



Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan

SECTION 32 EVALUATION REPORT

24 February 2022

Contents

Executive Summary	4
1.0 Introduction	7
1.1 Section 32 Evaluation	7
1.2 The Evaluation Approach.....	7
2.0 The Issue	9
2.1 Background.....	9
2.2 Problem definition	10
Issue 1: Inconsistent text.....	10
Issue 3: Implied minimums.....	14
Issue 4: References to parking ‘requirements’ and ‘required parking’.....	15
Issue 5: References to ‘reduction in parking’	15
Issue 6: Improving clarity	15
Issue 7: Assessment of travel demand in the AUP.....	15
3.0 Objectives of PPC71/PM14	17
4.0 Reasons for the proposed plan change	18
4.1 Outline of the plan change	18
4.2 Rationale for the plan change	21
4.3 Scope of PPC71/PM14	21
5.0 Statutory Evaluation under the Resource Management Act 1991	23
5.1 Part 2 of the RMA	23
5.2 Other relevant sections of the RMA	24
6.0 National and Regional Planning Context	25
6.1 National Policy Statements	25
National Policy Statement on Urban Development.....	25
National Environmental Standards.....	25
6.2 Other relevant legislation	25
6.3 Auckland Plan 2050	25
6.4 Auckland Unitary Plan Regional Policy Statement	27
7.0 Development of the Plan Change Options.....	31
7.1 Process of Identifying Consequential Technical Amendments	31
7.6 Information Used	33
8.0 Consultation.....	33

8.1	Relevant Sections of Resource Management Act 1991 and Local Government Act 2002	33
8.2	Consultation with Key Stakeholders	35
8.3	Consultation with Mana Whenua / Iwi Authorities.....	36
8.4	Local Board Engagement.....	37
8.5	Consultation with Technical Specialists.....	38
9.0	Section 32 evaluation	38
9.1	Evaluation of PPC71/PM14 objectives	38
9.2	Description of options	39
9.3	Evaluation of options.....	40
9.4	Summary of analysis.....	58
9.5	Recommendations	58
10.0	Conclusion	60
	List of Attachments	61
	Attachment A: Section 32 of the RMA.....	62
	Attachment B: List of AUP provisions affected by PPC71/PM14.....	64
	Attachment C: List of HGI Plan provisions affected by PPC71/PM14	72
	Attachment D: Proposed amendments to the AUP to address Issue 7: Assessment of travel demand in the AUP	73
	Attachment E: Proposed AUP tracked changes (PPC71 and non-Schedule 1).....	77
	Attachment F: Proposed HGI Plan tracked changes (PM14 and non-Schedule 1).....	78

Executive Summary

Objectives of PPC71/PM14

The objectives of PPC71/PM14 are to:

- Give effect to Policy 11 of the National Policy Statement on Urban Development (**NPS-UD**).
- Make consequential technical amendments to the Auckland Unitary Plan (Operative in part) (**AUP**) and Auckland Council District Plan – Hauraki Gulf Islands Section (**HGI Plan**) that are necessary to give effect to Policy 11 of the NPS-UD where these fall outside the scope of non-Schedule 1 changes as described in clause 3.38 of the NPS-UD.
- Ensure that the AUP and the HGI Plan continue to adequately address any adverse effects on the transport network after minimum car parking requirements are removed from the plans.

Rationale for the plan change

The NPS-UD requires the council to remove provisions (that have the effect of requiring that development provide a minimum number of car parks) from the AUP and the HGI Plan. The removals must be done by 20 February 2022, without using the Resource Management Act 1991 (RMA) Schedule 1 plan change process.

As a result of removing parking minimums, there are a number of consequential changes required to the Unitary Plan. These changes fall outside the scope of the non-Schedule 1 changes and must be the subject of a plan change. They fall into the following categories:

- Issue 1: Inconsistent text
- Issue 2: Policy hierarchy in Chapter E27 of the AUP
- Issue 3: Implied minimums
- Issue 4: References to parking 'requirements' and 'required parking'
- Issue 5: References to 'reduction in parking'
- Issue 6: Improving clarity
- Issue 7: Assessment of travel demand in the AUP.

Summary of Recommended Options

A section 32 analysis of options has been undertaken in accordance with section 32(1)(b) and (2) of the RMA. The report analyses a number of options in relation to each of the seven issues. The recommended options are:

Issue 1: Inconsistent text

- Recommendation 1.2: Amend the text as necessary through a plan change to ensure internal consistency within the AUP and HGI Plan, consistency with the NPS-UD direction and to ensure there are no gaps in the plans.

Issue 2: Policy hierarchy within AUP Chapter E27 – Transport

- Recommendation 2.3: Amend parking policies as necessary to ensure consistency with the NPS-UD direction.

Issue 3: Implied minimums

- Recommendation 3.3: Amend provisions with implied minimums.

Issue 4: Parking ‘requirements’ and ‘required parking’

- Recommendation 4.3: Delete references to parking ‘requirements’ and replace ‘required’ with ‘proposed’ or ‘provided’.

Issue 5: References to ‘reduction in parking’

- Recommendation 5.3: Amend provisions that refer to a ‘reduction in parking’.

Issue 6: Improving clarity

- Recommendation 6.2: Amend parking provisions as necessary to improve clarity and consistency throughout the plans.

Issue 7: Assessment of travel demand in the AUP

- Recommendation 7.4: Add a new activity, standard, matters of discretion and assessment criteria to AUP Chapter E27, and amend the definition of ‘travel plan’ in AUP Chapter J to address the effects of travel demand on the transport network.

These recommended options are considered to be the most effective and efficient way to achieve the objectives of PPC71/PM 14.

Matters outside the scope of the plan change

The following matters have been identified as matters that require further investigation as a result of implementing Policy 11 of the NPS-UD, but are outside the of scope of PPC71/PM 14:

- The provision of accessible parking.
- Private pedestrian-only access to sites.
- Property access, including pick-up and drop-off / loading facilities and provision for emergency services access, where no vehicle access is proposed, with consideration of potential adverse effects of these on the transport network.
- The provision for and design of on-site bicycle access and bicycle parking where no vehicle access is proposed.
- The provision for and design of on-site electric vehicle charging facilities and shared spaces where no vehicle parking is proposed.

Where and when appropriate, these matters will be addressed through a future plan change process.

1.0 Introduction

1. This report is prepared as part of the evaluation required by section 32 of the Resource Management Act 1991 (**RMA** or **the Act**) for Proposed Plan Change 71 (**PPC71**) to the Auckland Unitary Plan (Operative in Part) (**AUP**) and proposed Plan Modification (**PM14**) to the Auckland Council District Plan – Hauraki Gulf Islands Section (**HGI Plan**).
2. PPC71/PM 14 address consequential technical matters arising from the removal of car parking minimums to give effect to Policy 11 of the NPS-UD. It seeks to ensure that the AUP and the HGI Plan continue to function as intended and that adverse effects on the transport network can continue to be assessed under the AUP once car parking minimums are removed.

1.1 Section 32 Evaluation

3. Section 32 of the RMA requires that before adopting any objective, policy, rule or other method, the council shall carry out an evaluation to examine:
 - The extent to which each objective is the most appropriate way to achieve the purpose of the Act
 - Whether, having regard to their efficiency and effectiveness, the policies, rules or other methods are the most appropriate for achieving the objective.
4. The evaluation must also take into account:
 - The benefits and costs of policies, rules, or other methods
 - The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules or other methods.
5. Section 32 of the RMA is provided in Attachment A to this report.

1.2 The Evaluation Approach

6. This section outlines how PPC71/PM 14 have been evaluated under section 32 of the RMA. In accordance with section 32(6) of the RMA and for the purpose of this report:
 - the 'objectives' means the objectives of PPC71/PM 14, as PPC71/PM 14 do not propose any new objectives in the AUP or the HGI Plan
 - the 'proposal' means this plan change
 - the 'provisions' means the method(s) used to give effect to the objectives of PPC71/PM 14.
7. The evaluation approach and report format are set out in Table 1 below.

Table 1: Report format

Sections of this report	Contents of the section
Section 2: The issue	This part of the report provides the background and describes the resource management issue to be resolved.
Section 3: Objectives of PPC71/PM 14	This part of the report sets out the objectives of PPC71/PM 14.
Section 4: Reasons for the proposed plan change	In accordance with sections 32(1)(a) and (1)(b)(iii) of the RMA, this part of the report examines the extent to which the objectives of the proposal (PPC71/PM 14) are the most appropriate way to achieve the purpose of

Sections of this report	Contents of the section
	the RMA. This section outlines the reasons for, and the scope of, PPC 71/PM 14.
Section 5: Statutory evaluation	This part of the report evaluates the relevance of PPC71/PM14 to Part 2 (sections 5-8) and other relevant parts / sections of the RMA.
Section 6: National and local planning context	This part of the report evaluates the relevance of PPC71/PM14 against the national and local planning context.
Section 7: Development of the plan change	This part of the report outlines the methodology and development of PPC 71/PM14, including the information used.
Section 8: Consultation	This part of the report outlines the consultation undertaken in preparing PPC71/PM14. It includes a summary of all advice received from iwi authorities on PPC71/PM14 (as required by section 32(4)(a) of the RMA).
Section 9: Section 32 evaluation	In accordance with section 32(1)(b) and (2) of the RMA, this section examines whether the options appropriately achieve the objectives of the AUP and the sustainable management purpose of the RMA. The options are assessed by their efficiency and effectiveness, costs, benefits and risks to resolve the RMA issue.
Section 10: Conclusion	This part of the report concludes that PPC71/PM14 is the most efficient, effective and appropriate means of addressing the resource management issues identified.

8. This section 32 evaluation report will continue to be refined in response to any consultation feedback provided to the council, and as PPC71/PM14 progresses through the plan change process. The section 42A hearing report, which will analyse the plan change documentation, submissions and further submissions, will form part of the section 32 evaluation. The decision notice which takes account of all plan change documentation, submissions, further submissions and the evidence presented at the hearing is also part of the section 32 evaluation.

2.0 The Issue

2.1 Background

9. National policy statements provide national direction for matters of national significance relevant to achieving the sustainable management purpose of the RMA. They allow the Government to prescribe objectives and policies for matters of national significance.
10. The NPS-UD has its origins in the National Policy Statement on Urban Development Capacity 2016 (**NPS-UDC**) which sought to enable greater development capacity for housing and business. The NPS-UDC has been replaced by the NPS-UD, which gives further policy direction in certain planning areas. The NPS-UD is part of the Government's Urban Growth Agenda. This Agenda states that to support productive and well-functioning cities it is important that regional policy statements, regional plans and district plans provide adequate opportunity for land development for business and housing to meet community needs. The stated potential benefits of flexible urban policy include higher productivity and wages, shorter commute times, lower housing costs, social inclusion, and more competitive urban land markets.
11. The NPS-UD states in Policy 11 that 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; and
 - b) 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.
12. The NPS-UD requires the council to remove objectives, policies, rules or assessment criteria that have the effect of requiring a minimum number of car parks from the AUP and the HGI Plan. The removals must be done by 20 February 2022, without using RMA Schedule 1 plan change process (i.e., members of the public are not able to make submissions on the removals). However, accessible parking minimums and parking dimensions or manoeuvring standards can continue to be specified in these plans.
13. The NPS-UD guidelines state that the purpose of this direction is to enable more housing and commercial developments, particularly in higher density areas where people do not necessarily need to own or use a car to access jobs, services, or amenities. It will enable urban space to be used for higher value purposes other than car parking and remove a significant cost for higher density developments. Developers may still choose to provide car parking in many areas, but the number of car parks provided by them will be driven by their assessment of market demand.
14. A number of issues have been identified as a consequence of removing minimum car parking requirements from the AUP and the HGI Plan. These are as follows:
 - a) Consequential technical amendments to the AUP and HGI Plan that are necessary to give effect to Policy 11 of the NPS-UD but fall outside the scope of non-Schedule 1 changes as described in clause 3.38 of the NPS-UD.
 - b) The retention of the provision of accessible parking
 - c) Design of private pedestrian access where no vehicle access is proposed
 - d) Property access, including pick-up and drop-off / loading facilities and provision for emergency services access, where no vehicle access is proposed, with consideration of potential adverse effects of these on the transport network.

- e) The provision for and design of on-site bicycle access and bicycle parking where no vehicle access is proposed
 - f) The provision for and design of on-site electric vehicle charging facilities and shared spaces where no vehicle parking is proposed.
15. Addressing these issues will require other plan changes to the AUP and HGI Plan as they fall outside the scope of the non-Schedule 1 changes required by the NPS-UD.
 16. This section 32 report addresses item 14(a) in paragraph 14 which identifies consequential technical amendments to the AUP and the HGI Plan that are necessary to give effect to Policy 11 of the NPS-UD but fall outside the scope of non-Schedule 1 changes as described in clause 3.38 of the NPS-UD.

