

**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

**STATEMENT OF EVIDENCE OF MACIEJ WIKTOR LEWANDOWSKI ON BEHALF
OF STRATUM MANAGEMENT LIMITED (SUBMITTER 249)**

HEARING STREAM 9 – INFRASTRUCTURE

10 JUNE 2024

PLANNING

1. INTRODUCTION

1.1 My name is Maciej (Mitch) Wiktor Lewandowski. I am a Resource Management Consultant and Director of Building Block Planning Ltd, a Wellington based planning and resource management consultancy. I have held my current role since April 2022.

Qualifications and Experience

1.2 I hold a Bachelor of Resource Studies from Lincoln University, a Master of Resource and Environmental Planning from Massey University, and a Post Graduate Diploma in Management from Massey University. I am a Full Member of the New Zealand Planning Institute and accredited resource management commissioner.

1.3 I have 22 years' professional experience. In my current role I assist a range of private and public sector clients, including Stratum Management Ltd ("**Stratum**"), across a range of resource management matters.

1.4 Prior to my current role I was employed by Urban Perspectives Limited as a Resource Management Consultant for a period of 3 years. Prior to that role, I was employed by the Wellington City Council for a period of 5 years, as Principal Advisor Planning within the Council's District Plan team.

Involvement in Stratum Managements' submission to the Proposed District Plan

1.5 I provided Stratum with advice to inform its submission, and further submission, to the Proposed District Plan ("**PDP**").

Code of conduct

1.6 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

2. SCOPE OF EVIDENCE

2.1 Stratum's submission in respect of this topic stream related solely to the Transport chapter, and specifically the following provisions as they relate to the provision of bicycle parking:

- (a) Objective TR-O1 – Purpose
- (b) Policy TR-P3 – Managed activities
- (c) Table 7 – Minimum number of on-site cycling and micromobility device parking spaces

2.2 I address these submission points, and the response to them provided through the Council's Section 42A ("**s42A**") report, in the following sections.

2.3 My evidence draws on the evidence of Mr Craig Stewart, and Mr Gary Clark.

3. TRANSPORT CHAPTER

Table 7 – TR: Minimum number of on-site cycling and micromobility device parking space

- 3.1 Rule TR-R1 provides for all activities¹ as a permitted activity, subject to compliance with standards. One relevant standard is TR-S2. It requires the provision of cycle and micromobility parking in accordance with Table TR-7.
- 3.2 Table TR-7 specifies requirements for both short-stay (visitor) and long-stay (residents, staff and students) bicycle parking.
- 3.3 In respect of short-stay parking, Table TR-7 as amended through the s42A report, states that it is only required in the city centre zone² where a short stay car park is provided, otherwise short stay bicycle parking is not required. This appears to be aimed at commercial activity and is unlikely to ever be required for a residential apartment building that would not provide for a short-stay car park.
- 3.4 Long term bicycle parking is to be provided at a rate of 1 space for each residential unit. It cannot be provided within the unit itself. It can be provided as a lockable, residential unit specific storage facility, and it can be provided on a communal basis.
- 3.5 Standard TR-S3 provides detail on bicycle and micromobility parking design. A key aspect of that standard is reference to a newly proposed³ 'Figure 1 – TR: Cycle and micromobility parking' that provides detail on design options and space requirements to meet this standard when provided within a shared space, which is the most likely outcome in an apartment context.
- 3.6 Table TR-S3 also specifies that at least one in four spaces must meet the standards for 'larger cycles'.
- 3.7 The Stratum submission opposed the requirement for bicycle parking for residential development, and the submission contextually discussed this with reference to the 'centres' zones. The evidence of Mr Stewart makes clear that Stratum's opposition is focussed on the city centre zone. Therefore the relief sought by Stratum is that the standard not apply to residential development in the city centre zone.

¹ Except for certain listed activities that are otherwise provided for.

² Along with the Metropolitan, Local Centre, Neighbourhood Centre and Mixed Use zones.

³ Through the s42A report.

3.8 The basis for Stratum's opposition is grounded in the cost implications of meeting this standard.

3.9 The evidence of Mr Lieswyn⁴ for the Council notes that the cost of providing bicycle parking is substantially less than providing for car parking spaces. Mr Lieswyn is correct that the overall cost of bicycle parking infrastructure (stands for example) is not significant in the context of an apartment development (but is a cost nevertheless). However, that is not the issue which Stratum is addressing. Mr Lieswyn then acknowledges the more significant concern when he says:

It is acknowledged that cost is not simply the cost of parking materials (e.g. stands, hooks, and lockers) but also the opportunity cost of the space. However the space required for cycle and micromobility parking is far less than for cars – at least 10 bikes fit in a single car park, and in constrained developments there are inventive ways to fit in parking. The parking can also cater to prams and mobility scooters – providing for all ages and abilities.

