

**2.9 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 Unitary Plan.

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

The subject matter of this report is supply of 'accessory parking' ie the approach the Unitary Plan takes to the controlling the amount of on-site parking which is required or permitted in association with development. The term 'accessory activities' is defined in the Unitary Plan as follows:

#### **"Accessory activities**

Activities located on the same site as a primary activity, where the activity is incidental to, and serves a supportive function of the primary activity.

Includes

- permitted or required parking"

Accessory parking is considered to be incidental and supportive to another activity on the same site. Some legacy plans use the term 'ancillary parking'.

This 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 have parking rules which differ from those specified 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 some parts of Auckland, the approach to accessory parking in the Unitary Plan is a significant policy shift. With the exception of the City Centre, and some other centres (eg parts of Newmarket, New Lynn), the legacy plans generally adopt an approach of requiring a minimum amount of on-site parking to be provided in conjunction with an activity or development. This approach is intended to avoid adverse effects, such as localised traffic congestion, or illegal parking, that can occur from overflow parking. The Unitary Plan takes a different approach, by applying parking maximums which permit, rather than require, accessory parking to be provided in areas of intensification in and around centres and in the Mixed Use zone. The zones and locations where the parking maximums apply are: City Centre zone; City Centre Fringe overlay<sup>1</sup>; Metropolitan, Town and Local Centres zones; Mixed Use zone; Terrace Housing and Apartment Buildings zone; and the Mixed Housing Urban zone. Outside of these locations, and in the Mixed Housing Urban zone (where both parking maximums and minimums apply), the Unitary Plan does require a minimum level of accessory parking to be provided in conjunction with an activity or development. In general the minimum parking rates specified in the Unitary Plan require less parking to be provided than is required by the legacy plans.

In the zones and locations where parking maximums (and no parking minimums) apply, it is anticipated that implementation of this approach will have significant benefits in promoting efficient use of land, reducing development costs, encouraging better urban design outcomes, and supporting public transport. It is considered that potential negative effects are not significant in relation to benefits, and that such effects can be managed.

### 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...'

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<sup>1</sup> The City Centre Fringe overlay is identified on the infrastructure overlay layer of the planning maps. It applies around the City Centre zone.

### *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>2</sup>.'

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

In general, legacy plans had objectives, policies and rules which placed greater emphasis on requiring sites to provide sufficient on-site parking so as to avoid adverse effects such as localised congestion associated with overflow parking. With some exceptions, the effects of parking requirements on the intensification and its role in supporting public transport were not well reflected in the legacy documents. The notable exception is the Central Area Section of the Auckland City District Plan, which adopted a parking maximum approach.

The legacy plans have a range of parking rate requirements with some similarities and some differences between plans. Differences can occur because different rates have been applied but also because activities are defined and grouped in different ways.

Additional information about the specific parking rules contained in the legacy plans can be found in the reports completed in January 2012 by Flow Transportation Specialists, and Transport Planning Solutions et al (see 5.1).

#### **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 new 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 accessory 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 set a policy direction of progressively introducing maximum parking standards for non-residential development in town centres in conjunction with the implementation of comprehensive parking management plans.

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<sup>2</sup> paragraph 577, Chapter 13, Auckland Plan

The Auckland Regional Parking Strategy places some emphasis on the implementation of comprehensive parking management plans. However it was apparent that given the timeframes of the Unitary Plan, and the number of centres involved, it would not be possible to develop such plans for each centre, prior to developing a Unitary Plan parking approach. It was recognised that the Unitary Plan presented a unique opportunity to develop a more co-ordinated regulatory approach to parking across Auckland. There was desire to take advantage of this opportunity and not simply defer decisions about removing parking minimums, and introducing parking maximums in centres into the future.

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>3</sup>.

The two reports provided by Flow Transportation Services 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. A further report by Flow Transportation Services in June 2012 provided the basis for the identification of a 'City Centre Fringe overlay' around the City Centre where some specific parking controls apply. 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. Work undertaken by Flow Transportation Services, Transportation Planning Solutions, and later by MRCagney Pty Ltd for the council has been informed by international literature<sup>4</sup> which highlighted the unintended consequences of parking regulation.

The Auckland Plan, which was finalised in March 2012 provided a strategy to steer Auckland's future development over the next 30 years. As outlined in 1.4, 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, the PWP considered broad options provided by officers and made the following decisions about accessory parking:

- refine the existing legacy approach in the City Centre
- outside of the City Centre - apply a different parking approach for centres as compared with the rest of the region.

