2.39 Traffic in centres – S 32 evaluation for the Proposed Auckland Unitary Plan

1 Overview and Purpose

1.1 Subject Matter of this Section

An objective of the Auckland Plan is that commercial activities should be located in centres[1]. This is sometimes difficult as in-centre land is scarce and its cost and the fragmentation of sites can make development uneconomic. In legacy councils the regulatory costs of transport assessments often exacerbated these difficulties. Centres are more congested that most out-of-centre areas so it is more difficult to demonstrate that an in-centre development will have fewer traffic effects than an out-of-centre development. This indirectly encourages out-of-centre development, which is contrary to the Auckland Plan objectives.

The Proposed Auckland Unitary Plan (the Unitary Plan) does not require integrated transport assessments (ITA) or the use of high traffic generating activity rules (HTGA rules) for commercial activities that locate in-centre. This S32 analysis demonstrates why this approach is proposed.

1.2 Resource Management Issue to be Addressed

Change 6 to the Auckland Regional Policy Statement (Operative 2012) sought to implement the 1999 Regional Growth Concept and integrate land use with transport. The change required an Integrated Transport Assessment (Appendix J) be prepared for '*proposals to amend the MUL, Structure Plans, Plan Changes, Variations and resource consent applications which enable major trip generating activities*' (Method 2.6.12.7).

The approach was considered necessary given the Auckland context, where transport and accessibility are viewed as significant issues facing the region. There are concerns that many of the transport issues in Auckland are the direct result of incremental land use and transport decisions. These are made in isolation from each other and do not always address all modes of transport or adequately assess the wider and long-term implications of transport and land use decisions.

The council has also received advice from commercial operators and landowners that the requirements for ITA and HTGA are a regulatory disincentive to the location of commercial activities in-centre.

The issue to be addressed is how to integrate land use and transport decisions in a way that makes in-centre commercial development more attractive.

1.3 Significance of this Subject

The Unitary Plan proposes a significant policy shift as it does not require new in-centre commercial activities to avoid, remedy or mitigate all of their adverse effects.

This creates the potential for increased costs to council in terms of mitigation of in-centre transport congestion and ensuring public transport initiatives are well funded, frequent and efficient. This is a potential realignment of infrastructure spend between in and out-of-centre development. There is likely to be increased transport infrastructure costs to council in-centre as fewer of these costs are being met by the private sector.

This S32 makes the case that the costs of the approach are outweighed by the wider benefits to the community and the region. It is considered that these are likely to be offset by the increased efficiencies of use in-centre (due to more use of the transport resource,

[1] This S32 analysis is based on the assumption that a centres + policy approach to the location of commercial activities is the preferred approach. See the Business package S 32 analysis for a full discussion of this approach.

particularly with increased public transport usage) and lower infrastructure costs to council that result from out-of-centre commercial development.

1.4 Auckland Plan

Chapter 8 and Chapter 13 of the Auckland Plan are particularly relevant to this report.

Chapter 8 includes the following (p 203).

- *Strengthen Auckland's network of metropolitan, town, local and neighbourhood centres so they are well-connected and meet community needs for jobs, housing, and goods and services, at a variety of scales. Auckland's network of centres will:*
  - *Be the primary focus for retail and other commercial activity, providing a wide range of outlets in a competitive environment, while limiting out-of-centre retail and office development*
  - *Accommodate an increase in the density and diversity of housing in and around centres*
  - *Develop sufficient scale, intensity and land-use mix (appropriate to a centre's position in the hierarchy) to support high-frequency public transport*
  - *Concentrate activities which generate a high number of trips*
  - *Maximise access by walking, cycling and public transport and support a reduction of car trips*

Chapter 13 includes the following.