3.10 In a city centre context particularly, the space required for these facilities comes at significant cost. This matter has been addressed by Mr Stewart who provides a current and real example of a building that Stratum is currently seeking a resource consent for.

3.11 In that example, shown in Figure 1 below and by way of a larger image in Attachment 1, Stratum is proactively providing for bicycle parking in a proposed apartment development of some 135 apartments.

⁴ Pages 2-3.

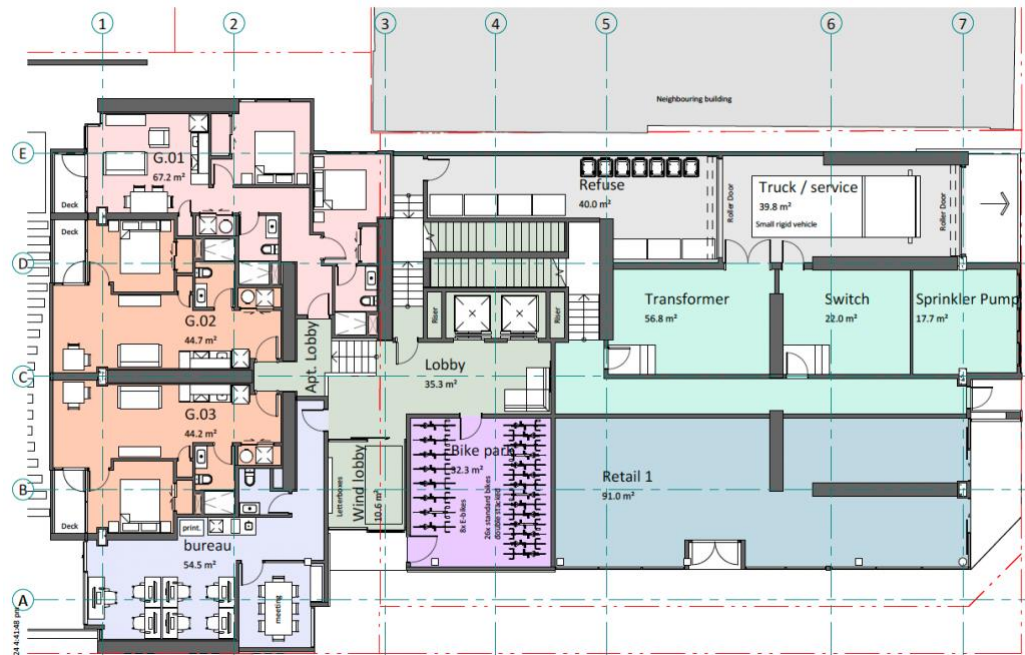


Figure 1. Ground floor plan of a proposed apartment building showing a proposed bike parking area.

- 3.12 The bicycle parking area that Stratum is proposing shows capacity for up to 26 'standard' bikes and a further 8 e-bike spaces for a total of 34 spaces. The area of the proposed space is 32.3m². Mr Stewart's evidence says that this floor area has a value of some \$422,400.
- 3.13 Mr Clark has considered how many spaces could be accommodated within that space by complying with the proposed standards. He considers that the space could accommodate 18 bicycles.
- 3.14 Mr Clark has then considered the space requirement to accommodate 135 bicycles, i.e. one for each apartment, in accordance with standard TR-S3. In his assessment, that level of provision would require some 580m². In terms of a value to Stratum, that area equates to \$7.6M.
- 3.15 As detailed in the evidence of Mr Stewart, that is a substantial cost imposition on a building such as that proposed. The evidence further highlights that apartment developers such as Stratum are already making provision for bicycle parking in the absence of a prescribed standard. Equally, Stratum is making judgements on the appropriate size of such facilities within the parameters of space requirements, competing uses, and costs.
- 3.16 Mr Stewart's evidence is also that such a cost would impact on housing affordability, or in a worst case, would impact on the viability of a building.
- 3.17 The costs of this standard have not in my view been adequately assessed when developing these provisions, and in particular as they relate to

apartment development in the city centre zone. The specific qualities of the city centre zone, and the nature of apartment development within it, means that bicycle parking needs to occur within a building. Whether provided through individual storage lockers, or as a communal facility, both require substantial floor space. That floor space needs to be constructed at a cost, and needs to provide a return. An assessment of those (readily quantifiable) costs has not, in my opinion, been undertaken to contrast against the purported benefits.