The approach endorsed by the PWP included:

- apply parking maximums in centres and the city fringe area around the city centre
- apply minimums (as well as maximums) in some centres not on the Rapid and Frequent Service Network<sup>5</sup> by 2022

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<sup>3</sup> p52, Auckland City Centre Masterplan, 2012

<sup>4</sup> For example: Donald Shoup *The High Cost of Free Parking*, Planners Press, Chicago, 2011.

<sup>5</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:

- apply parking minimums (with no maximums except for offices) outside centres
- apply parking maximums to offices in all locations
- apply a land use approach which controls out of centre development eg retail
- support with comprehensive parking management plans (by Auckland Transport).

The accessory parking rules were included in the August 2012 draft of the Unitary Plan. That draft was circulated internally, and to some key external stakeholders such as NZTA and the Key Retailers Group<sup>6</sup>.

The parking rules included in the August 2012 draft of the Unitary Plan were accompanied by mapped parking overlays which identified the areas in and around centres where the parking maximums applied. The City Centre Fringe overlay applied to identified areas around the City Centre. The other parking overlays applied to metropolitan, town and local centres and were based on distances from stops on the Rapid and Frequent Service Network 2022. The overlays applied to sites located within 1km of rail or busway stops, or 800m from bus stops (generally measured from the main bus stop in the centre). The overlays also identified some locations where parking maximums and parking minimums applied. Those locations were in and around three town centres and 12 local centres<sup>7</sup> which were, at that time, not programmed to be served by the Rapid and Frequent Service Network by 2022. The minimums applied in those locations were 75% of the maximum parking rates.

As the result of feedback and review of the August 2012 draft of the Unitary Plan, the following main changes were made to the accessory parking rules:

1. The maximum parking rates for retail were made more permissive in response to issues raised by the Key Retailers Group. The issues raised were about the dependence of retail on short-term parking for trips generally made outside peak times, or as drive by trips. Such trips are less suited to public transport than other land uses such as offices or educational facilities which generate a higher number of commuter trips.
2. City Centre Fringe overlay retained, but other overlays removed. This was replaced by a shift to a zone based approach, with maximums being applied to the following zones and areas: City Centre Fringe overlay; Metropolitan, Town, and Local Centres zones, Mixed Use zone, Terrace Housing and Apartment Buildings zone.
3. Deleted the approach whereby minimums as well as maximums would apply to three town centres and 12 local centres. Maximums only applied.
4. Some parking rates modified. In response to issues raised by key retailers, separate parking rates were provided for trade suppliers where minimums apply.

The change to more permissive parking maximums for retail was identified as requiring specific political approval. The Political Working Party agreed this direction at their meeting of 4 December 2012.

Feedback received to the March 2013 draft of the Unitary Plan covered a range of views about parking, and included some feedback about parking rates for specific activities. The key matters raised in feedback were:

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- 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.'

<sup>6</sup> Key Retailers Group includes representatives from Westfield, Foodstuffs, Kiwi Income Property Trust, The Warehouse, Progressive, AMP, Bunnings.

<sup>7</sup> The three town centres were Orewa, Silverdale, and Whangaparaoa. The twelve local centres were Addison, Albany Village, Beach Haven, Dawson Road, Drury, Favona, Greville, Gulf Harbour, Hingaia, Long Bay, Meadowlands, Torbay.

- concern about intensification and the traffic and amenity effects of associated on-street parking
- requests for minimums to be removed from all zones - especially the Mixed Housing zone
- opposition to the removal of minimums - including from some business associations
- requests for all dwellings to have two on-site parking spaces
- requests from members of the Key Retailers Group for minimums (and no maximums) for retail in all locations, and opposition to any constraints on short-term parking
- some opposition to changes to the City Centre maximum rates
- specific concern about the parking rates for particular activities eg retirement villages, self-storage facilities, warehousing, marinas.

At their meeting of 5 July 2013, the Auckland Plan Committee gave the following interim directions:

- investigate a minimum rate of 1 park per dwelling in the Mixed Housing subzone (3 storey) which was being developed. Otherwise retain the residential rates as per the March draft
- retain the approach to retail parking as per the March draft
- investigate alternative provisions eg minimum parking provisions for rural / outer and local centres that are not and are unlikely to be well serviced by public transport.

As the result of the direction from the Auckland Plan Committee, five town centres and nine local centres were identified as not being subject to the maximum parking controls otherwise applying in the Town Centre and Local Centres zone. Instead minimum parking rates would apply, with the rates being the same as those that applied outside centres. The five town centres are Helensville, Kumeu / Huapai, Pukekohe, Warkworth and Wellsford. The nine local centres are Karaka, Kaukapakapa, Leigh, Matakana, Riverhead, Snells Beach, Te Hana, Waimauku, and Waiuku. These centres are all located outside the main metropolitan Auckland area and none are currently programmed to be on Auckland Transport's Rapid and Frequent Service Network by 2022.

