

## 2.38 – Non-accessory parking - section 32 evaluation for the Proposed Auckland Unitary Plan

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## **1 Overview and Purpose**

This evaluation should be read in conjunction with Part 1 in order to understand the context and approach for the evaluation and consultation undertaken in the development of the Proposed Auckland Unitary Plan (the Unitary Plan).

### **1.1 Subject Matter of this Section**

The subject matter of this report is the approach the Unitary Plan takes to non-accessory and off-site parking i.e. the approach the Unitary Plan takes to permitting or controlling off-street parking which is provided as a principal or stand-alone activity. Terms used in legacy plans to describe this type of parking include 'non-ancillary parking', 'commercial or public parking'. This report does not consider park-and-rides, which are also provided for in the Unitary Plan, but are treated as a different activity than non-accessory parking.

The report considers the Auckland-wide approach which is contained in the district level objectives, policies and rules relating to Transport. Some higher level Transport objectives and policies which occur at regional policy statement level are also considered. Some sites or locations may include specific rules about non-accessory or off-site parking which differ from those in the Auckland-wide rules. Those variations are not considered in this report.

### **1.2 Resource Management Issue to be Addressed**

The subject matter of this report assists in addressing the following issues of regional significance identified in the Unitary Plan:

- 1.1 Enabling quality urban growth
- 1.2 Enabling economic well-being.

Parking has the potential to impact upon the issues of enabling quality urban growth and economic wellbeing in a number of ways, including the following:

- Parking occupies land which may be more optimally used in another way
- Parking can have an adverse effect on the built environment by being aesthetically unpleasant or breaking up the character of areas
- Parking availability can be an important determinant of transport mode choice
- Parking can be expensive to provide
- Parking availability can be important for the economic well-being of businesses (e.g. short-term parking for retail customers)
- Parking availability can impact upon congestion levels

The resource management context is also explained in the introduction to 1.2 Transport (District level) of the Unitary Plan:

*'Parking is an essential component of Auckland's transport system as it can have major implications for the convenience, economic viability, design and layout of an area. It is important that parking is managed and provided in a manner that supports urban amenity and efficient use of land. It can also be managed to have a significant influence on reducing car use, particularly for commuter travel. This in turn reduces the growth in traffic, particularly during peak periods, and achieves a more sustainable transport system.'*

### **1.3 Significance of this Subject**

In the City Centre zone and City Centre Fringe overlay (identified on the planning maps), the approach to long-term parking is a policy shift of moderate significance, and differs from the legacy documents. The rules treat long-term non-accessory parking as non-complying in these areas. The legacy Auckland City Central Area Plan does provide for 'non-ancillary commuter parking areas and / or buildings' as a discretionary activity in some parts of the city centre.

Outside of the area covered by the City Centre zone and the City Centre Fringe overlay, there are a range of approaches in the legacy plans to non-accessory and off-site parking. In most cases, the approach in the Unitary Plan is not a significant policy shift. Some examples of treatment in various zones in legacy documents are provided in 1.5.

It is anticipated that the implementation of the proposed approach will have economic benefits in promoting a quality urban environment and efficient use of land by providing for shared and consolidated parking arrangements. The additional limitation on long-term parking in the City Centre zone and City Centre Fringe overlay will have economic and social benefits by supporting public transport and managing the growth in congestion in routes in and out of the city centre, at peak times.

#### 1.4 Auckland Plan

##### *Chapter 10 Urban Auckland*

Directive 10.6 of the Auckland Plan explicitly addresses parking, and states as follows:

‘Parking standards and innovative parking mechanisms should take account of multiple objectives, including the need to:

- facilitate intensive and mixed use developments within strategic locations
- improve housing affordability
- reduce development costs
- encourage use of public transportation
- optimise investments in public parking facilities, civic amenities and centre developments
- foster safe, convenient and attractive walkable neighbourhoods.’

Paragraph 576 of the Auckland Plan provides further context for Directive 10.6 as follows:

‘Inappropriate regulations and inflexible standards can impact negatively on good design. They impede the development of more intensive housing and mixed developments. For example, at times traditional parking standards (minimum numbers of car parking spaces) are imposed in areas where alternative options (parking buildings or investment in public transportation) imply that such minimums are counterproductive to delivering the goal of intensification, mixed use and affordability. The Auckland Council intends to review its approach to parking, as part of the development of the Unitary Plan...’

##### *Chapter 13 Auckland’s Transport*

Parking spaces and structures form part of Auckland’s transport system. Chapter 13 Auckland’s Transport highlights that a ‘change in parking strategy and standards is required to encourage intensification, mixed-use development, more efficient use of land, and shifts to walking, cycling and public transport<sup>1</sup>.’

#### 1.5 Current Objectives, Policies, Rules and Methods

The legacy Auckland City Central Area Plan provides for non-accessory parking as follows:

Activities	Pedestrian-Orientated areas	Less Pedestrian-Orientated areas
Short-term public visitor car parking areas or buildings (only on sites with access to Type 2, 3 and 4 roads)	D	D

<sup>1</sup> paragraph 577, Chapter 13, Auckland Plan

Activities	Pedestrian-Orientated areas	Less Pedestrian-Orientated areas
Non-ancillary commuter parking areas and / or buildings (only on sites which access to Type 2 and 3 roads)	D	D
Non-ancillary commuter parking areas and / or buildings (only on sites with access to Type 4 roads)	NC	D

Outside of the area covered by the legacy Central Area Plan there are a range of approaches to non-accessory and off-site parking. Some examples of treatment in various zones in legacy documents are as follows:

- Auckland Isthmus Plan - 'commercial carparking' is discretionary in the Business 1, 2, 5, 7, 8 and Mixed Use; controlled in Business 3, and permitted in Business 4 and 5A
- Manukau Plan - 'carparking areas and buildings not ancillary to a permitted activity' are permitted in the Business 1-5, and discretionary in Business 6
- Rodney Plan - 'carparking areas and carparking buildings other than those ancillary to a permitted, restricted discretionary or discretionary activity' are restricted discretionary in Retail Service, discretionary in Mixed, permitted in Industrial
- Papakura - 'commercial and public carparking' is restricted discretionary in Commercial 3.

### 1.6 Information and Analysis

The legacy document, Auckland Regional Parking Strategy 2009, which was completed by the Auckland Regional Council provided a starting point by setting out a direction for the supply and management of parking in the region.

Technical reports and technical notes have been prepared by several transport consultancies to assist the council with the development of the objectives, policies and rules relating to parking. The documents of most relevance to this report are listed in 5.1.

Internal and external feedback received throughout the development of the parking approach has also provided information and analysis.

### 1.7 Consultation Undertaken

Internal consultation has been undertaken within council and with Auckland Transport.

External consultation has occurred as part of the consultation on the August 2012 and March 2013 drafts of the Unitary Plan. The August 2012 draft was circulated to some key stakeholders eg NZTA, and the Key Retailers Group. The March 2013 draft was subject to a enhanced public engagement.

Additional details are provided in 5.2 and in the s32 dealing with the overall consultation approach.

### 1.8 Decision-Making

The start of the decision making was influenced by the approach of the Auckland Regional Parking Strategy 2009, a legacy document prepared by the former Auckland Regional Council. That strategy included policy guidance about stand-alone public parking lots and buildings, including the different roles of short-stay parking and long-stay parking.

The Auckland City Centre Masterplan 2012 was an important influence at the start of the decision making process on parking in the City Centre. The masterplan noted that an

appropriate level of parking, particularly short-term parking is required to support the economic vitality of the city centre. It also suggested that a substantial increase in public transport, walking and cycling could allow the number of long-term parking spaces to be reduced<sup>2</sup>.

The two reports provided by Flow Transportation Services (Flow) and Transportation Planning Solutions Ltd in early 2012 were key base documents for the development of the approach. Some of the recommendations in these reports were further modified, usually in response to internal and external feedback via the consultation process. Some modelling work undertaken by Flow in April 2012 was considered when deciding approaches for the City Centre. A further report by Flow in June 2012 provided the basis for the identification of a 'City Centre Fringe overlay' around the City Centre where a more restrictive approach is taken to non-accessory long-term parking as compared with other non-CBD centres. This recognises the influence of the City Centre on this fringe area, and provides some transition between the parking approach of the City Centre and that of other urban centres in Auckland.

The Auckland Plan, which was finalised in March 2013 provided a strategy to steer Auckland's future development over the next 30 years. It included some relatively specific direction about the need to develop parking standards and innovative parking mechanisms which take account of multiple objectives.

Political endorsement of the overall approach was given at a meeting of the Political Working Party (PWP) on 10 October 2012. At that meeting, officers sought specific direction on a recommendation about treatment of non-accessory parking in the City Centre zone and adjacent City Centre Fringe overlay. The PWP decided the following for non-accessory parking in these locations: short-term parking should be a discretionary activity; long-term parking should be a non-complying activity. Officers advised that it was intended that non-accessory parking, both short-term and long-term, would be provided for as a discretionary activity in other centres, and be non-complying outside centres. Off-site parking would be treated as a discretionary in most locations.