- 3.18 Alternatively, meeting the space requirements would require the provision of space or an ancillary building outside of an apartment building that might otherwise be more efficiently and economically utilised for building space.
- 3.19 The standards are more readily met in a residential setting where outdoor space in particular is more readily available. In a larger multi-unit development, bicycle parking facilities can be provided in a shared bike parking structure or structures as Stratum has provided in its recent Tawa development. In smaller developments, it can be provided individually associated with a unit. Importantly, the costs associated with that provision are not the same as those needed to be provided within an apartment building.
- 3.20 Stratum's position in its submission, as confirmed in the evidence of Mr Stewart, was to remove the bicycle parking requirement for residential development in the city centre zone. That remains Stratum's preferred option.
- 3.21 The evidence of Mr Clark considers whether the proposed ratio of one space per unit is the optimal ratio. He has considered an alternative ratio with reference to a survey of some existing apartment buildings undertaken by Stratum. He has also considered the availability of data in respect of bike ownership.
- 3.22 His recommendation is that should a standard for bicycle parking be retained for the city centre zone, then the ratio that should be included is 1 bicycle parking space for every 4 units.
- 3.23 In my view, this would account for a mixed level of bicycle ownership and use, the availability of publicly available micromobility, and the walkability of the city centre. It would also strike a better balance with the competing factors that Mr Stewart highlights - namely the significant costs of providing these facilities and the impacts of those costs.

3.24 These options can be reflected within the existing Table 7 as follows. Firstly, in terms of the Stratum’s preferred position the following change would be required:

Table 7 – TR: Minimum number of on-site cycling and micromobility device parking spaces

Activity	Minimum number of on-site cycling and micromobility device parking spaces	
	Short stay (visitors)	Long stay (staff, residents, students)
Any activity in the following zones <ul style="list-style-type: none"> ▪ City Centre ▪ Metropolitan ▪ Local Centre ▪ Neighbourhood Centre ▪ Mixed Use 	In accordance with the rest of this table if one or more short stay car parks are provided on-site, otherwise Nil.	In accordance with the rest of this table, <u>except for residential development in the city centre zone where no provision is required.</u>

3.25 And alternatively, in terms of a reduced ratio the following changes would be required:

Table 7 – TR: Minimum number of on-site cycling and micromobility device parking spaces

Activity	Minimum number of on-site cycling and micromobility device parking spaces	
	Short stay (visitors)	Long stay (staff, residents, students)
Residential	1 per 10 residential units	Minimum 1 per residential unit** <u>except for the city centre zone where provision shall be made at a rate of 1 per 4 residential units.</u>

Objective TR-O1

- 3.26 The change sought by the Stratum submission to this objective was to reflect the change it sought to Table 7. The change sought was:

TR-O1 Purpose

Land use and development is managed to ensure that:

...

4. New development provides appropriate on-site facilities for cycling and micromobility users to meet expeted demand; and

...

- 3.27 Having considered this submission point further, I am not convinced that the change is necessary, irrespective of either of the two changes proposed to Table 7. Matter 4 would continue to apply irrespective of whether the provision is not required in the city centre zone, or if a reduced rate is provided for in the city centre zone.

Policy TR-P3

- 3.28 As for Objective TR-O1, the change to this policy sought by the Stratum submission was to reflect the change sought to Table 7. The proposed change was:

TR-P3 Managed activities

Only allow on-site transport facilities and driveways that do not meet standards where:

...

4. The projected demand for loading spaces ~~or cycling and micromobility parking~~ will be lower than that required in the standards or can be accommodated by public, shared or reciprocal arrangements;

...

- 3.29 As for my comment in 3.27 above, I do not think that the change is ultimately necessary should the Panel adopt either of the two aspects of relief sought by Stratum.

3.30 Should the Panel not support either of the options sought by Stratum however, then this policy would become problematic. Should Stratum propose a new apartment building that did not provide 1 bicycle parking space per residential unit, then the policy states that this should only be allowed if Stratum can prove that the projected demand will be lower than what is required or can be otherwise accommodated by public, shared or reciprocal arrangements. This is a potentially onerous requirement to meet and would appear to require Stratum to somehow prove that future demand, from potential and unknown future purchasers, would be less than what the standard requires. I do not think it would be feasible to practically provide for a shortfall for an apartment building through a public, shared or reciprocal arrangement. In the absence of meeting the standard, the policy appears to be directive that a future apartment building should not be allowed.

4. CONCLUSION

4.1 Residential apartment development in the city centre has particular characteristics that would not readily accommodate the bicycle parking standard proposed. It will impose significant costs to apartment development that will need to be recouped or, at worst, could make a project unviable.