- Paragraph 737 identifies that the three components required to address current congestion problems, accommodate future business and population growth, and move to a 'single transport system' are to:
  - *'improve and complete the existing road and rail network*
  - *encourage a shift towards public transport; and*
  - *support environmental and health objectives through walking and cycling'. (p313)*

Priority 1

- *'Manage Auckland's transport as a single system' (p318)*

Priority 2

- *'Integrate transport planning and investment with land use development' (p322)*

Strategic direction 13

- *'Create better connections and accessibility within Auckland, across New Zealand and to the world.' (p 312)*

Directive 13.1

- *'Manage Auckland's transport system in accordance with the principles in Box 13.1 and review existing policies to reflect Auckland's single system transport approach and principles'. (p319)*

1.5 Current Objectives, Policies, Rules and Methods

Legacy plans typically require ITA and HTGA rules for commercial development regardless of location, to ensure that adverse effects on the transport system are avoided, remedied and mitigated.

As described above, this disincentives new in-centre commercial development.

1.6 Information and Analysis

The transportation benefits of a compact urban form have been demonstrated by, for example, Stephen Abley's evidence for the Change 6 hearings. This evidence provides a

good explanation of how a centres approach has positive effects overall on the transportation network - see 5.1 for this and further references.

The High Court has also recognised the benefits of a centres approach for the transport network:

> *'By operating a district centre, as opposed to a dispersion model, traffic movements will of necessity be focused around the district centre. The effect will be to intensify traffic in those areas but at the same time reduce the traffic impact on other sections of the roading network. There are thus significant advantages in terms of overall trip miles and traffic generation to be gained in concentrating businesses in one area. The aim is that overall a better result is achieved. As a whole, the roading network is 'better off'.'*[2]

A centres approach also clearly encourages in-centre commercial development that is sought by the Auckland Plan.

The approach also requires infrastructural investment, being necessary improvements to the existing rail and road system, as well as ensuring the funding of efficient public transport initiatives and services. This aspect of the approach lies outside the scope of the Unitary Plan.

1.7 Consultation Undertaken

Consultation on this subject has been undertaken with commercial business owners and landowners and Auckland Transport during the Auckland Plan and Unitary Plan development process (refer Appendix 3.39.2).

1.8 Decision-Making

See Appendix 3.39.3.

1.9 Proposed Provisions

The significant difference between legacy plans and the proposed Unitary Plan is the absence of a requirement for an ITA or HTGA rule for new commercial activities in the city centre, metropolitan or town centres.

The absence of a rule requiring an ITA or HTGA rule for in-centre commercial activity supports the Auckland Plan's in-centre intensification and consolidation objectives. In doing so, the Auckland Plan and Unitary Plan accept the pattern and distribution of traffic caused by in-centre commercial activity as 'acceptable', given both the wider benefits to the entire road transport network, as well as the overall public good benefits that stem from a compact urban form.

1.10 Reference to other Evaluations

This section 32 report should be read in conjunction with the following evaluations:

- 2.1Urban form and land supply
- 2.4 Business
- 2.5 Building heights
- 2.6 Business building form and design
- 2.7 Design statements
- 2.8 Sustainable design
- 2.9 Accessory parking
- 2.38 Non-accessory parking
- 2.40 Cycle parking

[2] Christchurch City Council vs Emma Jane et al. High Court CIV-2008-485-000280 [paragraph 30]

- 2.41Strategic Transport Corridor zone
- 2.43 Land Transport Noise
- 2.44 Air quality buffers – major roads
- 2.46 City Centre precincts

2 Objectives, Policies and Rules

The following is an evaluation of the appropriateness of the objectives, policies and rules in achieving the purpose of the RMA, in the context of the identified issue.

2.1 Objective

The following objectives are proposed:-

Part 1, Chapter B, Section 3 – RPS Objective 2 – 3.1 Commercial and industrial growth
Commercial growth is focused within a hierarchy of centres and identified growth corridors that support the compact urban form.

Part 1, Chapter B, Section 3 – RPS Objective 5 – 3.2 Significant infrastructure and energy
Infrastructure planning and development is integrated and co-ordinated at an early stage with land use and development to support residential and business growth.

Part 1, Chapter B, Section 3 – RPS Objective 2 – 3.3 Transport
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.

Part 2, Chapter D, Section 3 – Zone Objective 2 – 3.1 General objectives and policies for Centres, Mixed Use, General Business and Business Park zones
Development is of a form, scale and design quality so that centres are reinforced as focal points for the community.

Part 2, Chapter C, Section 1 – Auckland-wide Objective 1 – 1.2 Transport
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.

