative Requirements*

- 4.1 Clause (3)(10(d) of Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities during the preparation of a proposed plan.
- 4.2 Clause 3(1) also requires local authorities to consult with (a) the Minister for the Environment; and (b) those other Ministers of the Crown who may be affected by the policy statement or plan; and (c) local authorities who may be so affected; and (e) any customary marine title group in the area, that may be affected by changes made to the District Plan.
- 4.3 Clause 3(4) requires local authorities to undertake consultation in accordance with section 82 of the Local Government Act 2002, which outlines the principles of consultation. These principles have been followed during the preparation of the proposed Plan Change 5.
- 4.4 Clause 4A requires the District Council to provide a copy of a draft proposed plan to iwi authorities consulted, before notification, and have particular regard to any advice received.
- 4.5 Overall, prior to public notification of the proposal, consultation was undertaken as outlined below:
  - a. Statutory consultation under Clause 3(1) of Schedule 1;
  - b. Without undertaking discretionary consultation under Clause 3(2) of Schedule 1 of the RMA; and
  - c. Statutory consultation with iwi authorities as per Clause 4A of Schedule 1 of the RMA.
- 4.6 This section summarises the consultation feedback / advice received from Iwi regarding the proposed amendments to accessible parking provisions, and the Council's consideration of, and response to that feedback as required by Section 32(4A)(b) of the RMA.

## *Pre-Notification Consultation with iwi authorities*

4.7 Te Puni Kōkiri recognises that the following iwi are connected to the Whakatāne District:

- Ngāti Awa
- Ngāti Mākino
- Ngāti Manawa
- Ngāti Rangitīhi
- Ngāti Tūwharetoa (Bay of Plenty)
- Ngāti Whare
- Tūhoe.

All Iwi listed above were advised of the proposed Plan Change and information was provided regarding the reason for the proposal, along with a table outlining the specific changes that would be made to wording in the District Plan. No issues or concerns regarding the proposed Plan Change have been identified by Iwi.

## *Pre-Notification Consultation with other key stakeholders*

4.8 Other key stakeholders that have been consulted during the development of Plan Change 5 include:

- Representatives of the Business community (Eastern Bay of Plenty Chamber of Commerce, EPIC)
- Representatives of the Disability Sector (CCS, Disabilities Resource Centre)

Feedback was received from the Disabilities Resource Centre Trust who support Plan Change 5.

## **5.0 Statutory Policy Context**

5.1 The relevant sections of the RMA, NPS-UD and the District Plan are discussed below.

### *Resource Management Act*

5.2 Section 5 sets out the purpose of the RMA, which requires an integrated planning approach and direction to promote the sustainable management of natural and physical resources. Guidance as to how the overall sustainable management purpose is to be achieved is provided in the other sections, including sections 6, 7 and 8 of Part 2 of the RMA:

### **5 Purpose (Emphasis added)**

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, **which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety** while –*
  - a) *Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
  - b) *Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
  - c) *Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

5.3 The assessment contained within this report considers the proposed provisions in the context of advancing the purpose of the RMA to achieve the sustainable management of natural and physical resources.

5.4 People who are eligible for mobility parking permits require parking spaces close to businesses, services and amenities to meet their access needs. Accessible parking spaces are wider than standard parking spaces, making it easier to get in and out of a vehicle with a wheelchair or mobility aid<sup>2</sup>. The correct use of accessible parking allows permit holders to travel more freely within their community and by doing so, meet some of their **social, economic and cultural well-being needs**, which they may otherwise not be able to do so<sup>3</sup>.

### **Other National Legislation or Policy Statements**

5.5 When preparing or making changes to district plans, district councils must give effect to any National Policy Statement (NPS) or National Environmental Standards (NES). Additionally, the National Planning Standards 2019 must also be implemented within prescribed timeframes (discussed below in more detail).