The non-accessory parking rules were included in the August 2012 and March 2013 drafts of the Unitary Plan. There has been little specific feedback on non-accessory parking in response to either of these drafts. Feedback from the Key Retailers Group and the Property Council stressed the importance of short-term parking to retail businesses. Feedback from business associations on parking also emphasised the importance of customer parking to the competitiveness of centres. In response to feedback from Auckland Transport on the March draft, the Mixed Use zone was added to the zones where non-accessory parking (both short-term and long-term) was provided for as a discretionary activity.

## **1.9 Proposed Provisions**

The Auckland-wide rules, and associated definitions, are summarised below.

Non-accessory parking is defined in the Unitary Plan as follows:

### **'Parking (non-accessory)**

Parking which is provided as a principal activity on the site and is not accessory to any of the approved activities on the site. The parking may be:

- available to members of the public for a charge or fee
- reserved or leased.

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<sup>2</sup> p52, Auckland City Centre Masterplan, 2012

Excludes:

- parking required or permitted accessory to other land uses.
- off-site parking

Includes:

- short-term parking (non-accessory)
- long-term parking (non-accessory).'

The Unitary Plan also includes definitions of short-term, long-term and off-site parking as follows:

**'Short-term parking (non-accessory)**

Where:

1. the parking is for public use on a casual and short stay basis between 7am and 6pm Monday to Friday inclusive, but excluding public holidays
2. any pricing schedule severely penalise parking exceeding 240 minutes (four hours) during the time periods set out in clause 1 above.
3. the parking may also be used on a longer stay basis outside the time and days set out in clause 1 above.'

**'Long-term parking (non-accessory)**

Where:

1. the parking is for public use on a long stay basis in excess of 240 minutes (4 hours) between 7am and 6pm Monday to Friday inclusive, but excluding public holidays
2. the parking may also be used outside the times and days set out in clause 1 above.'

**'Off-site parking**

Parking on a site which is dedicated to the use of an activity taking place on another site. It provides parking which would otherwise have been required or permitted on that other site or sites"

There are special information requirements in the Transport rules for applications for off-site parking. The Unitary Plan requires such applications to include information to demonstrate that:

- a. the proposal provides off-site parking which is related exclusively to the parking requirements associated with activities located on other donor site(s) in the area
- b. the off-site parking arrangement will be formalised on the land titles of all sites involved, including extinguishing the ability to provide accessory parking on the donor site(s).
- c. the parking has been transferred from the donor site(s) and the donor site(s) are required or permitted by the parking standards of the Unitary Plan to provide the number of parking spaces proposed.'

The activity table in the Auckland-wide rules provides for non-accessory and off-site parking as follows:

<b>Activity</b>	<b>Activity status</b>
Short-term parking (non-accessory) in these zones and locations: <ul style="list-style-type: none"><li>• City Centre zone</li><li>• Parking overlay - City Centre Fringe overlay</li><li>• Metropolitan Centre zone</li><li>• Town Centre zone</li></ul>	Discretionary

Activity	Activity status
<ul style="list-style-type: none"> <li>Local Centre zone</li> <li>Mixed Use</li> </ul>	
Long-term parking (non-accessory) in these zones and locations: <ul style="list-style-type: none"> <li>City Centre zone</li> <li>Parking overlay - City Centre Fringe overlay</li> </ul>	Non-complying
Long-term parking (non-accessory) in these zones: <ul style="list-style-type: none"> <li>Metropolitan Centre</li> <li>Town Centre</li> <li>Local Centre</li> <li>Mixed Use</li> </ul>	Discretionary
Off-site parking (non-accessory)	Discretionary

Applications for these activities will be subject to the normal tests for non-notification under the RMA. Assessment matters for these activities are provided in policies, as outlined in 2.2.1.

### 1.10 Reference to other Evaluations

The list below identifies the s32 evaluations of most relevance to this report. In particular, this section 32 report should be read in conjunction with the evaluations identified below with an asterisk (\*).

- 2.1 Urban form and land supply
- 2.3 Residential
- 2.4 Business\*
- 2.6 Business building form and design\*
- 2.9 Accessory parking\*
- 2.39 Traffic in centres
- 2.40 Cycle parking
- 2.42 Crossings on arterial roads\*
- 2.46 City Centre precincts

## 2 Objectives, Policies and Rules

### 2.1 Objective (RPS level)

The following RPS objectives under Part 1, Chapter B, Section 3.3 - Transport are relevant to the topic:

*'2. An effective, efficient and safe integrated transport system that is integrated with, and supports, a quality, compact form of urban growth and associated land use.'*

*'4. A transport system that facilitates transport choices and enables accessibility and mobility for all sections of the community.'*

Auckland's transport system, as described in the introduction to 3.3, includes parking spaces and structures:

*'Auckland's transport system comprises  
- state highways, all other roads, rail, ports, airports and airfields, public transport (land and sea), parking spaces and structures, accessways, cycle and pedestrian routes, and all of their related facilities.'*

*- broader elements including transport users and their behaviours, and the interaction between land use activities and transport networks.'*  
(underlining added)

Parking is a key aspect of the interaction between land use activities and the transport network. It occupies a significant amount of land which affects urban form. The availability of parking can be a key determinant of modal choice and this impacts on the performance of the transport network.

### **Relevance – Addressing the key Unitary Plan issues**

The objectives address the following issues identified in the Regional Policy Statement part of the Unitary Plan:

- 1.1 Enabling quality urban growth
- 1.2 Enabling economic wellbeing

### **Relevance – Achieving the purpose of the Act**

Section 5(1) states that the purpose of the Act is 'to promote the sustainable management of natural and physical resources'. The objectives are in accordance with this purpose. The transport system, which includes parking spaces and structures, is a physical resource which needs to be sustainably managed. In accordance with section 5(2), the objectives seeks to manage the use, development and protection of the transport system 'in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety'. The objectives seek to sustain the potential of the transport system 'to meet the reasonably foreseeable needs of future generations'. This is evident in objective 2 which refers to supporting 'a quality, compact form of urban growth and associated land use'.

Section 6 of the Act identifies the matters of national importance which need to be recognised and provided for in achieving the purpose of the Act. The objectives selected do not include specific reference to these matters. However these matters are addressed by other Regional Policy Statement level objectives in the Unitary Plan.

Section 7 of the Act identifies 'other matters' which need to be given particular regard to in achieving the purpose of the Act. The matters of particular relevance to the objectives are:

- '(aa) The ethic of stewardship
- (b) The efficient use and development of natural and physical resources
- (c) The maintenance and enhancement of amenity values'
- '(f) Maintenance and enhancement of the quality of the environment
- (g) Any finite characteristics of natural and physical resources'

Section 8 requires the principles of the Treaty of Waitangi (Te Tiriti O Waitangi) to be taken into account in achieving the purpose of the Act. The objectives need to be considered in the context of the Unitary Plan as a whole. When viewed within that context, the objectives do not require amendment to reflect the principles of the Treaty of Waitangi (Te Tiriti O Waitangi).

### **Usefulness**

The objectives will be useful for assisting decision making when assessing plan changes, notices of requirement, and resources consents involving the transport system.

As these objectives are at the regional policy statement level, they are useful in setting the direction which the district plan level objectives need to give effect to.



The objectives assist in achieving environmental outcomes identified elsewhere in the Unitary Plan. In particular, they support other environmental outcomes which seek a quality built environment and a compact urban form.

### **Achievability**

The objectives are in accordance with the council's functions as a regional council under s30(1) of the RMA. In particular, it is in accordance with the following functions:

'a. the establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the natural and physical resources of the region:

b. the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance:'

...

'gb. the strategic integration of infrastructure with land use through objectives, policies, and methods:'

The Unitary Plan will contribute to the achievement of these objectives by policies and rules which:

- provide for transport infrastructure
- manage parking
- integrate land use and transport.

The following methods, which occur outside the Unitary Plan, also contribute to the achievement of these objectives:

- the construction, operation and maintenance of transport infrastructure by the council, Auckland Transport, NZTA, KiwiRail and other transport providers and operators
- Bylaws e.g. for controlling on-street parking
- education and advocacy to encourage changes in travel behaviour which reduce private car use particularly during peak periods
- monitoring and review.

### **Reasonableness**

The outcomes set are expected to have greater benefits than costs.

The objectives are reasonable because they recognise the need for integration within the transport system (which includes parking spaces and structures), as well as for integration between land use and transport (where parking is a key interface).

### **Legacy issues**

These objectives are consistent with similar objectives in the legacy Regional Policy Statement.