2.2 Problem definition

17. Six technical issues have been identified that will result from removing parking minimums from the AUP.

Issue 1: Inconsistent text

18. The background text in the transport chapters within the AUP and the HGI Plan need to be amended to ensure that they accurately reflect the plans' content after car parking minimums have been removed. All amendments in this category are proposed to be included in the plan change because they are not objectives, policies, rules or assessment criteria.

Issue 2: Policy hierarchy in Chapter E27 of the AUP

19. The removal of all provisions that have the effect of requiring a minimum number of car parking spaces from the AUP may require amendments to other parts of the plans to ensure that the policy framework gives effect to the NPS-UD.
20. The current objectives and policies in Chapter E27 of the AUP relating specifically to the supply and number of parking spaces may need to be amended to ensure that the policy framework gives effect to the NPS-UD following the removal of car parking minimums. An overview of the relevant E27 objectives and policies is provided in Table 2 below.

Table 2: Analysis of operative objectives and policies in Chapter E27 of the AUP relating to the amount of parking

Provision reference	What it does	Consistency with NPS-UD
<p>Objective E27.2(3)</p> <p>Parking and loading support urban growth and the quality compact urban form.</p>	<p>Provides a high-level outcome for parking and loading to support urban growth.</p>	<p>This objective continues to be relevant. Where parking is provided, it is appropriate to ensure that it supports urban growth and the quality compact urban form.</p> <p>This objective is considered to be consistent with the NPS-UD.</p>

Provision reference	What it does	Consistency with NPS-UD
<p>Objective E27.2(4)</p> <p>The provision of safe and efficient parking, loading and access is commensurate with the character, scale and intensity of the zone.</p>	<p>This relates to the provision of parking being commensurate with the character and scale of the zone.</p>	<p>While this objective currently provides support to the minimum car parking rates, it also supports other policies and provisions such as those relating to amenity and operational safety outcomes.</p> <p>It is considered to be consistent with the NPS-UD.</p>
<p>Policy E27.3(3)</p> <p>Manage the number, location and type of parking and loading spaces, including bicycle parking and associated end-of-trip facilities to support all of the following:</p> <ul style="list-style-type: none"> (a) the safe, efficient and effective operation of the transport network; (b) the use of more sustainable transport options including public transport, cycling and walking; (c) the functional and operational requirements of activities; (d) the efficient use of land; (e) the recognition of different activities having different trip characteristics; and (f) the efficient use of on-street parking. 	<p>This policy sets out the matters that are relevant in terms of managing the number, location and type of parking and loading spaces. It also applies to bicycle parking and end-of-trip facilities.</p>	<p>The matters listed are varied and range from those that support the operational needs of the proposal to those that encourage use of non-vehicular travel to the activity.</p> <p>It is considered to be consistent with the NPS-UD.</p>
<p>Policy E27.3(4)</p> <p>Limit the supply of on-site parking in the Business – City Centre Zone to support the planned growth and intensification and recognise the existing and future accessibility of this location to public transport, and support walking and cycling.</p> <p>Policy E27.3(5)</p> <p>Limit the supply of on-site parking for office development in all locations to:</p> <ul style="list-style-type: none"> (a) minimise the growth of private vehicle trips by commuters travelling during peak periods; and (b) support larger-scale office developments in the Business – City Centre Zone, Centre Fringe Office Control area, Business – Metropolitan Centre Zone, Business 	<p>These policies relate to maximum parking provisions.</p>	<p>This is considered to be consistent with the NPS-UD because they relate to maximum parking provision and support for other modes of transport.</p>

Provision reference	What it does	Consistency with NPS-UD
<ul style="list-style-type: none"> – Town Centre Zone and Business – Business Park Zone. 		
<p>Policy E27.3(6)</p> <p>Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by:</p> <ul style="list-style-type: none"> (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities. 	<p>This policy relates to a flexible parking approach and refers to situations where there are</p> <ul style="list-style-type: none"> (a) no parking maximums as well as (b) where there are no minimums. 	<p>The NPS-UD does not require maximums and therefore this part of the policy (6a) is considered to be consistent with the NPS-UD.</p> <p>Part (b) of this policy is no longer required as there are no situations where a minimum is required.</p>
<p>Policy E27.3(6A)</p> <p>Enable the reduction of on-site parking for retail and commercial services activities in the Business-Metropolitan Centre Zone, Business-Town Centre Zone, Business-Local Centre Zone and Business-Mixed Use Zone where a suitable public off-site parking solution is available and providing for no or reduced on-site parking will better enable the built form outcomes anticipated in these zones.</p>	<p>This policy is about enabling the reduction of parking spaces.</p>	<p>This policy is consistent with the NPS-UD however it is unnecessary because there is no need to specify where parking can be reduced because parking will not be required anywhere.</p>
<p>Policy E27.3(7)</p> <p>Provide for flexible on-site parking by not limiting or requiring parking for subdivision, use and development (excluding office) in the Centre Fringe Office Control area, Residential – Terrace Housing and Apartment Buildings Zone and Residential – Mixed Housing Urban Zone (studio and one bedroom dwellings).</p>	<p>This policy states that parking is not required or limited in certain zones/activities.</p>	<p>The part of this policy about not requiring parking is consistent with the NPS-UD as it is stating where there are no parking requirements.</p> <p>However, it is no longer necessary as there will be no minimums in any zone.</p> <p>The part about limiting parking is not inconsistent with the NPS-UD.</p>

Provision reference	What it does	Consistency with NPS-UD
<p>Policy E27.3(8)</p> <p>Require all other subdivision, use and development to provide a minimum level of on-site parking in recognition of the more limited alternatives to private vehicle travel unless it can be demonstrated that a lesser amount of on-site parking is needed for a particular site or proposal or the provision of on-site parking would be inconsistent with the protection of Historic Heritage or Special Character overlays.</p>	<p>This policy outlines the approach to minimum parking in the plan.</p>	<p>This is not consistent with the NPS-UD as it establishes the plan's direction for including minimum parking requirements.</p>
<p>Policy E27.3(9)</p> <p>Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.</p>	<p>This policy is about flexible approach to parking and supports efficient land use and overall reduction of parking.</p>	<p>This is consistent with the NPS-UD.</p>
<p>Policy E27.3(10)</p> <p>Provide for non-accessory parking where:</p> <p>(a) the proposal and the type of parking will reinforce the efficient use of land or planned growth and intensification provided for in this plan for the site or locality; and</p> <p>(b) there is an undersupply or projected undersupply of parking to service the area having regard to all of the following:</p> <p>(i) the efficient use of land to rationalise or consolidate parking resources in centres;</p> <p>(ii) the availability of alternative transport modes, particularly access to the existing and planned public transport;</p> <p>(iii) the type of parking proposed;</p> <p>(iv) existing parking survey information; and</p> <p>(v) the type of activities in the surrounding area and their trip characteristics.</p>	<p>This policy relates to parking as an activity in itself.</p>	<p>This does not relate parking to any particular activity or development.</p> <p>It is considered to be consistent with the NPS-UD.</p>
<p>Policy E27.3(11)</p> <p>Discourage the development of long-term non-accessory parking in the Business – City Centre Zone and the Centre Fringe Office Control as shown on the planning maps to:</p> <p>(a) recognise and support the high level of accessibility these areas have to the public transport; and</p>	<p>These policies support the overall reduction of non-accessory parking areas, land use efficiency and alternative modes of transport.</p>	<p>This is considered to be consistent with the NPS-UD.</p>

Provision reference	What it does	Consistency with NPS-UD
<p>(b) minimise the growth in private vehicle trips by commuters during peak periods.</p> <p>Policy E27.3(12)</p> <p>Control the development of long-term non-accessory parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and in the Business – Mixed Use Zone so that the parking does not undermine:</p> <p>(a) the efficient use of land or growth and intensification provided for in this plan for the site or locality; and</p> <p>(b) the use of public transport in these zones.</p>		
<p>Policy E27.3(13)</p> <p>Provide for park-and-ride and public transport facilities which are located and designed to support the public transport network by:</p> <p>(a) locating in proximity to public transport stations, stops and terminals;</p> <p>(b) growing public transport patronage to assist in relieving congested corridors by encouraging commuters to shift to public transport;</p> <p>(c) making public transport easier and more convenient to use, thereby attracting new users;</p> <p>(d) improving the operational efficiency of the public transport network;</p> <p>(e) extending the catchment for public transport into areas of demand where it is not cost-effective to provide traditional services or feeders;</p> <p>(f) reinforcing existing and future investments on the public transport network; and</p> <p>(g) providing free, secure and covered parking for bicycles.</p>	<p>This policy is about supporting the use and efficiency of public transport by providing park and ride facilities.</p>	<p>This is considered to be consistent with the NPS-UD.</p>

Issue 3: Implied minimums

21. This issue relates to provisions in the plans that describe the amount of parking. Such words commonly used in the plan are 'sufficient' and 'adequate'. While these words do not set a particular number of car parking spaces, they imply that there will need to be parking provided and reflect the notion that there is a base number that must be met or exceeded. This is considered to be contrary to the intent of the NPS-UD.

22. These words on their own are also difficult to assess in the context of the AUP and HGI Plan having removed minimum parking rates. The current minimum rates can form a starting point for decisions about levels of parking that can be built and negotiated. Without the minimum parking rates, it may become more difficult to decide what is the 'adequate' or 'sufficient' amount of parking.
23. These words are found in assessment criteria in several AUP precincts. Some of these precincts state that the E27.6.2 parking standards do not apply in the precinct, while others are silent on this and therefore the E27 standards are also applicable. In both cases, the level of parking has been included as an assessment matter for certain activities/developments in the precinct.

Issue 4: References to parking 'requirements' and 'required parking'

24. The AUP refers to parking 'requirements' and 'required parking'.
25. There can be a variety of parking 'requirements' for a particular proposal. These include, but are not limited to, requirements that are:
 - stated in the AUP
 - recommended through an assessment of transport effects
 - part of a condition on a resource consent
 - a user-defined requirement that is necessary in order to undertake the proposed activity in that location.
26. It is also noted that parking 'requirements' has a broader meaning than 'required parking'. For example, parking requirements can include not only the amount of parking but also requirements for landscaping, design and access. 'Required parking' is narrower, being simply the quantum of parking that is required.
27. Given the direction of the NPS-UD to remove car parking minimums, these terms are no longer consistent with the intent of Policy 11 of the NPS-UD. Therefore, any references to parking 'requirements' and 'required parking' are proposed to be deleted or amended throughout the AUP and the HGI Plan.

Issue 5: References to 'reduction in parking'

28. The AUP uses the term 'reduction in parking' in the assessment criteria for some precincts. These provisions essentially require an assessment of the effects of reducing parking from the current amount (status quo). It is considered that this may be interpreted as treating current parking as a minimum rate and therefore this term is proposed to be deleted throughout the AUP.

Issue 6: Improving clarity

29. This issue recognises that there are amendments proposed relating to car parking provisions that seek to improve clarity and consistency throughout the AUP and the HGI Plan, but do not fall into any other categories.

Issue 7: Assessment of travel demand in the AUP

30. The demand for parking can have effects on the transport network as well as safety and amenity values. Proposed activities and developments can generate significant parking demands. The Ministry for the Environment's car parking fact sheet¹ clarifies that the effects of parking can still be assessed.
31. The infringement to the standards for minimum parking (E27.6.2) currently requires assessment of matters including: the nature of the operation, access by public

¹ Page 2, <https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-car-parking-fact-sheet/>

transport, travel plans, effects of overspill, availability of on-street parking, shared parking and physical site constraints. These assessment matters will be deleted from the AUP as they relate to minimum parking requirements. The amenity effects of parking will continue to be assessed and managed through provisions in the AUP relating to matters such as location, design, screening and landscaping of parking areas. These provisions will be unchanged as a result of the removal of minimum parking rates.

32. However, in light of the NPS-UD direction to remove minimum car parking requirements from district plans, it is appropriate to consider and enable the ability to assess wider travel demand effects from a proposal. This ensures that adverse effects on the transport network, arising from proposals that were previously subject to minimum car parking requirements, can be adequately assessed and managed.