5.6 The following NPS are currently in effect:

- NPS on Urban Development 2020 (NPS-UD)
- NPS for Freshwater Management (NPS-FW)
- NPS for Renewable Electricity Generation (NPS-REG)

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<sup>2</sup> CCS Disability Action Website (a)

<sup>3</sup> CCS Disability Action Website (b)



- NPS on Electricity Transmission (NPS-ET)
- 5.7 Work is currently underway on the proposed NPS for Indigenous Biodiversity.
- 5.8 The National Environmental Standards (NES) that are currently in effect are:
- NES for Air Quality
  - NES for Sources of Drinking Water
  - NES for Telecommunication Facilities
  - NES for Electricity Transmission Activities
  - NEW for Assessing and Managing Contaminants in Soil to Protect Human Health
  - NEW for Plantation Forestry.
- 5.9 The proposal does not seek to change the overall policy direction of the District Plan and does not introduce provisions that would be inconsistent with any NES or NPS. The NPS-UD is discussed in detail below.

### *National Policy Statement on Urban Development 2020 (NPS-UD)*

- 5.10 The NPS-UD is a national policy statement under the RMA which came into effect on 20 August 2020.
- 5.11 National policy statements allow central government to prescribe objectives and policies for matters of national significance relevant to achieving ‘sustainable management’ – set out as being the ‘purpose’ of the RMA within section 5. Under section 75(3) of the RMA, district plans are required to give effect to any national policy statement.
- 5.12 Policy 11 (and clause 3.38) of the NPS-UD prevents district plans from prescribing a minimum number of on-site car parks and encourages the use of comprehensive parking management plans.
- Policy 11: In relation to car parking:*
- a) *The district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks;*
  - b) *And tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.*

Subpart 8 lists what local authorities must do to give effect to Policy 11:

#### *Subpart 8 Car Parking*

### 3.38 Car parking

- 1) *If the district plan of a tier 1, 2, or 3 territorial authority contains objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity, the territorial authority must change its district plan to remove that effect, other than in respect of accessible car parks.*
- 2) *Territorial authorities must make any changes required by subclause (1) without using a process in Schedule (1) of the Act.*
- 3) *Nothing in this National Policy Statement prevents a district plan including objectives, policies, rules, or assessment criteria:*
  - (a) *Requiring a minimum number of accessible car parks to be provided for any activity; and*
  - (b) *Relating to parking dimensions or manoeuvring standards to apply if:*
    - (i) *A developer chooses to supply car parks; or*
    - (ii) *When accessible car parks are required.*

5.13 Whakatāne District Council is a Tier 3 local authority.

## *National Planning Standards*

5.14 In April 2019, the Government released a set of National Planning Standards (planning standards) that require all regional policy statements, regional plans and district plans to have a consistent structure and format. The planning standards have been introduced to improve the efficiency and effectiveness of the planning system, rather than seeking to alter the outcomes of policy statements or plans.

5.15 The planning standards prescribe various timeframes for implementation. Whakatāne District Council is required to comply with specified planning standards by November 2024 and the definitions standard by November 2026. As the provisions being reviewed are an individual plan change proposal, rather than a full proposed district plan, the planning standards are not required to be implemented at the present time. The planning standards are silent on the matter of accessible parking.

## *Regional Policy Statement*

5.16 Section 74 of the Act requires that a district plan prepared by a territorial authority must 'give effect to' any operative Regional Policy Statement and 'have regard to' any proposed Regional Policy Statement.

- 5.17 The Bay of Plenty Regional Policy Statement (RPS) was made operative in 2014. While the Regional Policy Statement does not specifically address accessibility issues, Policy UG 8B: *Implementing high quality urban design and live-work-play principles* requires territorial authorities to ‘adhere to the New Zealand Urban Design Protocol (March 2005) key urban design qualities.’ These are outlined in Appendix B - High quality urban design principles.
- 5.18 Appendix B: Principle 1 of the RPS lists the high-quality urban design qualities that must be adhered to and which demonstrate adherence to the New Zealand Urban Design Protocol (2005) Key Urban Design Qualities. These include that the design:
- Provides a variety of connections between spaces and places, including provision for cars, cycles, buses, pedestrians and other transport modes;
  - Reflects the importance of community spaces;
  - Provides a comfortable and safe urban environment; and
  - Contributes to the well-being of people and communities.
- 5.19 Appendix B: Principle 2 emphasises the need to achieve balance within the management of growth states and promotes an approach to future development through land uses that:
- Efficiently links by way of roads, cycle ways and walkways, housing to people’s places of work and play; and
  - Demonstrates adherence to the New Zealand Design Protocol (March 2005) Key Urban Design Qualities.
- 5.20 This proposal to amend the way that accessible parking standards are expressed in the District Plan does so in a manner that gives effect to Policy UG 8B and adheres to the urban design principles outlined in Appendix B of the RPS.