#### **2.1.1 Policies**

The following policies under 3.3 Transport (RPS) are relevant to the objectives:

*'7. Manage the increase in transport movements associated with development which is in accordance with the quality compact form of urban growth provided for in the Unitary Plan while recognising that there may be increased delays in some locations and during some periods of the day.'*

...

*'13. Support land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods.'*

*14. Improve the attractiveness and efficiency of more sustainable transport options, such as buses, trains, ferries, cycling and walking, by:...*

*b. limiting parking supply in locations served by the rapid and frequent service network<sup>3</sup>*  
...

These policies have been identified because they are relevant to the use of parking policy to give effect to the objectives. The extent to which the Unitary Plan permits or controls non-accessory and off-site parking impacts on urban form outcomes, the economic success of business, and the transport modes that people choose, including the relative attractiveness of walking, cycling and public transport.

## **2.2 Objective (District level)**

The following District Level objective at Part 2, Chapter C, Section 1.2 Transport is key:

*'3. The number, location and type (short-term or long-term, public or private) of parking and loading spaces, including cycle parking and associated end-of-trip facilities, support:*

*a. intensification in the following locations:*

- the City, Metropolitan, Town and Local Centres zones*
- the City Centre Fringe overlay (as identified on the planning maps)*
- the Terrace Housing and Apartment Buildings zone*
- the Mixed Use zone.*

*b. the effective, efficient and safe operation of the transport network*

*c. the use of more sustainable transport options including public transport, cycling and walking*

*d. the economic activity of businesses*

*e. the efficient use of land.'*

The following objectives under the same section are also relevant:

*'1. Land use and all modes of transport are integrated in a manner that enables the adverse effects of traffic generation on the transport network to be managed.'*

*'4. Parking and loading is designed, located and accessed safely and efficiently for pedestrians and vehicles within and outside the site and in a manner which contributes to quality design of the built environment.'*

Objective 4 is about the design of and access to parking areas, rather than about supply of parking. However it is relevant, as the resource consent status (discretionary and non-complying) applied to non-accessory and off-site parking mean that design matters can be considered.

## **Relevance – Addressing the key Unitary Plan issues**

These objectives address the following issues identified in Regional Policy Statement part of the Unitary Plan:

### **1.1 Enabling quality urban growth**

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<sup>3</sup> The Rapid and Frequent Service Network is defined in the Unitary Plan as follows:

'A public transport network supporting services which are:

- frequent (minimum frequency every 15 minutes), and
- all day (operating between 7am and 7pm weekdays as a minimum).

Includes:

- rail and busway services operating in a dedicated right-of-way as a rapid services (eg rail network and the North Shore busway)
- frequent bus services supported by priority measures
- frequent ferry services.'

## 1.2 Enabling economic wellbeing.

### **Relevance – Achieving the purpose of the Act**

*Section 5* – s.5(1) states that the purpose of the Act is ‘to promote the sustainable management of natural and physical resources’. These objectives are in accordance with this purpose. The use of land for parking is a physical resource which needs to be sustainably managed. In accordance with 5(2), the objectives seek to manage the use, development, and protection of the physical parking resource ‘in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety’.

The objectives recognise that the way in which parking supply is managed has implications for the sustainable use of land, particularly in areas identified for growth and intensification where land is scarce and highly valued resource. The objectives also recognise the relationship between parking supply and the sustainable management of the transport network - particularly in relation to modal choice and impact on congestion levels.

The list below identifies which of the objectives are most closely related providing for the three well-beings (social, economic and cultural), and to health and safety.

- social - objective 1, objective 3(a), (b), (c); objective 4
- economic - objective 1; objective 3(a), (b), (c), (d), (e); objective 4
- cultural - objective 3(a); objective 4
- health and safety - objective 3(b), (c); objective 4

*Section 6* of the Act identifies matters of national importance which need to be recognised and provided for in achieving the purpose of the Act. None of the matters are of particular relevance to the topic of non-accessory and off-site parking. Some of these matters may however be of relevance to a specific site or a specific proposal involving non-accessory and off-site parking.

*Section 7* of the Act identifies ‘other matters’ which need to be given particular regard to in achieving the purpose of the Act. The matters of particular relevance to the topic of non-accessory and off-site parking are:

- ‘(aa) The ethic of stewardship
- (b) The efficient use and development of natural and physical resources
- (c) The maintenance and enhancement of amenity values
- (f) Maintenance and enhancement of the quality of the environment’

The list below identifies which of objectives 1 and 3 have most regard to the ‘other matters’ listed above.

- 7(aa) - objective 1; objective 3(a), (b), (c), (e)
- 7(b) - objective 1, objective 3(a), (b), (c), (d), (e); objective 4
- 7(c) - objective 1; objective 3(c); objective 4
- 7(f) - objective 1; objective 3(a), (b), (c); objective 4.

*Section 8* requires the principles of the Treaty of Waitangi (Te Tiriti O Waitangi) to be taken into account in achieving the purpose of the Act. The objectives need to be considered in the context of the Unitary Plan as a whole. When viewed within that context, the objectives do not require amendment to reflect the principles of the Treaty of Waitangi (Te Tiriti O Waitangi).

### **Usefulness**

The objectives will be useful for assisting decision making when assessing plan changes, notices of requirement or resource consent proposals involving non-accessory and off-site parking.

The objectives assist in achieving environmental outcomes identified elsewhere in the Unitary Plan. In particular, they support other environmental outcomes which seek a quality built environment and a compact urban form.

### **Achievability**

The objectives are in accordance with the council's functions as territorial authority under s31(1)(a) and (b) of the Act i.e.:

- 'a. the establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district:
- b. the control of any actual or potential effects of the use, development, or protection of land, ...'

The objectives will be achieved by a combination of approaches:

- Rules in the Unitary Plan which control the amount and type of non-accessory and off-site parking, as well as the design of parking buildings and areas.
- The council working with Auckland Transport to ensure that the on-street and off-street parking which Auckland Transport is responsible for is managed to complement the Unitary Plan approach.
- Preparation and implementation by Auckland Transport of Comprehensive Parking Management Plans which consider parking in a particular area - usually a centre.
- Monitoring and review to measure achievement of the objectives.

### **Reasonableness**

Objective 1 is reasonable because it acknowledges the relationship between land use and transport, and the need for an integrated approach.

Objective 3 is reasonable because it adopts a balanced approach and recognises that parking supply needs to be managed to support a range of outcomes.

Objective 4 is reasonable because it recognises that it is desirable for parking to be designed, located and accessed so as to promote safety and efficiency for pedestrians and vehicles, and to contribute to quality of the built environment.

### **Legacy issues**

Legacy plans had a range of objectives relating to parking. In general there was a greater emphasis on providing for parking so as to avoid the adverse effects associated with overflow parking.

#### **2.2.1 Policies**

The following policies in Part 2, Chapter C, Section 3 - 1.2 Transport (District level) are relevant to the objectives:

*'2. Limit the supply of on-site parking in the following locations to support the planned growth and intensification provided for in the Unitary Plan, recognise the existing and future accessibility of these locations to the Rapid and Frequent Service Network, and support walking and cycling:*

- a. the City, Metropolitan, Town and Local Centres zones*
- b. the City Centre Fringe overlay (as identified on the planning maps)*
- c. the Terrace Housing and Apartment Buildings zone*
- d. the Mixed Use zone.'*

*'5. Provide for flexible approaches to parking, including shared, consolidated and off-site parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.*

*6. Provide for non-accessory parking and off-site parking where:*

*a. the proposal and the type of parking proposed e.g. visitor or commuter, short-term or long-term, private or public, will reinforce the efficient use of land or planned growth and intensification provided for in the Unitary Plan for the site or locality*

*b. there is an undersupply or projected undersupply of parking to service the area having regard to:*

*i. the availability of alternative transport modes, particularly access to the existing and planned Rapid and Frequent Service Network*

*ii. the type of parking proposed*

*iii. existing parking survey information*

*iv. the type of activities in the surrounding area.*

*c. any off-site parking is generally in close walking distance of the donor site(s) unless it is shown that a greater separation distance is reasonable and practicable.*

*7. Avoid the development of long-term parking (non-accessory) in the City Centre zone and the City Centre Fringe overlay to:*

*a. recognise and support the high level of accessibility these areas have to the Rapid and Frequent Service Network*

*b. minimise the growth in private vehicle trips by commuters during peak periods.*

*8. Control the development of long-term parking (non-accessory) in the Metropolitan, Town and Local Centre zones and in the Mixed Use zone so that the parking does not undermine:*

*a. the efficient use of land or growth and intensification provided for in the Unitary Plan for the site or locality*

*b. public transport in these zones.'*

*'9. Encourage facilities for parking (non-accessory) to provide for alternatives to the private car and single occupant cars, or promote use of smaller or more energy efficient cars. This may include:*