3.0 Objectives of PPC71/PM14

33. This section 32 report involves analysing the most appropriate method to give effect to the Unitary Plan objectives, having regard to the requirements of the Resource Management Act 1991 and the National and Regional Planning context.
34. In accordance with section 32(1) of the RMA, this report examines the extent to which the objectives of the plan change are the most appropriate way to achieve the Act and whether the provisions in the proposal are the most appropriate way to achieve the objectives.
35. The objectives of PPC71/PM14 are to:
 - Give effect to Policy 11 of the NPS-UD
 - Address consequential technical amendments to the AUP and HGI Plan that are necessary to give effect to Policy 11 of the NPS-UD but fall outside the scope of non-Schedule 1 changes as described in clause 3.38 of the NPS-UD
 - Ensure that the AUP continues to adequately address any adverse effects on the transport network after minimum car parking requirements are removed from the plan.

4.0 Reasons for the proposed plan change

4.1 Outline of the plan change

36. The removal of provisions which contain car parking minimums from the AUP and HGI Plan is required by the NPS-UD without using the RMA Schedule 1 plan change process.
37. However, as outlined in section 2 of this report, the removal of car parking minimums results in the need for a number of consequential technical amendments to the AUP and HGI Plan, which fall outside the scope of non-Schedule 1 changes, to ensure that the plans give effect to the NPS-UD.
38. Many of these changes are of a technical nature and are required to ensure the AUP and HGI Plan continue to function as intended and the provisions continue to be supported by an appropriate policy framework.
39. PPC71/PM14 seeks to address the following issues:
 - Issue 1: Inconsistent text
 - Issue 2: Policy hierarchy in Chapter E27 of the AUP
 - Issue 3: Implied minimums
 - Issue 4: References to parking ‘requirements’ and ‘required parking’
 - Issue 5: References to ‘reduction in parking’
 - Issue 6: Improving clarity
 - Issue 7: Assessment of travel demand in the AUP.
40. Examples of amendments for Issues 1 to 6 are shown in Table 3 below. New provisions proposed for addressing travel demand (Issue 7) are outlined in Paragraph 43 below.
41. PPC71/PM14 amendments are shown in red underline and strikethrough, while non-Schedule 1 amendments (that are not part of this plan change) are shown in black underline and strikethrough. Full tracked changes to the AUP and the HGI Plan are provided in Attachments E and F to this report.

Table 3: Examples of amendments to the AUP and HGI Plan that fall under Issues 1 to 6

Issue category	Examples
Issue 1: Inconsistent text	<p>AUP E27.1. Background:</p> <p><i>The current predominance of private vehicle travel and the accompanying demand requirements for parking is recognised in terms of both the positive and adverse effects associated with accommodating these parking requirements.</i></p> <p>HGI Plan 13.4.5 Parking and access (resource management strategy):</p> <p><i>In general, all new developments and new activities in existing buildings will be required to provide adequate on-site parking. However, not all activities and developments will be able to, or indeed need to provide the required parking taking into account their particular characteristics.</i></p>

Issue category	Examples
<p>Issue 2: Policy hierarchy in Chapter E27 of the AUP</p>	<p>AUP Policy E27.3(6):</p> <p>Provide for parking in the Business—Metropolitan Centre Zone, Business—Town Centre Zone, Business—Local Centre Zone and Business—Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by:</p> <p>(a)—not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals.</p> <p>(b)—not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.</p> <p><u>Limit the supply of on-site parking for education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.</u></p> <p>AUP Policy E27.3(6A):</p> <p>Enable the reduction of on-site parking for retail and commercial services activities in the Business-Metropolitan Centre Zone, Business-Town Centre Zone, Business-Local Centre Zone and Business-Mixed Use Zone where a suitable public off-site parking solution is available and providing for no or reduced on-site parking will better enable the built form outcomes anticipated in these zones.</p>
<p>Issue 3: Implied minimums</p>	<p>AUP Standard I303.6.1(1):</p> <p>The number of parking and There should be adequate loading spaces must be maintained at 270 spaces, including and 8 bus parking spaces.</p> <p>AUP Assessment criteria I304.8.2(5)(c):</p> <p>The effects of traffic and parking on the safety and efficiency of the transport network.</p> <p>...</p> <p>(c) [deleted] Whether the precinct has sufficient parking capacity to provide for the day to day needs of existing and proposed activities.</p>
<p>Issue 4: References to parking 'requirements' and 'required parking'</p>	<p>AUP Standard I308.6.8(2):</p> <p>For the purpose of calculating gross floor area to determine the quantity of required maximum car parking requirements within sub-precinct A, above ground car parking (including manoeuvring areas) located within buildings shall be excluded.</p> <p>AUP Assessment criteria I330.8.2(4):</p> <p>parking and loading areas not meeting the requirements of Standard I330.6.5 above:</p> <p>...</p> <p>(b) where it is desired to provide parking in excess of the Unitary Plan requirements, it may be feasible to operate stacked parking which must be specifically designed to the council's satisfaction. The satisfactory operation of the required parking area should not be compromised.</p>

Issue category	Examples
<p>Issue 5: References to 'reduction in parking'</p>	<p>AUP Assessment criteria I322.8.2(3)(d):</p> <p>(3) <i>any activity that does not comply with Standards I322.6.3 Impervious areas, I322.6.5 Building height or I322.6.6 Building location:</i></p> <p>...</p> <p>(d) <i>the effects on the surrounding transport network.</i></p> <p>...</p> <p>(ii) <i>[deleted]-whether a reduction in car parking will compromise the successful implementation of a Transport and Traffic Management Plan, where relevant or required;</i></p> <p>HGI Plan 13.7.5 Matters of discretion:</p> <p><i>Matters of discretion for a reduction in parking and loading spaces</i></p> <p><i>When considering an application to reduce the number of parking and loading spaces, the council has restricted its discretion to considering the following matters:</i></p> <p>...</p>
<p>Issue 6: Improving clarity</p>	<p>AUP Policy I504.3(7):</p> <p><i>Require the retention of appropriate facilities for boating, such as public boat ramps and boat trailer parking spaces associated with the marina and boat ramp.</i></p> <p>AUP Standard E27.6.2(5):</p> <p><i>Table E27.6.2.4 sets out the parking rates which apply to the Business – Neighbourhood Centre Zone and all other zones and areas not specified in Table E27.6.2.1, Table E27.6.2.2 and Table E27.6.2.3.</i></p>

42. Issue 7 seeks to address the effects of travel demand on the transport network in the AUP after car parking minimums are removed from the plan. It recognises that there is potential for activities that were previously subject to minimum car parking requirements to have adverse effects on the transport network. Therefore, the purpose of the new provisions is to ensure that the AUP enables the assessment of effects on the transport network and where required, the effects can be adequately avoided, remedied or mitigated.

43. The following amendments are proposed in the AUP to address Issue 7:

- Chapter E27 – Transport:
 - Insert a new Rule E27.4.1(A3a) in Activity Table E27.4.1
 - Insert a new Standard E27.6.1A
 - Insert a new Matter of discretion E27.8.1(4A)
 - Insert a new Assessment criteria E27.8.2(3A)
 - Amend Special information requirement E27.9(2)(b)
- Chapter J – Definitions of the AUP:
 - Amend the definition of 'travel plan'.

44. The new travel demand provisions are set out in full in Attachment D to this report.
45. Rule E27.4.1(A3a) provides for any activity or subdivision which meets or exceeds the new travel demand thresholds in Standard E27.6.1A as a restricted discretionary activity. Any activity meeting or exceeding the development thresholds in Table E27.6.1A will require a travel plan as part of an assessment of environmental effects. This requirement has been included as a new special information requirement (E27.9(2)(b)).
46. The activity categories listed in the new Standard E27.6.1A is based on the list of activities in the existing trip generation standard (Standard E27.6.1), and include care centres, community facilities, healthcare facilities and entertainment facilities as they are activities that tend to generate travel demand. Similar to the existing Standard E27.6.1, the new Standard E27.6.1A does not apply to activities in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, or Residential – Terrace Housing and Apartment Building Zone or Centre Fringe Office Control as shown on the planning maps. These zones generally did not have minimum parking requirements prior to the NPS-UD coming into force.
47. New matters of discretion (E27.8.1(4A)) and related assessment criteria (E27.8.2(3A)) are also proposed to address the following matters:
 - The extent to which the travel demands of the activity are provided for, including the adequacy of travel choices by all modes as an alternative to private vehicle travel and proposed measures to reduce demand for travel by private vehicle.
 - The effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement
 - The extent to which the travel plan addresses the matters above.
48. The definition of ‘travel plan’ in Chapter J is also proposed to be amended to include references to micro mobility, to recognise that car parking and loading areas are a limited resource and include details of ongoing activities and processes that will be used to support the use of walking and cycling, public transport, carpooling and micro mobility.
49. All chapters and provisions of the AUP and HGI Plan affected by this plan change are set out in Attachments B and C while full tracked changes are provided in Attachments E and F to this report.

4.2 Rationale for the plan change

50. The NPS-UD requires the council to remove provisions that have the effect of requiring a minimum number of car parks from the AUP and the HGI Plan. The removals must be done by 20 February 2022, without using the RMA Schedule 1 plan change process (i.e., members of the public are not able to make submissions on the removals).
51. As a result of removing parking minimums, there are a number of consequential technical changes required to the Unitary Plan. These changes were identified using the process set out in section 7.1 of this report. They fall outside the scope of the non-Schedule 1 changes and must be the subject of a plan change.

4.3 Scope of PPC71/PM14

52. The scope of PPC71/PM14 is limited to addressing consequential technical amendments in the AUP and HGI Plan and ensuring that the effects of travel demand can be adequately addressed in the AUP following the removal of car parking minimums to give effect to Policy 11 of the NPS-UD.
53. Therefore, the scope of PPC71/PM14 is amendments which address the following issues:
- Issue 1: Inconsistent text
 - Issue 2: Policy hierarchy in Chapter E27 of the AUP
 - Issue 3: Implied minimums
 - Issue 4: References to parking 'requirements' and 'required parking'
 - Issue 5: References to 'reduction in parking'
 - Issue 6: Improving clarity
 - Issue 7: Assessment of travel demand in the AUP.
54. PPC71/PM14 does not seek to alter the current policy direction in the AUP or the HGI Plan and does not seek to alter any objectives. It is recognised that there are a number of related consequential issues that arise from the removal of parking minimums. They are:
- a) The provision of accessible parking
 - b) Private pedestrian-only access to sites
 - c) Property access, including pick-up and drop-off / loading facilities and provision for emergency services access, where no vehicle access is proposed, with consideration of potential adverse effects of these on the transport network.
 - d) The provision for and design of on-site bicycle access and bicycle parking where no vehicle access is proposed
 - e) The provision for and design of on-site electric vehicle charging facilities and shared spaces where no vehicle parking is proposed.
55. These issues will be addressed through a separate plan change process where appropriate.

5.0 Statutory Evaluation under the Resource Management Act 1991

5.1 Part 2 of the RMA

56. Section 5 of the RMA describes the purpose of the Act which is to promote the sustainable management of natural and physical resources, as defined in section 5(2) of the Act.
57. The consequential changes are of a technical nature and are intended to ensure the AUP and HGI Plan continue to function as intended (albeit with the removal of parking minimums). The exception is the assessment of travel demand effects. Enabling such an assessment to be undertaken is new and is in accordance with section 5(2)(c) of the RMA to avoid, remedy, or mitigate any adverse effects of activities on the environment.
58. Section 6 of the RMA outlines matters of national importance. In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the matters of national importance set out in Section 6.
59. Car parking is not considered to be a matter of national importance, although the removal of parking minimums is the subject of a national policy statement, the NPS-UD.
60. Section 7 of the RMA outlines other matters. The following are considered to be of particular relevance to PPC71/PM14:
 - the efficient use and development of natural and physical resources (section 7(b))
 - the maintenance and enhancement of amenity values (section 7(c))
 - the effects of climate change (section 7(i)).
61. The removal of car parking minimums and the related consequential changes to the AUP will assist in addressing the identified matters outlined in section 7 of the RMA. In particular, the removal of parking minimums will enable land to be used more efficiently (section 7(b)) by providing more space for housing development, whilst continuing to enable parking to be provided where there is appropriate demand.
62. Subsequent benefits resulting from this change include opportunities for enhanced on-site amenity for residents and users of new developments which choose to provide either no parking or minimal parking following the removal of minimum standards (section 7(c)).
63. The removal of parking minimums will also support reductions in greenhouse gas emissions in response to climate change (section 7(i)) by encouraging the use of active and public transport modes where on-site parking is not provided for.
64. Section 8 of the RMA states that all persons exercising functions and powers under the Act shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
65. The plan change will not be contrary to the principles of Te Tiriti o Waitangi and the development of the plan change has been undertaken with consideration to iwi. Details of the consultation are outlined in section 8 of this section 32 report.