## *Whakatāne District Plan*

- 5.21 The objectives and policies of the District Plan that are relevant and have been given due regard in the identification of resource management issues and evaluation are listed in Table 2 below.

*Table 2: Relevant Objectives and Policy of the District Plan*

<b>Plan Reference</b>	<b>Provisions</b>
Objective Bus4	To enable the Whakatāne Town Centre to continue to draw on its natural and cultural heritage to emphasise its relationship to the river and escarpment and to enable the Whakatāne Town Centre to continue to be a place with a strong local identity that is vibrant and highly valued by residents, businesses and visitors.

Policy 8	To manage the movement of people, cyclists and vehicles within the Whakatāne Town Centre by defining vehicle and pedestrian priority areas and streets.
Objective TS1	A safe, efficient, sustainable integrated land transport network.
Policy 8	To encourage an effective and efficient functioning of the transport network, ensuring that the ease of movement for pedestrians, cyclists, disabled people, the elderly, children, motor vehicles, and public transport is not unduly compromised.
Objective TS4	The safe movement of traffic and pedestrians entering, leaving and within sites.
Policy 1	To ensure sufficient and practical provision of safe on-site parking, manoeuvring areas, connectivity and access and pedestrian connectivity.

5.22 This proposal will assist with implementing the above objectives and policies.

### *Iwi Management Plans*

5.23 When preparing or changing a district plan, Section 74(2A)(a) of the RMA states that Councils must take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the District.

5.24 The following Iwi Management Plans have been received by the Whakatāne District Council:

- Ngāti Rangitahi Iwi Environmental Management Plan
- Ngāti Umutahi Whenua Management Plan
- Ngāti Manawa Environmental Scoping Report
- Tawharu o Ngā Hapū o Whakatōhea Resource Management Plan
- Ngāti Awa Environmental Plan
- Te Upokorehe Iwi Management Plan
- Ngāti Tūwharetoa ki Kawerau Kiwi Management Plan
- He Mahere Putahitanga – A pan-tribal Iwi Management Plan

5.25 In accordance with Section 74(2A) of the Act, Council must take into account any relevant planning document recognised by an iwi authority that has been lodged with Council. None of the iwi/hapu management plans lodged with Council raise any issues of particular relevance to this Plan Change.

## 6.0 Non-Statutory Policy Context

### *Bay of Plenty Regional Public Transport Plan 2018*

6.1 The Regional Public Transport Plan (RPTP) outlines the current public transport situation in the Bay of Plenty region, the strategic direction and objectives for public transport in the region, and the programme of projects to achieve the objectives.

6.2 The RPTP contains the following Accessibility Objective and Policies:

<b>Accessibility:</b> <b>Objective: Pursue improved accessibility for isolated communities and for mobility impaired person where this can be delivered at reasonable cost.</b>	
Policy 7	Provide public transport services on Rural Connector Routes that link to Regional Strategic corridors and maintain access to essential community goods and services.
Policy 8	Support the operation of the Total Mobility Scheme (subject to Government funding) in the Bay of Plenty using a variety of transport providers that are able to meet Council requirements and demonstrate a current gap in service levels.
Policy 9	Aggressively pursue the development of Mobility-As-A-Service platform that delivers innovative transport services for small communities and for those with special transport needs.

6.3 The provision of mobility parking plays an important role in ensuring that the whole journey is accessible. This proposal contributes to achieving Policy 8 of the RPTP by ensuring that an appropriate level of mobility parking is provided across the district.

6.4 This proposal has been developed with regard to the RPTP.

## 7.0 Resource Management Issue

### *Expressing accessible parking requirements in the District Plan*

7.1 The resource management issue that this proposal seeks to address has arisen as a result of the requirement of the NPS-UD to remove minimum parking requirements from district plans. The issues the proposal seeks to address is how to express the requirements for accessible

parking the District Plan when the current baseline on which they are set is requirement to be removed from all district plans.