*a. parking spaces allocated to car share or car pool vehicles*

*b. parking spaces allocated to small cars or hybrid vehicles*

*c. spaces allocated to scooter or motorcycle parking*

*d. free, secure and covered parking for cycles*

*e. end-of-trip facilities such as secure lockers, showers and changing facilities*

*f. charging points for electric vehicles.'*

*'17. Require the location, design and external appearance of park-and-ride, non-accessory and off-site parking facilities, public transport facilities, and off-road pedestrian and cycling facilities to:*

*a. complement adjacent uses and developments with any buildings or structures to be of similar or compatible scale to those existing or provided for in the surrounding area*

*b. meet the design outcomes identified in this Unitary Plan for the site and/or location generally*

*c. provide screening, such as exterior panelling, for any parking building*

*d. be accessible, safe and secure for users with safe and attractive pedestrian connections within the facility and to adjacent public footpaths.*

*e. provide an attractive interface between any buildings, structures or at-grade parking areas and adjacent streets. Depending on location and scale, this may include:*

*i. maintaining an active frontage through sleeving and/or an interesting appearance through use of architectural treatments so that the facility contributes positively to the*

*pedestrian amenity and to any retail, commercial or residential uses along the road it fronts*

*ii. planting and other landscaping*

*f. provide for any buildings to be adapted for other uses if no longer required for parking. In particular, the floor to ceiling height of a parking building at street level should be capable of conversion to other activities provided for in the zone.*

*18. Require park-and-ride, non-accessory and off-site parking facilities, and public transport facilities, and their access points to be of scale and design, and to be managed, operated and developed so as to avoid adverse effects on the effective, efficient and safe operation of the transport network including:*

*a. the safety of pedestrians and cyclists*

*b. amenity for pedestrians*

*c. avoiding queuing onto the road and conflict at access points to the facility*

*d. avoiding generating high volumes of traffic onto local roads or areas with high pedestrian amenity*

*e. the operation of public transport services and related infrastructure.'*

These policies have been selected because they are relevant to the topic of non-accessory and off-site parking.

Policies 9, 17 and 18 are 'assessment policies' which are particularly intended to be referred to when assessing applications for non-accessory and off-site parking. Auckland-wide Transport rules do not include any assessment criteria for discretionary activities - rather the relevant assessment policies at 1.2 Transport (District level) should be relied upon.

The next portion of this report considers how the policies above contribute to achieving objectives 1, 3 and 4 at 1.2 Transport (District level).

### **Objective 1**

Objective 1 refers to land use and all modes of transport being 'integrated in a manner that enables the adverse effects of traffic generation on the transport network to be managed'. The objective / policy linkages identified below for objective 3(b) and 3(c) are applicable to this objective also. These linkages identify the relationship between land use and transport.

### **Objective 3(a) – Intensification in identified zones**

Objective 3(a) requires the number, location and type of parking spaces to support intensification in City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; the Terrace Housing and Apartment Buildings zone. The policies contribute to achieving objective 1(a) as outlined below.

Policy 2 limits the supply of on-site parking in the locations specified in objective 3(a), to support planned growth and intensification.

Policy 5 supports flexible approaches to parking which use land and parking more efficiently.

Policy 6(a) refers to providing for non-accessory and off-site parking where the proposal and type of parking will reinforce planned growth and intensification.

Policy 8(a) refers to controlling the development of long-term non-accessory parking in Metropolitan, Town and Local Centre zones and the Mixed Use zone so that parking does not undermine the efficient use of land and planned intensification.

### **Objective 3(b) – Safe and efficient operation of the transport network**

Objective 3(b) requires the number, location and type of parking spaces to support 'the safe and efficient operation of the transport network'. The policies contribute to achieving objective 3(b) as outlined below.

Policy 2 identifies the link between the locations where parking supply should be limited, and recognition of the existing and future accessibility of these locations to the Rapid and Frequent Service Network. The safe and efficient operation of the Rapid and Frequent Service Network is supported by a policy of parking restraint in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; the Terrace Housing and Apartment Buildings zone.

Similarly policy 6(b)(i) recognises that access to the existing and planned Rapid and Frequent Service Network should be regarded when considering whether there is a undersupply or projected undersupply of parking to service an area. This contributes to achieving safe and efficient operation of the Rapid and Frequent Service Network.

Policy 7 is about avoiding the development of long-term non-accessory parking in the City Centre zone and the City Centre Fringe overlay. Policy 7(a) relates this to recognising and supporting the high level of accessibility these areas have to the Rapid and Frequent Service Network. Policy 7(b) relates it to minimising the growth in private vehicle trips by commuters during peak periods. Both aspects of this policy contribute to achieving objective 3(b).

Policy 8(b) refers to controlling the development of long-term non-accessory parking in Metropolitan, Town and Local Centre zones and the Mixed Use zone so that parking does not undermine the public transport in centres.

Policy 18 requires the scale, design, management, operation and development of non-accessory and off-site parking facilities and their access points to avoid adverse effects on the safe and efficient operation of the transport network.

### **Objective 3(c) – More sustainable transport options**

Objective 3(c) requires the number, location and type of parking spaces to support 'the use of more sustainable transport options including public transport, cycling and walking'. The policies contribute to achieving objective 3(c) as outlined below.

The linkages between policy 2, 6(b)(i), 7(a), and 8(b) and public transport have been covered under the previous heading and are not repeated here. Policy 18(e) identified 'the operation of public transport services and related infrastructure' as an aspect of the safe and efficient operation of the transport network.

Policy 9 is about encouraging non-accessory parking facilities 'to provide for alternatives to the private car and single occupant cars, or promote use of smaller or more energy efficient cars'.

Policy 17(d) requires safe and attractive pedestrian connections within non-accessory and off-site parking facilities and to adjacent public footpaths. Policy 17(e) refers to requiring the location, design and external appearance of parking facilities to contribute positively to pedestrian amenity.

Policy 18 identifies some sustainable transport options (i.e. walking, cycling and public transport) which need to be taken into account in avoiding adverse effects from parking facilities on the safe and efficient operation of the transport network.

### **Objective 3(d) – Economic activity of businesses**

Objective 3(d) requires the number, location and type of parking spaces to support 'the economic activity of businesses'. The policies contribute to achieving objective 3(d) as outlined below.

Policy 6 provides for non-accessory and off-site parking where specified criteria are met. Policy 6(a) refers to the proposal and type of parking needing to 'reinforce the efficient use of land or planned growth and intensification'. This is consistent with providing for the economic activity of business.

Policy 7 avoids 'the development of long-term car parking (non-accessory) in the City Centre zone and City Centre Fringe overlay'. However policy 6 provides for other forms of non-accessory parking (ie short-term, and off-site) in these locations. This recognises that short-term non-accessory parking can support the economic activity of businesses by providing for customer and visitors. Vehicle trips made by customers and visitors are less suited to conversion to public transport than regular commuter trips made by staff and students.

Policy 17 addresses the location, design and external appearance of non-accessory and off-site parking facilities. Good design and external appearance contributes to a quality built environment which can contribute to the economic activity of businesses, particularly in locations such as centres where pedestrian amenity is important for attracting customers.

#### **Objective 3(e) – Efficient use of land**

Objective 3(e) requires the number, location and type of parking spaces to support 'the efficient use of land'. The policies contribute to achieving objective 3(e) as outlined below.

Policy 2 limits the supply of on-site parking in City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; the Terrace Housing and Apartment Buildings zone to support planned intensification. It therefore contributes to achieving the objective 3(e).

Policy 5 provides for 'flexible approaches to parking, including shared, consolidated and off-site car parking, which use land and car parking spaces more efficiently...'.

Policy 6(a) refers to providing for non-accessory and off-site parking where the proposal or type 'will reinforce the efficient use of land ...'.

Policy 8 refers to controlling the development of long-term non-accessory parking in the Metropolitan, Town and Local Centres zones and the Mixed Use zone, so that it does not undermine the efficient use of land.

Policy 17(f) refers to providing for buildings to be adapted to other uses if no longer required for parking.

#### **Objective 4 – Design, location and access**

Objective 4 at 1.2 Transport (District level) refers to parking being 'designed, located and accessed safely and efficiently for pedestrians and vehicles within and outside the site and in a manner which contributes to quality design of the built environment'. This is addressed by policies 17 and 18. Policy 17 addresses the 'location, design and external appearance'. Policy 18 addresses the scale and design of non-accessory parking facilities, and their access points as well as the way in which their management, operation and development affects the transport network.

#### **2.2.2 Rules and other methods**

The proposed provisions are summarised in 1.9 above. The approach is zone based, with the exception of a City Centre Fringe overlay which applies around the City Centre zone.



In the City Centre zone and City Centre Fringe overlay, short-term non-accessory parking is a discretionary activity and long-term non-accessory parking is a non-complying activity. Both short-term and long-term non-accessory parking are discretionary in the Metropolitan Centre, Town Centre, Local Centre, Mixed Use, Terrace Housing and Apartment Buildings zones. Off-site parking is a discretionary activity in all locations.