Part 2, Chapter C, Section 1 – Auckland-wide Objective 5 – 1.2 Transport
5. Development provides access between the road and activities by:
a. facilitating the effective, efficient and safe operation of the transport network
b. prioritising pedestrian safety and amenity along public footpaths
c. achieving a balance between the placemaking, movement and access functions of the road.

Appropriateness of the objectives

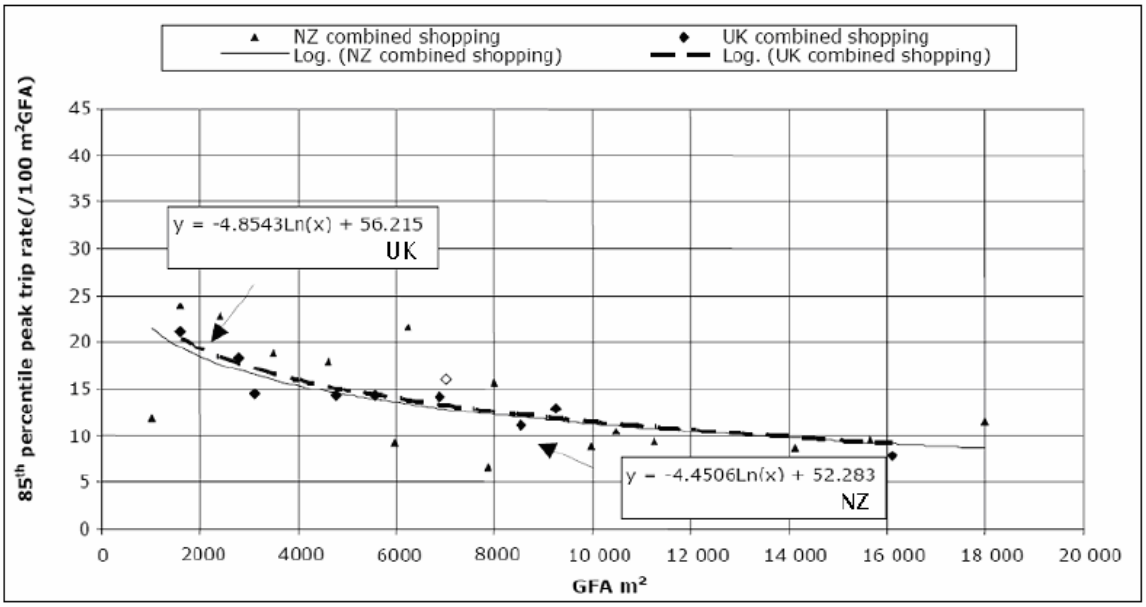
The objectives seek to promote a centres+ approach to consolidating and intensifying development within commercial centres, as well as ensuring that necessary (transport) infrastructure is integrated with this urban form.

The transport benefits of such an approach include:

- due to economies of scale, larger scale and more intensive centres result in a corresponding reduction in vehicle trip generation rates **(Figure 1)**;
- internal travel within a centre is linked via sustainable (walking) modes. Even if the original trip to the centre was by motor vehicle, internal multi-trips are increased and walking between destinations is more frequent. This promotes more efficient travel and reduces environmental impacts of transportation; and lastly

- dispersed retail outlets are not compact because they typically require a large number of single use car parks. This is an inefficient use of land that is partially due to their poor location, eg they are not surrounded by high-density residential activities. This means they are difficult to support with an efficient public transport system and will have more significant effects in terms of transport. Centres such as Newmarket, Sylvia Park, Botany town centre and alike provide greater transportation efficiencies, and are easier to support in terms of transport.

Figure 1: Comparison of UK and New Zealand 85th percentile trip rates –retail



Source: Douglass & McKenzie p107.

The centres + approach requires the plan to anticipate that traffic and network conditions will deteriorate around commercial centres as the centres intensify, redevelop and/or grow. It follows that at an objective level there is acceptance that increases in traffic around centres is necessary and appropriate and that council will accordingly plan mitigation measures and invest in public transport initiatives.