## 8.0 Scale and Significance Evaluation

- 8.1 The level of detailed analysis in this evaluation is **low**, to reflect the scale and significance of the effects of the implementation of the proposed provisions. The proposal seeks to ensure that an appropriate level of accessible parking is provided throughout Whakatane District. This will be undertaken by maintaining the requirement for accessible parking at current levels, now that non-accessible parking minimums have been removed from the District Plan. This change only affects how accessible parking provisions are expressed in the District Plan and does not change the number required.

## 9.0 Evaluation of Proposed Objective

- 9.1 Section 32(1)(a) requires an examination of the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the Act.
- 9.2 Where there are no new objectives proposed, such as in this case, an examination of the extent to which the purpose of the proposal is the most appropriate way to achieve the purpose of the Act is required (s32(6)).
- 9.3 Consistent with the resource management issue identified in Section 7 above, the purpose of the proposal is to express accessible parking requirements so as to ensure their continued administration in light of the mandated removal of non-accessible minimum parking standards, to achieve Strategic Objectives Bus1, TS1 and TS4 of the District Plan (as listed in paragraph 5.21 of this report).

## 10.0 Evaluation of the Proposed Provisions

- 10.1 Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions (policies and methods) are the most appropriate way to achieve the objective or purpose of the proposal. This assessment must:
- i. Identify other reasonably practicable options for achieving the objectives (S32(1)(b)(i));
  - ii. Assess the efficiency and effectiveness of the provisions in achieving the objectives (S32(1)(b)(ii)), including:

- Identify and assess the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions (S32(2)(a)); including opportunities for:
    - (i) economic growth that are anticipated to be provided or reduced, and
    - (ii) employment that are anticipated to be provided or reduced, and
  - If practicable quantify the benefits and costs (S32(2)(b)); and
  - Assess the risk of not acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions (S32(2)(c)); and
- iii. Summarise the reasons for deciding on the provisions (S32(1)(b)(iii)),
- 10.2 Section 32(3) requires that if the proposal is an amending proposal that will amend a plan that is already proposed, the examination under subsection (1)(b) must relate to:
- (a) The provisions and objectives of the amending proposal; and
  - (b) The objectives of the existing proposal to the extent that those objectives –
    - (i) Are relevant to the objectives of the amending proposal; and
    - (ii) Would remain if the amending proposal were to take effect.
- 10.3 The removal of non-accessible minimum parking requirements has been mandated by the NPS-UD, as discussed in paragraphs 5.10-5.12 of this report. Because the accessible parking provisions are currently set as a proportion of the total parks provided by the activity, this has necessitated a change to how accessible parking requirements are expressed in the District Plan. These provisions **cannot be used in their current format** since the mandated changes were implemented on 1 December 2021, and therefore must be able to be expressed as standalone provisions. In this instance, retaining the status quo is not an available option for retaining existing accessible parking provisions.

### *Reasonably practicable options*

- 10.4 In this case, there are two reasonably practicable options:
- Option 1 – Undertake Plan Change 5 which will:
    - Require the provision of accessible parking in circumstances where it was required prior to the removal of minimum parking requirements as mandated in the NPS-UD; and
    - Ensure the provision of accessible parking can continue to be considered in the consenting process.
  - Option 2 – Do nothing. No plan change is required.
- 10.5 The costs, benefits, efficiency and effectiveness of the two options are evaluated in Table 3 below.

- 10.6 Section 32(c) of the RMA requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. It is considered that, in this case, the information is certain and sufficient, and there is no need to assess the risk of acting or not acting, particularly in the context of the relatively low scale and significance of the proposal.

### *Reasons for deciding on the provisions*

- 10.7 The proposed amendments to the provisions are considered the most appropriate way to achieve the purpose of the proposal because:
- a. They are efficient and effective in terms of section 7(b) of the RMA while still achieving the Strategic Objectives Bus1, TS1 and TS4 of the District Plan;
  - b. They are in accordance with the functions of territorial authorities in s31 of the RMA and the sustainable management purpose of Part 2 of the RMA.