In other areas (outside of the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone), non-accessory parking (both short-term and long-term) are not provided for. Off-site parking is a discretionary activity.

The appropriateness, effectiveness and efficiency of these rules, as compared with other alternatives are further outlined in 3. The provisions will be effective at contributing towards achievement of the objectives. The rules do manage non-accessory and off-site parking in a manner 'that is integrated with, and supports, a quality, compact form of urban growth and associated land use' (objective 2 at 3.3 Transport (RPS)). The rules do contribute towards achievement of the outcomes identified in objective 3 of 1.2 Transport. Implementation of the rules are assisted by the fact that construction of substantial new parking areas will generally require some form of building or drainage consent from the council. This informs the council of such proposals and provides an opportunity to advise applicants of the need for a resource consent application if they are not already aware of this requirement. However there are some risks, and implementation difficulties, which are outlined under 2.2.4. In terms of efficiency, the costs of this alternative are outweighed by the benefits.

The rules on non-accessory and off-site parking are supported by other rules which control accessory parking. As noted in 2.1 and 2.2, other methods which support the rules are:

- the management by Auckland Transport of its on-street and off-street parking to complement the Unitary Plan approach.
- the preparation and implementation of Comprehensive Parking Management Plans which consider parking in a particular area - usually a centre
- education and advocacy to encourage changes in travel behaviour which reduce private car use, particularly during peak periods
- monitoring and review

### **2.2.3 Costs and Benefits of Proposed Policies and Rules**

The costs and benefits of the alternatives considered, including the proposed policies and rules, are outlined in 3.

The description of costs and benefits is generally provided in a qualitative rather than a quantitative manner. Some quantitative information was provided by Flow Transportation Services on the anticipated effects of increases in traffic flows on the future operation of the road network in the City Centre<sup>4</sup>. This work was undertaken to assist the council to decide on an approach to providing for additional short-term parking in the City Centre.

There has been no analysis that monetises costs and benefits in relation to non-accessory and off-site parking.

The approach to non-accessory and off-site parking provides for shared and consolidated parking arrangements in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; and the Mixed Use zone. This does have the potential to encourage and provide opportunities for economic growth by supporting efficient use of land,

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<sup>4</sup> Flow Transportation Services, Technical Note: Future Traffic Flows in the Auckland City Centre, 26 April 2012

quality urban design, and intensification in areas identified by the Unitary Plan for growth. Economic growth has the potential to result in additional employment opportunities.

#### **2.2.4 Adequacy of Information and Risk of Not Acting**

There are risks in acting as proposed due to the lack of information about the number and use of non-accessory and off-site parking spaces - particularly in the City Centre zone and City Centre Fringe overlay where a non-complying status is proposed for long-term non-accessory parking. However the use of the discretionary and non-complying statuses reduces the risks as each application can be considered on its merits.

In providing for off-site parking as a discretionary activity, there is risk of unintended consequences. This activity status may be used to create long-term parking which is then made available to the public generally, rather than being limited to the 'donor site'. This is a monitoring and enforcement matter.

The use of the non-complying status for long-term non-accessory parking in the City Centre zone and City Centre Fringe overlay is less effective at controlling the supply of long-term parking than an approach which makes additional provision of long-term parking a prohibited activity. However such an approach would be difficult to defend, and would require considerable additional information.

The risk of acting as set out in this alternative is that there may be some locations outside centres and the Mixed Use zone where it is appropriate to provide short-term or long-term accessory parking. However the non-complying status still allows such proposals to be considered on their merits. In addition, special zones or precincts can provide a different activity status for a specific site or locations.

There are known monitoring and enforcement difficulties with treating long-term non-accessory parking differently than short-term non-accessory parking. Consent may be granted for short-term parking, but it may then be operated as long-term parking. This change may be made by the operator in response to market demand. Experience in the city centre has shown that this does occur and that monitoring and enforcement is problematic. It may also be difficult to refuse a consent to convert existing short-term or off-site parking to long-term parking. These difficulties can undermine implementation of the rule and reduce its efficiency.

The risks are outweighed by the risks of not acting in accordance with these provisions.

### **3 Alternatives**

The proposed preferred alternative is discussed in 2 above. The status quo alternative is outlined in 1.5 above.

The alternatives considered are:

1. Status quo - Retain approach of legacy plans
2. Alternative 1 - Permitted activity status in all locations.
3. Alternative 2a - Preferred approach for City Centre zone and City Centre Fringe overlay; Metropolitan, Town and Local Centre zones; Mixed Use zone).
4. Alternative 2b - Preferred approach for 'other areas', not covered by alternative 2b.
5. Prohibited status for long-term non-accessory parking, and non-complying status for short-term non-accessory parking in the City Centre zone and City Centre Fringe overlay

The table below considers each alternative compared to the Proposed Alternatives.

	<b>Status quo - Retain approach of legacy plans</b>	<b>Alternative 1-Permitted activity status in all locations</b>	<b>Alternative 2a-Preferred approach for City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone</b>	<b>Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)</b>	<b>Alternative 3-More restrictive approach to non-accessory parking in the City Centre zone and City Centre Fringe overlay</b>
	<p><b>Description –</b></p> <p>Retain the provision of the legacy plans which adopt a range of approaches to non-accessory and off-site parking.</p>	<p><b>Description –</b></p> <p>Provide for non-accessory parking (short-term and long-term) and off-site parking as permitted activities in all locations.</p> <p>Developments would still need to comply with the zoning requirements, including development controls and any rules which require design assessments via a resource consent process.</p>	<p><b>Description –</b></p> <p>Provide for short-term non-accessory parking as a discretionary activity in the City Centre zone and City Centre Fringe overlay. Provide for long-term non-accessory parking as a non-complying activity in these locations.</p> <p>Provide for both short-term and long-term non-accessory parking as a discretionary activity in the following zones: Metropolitan Centre, Town Centre, Local Centre, and Mixed Use.</p> <p>Off-site parking is discretionary in all locations.</p>	<p><b>Description –</b></p> <p>Do not provide for short-term or long-term non-accessory parking outside of the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centre zones; Mixed Use zone. Such proposals therefore default to a non-complying activity status. Provide for off-site parking as a discretionary activity.</p>	<p><b>Description –</b></p> <p>Apply a prohibited activity status to long-term non-accessory parking, and a non-complying status to short-term non-accessory parking in the City Centre zone and City Centre Fringe overlay.</p> <p>Treat the Metropolitan, Town and Local Centres zones, and the Mixed Use zones as per Alternative 2a. Treat 'other areas' as per Alternative 2b.</p>
<b>Appropriateness</b>	<p>The alternative does not support the objectives.</p> <p>This alternative addresses the issues to varying extents depending on the particular approach in different parts of Auckland. The comments about appropriateness for Alternative 1, Alternative 2a, and Alternative 2b will apply in different locations.</p>	<p>The alternative does not support the objectives.</p> <p>In providing for non-accessory and off-site parking on an 'as of right' basis, this alternative does not address the issues because it does not allow particular parking proposals to be assessed on their merits to determine their effects on amenity, transport mode choice, and congestion levels in a particular location.</p> <p>This alternative does however address the issues in part by making it relatively easy to provide non-accessory parking to support the economic well-being of businesses. It also allows the market maximum opportunity to determine whether provision of parking is the optimal use of land.</p>	<p>The alternative does support the objectives.</p> <p>In requiring a resource consent for non-accessory and off-site parking, this alternative addresses the issues by allowing particular parking proposals to be assessed on their merits to determine their effects on amenity, transport mode choice, congestion levels, and the economic well-being of businesses in a particular location. It recognises that the provision of non-accessory and off-site parking can enable developers and businesses to use their land more optimally by reducing the need for on-site parking.</p> <p>In providing for short-term non-accessory parking as a discretionary activity in all these areas (including the City Centre zone and City Centre Fringe overlay), this alternative addresses the issue about the importance of short-term parking availability to the economic well-being of businesses which rely on such parking for customers or visitors.</p>	<p>The alternative does support the objectives.</p> <p>By not providing for non-accessory parking as a listed activity in these areas, this alternative addresses the issues related to the effect of parking on amenity and congestion levels. By listing off-site parking as a discretionary activity in these areas, this alternative addresses the issues of amenity and optimal use of land by providing for shared and consolidated parking arrangements, and requiring such proposals to be assessed on their merits.</p>	<p>The alternative generally supports the objectives except that the approach to short-term non-accessory parking may not provide appropriately for the economic activity of businesses.</p> <p>By discouraging short-term non-accessory parking, and prohibiting long-term non-accessory parking, this alternative addresses the issues by:</p> <ul style="list-style-type: none"> <li>encouraging land to be used for non-parking purposes, which are regarded as more optimum for these locations</li> <li>restricting parking to manage congestion levels and support public transport in these areas which have the highest levels of accessibility to public transport.</li> </ul>
<b>Effectiveness</b>	<p>This alternative will have mixed success in achieving the objectives. Overall it does not manage non-accessory and off-site parking in a manner 'that is integrated with, and supports, a quality, compact form of urban growth and associated land use' (objective 2 at 3.3 Transport (RPS)). It does not manage the number, location and type of parking spaces in a manner which will achieve</p>	<p>This alternative will not be successful in achieving the objectives. It does not manage non-accessory and off-site parking in a manner 'that is integrated with, and supports, a quality, compact form of urban growth and associated land use' (objective 2 at 3.3 Transport (RPS)). It does not manage the number, location and type of parking spaces in a manner which will achieve the outcomes</p>	<p>This alternative will be successful at contributing towards achievement of the objectives. It does manage non-accessory and off-site parking in a manner 'that is integrated with, and supports, a quality, compact form of urban growth and associated land use' (objective 2 at 3.3 Transport (RPS)). It does manage the number, location and type of parking spaces in a manner</p>	<p>This alternative will be successful at contributing towards achievement of the objectives. It does manage non-accessory and off-site parking in a manner 'that is integrated with, and supports, a quality, compact form of urban growth and associated land use' (objective 2 at 3.3 Transport (RPS)). It does manage the number, location and type of parking spaces in a manner</p>	<p>This alternative will be successful at contributing towards achievement of the objectives. However the non-complying status for short-term non-accessory parking may not be consistent with achieving a number, location and type of parking spaces to support the economic activity of businesses (Objective 3(d) at 1.2 Transport (District level)).</p>