5.2 Other relevant sections of the RMA

66. Sections 30 and 31 of the RMA specify the functions of regional and territorial authorities. The AUP, as a Unitary plan, performs both of these functions. Ensuring that the AUP continues to function in the manner intended after the removal of parking minimums is a district plan function.
67. Section 73 of the RMA sets out the procedures for the preparation and change of district plans. In accordance with section 73(1)(a), PPC71/PM14 will be undertaken according to the manner set out in Schedule 1 of the RMA.
68. In accordance with section 75(3) of the RMA a district plan must give effect to the following documents:
 - any national policy statement
 - any New Zealand coastal policy statement
 - a national planning standard
 - any regional policy statement.
69. PPC71/PM14 addresses section 75(3) as it assists with giving effect to Policy 11 of the NPS-UD by proposing consequential technical amendments to the AUP following the non-Schedule 1 removal of car parking minimums.
70. Section 80 of the RMA sets out the approach to which local authorities may prepare, implement, and administer combined regional and district documents. PPC71/PM14 proposes consequential amendments to both the district plan within the AUP and the HGI Plan.
71. PPC71/PM14 gives effect to the RPS provisions contained within the AUP as set out in section 6.4 below.
72. Overall, it is considered that PPC71/PM14 assists the council in carrying out its functions set out in sections 30 and 31 of the RMA to meet the requirements of the prescribed sections of the RMA set out above.

6.0 National and Regional Planning Context

73. The relevant national and regional planning documents are set out below.

6.1 National Policy Statements

74. National Policy Statements (NPS) provide national direction under the RMA on matters of national significance. There are currently five NPS in effect, only the NPS-UD is directly relevant to the removal of car parking minimums.

National Policy Statement on Urban Development

75. The NPS-UD came into effect in July 2020 (replacing the National Policy Statement on Urban Development Capacity) and provides direction for territorial authorities to realise compact, efficient and integrated urban form for 'well-functioning' urban outcomes. Development capacity is made more responsive to demand and accessibility to public transit networks. The statement provides direction for coordinating management of the effects which accompany intensification and variety of development typologies. The vitality, growth and accessibility of urban centres is recognised as fundamental to the ongoing livelihoods of residents.

76. The NPS-UD states in Policy 11 that 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; and
- b) 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.

77. Auckland is a tier 1 local authority.

78. This plan change involves consequential technical changes to the AUP resulting from giving effect to Policy 11 of the NPS-UD.

National Environmental Standards

79. National Environmental Standards (NES) are regulations that prescribe standards for environmental matters. There are currently seven NES in force as regulations, but none of these are relevant to the removal of car parking minimums.

6.2 Other relevant legislation

80. There are no other relevant Acts or legislation for this plan change.

6.3 Auckland Plan 2050

81. The Auckland Plan 2050 (Auckland Plan) sets out high level strategic direction through which the region will adapt and overcome to challenges presented by its growth. It sets out six key areas of attention integral to creating inclusive and prosperous social, economic, environmental and cultural outcomes for the future. Regarding these areas, integration between infrastructure planning, development capacity and transport networks will lead to more compact and sustainable urban outcomes in the medium and long term. The plan identifies social outcomes to be realised through constructive and supportive programs in the region. Table 4 below lists the priorities and directives of the Auckland Plan relevant to PPC71/PM14.

Table 4: Auckland Plan Directives and Focus Areas

Outcome	Directives and Focus Areas	How will the removal of parking minimums and the consequential plan changes give effect to the relevant direction or focus area
Outcome: Homes and places	<ul style="list-style-type: none"> • Direction 1: Develop a quality compact urban form to accommodate Auckland’s growth • Focus area 1: Accelerate quality development at scale that improves housing choices 	<p>The removal of parking minimums and the necessary consequential changes to the AUP and the HGI Plan will assist in achieving a quality compact urban form by enabling greater density.</p>
Outcome: Transport and access	<ul style="list-style-type: none"> • Direction 1: Better connect people, places, goods and services. • Direction 2: Increase genuine travel choices for a healthy, vibrant and equitable Auckland. • Direction 3: Maximise safety and environmental protection. • Focus area 4: Make walking, cycling and public transport preferred choices for many more Aucklanders. • Focus Area 5: Better integrate land-use and transport. 	<p>Other changes to the AUP arising from the implementation of the NPS-UD will contribute to addressing directions 1, 2 & 3.</p> <p>The removal of parking minimums and the consequential changes to the AUP will, over time, encourage greater use of walking, cycling and public transport as the preferred choices for more Aucklanders.</p> <p>Removing parking minimums removes the need for development space to be allocated to storing cars, leading to more compact housing development and encouraging more accessible active transport outcomes across Auckland.</p> <p>The requirement to prepare a travel plan when specified thresholds are exceeded will enable a site-specific assessment and response to a wide range of transport issues associated with a development. These include the proximity to public transport, cycling and pedestrian facilities and onsite matters such as accessible parking, loading and unloading of goods and people, pedestrian access, cycle storage and onsite electric vehicle charging.</p>
Outcome: Belonging and Participation	<ul style="list-style-type: none"> • Direction 1: Foster an inclusive Auckland where everyone belongs • Direction 2: Improve health and wellbeing for all Aucklanders by reducing harm and disparities in opportunities 	<p>Other changes to the AUP arising from the implementation of the NPS-UD will contribute to addressing directions 1, 2 & 3.</p> <p>By encouraging greater use of walking, cycling and public transport as the preferred choices for more Aucklanders, the health and well – being of Aucklanders will improve.</p>

6.4 Auckland Unitary Plan Regional Policy Statement

82. The Auckland Unitary Plan Regional Policy Statement (RPS) came into effect in November 2016. It gives effect to the RMA and subsequent national direction provided under the Act. The RPS sets out high-level objectives and policies through which action can be taken by council on issues of regional significance. Consistency is provided in different areas to achieve desirable outcomes across significant resource management issues for the urban environment. Standards of quality for different environments and the factors that contribute to those environments are laid out through the RPS chapters.
83. Table 5 below identifies the relevant RPS objectives and policies relating to parking minimums.

Table 5: Auckland Unitary Plan RPS Objectives and Policies

RPS Chapter	Relevant objective or policy	Relevance to Parking Minimums
B2.2. Urban growth and form	<p>Objective B2.2.1(1) A quality compact urban form that enables all of the following:</p> <ul style="list-style-type: none"> (a) a higher-quality urban environment; ... (c) better use of existing infrastructure and efficient provision of new infrastructure; (d) improved and more effective public transport ... 	<p>The removal of parking minimums and the necessary consequential changes to the AUP will assist in achieving a quality compact urban form.</p> <p>The requirement to prepare a travel plan when specified thresholds are exceeded will enable a site-specific assessment and response to a wide range of transport issues associated with a development. These include the proximity to public transport, cycling and pedestrian facilities and onsite matters such as accessible parking, loading and unloading of goods and people, pedestrian access, cycle storage and onsite electric vehicle charging.</p>
B2.3. A quality built environment	<p>Objective B2.3.1(1) A quality built environment where subdivision, use and development do all of the following:</p> <ul style="list-style-type: none"> ... (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change. 	<p>The removal of parking minimums and the consequential changes to the AUP will assist in achieving a higher quality built environment and maximise the use of urban land.</p>
	<p>Objective B2.3.1(3) The health and safety of people and communities are promoted.</p>	<p>The removal of parking minimums and the consequential changes to the AUP will, over time, encourage greater use of walking, cycling and public transport as the preferred choices for more Aucklanders.</p> <p>More active modes of travel have positive health benefits.</p>

RPS Chapter	Relevant objective or policy	Relevance to Parking Minimums
	<p>Policy B2.3.2(1) Manage the form and design of subdivision, use and development so that it does all of the following: ... (b) contributes to the safety of the site, street and neighbourhood; (c) develops street networks and block patterns that provide good access and enable a range of travel options; (d) achieves a high level of amenity and safety for pedestrians and cyclists; (e) meets the functional, and operational needs of the intended use; and ... Policy B2.3.2(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following: (a) providing access for people of all ages and abilities; (b) enabling walking, cycling and public transport and minimising vehicle movements; ...</p>	<p>A reduction in on-site parking will, over time, lead to less conflict on vehicle crossings between vehicles and pedestrians and cyclists.</p> <p>A separate plan change will address the functional and operational needs such as private pedestrian access to residential units without on-site parking, loading, cycle storage and EV charging.</p>
B2.4. Residential growth	<p>Objective B2.4.1(1) Residential intensification supports a quality compact urban form.</p> <p>Objective B2.4.1(2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area.</p> <p>Objective B2.4.1(4) An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland’s diverse and growing population.</p> <p>Policy B2.4.2(9) (9) Manage built form, design and development to achieve an</p>	<p>A reduction in onsite parking will provide opportunity for improved development quality.</p> <p>The removal of parking minimums and the consequential changes to the AUP will maximise the use of urban land, thereby potentially increasing housing capacity and choice of housing types.</p>

RPS Chapter	Relevant objective or policy	Relevance to Parking Minimums
	attractive, healthy and safe environment that is in keeping with the descriptions set out in placed-based plan provisions.	
B3.2. Infrastructure	<p>Objective B3.2.1(5) Infrastructure planning and land use planning are integrated to service growth efficiently.</p> <p>Policy B3.2.2(4) Avoid where practicable, or otherwise remedy or mitigate, adverse effects of subdivision, use and development on infrastructure.</p>	The removal of parking minimums will enable greater residential yield from development sites and more compact land use but will require investment in other infrastructure such as bus priority and operational funding (e.g., bus/train services).
B3.3. Transport	<p>Objective B.3.3.1(1) Effective, efficient and safe transport that:</p> <ul style="list-style-type: none"> (a) supports the movement of people, goods and services; (b) integrates with and supports a quality compact urban form; (c) enables growth; (d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community. <p>Policy B3.3.2(2) Enable the movement of people, goods and services and ensure accessibility to sites.</p> <p>Policy B3.3.2(5) Improve the integration of land use and transport by:</p> <ul style="list-style-type: none"> ... (b) encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods; ... (e) enabling the supply of parking and associated activities to reflect the 	<p>A reduction in onsite parking increases the effectiveness and efficiency of active and public transport modes which integrate with a quality compact urban form.</p> <p>Reduction in onsite parking encourages compact land use and greater intensity that reduces vehicle trips and encourages active mode choice. This is more likely to occur where there is a diversity of activities (e.g., centre-based, employment, local amenities/facilities, etc.).</p> <p>The removal of parking minimums and the consequential changes to the AUP will potentially lead to a reduction in onsite parking and increase the effectiveness and efficiency of active and public transport modes. Accessibility to sites is being addressed via a subsequent plan change.</p> <p>The removal of parking minimums and the consequential changes to the AUP will enable an assessment of travel demand effects (where thresholds are exceeded) and thereby enable any adverse effects on the transport system to be managed.</p>

RPS Chapter	Relevant objective or policy	Relevance to Parking Minimums
	<p>demand while taking into account any adverse effects on the transport system; and</p> <p>...</p>	
<p>B6.2. Recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation</p>	<p>Objective B6.2.1(2) The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised through Mana Whenua participation in resource management processes.</p> <p>Policy B6.2.2(1) Provide opportunities for Mana Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga in a way that does all of the following:</p> <p>...</p> <p>(c) provides for timely, effective and meaningful engagement with Mana Whenua at appropriate stages in the resource management process, including development of resource management policies and plans;</p> <p>...</p>	<p>Iwi were engaged in the statutory process surrounding this plan change and the resulting effects on the urban environment.</p>

7.0 Development of the Plan Change Options

7.1 Process of Identifying Consequential Technical Amendments

84. An audit of the AUP and HGI Plan was undertaken to identify parking minimums and where any consequential technical changes were required. A summary of the audit process is shown in Figure 1 and described in greater detail below.