Table 3: Evaluation of options

<b>Purpose of the proposal:</b>				
To ensure that the mandated removal of the minimum parking standards does not alter requirements for accessible parking.				
<b>Option</b>	<b>Purpose of option</b>	<b>Costs</b>	<b>Benefits</b>	<b>Efficiency &amp; Effectiveness</b>
1.	<p>Will ensure that accessible parking provisions are retained in the consenting processes following the removal of non-accessible parking minimums from the District Plan as mandated by the NPS-UD. Plan Change 5 will:</p> <ul style="list-style-type: none"> <li>• Reformat s13.2.9 (which previously outlined minimum parking requirements before being deleted as mandated by the NPS-UD), to specify the minimum number of accessible car parks that must be provided</li> <li>• Amend eighteen rules in chapters 3, 5 and 13 to ensure the provision of accessible parking can continue to be considered in the consenting process, even when no other parking is required or being provided.</li> </ul>	<p>In cases where developers did not intend to provide accessible parking, there could be additional costs to developers who will now be required to provide it.</p> <p>There are no costs to economic activity or employment.</p> <p>The only costs are those associated with preparing the proposal and undertaking consultation under Section 1 of the RMA.</p>	<p>The proposed Plan Change 5 will ensure that the requirement to provide accessible parking is retained within the District Plan, even though the minimum parking provisions have been removed.</p> <p>The proposed amended rules will ensure that the provision of accessible parking can still be considered in the consenting process even when no other parking is required or being provided.</p>	<p>These provisions will increase development costs because accessible parking will need to be provided. However, Option 1 is considered to be efficient because the benefits to the community outweigh the costs.</p> <p>The amended provisions are considered effective because they will ensure that accessible parking continues to be provided even though minimum parking requirements have been removed.</p>
2.	Option 2 will not enable the Council to consider the provision of	There are no costs associated with this option.	This option could reduce development costs if	Option 2 means the District Plan contains no

	<p>accessible parking during the consenting process. Option 2 will allow developers to choose whether or not to provide accessible parking and how many car parks they provide.</p> <p>Option 2 does not require a Plan Change.</p>	<p>However, doing nothing is likely to result in a reduced amount of accessible parking being provided over time.</p> <p><b><i>Social and Economic Costs:</i></b> Reducing the number of accessible car parks will provide a barrier for people who depend on accessible parking and is likely to limit their involvement in social and economic activities within the community.</p> <p>There are no costs associated with the preparation of this option.</p>	<p>developers choose not to provide accessible parking in situations where that would previously have been required.</p>	<p>requirements for developers to provide accessible parking. This could reduce development costs and lead to overall efficiencies.</p> <p>However, while Option 2 may increase economic efficiency, it is not effective in terms of delivering some social and economic outcomes. It will limit access and mobility for some members of the community and could prevent them from accessing some businesses and services.</p> <p>Overall, from a social and cohesive perspective this option is not effective because it is likely to reduce social participation by people dependent on accessible parking.</p>
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## 11.0 References

1. Ministry for the Environment, 2020. National Policy Statement on Urban Development. <https://environment.govt.nz/jpublications/national-policy-statement-on-urban-development-2020/>
2. Ministry for the Environment, 2020. 'Car Parking Factsheet.' <https://environment.govt.nz/assets/Publications/Files/car-parking-factsheet.pdf>
3. CCS Disability Action Website: Mobility Parking. 2021(a). <https://www.ccsdisabilityaction.org.nz/mobility-parking/>
4. CCS Disability Action Website: Mobility Parking. 2021(b). <https://www.ccsdisabilityaction.org.nz/assets/resource-files/Mobility-Parking-brochure-electronic.pdf>
5. Bay of Plenty Regional Council website:
  - Total Mobility. <https://www.boprc.govt.nz/living-in-the-bay/getting-around/total-mobility>
  - Regional Public Transport Plan 2019 Variation 1: <https://www.boprc.govt.nz/your-council/plans-and-policies/plans/regional-plans/regional-public-transport-plan>