	<b>Status quo - Retain approach of legacy plans</b>	<b>Alternative 1-Permitted activity status in all locations</b>	<b>Alternative 2a-Preferred approach for City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone</b>	<b>Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)</b>	<b>Alternative 3-More restrictive approach to non-accessory parking in the City Centre zone and City Centre Fringe overlay</b>
	<p>the outcomes set out in objective 3 of 1.2 Transport (District level).</p> <p>The effectiveness of this alternative varies depending on the particular approach in different parts of Auckland. The comments about effectiveness for Alternative 1, Alternative 2a, and Alternative 2b will apply in different locations.</p>	<p>set out in objective 3 of 1.2 Transport (District level).</p> <p>In particular, this alternative will not be successful at achieving the objectives because it does not allow individual proposals to be assessed on their merits to determine their effects. This includes effects on intensification, the transport network, transport mode choice, the economic activity of businesses, the efficient use of land, and contribution to a quality built environment.</p>	<p>which will achieve the outcomes set out in objective 3 of 1.2 Transport (District level).</p> <p>In particular, this alternative contributes towards achieving the objectives by:</p> <ul style="list-style-type: none"> <li>• providing for shared and consolidated parking arrangements which can promote intensification, more efficient use of land and a quality urban form</li> <li>• providing for parking which supports the economic activity of businesses</li> <li>• allowing individual proposals to be assessed on their merits to determine their effects - including effects on intensification, the transport network, transport mode choice, the economic activity of businesses, the efficient use of land, and contribution to a quality built environment.</li> </ul>	<p>which will achieve the outcomes set out in objective 3 of 1.2 Transport (District level).</p> <p>In particular, this alternative contributes towards achieving the objectives by providing for off-site parking arrangements which can result in more efficient use of land and a quality urban form. The lack of provision for non-accessory parking is consistent with the nature of these zones. This alternative applies in zones where the relationship between providing for non-accessory parking and the outcomes in objective 3 of 1.2 Transport (District level) about intensification, support of more sustainable transport modes, economic activity of business, and the efficient use of land are less critical.</p>	<p>In particular, this alternative discourages provision for vehicles, which contributes towards achieving the objectives supporting the use of more sustainable transport options and supporting the effective, efficient and safe operation of the transport network. However in not providing for short-term parking this alternative may detract from the objective of providing parking to support the economic activity of business.</p>
<b>Efficiency</b>	<p>The costs of this alternative outweigh the benefits.</p> <p>There are moderate difficulties in implementing this approach because it requires the approach of the legacy plans to be translated to a Unitary Plan format with different zonings.</p>	<p>The costs of this alternative outweigh the benefits</p> <p>This is the easiest alternative to implement because it does not involve any additional regulation in the Unitary Plan. It relies on the zoning controls.</p>	<p>The costs of this alternative are outweighed by the benefits.</p> <p>Implementation of this alternative is assisted by the fact that construction of substantial new parking areas will generally require some form of building or drainage consent from the council. This informs the council of such proposals and provides an opportunity to advise applicants of the need for a resource consent application if they are not already aware of this requirement.</p> <p>This alternative is more difficult to apply when existing sealed areas are converted to non-accessory parking.</p> <p>There are however some risks that can undermine implementation of this alternative and reduce its efficiency. These are further described under 'Risks' below.</p>	<p>The costs of this alternative are outweighed by the benefits</p> <p>Implementation of this alternative is assisted by the fact that construction of substantial new parking areas will generally require some form of building or drainage consent from the council. This informs the council of such proposals and provides an opportunity to advise applicants of the need for a resource consent application if they are not already aware of this requirement.</p> <p>This alternative is more difficult to apply when existing sealed areas are converted to non-accessory parking.</p> <p>There are however some risks that can undermine implementation of this alternative and reduce its efficiency. These are further described under 'Risks' below.</p>	<p>The costs of this alternative outweigh the benefits.</p> <p>Implementation of this alternative is assisted by the fact that construction of substantial new parking areas will generally require some form of building or drainage consent from the council. This informs the council of such proposals and provides an opportunity to advise applicants of the Unitary Plan requirements if they are not already aware of them.</p> <p>This alternative is more difficult to apply when existing sealed areas are converted to non-accessory parking.</p> <p>There are however some risks that can undermine implementation of this alternative and reduce its efficiency. These are further described under 'Risks' below.</p>
<b>Costs</b>	<p><b>Inconsistent approaches</b></p> <p>Retaining the legacy approaches misses an opportunity to create a more consistent approach across Auckland with a consistent set of objectives, policies and rules, including consistent assessment criteria.</p>	<p><b>Adverse effects</b></p> <p>Adverse effects may arise because the permitted activity status means that there will be no opportunity for the council to assess individual proposals, unless other resource consent requirements in the zone are triggered. Requiring a resource consent for non-accessory and off-site</p>	<p><b>Resource consent costs</b></p> <p>There are costs and uncertainty associated with obtaining a resource consent to establish or expand non-accessory and off-site parking. Resource consent costs can be a regulatory barrier which can discourage appropriate activities from establishing. Costs and</p>	<p><b>Resource consent costs</b></p> <p>There are costs and uncertainty associated with obtaining a resource consent to establish or expand non-accessory and off-site parking. Resource consent costs can be a regulatory barrier which can discourage appropriate activities from establishing. Costs and</p>	<p><b>Resource consent costs</b></p> <p>There are costs and uncertainty associated with obtaining a resource consent to establish or expand short-term non-accessory parking. Costs and uncertainty are incurred by businesses, developers and residents. Processing costs are incurred by the council.</p>