These objectives collectively provide for people and communities to be able to further their social, cultural and economic well-being, primarily through recognising the importance of integrating transport and land use planning. If the link can be better managed, greater well-being can be achieved. This typically means locating major trip generating activities where they be accessed by walking and cycling (by being located adjoining areas of residential intensification), and secondly where they can be well serviced by public transport. This aligns with a multi-modal transport system that provides emphasis on public transport, walking and cycling modes which can also assist in providing for people's health and safety**.** It can also assist in addressing areas where there are existing network deficiencies (through concentrating mitigation options) as well as integration between transport mode choice and mode interchange (i.e. car to bus to rail).

In terms of sustaining the resources to meet reasonably foreseeable needs, such an approach provides for: the ability to concentrate investment in public transport initiatives that are more efficient; enables shorter or combined trips (and hence reduces trip generation and length); and provides for the efficient use of physical resources associated with existing transport infrastructure.

The objectives do not specifically refer to safeguarding the life supporting capacity of air, water, soil or ecosystems, nor health and safety; however these aspects benefit from a more integrated and concentrated approach to land use and infrastructure management.

Adverse effects are addressed in terms of the need to manage the effects of traffic generation on the transport network. This takes into account the whole transport network, which aligns with the need to balance the costs of in-centre transport congestion against the benefits this can have on the entire transport network.

The objectives are also considered in accordance with the following principles of the Act:

- **S7(b)** in that the objective seeks to promote certainty in ongoing economic development which will provide for the continued use of physical resources associated with transport infrastructure.
- **S7(ba)** through minimising trip generation by agglomerating commercial activities within town centres.
- **S7(g)** in that the objective seeks to provide for the efficient use of transport infrastructure.
- **S7(c)** and **s7(f)** as the objectives seek to improve the environmental quality and amenity for people, rather than motor vehicles and roading infrastructure.

Achievability
The council has the ability to implement a centres+ approach to commercial consolidation, provided it is committed to providing in-centre development with the infrastructure it needs to be successful.

It is important to support the centres+ approach by reducing the barriers that commercial activities face when locating in-centre. This approach helps to achieve this.

Reasonableness
The objective is considered to be reasonable because it relates to a key issue facing Auckland as grows. Promoting in-centre development, particularly commercial development, is key to achieving a quality compact built form, integrating transport planning and infrastructure and reducing (overall) the environmental effects of transport generation.

2.1.1 Policies

The following policies support the above objectives.

Policy 1 of the RPS – 3.1 Commercial and industrial growth
Encourage commercial intensification to occur in the city centre, metropolitan and town centres, and enabled on identified growth corridors, to provide the primary focus for Auckland's commercial growth.

Policy 7 of the RPS – 3.3 Transport
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.

Policy 9 of the RPS – 3.3 Transport
Improve the integration of land use with transport by:

- *a. the delivery of a transport system that is planned, funded, staged to enable the delivery of quality urban growth as outlined in chapter B, section 2*
- *b. ensuring activities likely to generate significant trip numbers support, and can be serviced by the rapid and frequent service network*

c. managing activities along freight routes, other heavily trafficked roads, rail lines, or adjacent to ports and airports so that they do not compromise the effective, efficient and safe operation of these routes or give rise to reverse sensitivity effects.
d. requiring proposals for high trip generating developments, located outside of centres and/or not provided for in the Unitary Plan, to demonstrate integration with the transport network and mitigate adverse effects on that network.

Policy 13 of the RPS – 3.3 Transport
Support land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods.

Policy 2 of Auckland-wide objectives and policies – 1.1 Infrastructure
Prevent reverse sensitivity effects from inappropriate subdivision, use and development which may compromise the operation and capacity of existing or approved significant infrastructure.

Policy 1 of Auckland-wide objectives and policies – 1.2 Transport
Require high traffic generating activities or subdivisions which:
a. are proposed outside of the following zones:
- *the City, Metropolitan, Town Centres zones*
- *the Terrace Housing and Apartment Buildings zone; and*

b. do not already require an Integrated Transport Assessment under clause G.17.3.7 to mitigate and manage adverse effects on and integrate with the transport network by measures such as travel planning, providing alternatives to private vehicle trips, staging development, or undertaking improvements to the local transport network.