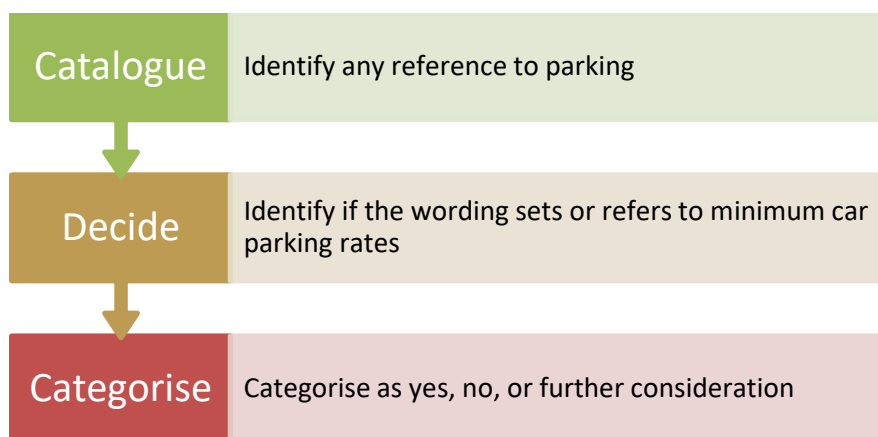


Figure 1: Summary of the AUP and HGI Plan audit process

85. Once all references to car parking were identified, each reference was assessed to determine if it comprised a minimum car parking rate as described in subpart 3.38(1) of the NPS-UD. Subpart 3.38(1) is set out below:
- (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.*
86. The NPS-UD does not affect:
- the ability to consider car parking effects using resource consents with a discretionary or non-complying activity status.
 - engineering standards
 - parking for vehicles other than cars, such as bus and bike parking
 - short term parking for service and utility spaces, such as loading bays and drop-off areas
 - accessible car parking and fire service vehicle access
 - rules which set the minimum rates of accessible car parks
 - rules which set maximum parking rates
 - managing the physical effects of car parking.
87. All objectives, policies, rules and assessment criteria in the AUP and HGI Plan that have the effect of requiring a minimum number of car parks were identified as non-Schedule 1 changes. These amendments must be made without the use of the plan change process under Schedule 1 of the RMA. Minimum parking requirements within existing designations do not need to be amended. These changes are therefore not

included in this plan change. Table 6 below shows some examples of minimum car parking rates that have been removed from the AUP.

Table 6: Examples of minimum car parking rates in the AUP

Line item	Provision/text Ref	Plan Section	Operative provision/text	Min parking?	If yes, what is the text amendment required (track changes)?
I330-5	I330.6.5. Parking, loading and access (1)	Standards	For the first 45,473m2 of gross floor area a minimum of 2018 parking spaces are to be provided and maintained to the Council's satisfaction.	Yes	(1) For the first 45,473m2 of gross floor area a minimum of 2018 parking spaces are to be provided and maintained to the Council's satisfaction.
I330-6	I330.6.5. Parking, loading and access (2)	Standards	(2) For gross floor area in excess of 45,473m2, parking spaces are to be provided on the Saint Lukes Precinct in accordance with the following rates as a minimum: (a) for retail activities: one space for every 22m2 of gross floor area; (b) for cinemas: one space for every 11 seats; (c) for dwellings: one space per dwelling in addition to the Table I330.6.5.1 below; and (d) for other activities: the rates set out in E27.6.2.4 Parking rates - area 2.	Yes	(2) For gross floor area in excess of 45,473m2, parking spaces are to be provided on the Saint Lukes Precinct in accordance with the following rates as a minimum: (a) for retail activities: one space for every 22m2 of gross floor area; (b) for cinemas: one space for every 11 seats; (c) for dwellings: one space per dwelling in addition to the Table I330.6.5.1 below; and (d) for other activities: the rates set out in E27.6.2.4 Parking rates - area 2.

88. In deciding if the references to car parking in the AUP and HGI Plan specify minimum car parking requirements, provisions that imply a requirement to provide car parking were identified and categorised into themes. Examples include references to “adequate parking”, “sufficient parking”, “reduction in parking” and “required parking”. The following issue categories were identified from the audit:

- Issue 1: Inconsistent text
- Issue 2: Policy hierarchy in Chapter E27 of the AUP
- Issue 3: Implied minimums
- Issue 4: References to ‘parking requirements’ and ‘required parking’
- Issue 5: References to ‘reduction in parking’
- Issue 6: Improving clarity
- Issue 7: Assessment of travel demand in the AUP.

89. A fuller description of the above issues is set out in section 2.2 of this report.

90. Table 7 below identifies the occurrence of the various issues in the sections of the AUP and HGI Plan.

Table 7: Issues in the AUP and HGI Plan

Issue	AUP E27	AUP other chapters	AUP precincts	HGI Part 13 Transport	HGI other chapters
Issue 1: Inconsistent text	✓			✓	
Issue 2: Policy hierarchy in Chapter E27 of the AUP	✓				
Issue 3: Implied minimums	✓	✓	✓	✓	✓
Issue 4: References to parking ‘requirements’ and ‘required parking’	✓	✓	✓	✓	✓

Issue	AUP E27	AUP other chapters	AUP precincts	HGI Part 13 Transport	HGI other chapters
Issue 5: References to 'reduction in parking'			✓	✓	
Issue 6: Improving clarity	✓		✓	✓	
Issue 7: Assessment of travel demand in the AUP	✓	✓			

91. Each proposed amendment to the AUP and HGI Plan has the relevant issue identified, as shown in Attachments E and F. This then corresponds to the assessment undertaken in Table 9 of this section 32 report.

7.6 Information Used

92. The list of reports, documents and evidence that have been used in the development of this section 32 report are listed in Table 8 below.
93. The section 42A hearing report will also form part of the section 32 analysis as will the decision from the independent hearing commissioners. Both the hearing report and decision will take into account the evidence presented by submitters.

Table 8: Information used to develop PPC71/PM14

Name of document, report, plan	How did it inform the development of the plan change
National Policy Statement on Urban Development and associated Section 32 Report	The NPS-UD required the changes to the AUP and Hauraki Gulf Island Plan. The associated section 32 report - National Policy Statement for Urban Development: Section 32 Evaluation Report, provided the rationale for these changes.
Auckland Plan 2050	Auckland's high level strategic plan – contains directives and focus areas that are relevant to car parking. Used to assess the appropriateness of the recommended option.
Resource Management Act 1991	Relevant sections of the legislation are used to assess the appropriateness of the recommended option.

8.0 Consultation

8.1 Relevant Sections of Resource Management Act 1991 and Local Government Act 2002

94. Schedule 1 of the RMA contains the process for the preparation, change and review of policy statements and plans.
95. Clause 1A of Schedule 1 of the Act requires that a proposed policy statement or plan must be prepared in accordance with any applicable Mana Whakahono a Rohe.
96. At the time of preparing this plan change, Auckland Council had not entered into any Mana Whakahono a Rohe with iwi. Requests have been received however from Nga Tai Ki Tāmaki, Ngati Whatua and Ngati Paoa but these are still being negotiated.
97. Clause 3 of Schedule 1 of the RMA states that:

- (1) *During the preparation of a proposed policy statement or plan, the local authority concerned shall consult—*
 - (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*
 - (d) *the tangata whenua of the area who may be so affected, through iwi authorities; and*
 - (e) *any customary marine title group in the area.*
- (2) *A local authority may consult anyone else during the preparation of a proposed policy statement or plan.*
- ...
- (4) *In consulting persons for the purposes of subclause (2), a local authority must undertake the consultation in accordance with section 82 of the Local Government Act 2002.*

98. No consultation is required in relation to the non-Schedule 1 amendments as these must be made without going through the plan change process. Consultation on PPC71/PM14 occurred with iwi authorities and the council's internal stakeholders – Auckland Transport and Resource Consents. This is discussed in detail below.

99. Section 82 of the Local Government Act 2002 outlines the principles of consultation. These are:

- (1) *Consultation that a local authority undertakes in relation to any decision or other matter must be undertaken, subject to subsections (3) to (5), in accordance with the following principles:*
 - (a) *that persons who will or may be affected by, or have an interest in, the decision or matter should be provided by the local authority with reasonable access to relevant information in a manner and format that is appropriate to the preferences and needs of those persons:*
 - (b) *that persons who will or may be affected by, or have an interest in, the decision or matter should be encouraged by the local authority to present their views to the local authority:*
 - (c) *that persons who are invited or encouraged to present their views to the local authority should be given clear information by the local authority concerning the purpose of the consultation and the scope of the decisions to be taken following the consideration of views presented:*
 - (d) *that persons who wish to have their views on the decision or matter considered by the local authority should be provided by the local authority with a reasonable opportunity to present those views to the local authority in a manner and format that is appropriate to the preferences and needs of those persons:*
 - (e) *that the views presented to the local authority should be received by the local authority with an open mind and should be given by the local authority, in making a decision, due consideration:*
 - (f) *that persons who present views to the local authority should have access to a clear record or description of relevant decisions made by*

the local authority and explanatory material relating to the decisions, which may include, for example, reports relating to the matter that were considered before the decisions were made.

- (2) *A local authority must ensure that it has in place processes for consulting with Māori in accordance with subsection (1).*

100. Clause 4A of Schedule 1 of the RMA sets out further pre-notification requirements concerning iwi authorities:

- (1) *Before notifying a proposed policy statement or plan, a local authority must—*
- (a) *provide a copy of the relevant draft proposed policy statement or plan to the iwi authorities consulted under clause 3(1)(d); and*
 - (b) *have particular regard to any advice received on a draft proposed policy statement or plan from those iwi authorities.*
- (2) *When a local authority provides a copy of the relevant draft proposed policy statement or plan in accordance with subclause (1), it must allow adequate time and opportunity for the iwi authorities to consider the draft and provide advice on it.*

8.2 Consultation with Key Stakeholders

101. Auckland Council Staff attended a Universal Design Forum meeting on 30 June 2021 to discuss potential implications arising from the implementation of Policy 11 of the NPS-UD. A follow-up meeting was held with Fire and Emergency New Zealand, Auckland Emergency Management, New Zealand Police and St John on 6 July 2021. The key issues identified included:

- The lack of onsite parking, including accessible parking:
 - will reduce accessibility to facilities and therefore the ability for some groups to maintain their independence
 - has an effect on door-to-door services such as delivery services and specialised transport pick-up/drop-offs
 - will result in more cars parked on berms and obstructing footpaths.
- Pedestrian access needs to be well-lit, free of obstructions, and of a sufficient width, gradient and surface to accommodate all users, including wheelchair users, mobility scooters and parents with prams.
- In terms of emergency services:
 - challenges in relation to narrow streets, site access and distance of sites from the road
 - there is a greater risk of injuries when access is limited, surfaces are uneven creating trip or slip hazards, and are narrow or poorly lit
 - increased response time to properties without vehicle access as emergency responders need to find a location to park their vehicles
 - any delay in response time increases risk to people's safety (for example if someone is suffering from a cardiac arrest, the chance of survival drops by 10-15% every minute that goes by without CPR or the use of an automated external defibrillator)

- pedestrian access needs to accommodate space requirements for stretchers and ladders.
102. Council staff have also presented to the Auckland Council’s Seniors Advisory Panel on 19 July 2021, the Auckland Council’s Disability Advisory Panel on 9 August 2021 and the Public Transport Accessibility Group (PTAG) on 18 November 2021.
103. This consultation with key stakeholder has focused more on the likely issues to arise with the removal of parking minimums, rather than the consequential changes necessary to enable the AUP to continue to function as intended (albeit with the removal of the parking minimums).

8.3 Consultation with Mana Whenua / Iwi Authorities

104. Clause 3(1)(d) of Schedule 1 to the RMA, states that local authorities shall consult with tangata whenua of the area who may be so affected, through iwi authorities, during the preparation of a proposed policy statement or plan.
105. Due to the nature and scale of the consequential technical plan change and the fact that it affects the entire region, all iwi were consulted with on the content of the plan change.
106. Clause 4A of Schedule 1 to the RMA states that local authorities must:
- Provide a copy of a draft proposed policy statement or plan to iwi authorities to consider
 - Have regard to feedback provided by iwi authorities on the draft proposed policy statement or plan
 - Provide iwi authorities with sufficient time to consider the draft policy statement or plan.
107. In addition to the above, recent legislation changes to the RMA introduced section 32(4A):

If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—

- (a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and*
- (b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.*
- (c) a summary of all advice received from iwi authorities on the PC (section 32 (4)(a) of the RMA).*

108. A hui was held with iwi on 27 October 2021. The purpose of the hui was to introduce the requirements of the NPS-UD and to outline the various work that was underway by Auckland Council. This was the first of several planned hui over 2021/2022.
109. A memo was subsequently sent to all 19 iwi in Auckland on 12 November 2021 advising them:
- Policy 11 of the NPS-UD requires Auckland Council to remove car parking minimums from the AUP and HGI Plans by 22 February 2022

- The removal of car parking minimums must be undertaken without using the Schedule 1 (plan change) process, so members of the public will not be able to make submissions on the removals
 - There are consequential changes required to the AUP resulting from the removal of parking minimums.
 - The removal of car parking minimums raises a number of related issues that may need to be addressed via a plan change(s) or other non-statutory methods. These issues are currently being investigated and will be addressed in 2022.
 - The memo outlined the timeframe and key milestones for both the non-Schedule 1 process and the potential plan changes.
 - Reference was also made at the hui to work also underway on Auckland Council's wider response to the NPS-UD. Additional consultation with Tāmaki Makaurau iwi authorities will occur on this response which will also involve changes to the Auckland Unitary Plan (Operative in Part) (AUP) and the Auckland Council District Plan – Hauraki Gulf Islands Section (HGI Plan).
110. Iwi were advised that a draft copy of the plan change was available on request and that council officers were available to answer any questions. Given the technical nature of the plan change, this approach was more appropriate than sending out detailed tracked changes. No formal feedback was received, although general concern regarding the removal of car parking requirements was raised.
111. A governance hui was held on 7 December 2021. A follow-up email was sent to the Kaitiaki Forum, ahead of the kaitiaki hui on 16 December 2021.
112. Feedback from both hui included:
- Concerns over road widths, traffic congestion and stormwater treatment and how these would be negatively impacted by the removal of parking minimums.
 - The need for parking restrictions in certain areas to ensure safety e.g., on bends.
113. There were no specific comments on the removal of parking minimums or requests to see the detail track changes.