Status quo - Retain approach of legacy plans	Alternative 1-Permitted activity status in all locations	Alternative 2a-Preferred approach for City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)	Alternative 3-More restrictive approach to non-accessory parking in the City Centre zone and City Centre Fringe overlay
<p><b>City Centre zone and City Centre Fringe overlay</b></p> <p>Retaining the existing approach of providing for long-term non-accessory parking as a discretionary activity in parts of the City Centre zone and City Centre Fringe overlay does not recognise the need to further limit the supply of additional long-term non-accessory parking in these locations due to :</p> <ul style="list-style-type: none"> <li>the high level of accessibility by the Rapid and Frequent Service Network</li> <li>the greater need to minimise growth in private vehicles by commuter in and out of the city centre during peak periods</li> <li>the existing supply of long-term non-accessory parking within these areas.</li> </ul> <p>The existing approach does not recognise the need for a different approach to long-term non-accessory parking in the City Centre Fringe overlay due to its proximity to the City Centre zone.</p>	<p>parking allows the council to consider whether the proposal is appropriate having regard to such matters as:</p> <ul style="list-style-type: none"> <li>type of parking proposed (e.g. visitor or commuter, short-term or long-term, private or public)</li> <li>the location, design and external appearance</li> <li>effects on the safe and efficient operation of the transport network.</li> </ul> <p><b>Does not give effect to Directive 10.6 of the Auckland Plan</b></p> <p>This alternative does not give effect to Directive 10.6 of the Auckland Plan which seeks a parking approach which takes account of multiple objectives.</p> <p><b>Too much parking</b></p> <p>May result in too much parking being provided in areas where intensification is proposed, and where there is good access to the existing or proposed Rapid and Frequent Service Network. This may not be the most efficient use of land and may undermine public investment in the Rapid and Frequent Service Network. This will particularly be critical if the parking is long-term rather than short-term. Traffic travelling to and from a parking space also needs to be accommodated on the road network. If parking is readily and cheaply available, it will encourage people to use private vehicles even when a viable alternative such as frequent public transport is available.</p> <p>There will be differences in opinion to what is 'too much parking'. Businesses, customers and employees may prefer a situation where there is parking available in the area most of the time ie the parking buildings or car parks are rarely full. This makes it easier to find a parking space, and also means that there is more parking available to serve peak requirements. Paid parking is also likely to be cheaper for users where there is an ample supply because it is less sought after.</p> <p><b>Inconsistent with approach to accessory parking</b></p> <p>This alternative is inconsistent with the</p>	<p>uncertainty are incurred by businesses, developers and residents. Processing costs are incurred by the council. Processing costs are partially recoverable but the amount charged to applicants does not always cover the full cost to the council.</p> <p>The costs and uncertainties are increased by the use of discretionary and non-complying activity statuses, rather than a controlled or restricted discretionary status. Also applications will be subject to the normal tests under the RMA for notification.</p> <p><b>Lack of flexibility for parking providers</b></p> <p>This alternative reduces the flexibility that parking providers have to respond to demand by adding new parking areas.</p>	<p>uncertainty are incurred by businesses, developers and residents. Processing costs are incurred by the council. Processing costs are partially recoverable but the amount charged to applicants does not always cover the full cost to the council.</p> <p>The costs and uncertainties are increased by the use of discretionary and non-complying activity statuses, rather than a controlled or restricted discretionary status. Also applications will be subject to the normal tests under the RMA for notification.</p> <p><b>Lack of flexibility for parking providers</b></p> <p>This alternative reduces the flexibility that parking providers have to respond to demand by adding new parking areas.</p>	<p>Processing costs are partially recoverable but the amount charged to applicants does not always cover the full cost to the council.</p> <p>The costs and uncertainties are increased by the use of the non-complying status, rather than a controlled, restricted discretionary, or discretionary status. Also applications would be subject to the standard tests under the RMA for notification.</p> <p><b>Lack of flexibility for parking providers</b></p> <p>This alternative reduces the flexibility that parking providers have to respond to demand by adding new parking areas.</p> <p><b>Lack of short-term non-accessory parking</b></p> <p>The non-complying status may discourage applications for short-term non-accessory parking. Short-term parking for visitors and customers can be important in supporting the economic activity of businesses.</p> <p>If there is a lack of short-term parking in a centralised or consolidated location, individual properties are more likely to make individual provision as accessory parking. This can lead to less efficient use of land.</p> <p>The non-complying status may also discourage existing car park operators from converting long-term parking to short-term parking. This type of conversion should be encouraged rather than discouraged.</p>

Status quo - Retain approach of legacy plans	Alternative 1-Permitted activity status in all locations	Alternative 2a-Preferred approach for City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)	Alternative 3-More restrictive approach to non-accessory parking in the City Centre zone and City Centre Fringe overlay	
	<p>preferred approach to accessory parking which proposes parking maximums in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; Terrace Housing and Apartment Buildings zone and the Mixed Housing Urban zone. If the Unitary Plan limits on-site parking this needs to be supported by a complementary approach to accessory parking.</p>				
<p><b>Benefits</b></p>	<p><b>Familiarity with existing approach</b> Users of the Plan (including applicants, developers, planning consultants, and council officers) are familiar with, and used to applying, the existing approach.</p> <p><b>City Centre and City Centre Fringe overlay - greater flexibility for parking providers</b> This alternative increases the amount of flexibility that parking providers have to respond to demand for commuter parking by adding new long-term non-accessory parking in the City Centre zone and City Centre Fringe overlay.</p>	<p><b>Avoiding resource consent costs</b> Avoids the costs and uncertainty associated with obtaining a resource consent to establish or expand non-accessory and off-site parking. Costs and uncertainty are incurred by businesses, developers and residents. Processing costs are incurred by the council. Processing costs are partially recoverable but the amount charged to applicants does not always cover the full cost to the council.</p> <p><b>Flexibility for parking providers</b> This alternative allows parking providers maximum flexibility to respond to demand by adding new parking areas.</p> <p><b>Consistent approach</b> There are benefits in applying a consistent approach across Auckland. A consistent approach is easier to apply. It can also avoid the anomalies that occur between zones.</p>	<p><b>Addresses adverse effects</b> Adverse effects can be avoided, remedied or mitigated because the discretionary and non-complying activity statuses allow the council to assess individual proposals. Requiring a resource consent for non-accessory and off-site parking allows the council to consider whether the proposal is appropriate having regard to such matters as:</p> <ul style="list-style-type: none"> <li>• type of parking proposed (e.g. visitor or commuter, short-term or long-term, private or public)</li> <li>• the location, design and external appearance</li> <li>• effects on the safe and efficient operation of the transport network.</li> </ul> <p><b>Gives effect to Directive 10.6 of the Auckland Plan</b> This alternative gives effect to Directive 10.6 of the Auckland Plan.</p> <p><b>Recognises need for different approach for City Centre zone and City Centre Fringe overlay</b> The use of a non-complying activity status in the City Centre zone and City Centre Fringe overlay recognises the need to treat these areas differently from other centres due to:</p> <ul style="list-style-type: none"> <li>• the high level of accessibility by the Rapid and Frequent Service Network</li> <li>• the greater need to minimise growth in private vehicle trips by commuters in and out of the city centre during peak periods</li> <li>• the existing supply of long-term non-accessory parking within these</li> </ul>	<p><b>Addresses adverse effects</b> The discretionary and non-complying activity statuses allow the council to assess individual proposals. Requiring a resource consent for non-accessory and off-site parking allows the council to consider whether the proposal is appropriate having regard to such matters as:</p> <ul style="list-style-type: none"> <li>• type of parking proposed (eg visitor or commuter, short-term or long-term, private or public)</li> <li>• the location, design and external appearance</li> <li>• effects on the safe and efficient operation of the transport network.</li> </ul> <p><b>Off-site parking supports more efficient use of land</b> In providing for off-site parking as a discretionary activity, this alternative recognises the benefits of providing for consolidated parking arrangements rather than encouraging incremental provision of accessory parking on individual sites. Consolidated parking can result in more efficient use of land and better urban design outcomes, including by limiting the number of vehicle crossings.</p>	<p><b>Addresses adverse effects</b> The non-complying activity status for short-term non-accessory parking allows the council to assess individual proposals. This allows the council to consider whether the proposal is appropriate having regard to such matters as:</p> <ul style="list-style-type: none"> <li>• type of parking proposed (e.g. visitor or commuter, short-term or long-term, private or public)</li> <li>• the location, design and external appearance</li> <li>• effects on the safe and efficient operation of the transport network.</li> </ul> <p>The use of a prohibited activity status for long-term non-accessory parking will be most effective at preventing the establishment of additional long-term parking.</p> <p>This approach is supported by work undertaken by Flow Transportation on the anticipated effects of increases in traffic flows on the future operation of the road network in the City Centre<sup>5</sup>. This work was undertaken to assist the council to decide on an approach to providing for additional short-term parking in the City Centre. Flow conclude that 'there would appear to be significant transport risks in pursuing additional short-term parking in the Auckland city centre. In this case, it may be advisable to focus the concept on particular targeted areas, where there is acknowledged as being a deficiency in parking and where the adverse transport effects are assessed as being less significant than in other locations'.</p>

<sup>5</sup> Flow Transportation Services, Technical Note: Future Traffic Flows in the Auckland City Centre, 26 April 2012