Policy 1 of Zone objectives and policies – 3.1 General objectives and policies for Centres, Mixed Use, General Business and Business Park zones
Reinforce the function of the city centre, metropolitan centres and town centres as the primary location for commercial activity.

Appropriateness
The policies seek to consolidate commercial development within the network of centres and support the integration of in-centre land use and transport by stating that;
- in some locations and at some times congestion will occur (Policy 7 of the RPS – 3.3 Transport)
- high trip generating activities should be serviced by the rapid and frequent service network (Policy 9 of the RPS – 3.3 Transport) and require these activities to mitigate their effects when they are not in the City Centre, Metropolitan or Town Centre zones (Policy 1 of Auckland-wide objectives and policies – 1.2 Transport)
- high trip generating activities that locate out-of-centre by should integrate with the transport network and mitigate adverse effects (Policy 9 of the RPS – 3.3 Transport)
- in-centre development is supported by encouraging land use development that reduces the demand for private vehicle trips (Policy 13 of the RPS – 3.3 Transport).

The policies are effective in that they are supported by a method that reduces barriers to commercial activities locating in-centre. They also require out-of-centre commercial development to undergo a higher level of assessment and mitigate their adverse effects.

The policies are efficient in that they simply remove a regulatory hurdle to in-centre commercial development. The policies are inefficient in that council will need to invest in mitigation and public transport initiatives to compensate for the reduced private investment. However there is expected to be a net benefit to the community in terms of overall trip distances, traffic generation, modal choice and public transport efficiencies.

2.1.2 Rules and other methods

Methods (including rules)

The proposed provisions are summarised in 1.9 above.

(i). Rules and Activity Tables for activities within the city centre, metropolitan centres and town centres as these relate to the extent, type and scale of commercial (retail and office activities), and the associated status for each (clause 1 of the business zone rules).
Commercial activity in centres are excluded from the ITA and HTGA rule requirements. All controlled, restricted discretionary and discretionary activities are excluded from the ITA requirement (clause 2.7.9 of the general provision rules). As commercial activity within the City Centre, Metropolitan and Town centres is permitted, these activities do not require ITAs. Similarly, the HTGA rule does not apply in these zones (clause 3.1 of the infrastructure rules).

(ii). Assessment criteria.

(iii). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, Long Term Plan spending on in-centre transport mitigation, public transport initiatives and working with the private sector in terms of trip management.

The approach is effective as it removes regulatory barriers to the achievement of the Auckland Plan objective to locate commercial activity in centres. It also makes out-of-centre commercial development potentially subject to these rules so, comparatively, in-centre commercial development is more attractive. The ITA approach is also consistent with the Auckland Transport (2012) Integrated Transport Assessment Guidelines. This identifies (page 8) that ITA's should be required where new proposals are established in a manner that is not anticipated by the Unitary Plan Framework – eg where the activities are non-complying.

The rules are efficient in that they simply remove a regulatory hurdle to in-centre commercial development. The policies are inefficient in that council will need to invest in mitigation and public transport initiatives to compensate for the reduced private investment. However there is expected to be a net benefit to the community in terms of overall trip distances, traffic generation, modal choice and public transport efficiencies.

2.1.3 Costs and Benefits of Proposed Policies and Rules

An assessment of the potential costs and benefits of the policies and rules is set out below. This assessment is primarily qualitative. There has not been a quantitative assessment conducted specifically for the Unitary Plan of the potential costs and benefits of this approach. However other documents provide the background to the costs and benefits – see 5.1 Information and Analysis.

Costs	**Social** *to the community* Potential increase adverse effects in terms of congestion and safety within close proximity to commercial centres. **Economic** *to the community* Congestion costs in terms of economic efficiency where seeking to traverse (but not go into) centres. *to the council* Potentially significant costs in terms of mitigation of in-centre transport congestion and ensuring public transport initiatives are well funded, frequent and efficient.