8.4 Local Board Engagement

114. Local Board Chairs were invited to a workshop on 12 July 2021. The purpose of the workshop was to:
- To update LB chairs about the implementation of Policy 11 of the NPS UD
 - To outline the process to address key consequential issues:
 - amendments to transport related text
 - accessible parking
 - design of pedestrian access onto sites.
115. A memo was subsequently sent to all local boards on 31 August 2021 ahead of a local board briefing on 6 September 2021. The local board briefing covered the following matters:
- Overview of Policy 11 of the NPS-UD
 - Implementing Policy 11

- Non-Schedule 1 process
- Consequential issues arising from the removal of car parking minimums
- Engagement undertaken to date
- Next steps.

116. A memo dated 12 October 2021 was subsequently circulated to all local board members outlining the nature of the consequential changes to the AUP and Hauraki Gulf Islands District Plan that were associated with the withdrawal of parking minimums. That memo also signalled that the five additional issues that had been raised would be workshopped with local boards in February 2022.

8.5 Consultation with Technical Specialists

117. The non-Schedule 1 amendments and PPC71/PM14 amendments both involve changes of a technical nature. These changes were the subject of advice from Auckland Transport, Auckland Council – Resource Consents and Flow Transportation Specialists acting as Auckland Council’s technical advisors.
118. With the removal of parking minimums, there is a need for consequential technical changes to ensure the consistency within and between chapters, and that effects on the transport network can continue to be addressed and assessed.
119. The demand for parking can have effects on traffic safety and efficiency as well as amenity values. These are currently addressed via minimum and maximum parking rates. With the removal of minimum car parking requirements from the plan, it was the view of Auckland Council and Auckland Transport staff that new provisions are required to enable an adequate assessment of travel demand on the safety and efficiency of the road network.
120. Therefore, a key focus in the development of PPC71/PM14 has been amendments to the AUP to enable the assessment of travel demand effects on the transport network in areas where there previously were car parking minimums.
121. Council staff worked closely with Auckland Transport and Flow, with inputs from the council’s Resource Consents department, to determine the most appropriate method to address travel demand effects. An evaluation of the new provisions is provided in section 9.3, in accordance with section 32(1)(b) of the RMA.

9.0 Section 32 evaluation

9.1 Evaluation of PPC71/PM14 objectives

122. The objectives of PPC71/PM14 are:
- To give effect to Policy 11 of the NPS-UD
 - To address consequential technical amendments to the AUP and HGI Plan that are necessary to give effect to Policy 11 of the NPS-UD but fall outside the scope of non-Schedule 1 changes as described in clause 3.38 of the NPS-UD
 - To ensure that the AUP continues to adequately address adverse effects on the transport network after minimum car parking requirements are removed from the plan.
123. Section 32(1)(a) of the RMA requires this evaluation report to examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act.

124. The relevant RPS objectives are as set out in section 6.4 of this report. The objectives of PPC71/PM14 give effect to RPS Objective B3.3.1(1) to provide effective, efficient and safe transport networks. In particular, in giving effect to Policy 11 of the NPS-UD, the objectives of this plan change support a quality compact urban form and facilitates transport choices.
125. The objectives of PPC71/PM14 seek to give effect to the direction of the NPS-UD to remove minimum car parking requirements by identifying technical matters within the AUP and HGI Plan that need to be addressed as a consequence of implementing Policy 11 of the NPS-UD.
126. Overall, the objectives of PPC71/PM14 are the most appropriate way to achieve the purpose of the RMA.

9.2 Description of options

127. The criteria used to select the high-level options to address the resource management issue and achieve the plan change objectives are as follows:
- Achievable/able to be implemented;
 - Acceptable RMA practice;
 - Timeliness – able to be implemented in a timely manner;
 - Addresses the resource management issue.
128. There are three high-level options:
1. Do nothing/status quo – leave the AUP and HGI Plan as is after the parking minimums have been removed.
 2. Address consequential technical issues through a plan change – address any gaps in the AUP and HGI Plan after the parking minimums have been removed via a plan change. This would cover any required changes that cannot be made via the non-Schedule 1 process.
 3. Develop non-statutory guidelines or similar – address any gaps in the AUP and HGI Plan via non-statutory guidance or interpretation guidance.
129. The assessment of possible options against the selection criteria is outlined in the Table 9 below.

Table 9: Assessment of possible high-level options against the selection criteria

Criteria	Option 1 – Do Nothing	Option 2 – Plan Change	Option 3 – Non-statutory Guidelines or Similar
Achievable/able to be implemented	This option requires no action so has no implementation actions	A plan change is able to be implemented via the RMA Schedule 1 plan change process.	Non-statutory guidance is able to be prepared outside of the RMA Schedule 1 plan change process.
Acceptable RMA practice	A do-nothing option is acceptable RMA practice. However, this will result in gaps	A plan change option is acceptable RMA practice if there is an issue(s) to be	Non-statutory guidance is an acceptable RMA practice. An example

	in the AUP and HGI Plan, making the plans more difficult to interpret and implement.	addressed and other methods are not appropriate or effective.	is the Auckland Design Manual or Interpretation Guidelines.
Timeliness – able to be implemented in a timely manner	This option requires no action so has no implementation actions.	Straightforward plan changes take anywhere from 9 months to over a year (excluding any appeals). This is a straightforward plan change.	Non-statutory guidance can be prepared in a more timely manner than a plan change
Addresses the resource management issue	Does not address the gaps left by the removal of parking minimums.	Addresses the gaps left by the removal of parking minimums	Non-statutory guidance can assist with interpretation matters but will not effectively address a gap in the plans. Non-statutory guidance also has no legal weight.

130. All three options are valid RMA approaches, and have strengths and weaknesses as outlined above.
131. It is clear however, given the objectives of the plan change and the limitations of doing nothing and non-statutory guidelines, Option 2, a plan change, is the most appropriate option.

9.3 Evaluation of options

132. Table 10 below outlines the criteria for evaluating the options for achieving the objectives of PPC71/PM14 as required under section 32(1)(b) of the RMA:
- To give effect to Policy 11 of the NPS-UD
 - To address consequential technical amendments to the AUP and HGI Plan that are necessary to give effect to Policy 11 of the NPS-UD but fall outside the scope of non-Schedule 1 changes as described in clause 3.38 of the NPS-UD
 - To ensure that the AUP continues to adequately address adverse effects on the transport network after minimum car parking requirements are removed from the plan.

Table 10: Criteria for the evaluation of options

Sections of the RMA		Criteria
Appropriateness	s32(1)(a) and s32(1)(b) of the RMA	Is this option the most appropriate way in which to address the issue at hand? In doing so, is this option the most appropriate way to meet the objective of the AUP and the purpose of the RMA?

Sections of the RMA		Criteria
Effectiveness	s32(1)(b)(ii) of the RMA	How successfully can this option address the issue? Does this option successfully meet the objectives of the AUP and the purpose of the RMA?
Efficiency	s32(1)(b)(ii) of the RMA	Does this option address the issue at lowest cost and highest net benefit?
Costs	s32(2) of the RMA	What are the social, economic, environmental or cultural costs and/or negative impacts that this option presents?
Benefits	s32(2) of the RMA	What are the social, economic, environmental or cultural benefits and/ or positive impacts that this option presents?
Risks	s32(2)(c) of the RMA	What are the risks of addressing this issue? What are the risks of not addressing this issue?

133. Table 11 below contains a description of how the criteria are to be scored.

Table 11: Evaluation rankings

Sections of the RMA	Ranking		
	Poor	Moderate	Strong
Appropriateness	Not appropriate in addressing issue	Somewhat addresses the issue	Appropriate in addressing the resource management issue
Effectiveness	Not effective in addressing issue	Somewhat effective in addressing issue	Addresses the issue effectively
Efficiency	Not efficient	Somewhat efficient	Efficient in addressing issue
Costs	Poses a high cost and/or had negative impact	Moderate costs and/or negative impacts	Little cost and/or negative impacts
Benefits	Little benefit and/or positive impacts	Moderate benefits and/or positive impacts	High benefit and/or positive impacts
Risks	High risks	Moderate risks	Low risk

134. An evaluation of the possible options against the evaluation criteria has been undertaken for each issue category. They are set out in Tables 12 to 18 below. The recommended option for each issue category is highlighted in blue.
135. These tables do not assess Option 3, as it is considered that non-statutory guidelines are not appropriate to address the technical issues arising from the removal of car parking minimums.

Table 12: Options for addressing Issue 1: Inconsistent text

Issue 1: Inconsistent text							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
1.1	Leave text as it is currently worded	<p>Not the most appropriate option to address the issue as gaps in the plans would lead to interpretation difficulties.</p> <p>This option is not the most appropriate way to meet the objectives of the plan change.</p>	<p>Does not successfully address the issue of gaps in the AUP and HGI Plan.</p> <p>Therefore, this option does not meet the objectives of the plan change or the purpose of the RMA.</p>	A low/no cost option but not efficient as the issue is not addressed.	<p>The AUP and HGI Plan may not read in the way that it is intended.</p> <p>Interpretation issues may arise, and affect resource consent processing times, and increase uncertainty for applicants when applying for resource consents.</p> <p>There could be unintended social, economic, environmental or cultural costs and/or adverse environmental effects.</p>	No immediate resourcing requirements or costs.	Unintended consequences as a result of gaps in the AUP and HGI provisions.
1.2	Amend the text as necessary through a plan change to ensure internal consistency within the AUP and HGI Plan, consistency with the NPS-UD direction and to	<p>This is considered to be the most appropriate option to address the issue as gaps in the plans would be addressed. Interpretation difficulties arising from the removal of parking minimums would be avoided.</p>	<p>Does successfully address the issue of gaps in the AUP and HGI plans.</p> <p>Therefore, this option meets the objectives of the</p>	A higher cost option but much more efficient than Option 1.1 as the issue is addressed.	<p>Resourcing requirements associated with undertaking plan changes.</p> <p>There are no other readily identifiable</p>	This would be a relatively straightforward plan change without the expectation that there will be significant costs.	Changes go beyond what is required to ensure internal consistency.

Issue 1: Inconsistent text							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
ensure there are no gaps in the plans.	This option is the most appropriate way to meet the objectives of the plan change.	plan change and the purpose of the RMA.		costs associated with this option.	The text would be consistent within the AUP and HGI plans and with the NPS-UD direction.		

Table 13: Options for addressing Issue 2: Policy hierarchy within AUP Chapter E27 Transport

Issue 2: Policy hierarchy within AUP Chapter E27 Transport							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
2.1	Leave policy framework in Chapter E27 of the AUP as it is currently worded	Not the most appropriate option to address the issue as gaps in the AUP and HGI's parking policy direction could lead to interpretation difficulties. This option is not the most appropriate way to meet the objectives of the plan change.	Does not successfully address the issue of gaps in the AUP and HGI's parking policy direction. Therefore, this option does not meet the objectives of the plan change or the purpose of the RMA.	A low/no cost option but not efficient as the issue is not addressed.	The suite of policies may not provide adequate policy direction to implement the NPS-UD. This may affect the assessment of resource consent applications.	No resourcing requirements or costs. Policy E27.3(3) reflects the direction of the NPS-UD and so the plan would not be inconsistent with the NPS-UD if this was unchanged.	AUP has gaps in methods used to implement policy direction. Unhelpful for the assessment of resource consent applications, so the intended outcomes may not be achieved.
2.2	Delete current parking policy in its entirety (Policy E27.3(3))	Not the most appropriate option to address the issue as deletion of the Policy E27.3(3) could lead to interpretation	Does not successfully address the issue of gaps in the AUP and HGI's parking policy direction.	A low/no cost option but not efficient as the issue is not addressed.	The AUP would not provide policy direction for parking, which would be unhelpful for	This would be a straightforward amendment without significant costs.	Parking is still able to be provided by landowners and developers. No policy direction if this occurs (e.g.