Status quo - Retain approach of legacy plans	Alternative 1-Permitted activity status in all locations	Alternative 2a-Preferred approach for City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)	Alternative 3-More restrictive approach to non-accessory parking in the City Centre zone and City Centre Fringe overlay
		<p>areas.</p> <p>This alternative also recognises the need for a consistent approach between the City Centre zone and the City Centre Fringe overlay, due to their close proximity.</p> <p><b>Recognises economic importance of short-term parking</b></p> <p>This alternative treats short-term non-accessory parking (discretionary) differently than long-term non-accessory parking (non-complying) in the City Centre and City Centre Fringe overlay. This recognises the importance of short-term parking for visitors and customers in supporting the economic activity of businesses. It also recognises that users of short-term parking are less likely to travel during peak periods than users of long-term parking.</p> <p><b>Recognises benefits of consolidated parking</b></p> <p>In providing for non-accessory and off-site parking as a discretionary activity (with some exceptions), this alternative recognises the benefits of providing for consolidated parking arrangements rather than encouraging incremental provision of accessory parking on individual sites. Consolidated parking can result in more efficient use of land and better urban design outcomes, including by limiting the number of vehicle crossings.</p> <p><b>Consistent with approach to accessory parking</b></p> <p>The preferred approach to accessory parking uses parking maximums to limit on-site parking in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; the Terrace Housing and Apartment Buildings zone. This alternative is complementary to that approach.</p>		<p><b>Recognises need for different approach for City Centre zone and City Centre Fringe overlay</b></p> <p>The use of a non-complying activity status (for short-term non-accessory parking) and prohibited activity status (for long-term non-accessory parking) in the City Centre zone and City Centre Fringe overlay recognises the need to treat this differently from other centres due to:</p> <ul style="list-style-type: none"> <li>• the high level of accessibility by the Rapid and Frequent Service Network</li> <li>• the greater need to minimise growth in private vehicle trips by commuters in and out of the city centre during peak periods</li> <li>• the existing supply of long-term non-accessory parking within these areas.</li> </ul> <p>This alternative also recognises the need for a consistent approach between the City Centre zone and the City Centre Fringe overlay, due to their close proximity.</p>
<b>Risks</b>	The content of the existing approaches are known. The effect of the approaches is not always well-known or measured. The risks of acting in the manner set out	The potential adverse effects associated with non-accessory and off-site parking are known. The risks of acting in the manner set out in this alternative are that	There are risks in acting as set out in this alternative due to the lack of information about the number and use of non-accessory and off-site parking spaces	The risk of acting as set out in this alternative is that there may be some locations outside centres where it is appropriate to provided short-term or
				The risk associated with applying a prohibited activity status to long-term non-accessory parking is that such an approach is difficult to defend. Further

Status quo - Retain approach of legacy plans	Alternative 1-Permitted activity status in all locations	Alternative 2a-Preferred approach for City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)	Alternative 3-More restrictive approach to non-accessory parking in the City Centre zone and City Centre Fringe overlay
<p>in this alternative are that the costs set out above will arise, and the outcomes set out in the objectives will not be achieved.</p> <p>There are known inconsistencies and anomalies in the existing legacy plans when they are compared with each other. This includes different ways in which 'non-accessory and off-site parking' is described and defined, as well as different activity statuses and assessment criteria. Maintaining the existing approaches misses an opportunity to develop a more consistent and rationalised set of policies and rules.</p>	<p>the costs set out above will arise, and the outcomes set out in the objectives will not be achieved.</p>	<p>particularly in the City Centre zone and City Centre Fringe overlay where a non-complying status is proposed for long-term non-accessory parking. However the use of the discretionary and non-complying statuses reduces the risks as each application can be considered on its merits.</p> <p>In providing for off-site parking as a discretionary activity, there is risk of unintended consequences. This activity status may be used to create long-term parking which is then made available to the public generally, rather than being limited to the 'donor site'. This is a monitoring and enforcement matter.</p> <p>The use of the non-complying status for long-term non-accessory parking in the City Centre zone and City Centre Fringe overlay is less effective at controlling the supply of long-term parking than an approach which makes additional provision of long-term parking a prohibited activity. However such an approach would be difficult to defend, and would require considerable additional information.</p> <p>There are known monitoring and enforcement difficulties with treating long-term non-accessory parking differently than short-term non-accessory parking. Consent may be granted for short-term parking, but it may then be operated as long-term parking. This change may be made by the operator in response to market demand. Experience in the city centre has shown that this does occur and that monitoring and enforcement is difficult. It may also be difficult to refuse a consent to convert existing short-term or off-site parking to long-term parking. These difficulties can undermine implementation of the alternative and reduce its efficiency.</p> <p>These risks are outweighed by the risks of not acting in accordance with this alternative.</p>	<p>long-term accessory parking. However the non-complying status still allows such proposals to be considered on their merits.</p> <p>In providing for off-site parking as a discretionary activity, there is risk of unintended consequences. This activity status may be used to create long-term parking which is then made available to the public generally, rather than being limited to the 'donor site'. This is a monitoring and enforcement matter. These difficulties can undermine implementation of the alternative and reduce its efficiency.</p> <p>These risks do not outweigh the risks of not acting in accordance with this alternative.</p>	<p>work would need to be completed about the number and use of long-term parking spaces in the City Centre zone and City Centre Fringe overlay to justify such a restrictive approach.</p> <p>The risk associated with applying a non-complying status to short-term non-accessory parking is that this could adversely affect the economic activity of businesses as short-term parking is important for visitors and customers.</p> <p>There are known monitoring and enforcement difficulties with treating long-term non-accessory parking differently than short-term non-accessory parking. Consent may be granted for short-term parking, but it may then be operated as long-term parking. This change may be made by the operator in response to market demand. Experience in the city centre has shown that this does occur and that monitoring and enforcement is difficult. These difficulties can undermine implementation of the alternative and reduce its efficiency.</p>



## 4 Conclusion

Based on the above discussion, the following conclusions are drawn. Alternative 2a is the preferred approach for City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; and the Mixed Use zone. This alternative provides for short-term non-accessory parking and off-site parking as a discretionary activity in all of these areas. Long-term non-accessory parking is a discretionary activity in the Metropolitan, Town and Local Centres zones; and the Mixed Use zone, and a non-complying activity in the City Centre zone and City Centre Fringe overlay. This alternative is preferred because it gives effect to Directive 10.6 of the Auckland Plan; allows adverse effects to be addressed through a consent process; recognises the need for a different approach for the City Centre zone and City Centre Fringe overlay; recognises the economic importance of short-term parking; supports consolidated parking; and complements the approach to accessory parking. The use of a non-complying activity status for long-term non-accessory parking in the City Centre zone and City Centre Fringe overlay recognises the need to treat these areas differently from other centres due to the high level of accessibility by public transport, the greater need to minimise commuter trips by private vehicle, and the existing supply of long-term non-accessory parking in these locations.

Alternative 2b is the preferred approach for other areas. This alternative provides for off-site parking as a discretionary activity in 'other areas'. Long-term and short-term non-accessory parking is a non-complying activity. This approach is preferred because it allows the council to consider individual proposal via a resource consent process. It also recognises that off-site parking supports more efficient use of land.

The following alternatives are therefore not recommended:

- Status quo - Retain the approach of the legacy plans
- Alternative 1 - Permitted activity status in all locations.
- Alternative 3 - Prohibited status for long-term non-accessory parking, and non-complying status for short-term non-accessory parking in the City Centre zone and City Centre Fringe overlay

The following alternatives are recommended:

- Alternative 2a - Preferred approach for the City Centre zone and City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; and the Mixed Use zone).
- Alternative 2b - Preferred approach for 'other areas' not covered by Alternative 2a.

In conclusion from the preceding discussion, the following are the recommended objectives, policies and methods.

- The objectives and policies at 3.3 Transport (RPS) and 1.2 Transport (District level) as outlined in this report
- The Auckland-wide Transport rules which give effect to Alternatives 2a and 2b
- The definitions relating to non-accessory and off-site parking as set out in section 1.9 of this report.

## 5 Record of Development of Provisions

### 5.1 Information and Analysis

Date	Author	Title	Comments	Appendix
2012	2012	Auckland City Centre Master Plan	20 year vision that sets the direction for the future of the city centre. Provides some direction for parking in the city centre	3.9.2

2012-01-17	Flow Transportation Specialists	Number of Parking and Loading Spaces Required	Base document for approach.	3.9.3
2012-01-25	Transport Planning Solutions Ltd; Houghton Consulting Ltd; UrbanismPlus Ltd	Number of Parking and Loading Spaces Required for the City Centre	Base document for approach.	3.9.4
2012-04-26	Flow Transportation Specialists	Future traffic flows in the Auckland City Centre	Additional modelling work to estimate likely effects of increases in traffic flows in the city centre, in order to offer guidance on parking standards - especially short-term parking.	3.9.5
2012-06-29	Flow Transportation Specialists	Auckland City Centre Fringe	Base document for approach.	3.9.6
2012-09	Auckland Council	Provisions as included in the August 2012 draft of the Unitary Plan	Circulated internally and to some stakeholders	3.9.7

### Legacy documents

Date	Author	Title	Comments
2009-03	Auckland Regional Council	Auckland Regional Parking Strategy	3.9.15
	Legacy councils	Legacy district plans	Researched by Flow and TPS as part of their reporting.

### 5.2 Consultation Undertaken

Date	Author	Title	Comments
2012-09	Various	Feedback received to August 2012 draft of the Unitary Plan. Responses also.	Feedback received from Auckland Transport, NZTA, Built Environment Unit, Transport and Strategy Unit, Key Retailers Group
2013	Auckland Council	Draft Unitary Plan, March 2013	Enhanced engagement covered in relevant s32

### 5.3 Decision-Making

Date	Political decision maker	Decision
2012-08-10	Political Working Party	For the City Centre zone and City Centre Fringe overlay: short-term parking should be a discretionary activity; long-term parking should be a non-complying activity.