	to business owners (Limited) costs to particular retail typologies (supermarkets and large format retail) where private motor vehicle currently (and in the foreseeable future) remains the main customer preference for access, through crowding out and increased congestion in centres. **Environmental** Increase in conflicts between transport modes (i.e. pedestrian and private vehicle) as activities consolidate at higher order centres. **Cultural** There are no anticipated cultural costs as a result of this policy.
Benefits	**Social** *to the community* Regulatory link between the distribution and integration of centres and the transport network, and the ability to incentivise major trip generating activities into centres where there effects can be concentrated, and somewhat dissipated through a reduction in overall trip generation and shorter trips. Reinforcement of centres linked with potential ability to provide a greater range of goods and services for the surrounding and intensifying community, and the ability to access centres by a range of modes. Incentivises in-centre development where the concentration of such better meets the needs of the less accessible and mobile. **Economic** *to the community* Incentivising activity in centre, improves agglomeration and creates efficiencies in terms of trip journeys, generation and public transport initiatives. Reduces congestion (overall) across the network i.e. that is a net benefit in terms of consolidation. *to the council* Ability to plan for, and ensure the efficient development of transport and community infrastructure around and within higher order centres, as a key component of the single system transport network. Proactive ability to identify and manage mitigation measures for the integration of the transport network with consolidated commercial, recreational and social infrastructure within the commercial centres and identified growth corridors. *to business owners* Increased certainty associated with supporting private and public investment, including transport mitigation and public transport infrastructure. **Environmental** Seeking to incentivise in-centre development as opposed to a dispersion model, will increase traffic movements and congestion in-centres. The effect will be to intensify traffic in those areas but at the same time reduce the traffic impact on other sections of the roading network and improve the efficiency and investment in public transport initiatives. There are thus significant advantages in terms of overall trip miles and traffic generation to be gained in concentrating businesses in one area. The aim is that overall a better result is achieved. As a whole, the roading network is 'better off'. Provides more holistic opportunities to consider mitigation in-centre rather than

	by project. **Cultural** There are no anticipated cultural benefits as a result of this policy.
Effectiveness	There is a consistent policy thread throughout the Plan in seeking to 'direct' commercial, recreational, and social activities into the higher order commercial centres so as to better enable and consolidate social and economic well-being (and the associated support of modal choice and the improved efficiency of infrastructure), thus resulting in increased in-centre functional amenity, as well as consolidating urban form. The identified policies and their methods (in this case the absence of an ITA requirement for major trip generators establishing within higher order centres) can assist in terms of incentivising or encouraging (refer Policy 2.3.1.1 (Commercial Growth)) in-centre intensification and consolidation. Such an approach seeks to reduce the regulatory hurdles associated with in-centre development. More importantly the approach infers that the council will need to invest through its Long Term Plan and the Regional Land Transport Programme ('RLTP') in mitigation measures and increased public transport initiatives to assist in reducing congestion and improve transport efficiency within its centre network in recognition of the wider public good attributable to in-centre development. The approach is more effective than not in terms of encouraging in-centre development, however there are a number of capacity hurdles that also hinder in-centre development that require consideration in conjunction with this method.
Efficiency	The policy, methods (and rules) can be implemented for a significant cost, predominantly where the council will need to invest in substantial mitigation and public transport initiatives to ensure that centre and associated transport network efficiency is not downgraded to the detriment of centre function or public safety. However, there is overall a net benefit *to the community* for in-centre consolidation, in terms of overall trip distances, traffic generation, modal choice and public transport efficiencies. The removal of an ITA for in-centre activity removes a regulatory hurdle in relation to encouraging in-centre activity.
Risks	There is are localized risks associated with the natural capacity of the road network to accommodate in centre development, unless this is met with commensurate investment by the council in alleviating such congestion through in road works or advances in public transport investment.
Appropriateness	Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and methods are appropriate in assisting to achieve the objectives.

2.1.4 Adequacy of Information and Risk of Not Acting

The costs and benefits of the approach have been assessed in a qualitative way. There has not been a quantitative assessment conducted specifically for the Unitary Plan of the potential costs and benefits of this approach. However other documents provide the background to the costs and benefits – see 5.1 Information and Analysis.

The council has received input from commercial operators and landowners that the requirements for ITA and HTGA are a regulatory disincentive to the location of commercial activities in-centre. In light of this, the risk of not acting is that this situation will continue and in-centre development will continue to be disincentivised. This would not contribute to

Council's overall objective of encouraging commercial development to locate in-centre and so would not achieve sustainable management in terms of Part 5 of the Act.