Issue 2: Policy hierarchy within AUP Chapter E27 Transport							
Option		Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
		<p>difficulties and lack of guidance for assessing proposals.</p> <p>This option is not the most appropriate way to meet the objectives of the plan change.</p>	<p>Therefore, this option does not meet the objectives of the plan change or the purpose of the RMA.</p>		<p>decision makers and plan users.</p>		<p>parking maximums, non-accessory parking)</p>
2.3	Amend parking policies as necessary to ensure consistency with the NPS-UD direction.	<p>The most appropriate option to address the issue as any gaps in the AUP and HGI's parking policy direction would be addressed and consistency with the NPS-UD achieved.</p> <p>This option is the most appropriate way to achieve the objectives of the plan change.</p>	<p>Does successfully address the issue of gaps in the AUP and HGI's parking policy direction and consistency with the NPS-UD is achieved.</p> <p>Therefore, this option meets the objectives of the plan change and the purpose of the RMA.</p>	<p>A higher cost option but more efficient than the previous options as the issue is addressed.</p>	<p>While the policies would be consistent with national policy direction, they may not fully consider all the policy implications under the NPS-UD.</p>	<p>This would be a relatively straightforward amendment without significant costs.</p>	<p>Policy changes could go beyond or not far enough for what is required to ensure consistency with the NPS-UD.</p>
2.4	Add a new parking policy (or amend the existing one) to support other proposed changes	<p>Not the most appropriate option to address the issue as this would duplicate existing policies.</p>	<p>Potential duplication of policy in the AUP.</p> <p>Therefore, this option does not</p>	<p>A higher cost option and less efficient than the previous options as the issue is not addressed.</p>	<p>While this amendment would help set the full policy direction of the AUP in regard to parking it is</p>	<p>This would be consistent with the NPS-UD.</p> <p>This would be a relatively straightforward</p>	<p>May give rise to confusion for plan users trying to meet duplicated policy.</p>

Issue 2: Policy hierarchy within AUP Chapter E27 Transport							
Option		Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
	throughout the plan.	This option is not the most appropriate way to achieve the objectives of the plan change.	meet the objectives of the plan change or the purpose of the RMA.		unnecessary to provide policy direction about what the plan does not contain.	amendment without significant costs.	

Table 14: Options for addressing Issue 3: Implied minimums

Issue 3: Implied minimums							
Option		Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
3.1	Do nothing – leave current wording in the AUP and HGI Plan	<p>Not the most appropriate option to address the issue of implied minimums as provisions will be unclear.</p> <p>Contrary to the NPS-UD.</p> <p>This option is not the most appropriate way to meet the objectives of the plan change.</p>	<p>Does not address the issue of implied minimum's and they remain in the AUP. Contrary to the NPS-UD.</p> <p>Therefore, this option does not meet the objectives of the plan change or the purpose of the RMA.</p>	A low/no cost option but not efficient as the issue of implied minimums is not addressed.	<p>These provisions will be difficult to use and interpret in the context of the NPS-UD. This will lead to time, and therefore financial costs for both applicants and consent processing.</p> <p>The legality of such provisions may be challenged based on non-compliance with the NPS-UD. This will result in time and financial costs. It may also render these</p>	<p>No financial costs.</p> <p>Parking may still be able to be assessed, albeit in a confined way.</p>	<p>Provisions will be unclear in light of the NPS-UD – Parking requirement.</p> <p>There may be challenges to implied minimums.</p>

Issue 3: Implied minimums							
Option		Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
					provisions unusable, which may then lead to adverse environmental effects.		
3.2	Remove provisions with implied minimums in their entirety	<p>A more appropriate option (than option 3.1) to address the issue of implied minimums as they are removed from the AUP and HGI Plan. This option gives effect to the NPS-UD.</p> <p>However, removing implied minimums without replacing them with more appropriate wording may leave gaps in the plans. It is therefore not the most appropriate way to meet the objectives of the plan change.</p>	While consistent with the NPS-UD and addresses the issue of implied minimums, the removal of the affected provisions in their entirety may leave gaps in the plans.	A higher cost option and more efficient (than option 3.1) as the issue of implied minimums is addressed by removing them from the AUP and the HGI Plan.	No assessment of parking would occur under this option, unless the E27 trip generation standard was triggered. This could lead to adverse environmental outcomes, including transport safety and efficiency.	<p>This would be a straightforward amendment to the AUP and HGI Plans, therefore minimising plan change costs.</p> <p>This would remove an assessment matter and therefore reduce costs to applicants.</p> <p>Compliance with the NPS-UD.</p>	There may be instances where there are adverse effects (including safety, efficiency and amenity values) and these are unable to be adequately addressed.
3.3	Amend provisions with implied minimums	A more appropriate option (than options 3.1 and 3.2) to address the issue of implied minimums as they	Would address the issue of implied minimums while ensuring there are no	A higher cost option and more efficient (than option 3.1) as the issue of	Costs associated with a more complex plan change.	<p>Clarity for plan users.</p> <p>Retention of parking provisions, and therefore the</p>	Provisions with implied car parking minimums are deleted or amended while references to parking in other related parts of the chapter/plan may remain

Issue 3: Implied minimums							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
		<p>are removed from the AUP and HGI Plans through amended provisions.</p> <p>Provisions with implied minimums can be amended on the case-by-case basis. This option is the most appropriate way to achieve the objectives of the plan change.</p>	<p>gaps in the AUP and the HGI Plans.</p> <p>Therefore, this option meets the objectives of the plan change and the purpose of the RMA.</p> <p>It also assists with meeting the requirements of the NPS-UD.</p>	<p>implied minimums is addressed while addressing potential gaps.</p>	<p>Costs for consent applicants could increase if the provisions are more complex than those that are existing.</p>	<p>ability to assess related effects.</p> <p>Removes any risk of non-compliance with the NPS-UD.</p>	<p>causing confusion for plan users.</p>
3.4	Amend provisions with implied minimums to refer to relevant parking policy	<p>A more appropriate option (than option 3.1) to address the issue of implied minimums as they are removed from the AUP and HGI Plans through amended provisions.</p> <p>The relevant policy in the AUP is Policy E27.3(3) which addresses parking matters. However, there is not an equivalent, all-encompassing</p>	<p>There is not an equivalent, all-encompassing policy in the HGI Plan. Therefore, this option is not the most effective option for addressing the issue of implied minimums within the HGI Plan.</p>	<p>A higher cost option and more efficient (than option 3.1) as the issue of implied minimums is addressed by removing them from the AUP.</p>	<p>Policy E27.3(3) is broad and therefore will require significant assessment, with resultant costs for applicants.</p> <p>Policy E27.3(3) contains a suite of considerations, which may not all be able to be achieved. Simply referring to the policy may not therefore be adequate to guide decision makers as it does not set</p>	<p>Compliance with the NPS-UD</p> <p>Retains the ability to assess and mitigate parking effects.</p>	<p>Greater costs for applicants, including compliance costs.</p> <p>Potentially significant opposition through the plan change process.</p>

Issue 3: Implied minimums						
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
	<p>policy in the HGI Plan.</p> <p>Therefore, this option is not the most appropriate way to achieve the objectives of the plan change.</p>			<p>out a policy outcome.</p> <p>As the HGI Plan does not have a comprehensive parking policy to refer to, this option will leave a gap in that plan.</p>		

Table 15: Options for addressing Issue 4: References to parking ‘requirements’ and ‘required parking’

Issue 4: Parking ‘requirements’ and ‘required parking’							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
4.1	<p>Retain references to parking ‘requirements’ and ‘required parking’ within the AUP and HGI Plans.</p>	<p>Not the most appropriate option to address the issue. Without parking minimums, it is unclear what is required.</p> <p>References to parking ‘requirements’ and ‘required parking’ imply that parking is to be expected to be provided. This is considered to be contrary to the NPS-UD.</p> <p>This is not the most appropriate way to achieve the objectives of the plan change.</p>	<p>Does not address the issue and is contrary to the NPS-UD.</p> <p>Therefore, does not meet the objectives of the plan change or the purpose of the RMA.</p>	<p>A low/no cost option but not efficient as the issue of is not addressed.</p>	<p>Retention of the terms will cause confusion if the plans do not have any parking requirements.</p>	<p>No change required, therefore no associated costs/resources required.</p> <p>Retention of this wording is inconsistent with the NPS-UD</p>	<p>Lack of clarity in the AUP.</p> <p>While there will not be any parking required, there will still be parking provided and parking requirements e.g. parking maximums, parking dimensions, manoeuvring standards (if parking is provided).</p>

Issue 4: Parking 'requirements' and 'required parking'							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
4.2	Delete all references to parking 'requirements' and the word 'required' from 'required parking' within the AUP and HGI Plans.	<p>A more appropriate option (than option 4.1) to address the issue of references to parking 'requirements'. However, this option does not adequately address the issue of references to 'required parking'.</p> <p>Deleting references to parking 'requirements' will remove ambiguity in the AUP and HGI Plans once car parking minimums are removed. Deleting the word 'required' from 'required parking' will be ambiguous and potentially contrary to the NPS-UD as parking will still be referred to.</p> <p>This is not the most appropriate way to achieve the objectives of the plan change.</p>	<p>Addresses the issue of references to parking 'requirements' but does not address the issue of references to 'required parking'.</p> <p>Therefore, this option does not meet the objectives of the plan change or the purpose of the RMA.</p>	A higher cost option and more efficient (than option 4.1) as the issue of references to Parking 'requirements' is addressed by removing the term from the AUP and the HGI Plans.	The removal of the word 'requirements' would remove reference to not only numbers of parking spaces but any other requirements such as landscaping. This could have adverse environmental effects if these matters are not considered adequately.	<p>Minimal change required.</p> <p>Avoids confusion for plan users.</p> <p>Consistent with the NPS-UD.</p>	<p>Lack of clarity in the AUP and the HGI Plans.</p> <p>While there will not be any parking required, there will still be parking 'requirements' e.g. parking maximums, parking dimensions, manoeuvring standards (if parking is provided).</p>
4.3	Delete references to parking 'requirements' and replace 'required' with	<p>A more appropriate option (than 4.1 & 4.2) to address the issue.</p> <p>Reflects the NPS-UD where</p>	Address the issue by deleting all references to parking 'requirements' and provides clarity for activities that proposes	A higher cost option and more efficient (than option 4.1) as the	There may be parking that is 'required', for example, to address safety and efficiency	<p>Consistent with NPS-UD</p> <p>Avoids confusion for plan users.</p>	There is a risk that deleted or amended provisions could result in inconsistency within plan chapters and

Issue 4: Parking 'requirements' and 'required parking'							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
	'proposed' or 'provided'	landowners/developers may choose to provide parking. This option is the most appropriate way to achieve the objectives of the plan change.	parking by replacing the word 'required' with 'proposed' or 'provided'. Reflects the NPS-UD where landowners/developers may provide parking. Therefore, meets the objectives of the plan change and the purpose of the RMA.	issue is addressed.	effects through a transport assessment.	Adding 'proposed' or 'provided' in front of parking will provide more clarity than simply removing 'required' in some instances.	cause confusion for plan users.

Table 16: Options for addressing Issue 5: References to 'reduction in parking'

Issue 5: References to 'reduction in parking'							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
5.1	Retain current wording – no change.	Not the most appropriate option to address the issue of "reduction in parking" as provisions will be unclear. Potentially contrary to the NPS-UD. This option is not the most appropriate way to meet the objectives of the plan change.	Does not address the issue of "reduction in parking" and the term remains in the AUP. Potentially contrary to the NPS-UD. Therefore, does not meet the objectives of the plan change and the purpose of the RMA.	A low/no cost option but not efficient as the issue of "reduction in parking" is not addressed.	Retention of this wording may be considered inconsistent with the NPS-UD.	No change required, therefore no associated costs/resources required.	Lack of clarity in the AUP and HGI Plans as parking can only be reduced if it is required in the first place. Provisions will be unclear in light of Policy 11 of the NPS-UD.