4.2 The universal application of a 1 space per residential unit standard does not appear to be based on any specific bicycle ownership data.

4.3 The evidence of Mr Clark considers that should a bicycle parking standard be applied to the city centre zone for residential development, then that rate should be for 1 space per 4 residential units, rather than the current 1 to 1 rate.

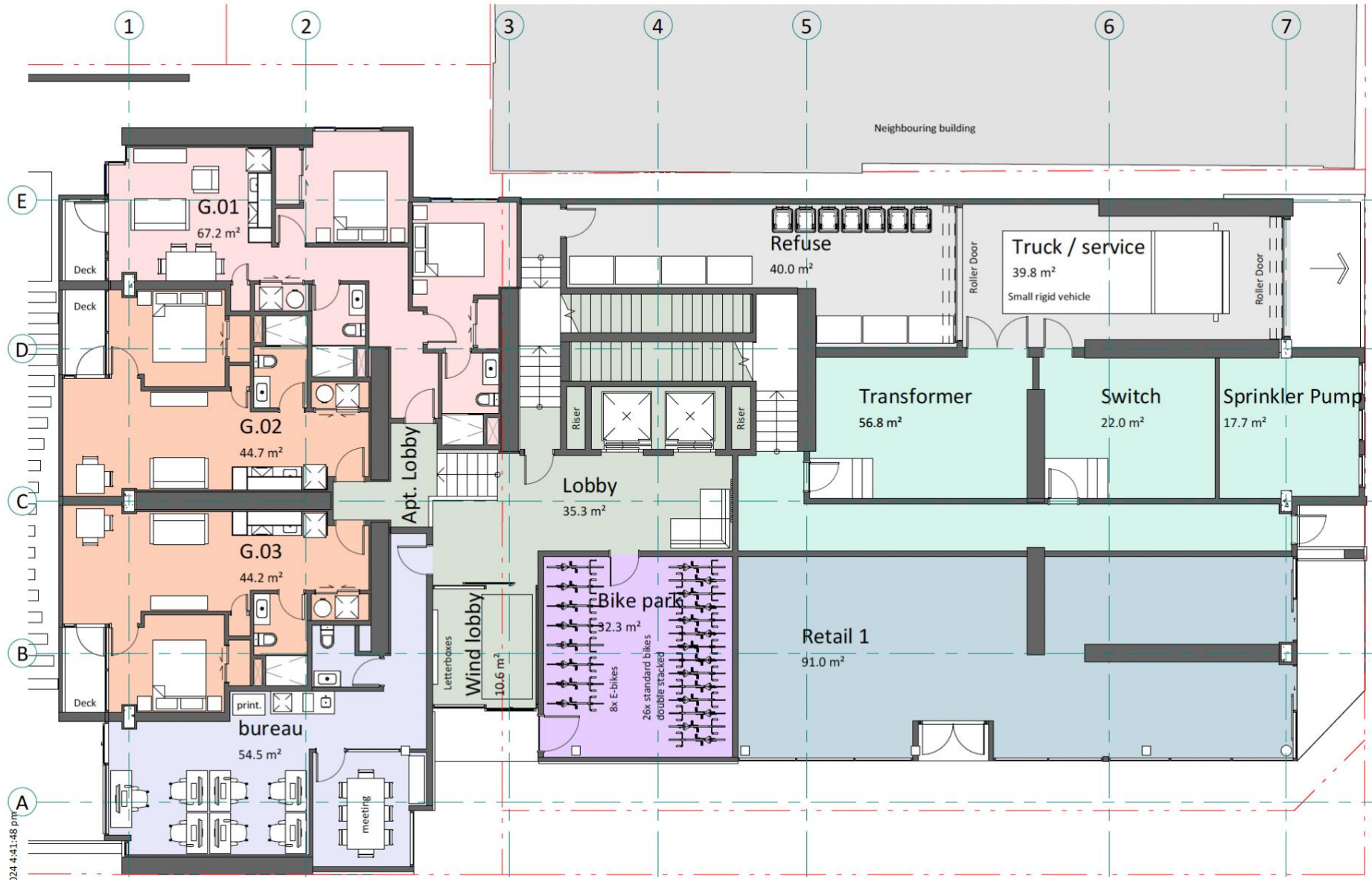
4.4 I consider this approach, should the Panel not remove the requirement entirely, more appropriately balances the costs of the proposed standard against the anticipated benefits, and would more appropriately achieve the purpose of the Act.



Mitch Lewandowski

27 May 2024

Attachment 1



24 4:41:48 pm