3 Alternatives

	Status quo alternative – Requirement for an ITA and HTGA rule for in-centre commercial activity	Alternative 1 – Preferred alternative - no requirement for an ITA or HTGA in the City Centre, Metropolitan Centre or Town Centre zones for in-centre commercial activity
Description	This alternative requires an ITA and HTGA rule for all high trip generating commercial development, regardless of location.	This alternative requires an ITA and HTGA rule for high trip generating commercial development only in out-of-centre locations. Commercial development in the City Centre, Metropolitan Centres and Town Centres do not have to demonstrate compliance with these rules.
Appropriateness	Given the Auckland Plan's objective to locate commercial activity in-centre and taking into account the analysis in this S32, it is considered that this alternative would not assist in resolving the issue expressed in 1.2. Consequently it is not consistent with Part 2 of the Act.	Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, the objectives, policies and methods appear appropriate to help resolve the issue.
Effectiveness	The alternative treats commercial development the same whether it is in or out-of-centre. It fails to reduce the regulatory hurdles associated with in-centre development and in doing so does not achieve the objective.	There is a consistent policy thread throughout the Auckland Plan and Unitary Plan that seeks to direct commercial activities into the City Centre, Metropolitan Centres and Town Centres. This is to consolidate urban form, increase in-centre amenity, improve the efficiency of infrastructure and enhance social and economic well-being. The alternative will reduce the regulatory hurdles associated with in-centre commercial development. To be effective the alternative does require council investment in transport and public transport initiatives to reduce congestion and improve transport efficiency within its centre network. This recognises the wider public good attributes of in-centre development. The alternative is more effective than not in terms of encouraging in-centre development, however it requires investment from council to achieve the objective. It is possible however that the alternative may not be sufficient to overcome other difficulties with commercial in-centre location, particularly for supermarkets, department stores and large format retail, for which car travel remains the main customer preference for access.
Efficiency	The alternative is efficient in that it is the status quo and does not require policy adjustment. It is efficient also because it does not require council to invest in traffic mitigation and public transport initiatives in-centre. However there is a cost to the wider community as the alternative may defer/reduce in-centre intensification, and result in a less efficient transport network overall.	The alternative removes a regulatory hurdle and from this perspective it is very simple and efficient. It is also more efficient for a developer who seeks to locate commercial activity in-centre. There are potentially significant costs if council has to invest in traffic mitigation and public transport initiatives, to ensure that centre and associated transport network efficiency is not downgraded to the detriment of centre function or public safety. However, the alternative is efficient as overall there is a net benefit to the community from in-centre commercial consolidation, in terms of overall trip distances, traffic generation, modal choice and public transport efficiencies.
Costs	**Social** *to the community* Public transport benefits of in-centre development may not be realised. Centre vitality and viability less likely to improve. Less mobile people may find it more difficult to access goods and services. **Economic** *to the community* Greater travel costs to access goods and services. Congestion (overall) across the network continues to worsen without public transport benefits of in-centre development. *to the council* Council has to react to unplanned out-of-centre development rather than being able to focus on centres	**Social** *to the community* Potential to increase adverse effects in terms of congestion and safety within close proximity to commercial centres. **Economic** *to the community* Congestion costs in terms of economic efficiency where seeking to traverse (but not go into) centres. *to the council* Potentially significant costs in terms of mitigation of in-centre transport congestion and ensuring public