Issue 5: References to 'reduction in parking'							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
5.2	Delete provisions that refer to 'reduction in parking'	<p>A more appropriate option (than option 5.1) to address the issue of 'reduction in parking' as the term is removed from the AUP and the HGI Plans.</p> <p>This option may leave gaps in the plans and therefore is not the most appropriate way to achieve the objectives of the plan change.</p>	<p>Would address the issue of reduction in parking.</p> <p>Therefore, would meet the objectives of the plan change and the purpose of the RMA.</p>	A higher cost option and more efficient (than option 5.1) as the issue of "reduction in parking" is addressed by removing the term from the AUP and HGI Plans.	The effects of reducing parking would not be able to be assessed. This has been identified as an important issue and there may be adverse effects on the transport network if this cannot be assessed.	<p>Potential for reduced application-related costs for customers</p> <p>The plan would no longer be inconsistent with the NPS-UD</p>	Risks will depend on the context in which the term is used.
5.3	Amend provisions that refer to a 'reduction in parking'	<p>A more appropriate option (than options 5.1 and 5.2) to address the issue as it allows affected provisions to be assessed and amended on a case-by-case basis.</p> <p>This option is the most appropriate way to achieve the objectives of the plan change.</p>	<p>Assessing affected provisions on a case-by-case basis will allow provisions to be amended accordingly.</p> <p>Therefore, this is an effective option that meets the objectives of the plan change and the purpose of the RMA.</p>	A higher cost option and more efficient (than options 5.1 and 5.2) as the issue of "reduction in parking" is addressed by removing the term from the AUP.	There may be submissions that question the word choice with time/costs involved in these processes.	<p>Could retain the ability to assess effects of reduced parking. This would lead to less likelihood of related adverse effects.</p> <p>Could be developed in a way that is consistent with NPS-UD</p>	Risks will depend on the context in which the term is used and the replacement wording.

Issue 5: References to 'reduction in parking'							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
			It also assists with meeting the requirements of the NPS-UD.				

Table 17: Options for addressing Issue 6: Improving clarity

Issue 6: Improving clarity							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
6.1	Do nothing – no additional changes to the plans	Not the most appropriate option as this option will not improve the clarity of provisions in the AUP and HGI Plans. This option does not meet the objectives of the plan change and the purpose of the RMA.	This option does not address the issue and therefore is not effective.	A low/no cost option but not efficient as this option may leave gaps and uncertainty within the AUP and HGI Plans. A future plan change may be required to address the gaps.	This may lead to interpretation issues and require more resources to resolve.	This would not incur any plan change related resources.	There is a risk of creating uncertainty for plan users if amendments seeking to improve clarity within the plans are not made. There is also a risk of provisions in the plans being inconsistent with the NPS-UD.
6.2	Amend parking provisions as necessary to improve clarity and consistency throughout the plans.	This is an appropriate option as it will improve the clarity and consistency of the plans and provide certainty for plan users. This option also ensures provisions remain consistent with the NPS-UD.	This option will improve clarity and consistency throughout the plans and provide certainty for plan users once minimum car parking requirements have been removed from the AUP and HGI Plans. It is therefore the most effective option.	Amending parking provisions to improve clarity through this plan change is considered to be the most efficient option. It will improve certainty for plan users and not lead to the need for a future plan change to address the issue.	Resourcing requirements associated with undertaking a plan change. There are no other readily identifiable costs associated with this option.	Improving plan provisions will create certainty for plan users.	There is a risk that submitters may request changes to the affected provisions beyond the scope of this plan change.

Issue 6: Improving clarity						
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
		This option is the most appropriate way to achieve the objectives of the plan change.				

Table 18: Options for addressing Issue 7: Assessment of travel demand in the AUP

Issue 7: Assessment of travel demand in the AUP						
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
7.1	Do nothing – no additional changes to the AUP	<p>Not the most appropriate option to address the issue as the threshold to assess travel demand effects through the existing trip generation standard (Standard E27.6.1) is set at a high level.</p> <p>This is not the most appropriate way to achieve the objectives of the plan change.</p>	<p>Does not address the issue of travel demand effects for activities previously subject to minimum car parking requirements. This option does not enable an assessment of travel demand effects on the transport network.</p> <p>Therefore, does not meet the objectives of the plan change and the purpose of the RMA.</p>	A low/no cost option but not efficient as the issue of enabling an assessment of travel demand effects is not addressed.	<p>The effects of travel demand would only be assessed for consent applications that require transport assessments based on other provisions.</p> <p>This may lead to adverse effects including effects on traffic safety, transport network efficiency and amenity values.</p>	<p>This would not incur any plan change related resources.</p> <p>There may be instances where there are adverse effects on the transport network including safety, efficiency and amenity and these are unable to be adequately assessed and addressed.</p>

Issue 7: Assessment of travel demand in the AUP							
Option	Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks	
7.2	Amend the assessment criteria relating to the trip generation standard to clarify that travel demand effects are to be assessed.	Not the most appropriate option to address the issue as the threshold to assess travel demand effects through the existing trip generation standard (Standard E27.6.1) is set at a high level. This option will therefore not meet the objective of the plan change and the purpose of the RMA.	Does not address the issue of travel demand effects at a level below the current trip generation rule. Therefore, does not meet the objectives of the plan change and the purpose of the RMA.	A higher cost option than Option 7.1 but not efficient as does not enable an assessment of travel demand effects at a level below the current trip generation rule.	This may result in additional consenting costs for some applicants.	This would ensure that travel demand effects are considered as part of the assessment required for proposals that meet the threshold in Standard E27.6.1. This amendment is not expected to have a significant resourcing requirement.	May be perceived as being contrary to the intent of the NPS-UD.
7.3	Amend the trigger in the trip generation standard to apply to smaller scale developments.	A more appropriate option (than Options 7.1 and 7.2) to address the issue as the threshold to assess travel demand effects (i.e. E27.6.1 Trip generation rule) is reduced to a lower level. Will therefore meet the objective of the plan change and the purpose of the RMA.	Would address the issue of parking demand effects at a level below the current trip generation rule. Therefore, would meet the objectives of the AUP and the purpose of the RMA.	A more efficient option (than options 1 & 2) as the issue of enabling an assessment of parking demand effects is addressed at a level below the current trip generation rule.	Trip generation may not always result in parking demand and this may not be the most appropriate mechanism to use. This is a complex amendment, with associated plan change resourcing implications. This would result in increased application costs	This would mean that more proposed developments and activities would be able to be assessed for their parking effects. This would ensure these effects are able to be managed.	Potentially not the most appropriate method to assess parking demand. Integrated transport assessments could be used for large developments, for example (currently applies to 100 dwellings or more or 500 units or more).

Issue 7: Assessment of travel demand in the AUP							
Option		Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
					<p>for some customers.</p> <p>The number of trips generated used in the standard would require robust analysis and this could result in significant costs/challenges.</p>		
7.4	<p>Add a new standard and related assessment criteria to address the issue of travel demand</p>	<p>A more appropriate option (than options 1 & 2) to address the issue. The threshold to assess travel demand effects is based on a new standard with a lower development threshold than the current trip generation standard.</p> <p>This option is the most appropriate way to achieve the objectives of the plan change.</p>	<p>Would address the issue of effects on the transport network using a new travel demand standard and at a level below the current trip generation standard. This option enables the assessment of proposals that would have had minimum car parking requirements previously.</p> <p>This option meets the objectives of the plan</p>	<p>A more efficient option (than options 1 & 2) as the issue of enabling an assessment of travel demand effects on the transport network is addressed via a new standard and at a level below the current trip generation standard.</p>	<p>This is a complex amendment, with associated plan change resourcing implications.</p> <p>This would result in increased application costs for some customers.</p> <p>The extent of travel demand used in the standard would require robust analysis and this could result in significant costs/challenges.</p>	<p>Such a provision would clearly and directly relate to travel demand effects.</p> <p>This would mean that more proposed developments and activities would be able to be assessed for their travel demand effects. This would ensure these effects on the transport network are able to be managed.</p>	<p>Potential pushback from the development sector the new standard and assessment criteria will have additional assessment requirements.</p>

Issue 7: Assessment of travel demand in the AUP							
Option		Appropriateness	Effectiveness	Efficiency	Costs	Benefits	Risks
			<p>change and the purpose of the RMA.</p> <p>It also assists with meeting the requirements of the NPS-UD.</p>				

9.4 Summary of analysis

136. A high-level analysis of options to address the objectives of the plan change has been undertaken. The objectives of PPC71/PM14 are set out in section 3 of this report and the high-level options as described in section 9.2. There are three high-level options:
1. Do nothing/status quo – leave the AUP and HGI Plan as is after the parking minimums have been removed.
 2. Address consequential technical issues through a plan change – address any gaps in the AUP and HGI Plan after the parking minimums have been removed via a plan change. This would cover any required changes that cannot be made via the non-Schedule 1 process.
 3. Non-statutory guidelines or similar – address any gaps in the AUP and HGI Plan via non-statutory guidance or interpretation guidance.
137. Option 2 is considered to be the most appropriate way to achieve the objectives of PPC71/PM14.
138. A more detailed evaluation of the options to address the seven issues identified with the removal of parking minimums is described in section 9.3 of this report. A plan change has been deemed to be the most appropriate option for addressing:
- Issue 1: Inconsistent text
 - Issue 2: Policy hierarchy within Chapter E27 Transport – this includes amending the existing parking policies and the addition of a new policy to support there being no minimum parking requirements
 - Issue 3: Implied minimums
 - Issue 4: References to parking ‘requirements’ and ‘required parking’ – but only in respect of ‘required parking’
 - Issue 5: References to ‘reduction in parking’
 - Issue 6: Improving clarity
 - Issue 7: Assessment of travel demand in the AUP – this includes both a new standard and assessment criteria.
139. Each option has been assessed against the following criteria: appropriateness, effectiveness, efficiency, costs, benefits and risks.

9.5 Recommendations

140. The recommended options for addressing the issues identified with the removal of parking minimums are summarised below. The rationale for these recommendations is contained in the assessment in section 9.3.

Issue 1: Inconsistent text

- Recommendation – Option 1.2: Amend the text as necessary through a plan change to ensure internal consistency within the AUP and HGI Plan, consistency with the NPS-UD direction and to ensure there are no gaps in the plans.

Issue 2: Policy hierarchy within AUP Chapter E27 Transport

- Recommendation – Option 2.3: Amend parking policies as necessary to ensure consistency with the NPS-UD direction.

Issue 3: Implied minimums

- Recommendation – Option 3.3: Amend provisions with implied minimums.

Issue 4: References to parking ‘requirements’ and ‘required parking’

- Recommendation - Option 4.3: Delete references to parking ‘requirements’ and replace ‘required’ with ‘proposed’ or ‘provided’

Issue 5: References to ‘reduction in parking’

- Recommendation – Option 5.3: Amend provisions that refer to a ‘reduction in parking’

Issue 6: Improving clarity

- Recommendation – Option 6.2: Amend parking provisions as necessary to improve clarity and consistency throughout the plans.

Issue 7: Assessment of travel demand in the AUP

- Recommendation – Option 7.4: Add a new activity in the Activity Table E27.4.1, a new Standard E27.6.1A, Matter of discretion E27.8.1(4A), Assessment criteria E27.8.2(3A) and Special information requirement E27.9(2)(b), and amend the definition of ‘travel plan’ in Chapter J to address the effects of travel demand on the transport network.

10.0 Conclusion

141. PPC71/PM14 seeks to give effect to the NPS-UD and to ensure the Auckland Unitary Plan and Auckland Council District Plan – Hauraki Gulf Islands Section continue to function as intended once the parking minimums are removed as a result of implementing Policy 11 of the NPS-UD. It also seeks to enable an assessment of the travel demand effects on transport network in those areas and circumstances where onsite parking was required prior to the NPS-UD.
142. Section 32 of the RMA requires that before adopting any objective, policy, rule or other method, the Council shall carry out an evaluation to examine:
 - The extent to which each objective is the most appropriate way to achieve the purpose of the Act, and
 - Whether, having regard to their efficiency and effectiveness, the policies, rules or other methods are the most appropriate for achieving the objective.
143. The evaluation has also taken into account:
 - The benefits and costs of policies, rules, or other methods; and
 - The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules or other methods.
144. A section 32 analysis of options to address the issues associated with the removal of parking minimums has been undertaken in accordance with section 32(1)(b) and (2) of the RMA.
145. The recommended options are outlined in section 9.5 of this report.
146. These options best achieve Part 2 of the Resource Management Act and the purpose or objectives of relevant national and regional planning documents. These include:
 - National Policy Statement on Urban Development
 - The Auckland Plan 2050
 - The Auckland Unitary Plan's Regional Policy Statement 2016.
147. PPC71/PM14 is the most efficient, effective, and appropriate means of addressing the resource management issue identified.

List of Attachments

Attachment	Name of Attachment
A	Section 32 of the RMA
B	List of AUP provisions affected by PPC71/PM14
C	List of HGI Plan provisions affected by PPC71/PM14
D	Proposed amendments to the AUP to address Issue 7: Assessment of travel demand in the AUP
E	Proposed AUP tracked changes (PPC71/PM14 and non-Schedule 1)
F	Proposed HGI Plan tracked changes (PPC71/PM14 and non-Schedule 1)