	and public transport to a greater extent. *to business owners* Business areas seeking to locate in-centre have higher compliance costs. **Environmental** Traffic more likely to be dispersed throughout region. Overall trip distances increase and public transport not reinforced. As a whole, the roading network is 'worse off'. **Cultural** There are no anticipated cultural costs as a result of this policy.	transport initiatives are well funded, frequent and efficient. *to business owners* Rule encourages in-centre development which may be more expensive and require different retail model for some business types. **Environmental** Increase in conflicts between transport modes (i.e. pedestrian and private vehicle) as activities consolidate at higher order centres. **Cultural** There are no anticipated cultural costs as a result of this policy.
Benefits	**Social** *to the community* Centres less congested for users. **Economic** *to the community* Goods and services could potentially be cheaper if large format retail activities continue to locate out-of-centre *to the council* Council needs to invest less in in-centre traffic mitigation. *to business owners* Effects of HTGA assessed in equal and transparent way. **Environmental** Centres less congested with a potentially more pleasant environment. **Cultural** There are no anticipated cultural benefits as a result of this policy.	**Social** *to the community* Effects of major commercial trip generating activities more likely to be in-centre. Leads to a reduction in overall trip generation, shorter trips and the ability to access centres by a range of modes. Centre vitality and viability reinforced. In-centre development better meets the needs of the less mobile people. **Economic** *to the community* More in-centre development improves agglomeration and creates efficiencies in terms of trip journeys, generation and public transport initiatives. Reduces congestion (overall) across the network. *to the council* Ability to plan for, and ensure the efficient development of transport and community infrastructure around and within higher order centres, rather than reacting to unplanned out-of-centre commercial development. *to business owners* Increased certainty due to support shown for in-centre commercial development. **Environmental** In-centre development (as opposed to a dispersed model) will increase traffic movements and congestion in-centres. This intensifies traffic in those areas but at the same time reduces the traffic impact on other sections of the roading network and improves the efficiency and investment in public transport initiatives. There are thus significant advantages in terms of overall trip miles and traffic generation to be gained in concentrating businesses in one area. The aim is that overall a better result is achieved. As a whole, the roading network is 'better off'. **Cultural** There are no anticipated cultural benefits as a result of this policy.
Risks	Council's approach is perceived to fail to support its higher objectives of in-centre commercial activity. In-centre commercial activity less likely to be achieved.	There are localised risks associated with the natural capacity of the road network to accommodate in-centre development. There is a risk that council will not sufficiently fund mitigation and public transport to an extent that enables the benefits of the alternative to be realised. Alternative may not be sufficient to overcome other difficulties with commercial in-centre location.

4 Conclusion

The Auckland Plan has an objective to locate commercial activity in-centre (particularly the city centre, metropolitan and town centres). In-centre commercial activity has acknowledged benefits for the region's transport network including considerable trip generation efficiencies, modal choice, and public transport benefits. The vitality and viability of centres are also enhanced.

ITAs and HTGA rules are important tools when integrating land use and the transport network. Requiring an ITA or HTGA rule for commercial developments in-centre is contrary to the wider public good benefits the objective can achieve, and acts as a disincentive.

The proposed approach removes a regulatory hurdle and may assist in encouraging commercial development within centres. However, it is acknowledged that there are a range of other constraints that may make in-centre commercial development less desirable for some typologies, and that the council will need to ensure the in-centre transport network remains efficient.

In conclusion, the proposed objectives, policies and methods are considered to be appropriate in terms of achieving the purpose of the Act.

5 Record of Development of Provisions

5.1 Information and Analysis

Background documents

Strategies:

- → New Zealand Transport Strategy (NZTS) 2008
- → Government Policy Statement (GPS) on Land Transport Funding 2012/13-2021/22
- → Auckland Plan 2012
- → Change 6 to the Auckland Regional Policy Statement (Operative 2012)

Other documents:

- *Auckland Transport (October 2012). Integrated Transport Assessment Guidelines.* (Appendix 3.2.15)

- *Transport New Zealand Research Report 453 (2011). Douglass M & Abley S. Trips and Parking Related to Land Use* (Appendix 3.39.1)

- *High Court CIV-2008-485-000280. (2008) Christchurch City Council vs. Emma Jane et al.*

- *Evidence of Stephen John Abley on behalf of Auckland Regional Council, 28 August 2009 ENV-2007-304-000472* (Appendix 3.4.2)

5.2 Consultation Undertaken

See Appendix 3.39.2.

5.3 Decision-Making

See Appendix 3.39.3.

The council has worked with Auckland Transport to develop this approach. The concept was discussed with political representatives (eg in a presentation to the PWP on 27-07-2012) but no decision was sought on this issue.

There has been no specific political decision on this topic. The ITA provisions were proposed in the March 2013 draft but the HTGA rule was not contained in that draft.