In response to feedback, and as discussed with the Auckland Plan Committee, the parking minimums applying to dwellings in the two Mixed Housing zones were amended so that less parking was required. A maximum was also applied in the Mixed Housing Urban zone. Some other minor changes were made to the parking rates or descriptions for specific activities in response to feedback. Some rates were reviewed and no changes made. Technical advice was provided by Flow Transportation Specialists to assist with some matters raised in feedback about parking rates for specific activities.

### **1.9 Proposed Provisions**

The Auckland-wide parking rules are summarised below. The Unitary Plan uses both maximum rates (parking maximums) and minimum rates (parking minimums). The number of parking spaces provided in association with development must:

- not exceed the maximum rates in locations where these apply
- meet the minimum rates in locations where these apply
- meet the minimum rates and not exceed the maximum rates in locations where both apply.

#### **City Centre zone**

Parking maximums apply in the City Centre zone. For all uses, other than dwellings, the rate is 1:200m<sup>2</sup>. For dwellings, the rates vary between 0.7 to 1.7 per dwelling depending on size, with an allowance also made for visitor spaces.

No parking is permitted on sites where vehicle access would be located within a Vehicle Access Restriction - General in the City Centre zone. The location of this type of vehicle access restriction is identified on the infrastructure layer of the planning maps. It applies to streets with a high pedestrian focus.

Wynyard Quarter and the Port Area have their own parking standards. They are not included in this report as they are not covered by the general parking standards applying to the City Centre zone.

No minimums apply in the City Centre zone.

### **City Centre Fringe overlay, Centres zones, Mixed Use zone, Terrace Housing and Apartment Buildings zone, Mixed Housing Urban zone**

Parking maximums also apply in the City Centre Fringe overlay (which is identified on the infrastructure layer of the planning maps); and the following six zones: Metropolitan Centre, Town Centre, Local Centre, Mixed Use, Terrace Housing and Apartment Buildings and Mixed Housing Urban. The City Centre Fringe overlay includes the following centres - Grafton, Newton, Parnell and Ponsonby. Parking maximums are generally set at a level which seeks to accommodate no more than 85% of peak parking demand. However more permissive maximums (which allow more parking) have been provided for retail activities.

As outlined in 1.8, the rules do identify five town centres and nine local centres which are not subject to the maximum parking controls otherwise applying in the Town Centre and Local Centres zone. Instead minimum parking rates apply, with the rates being the same as those that applied outside centres. The five town centres are Helensville, Kumeu / Huapai, Pukekohe, Warkworth and Wellsford. The nine local centres are Karaka, Kaukapakapa, Leigh, Matakana, Riverhead, Snells Beach, Te Hana, Waimauku, and Waiuku. These centres are all located outside the main metropolitan Auckland area, and none are currently programmed to be on Auckland Transport's Rapid and Frequent Service Network by 2022.

The rules do not permit parking on sites where vehicle access would be located within Key Retail Frontage overlay. The location of this overlay is identified on the built environment layer of the planning maps. It applies to identified streets in Metropolitan, Town Centre and Mixed Use zones with a high pedestrian focus.

The maximums that apply to offices in the City Centre Fringe overlay (1:60m<sup>2</sup> GFA) are less permissive than the maximums applying in the other zones noted above (1:30m<sup>2</sup> GFA).

Both maximums and minimums apply in the Mixed Housing Urban zone. Otherwise no minimums apply in these zones.

### **All other areas**

Parking minimums apply in all other areas. Parking minimums are generally set at a level which seeks to accommodate no more than 75% of peak parking demand.

The only maximums that apply are for offices, and for dwellings in the Mixed Housing Urban zone. For offices, there is a maximum rate (1:30m<sup>2</sup> GFA) as well as a minimum rate (1:45m<sup>2</sup> GFA) in all of the 'other areas'. Dwellings in the Mixed Housing Urban zone are subject to a maximum, as well as a minimum.

### **All locations**

Proposals which do not comply with the standards setting out the amount of parking required or permitted are considered as a restricted discretionary activity. Outside of the City Centre zone, such proposals will be considered without the need for public or limited notification, or the need to obtain the written approval of affected parties. Applications to exceed the parking



maximums in the City Centre zone will be subject to the normal tests for notification under the RMA.

The assessment criteria for proposals to exceed the parking maximums are as follows:

- a. the additional land used for parking will not undermine efficient use of land and the growth and intensification provided for in the Unitary Plan in the following zones and locations: City Centre, Metropolitan Centre, Town Centre, Local Centre, Mixed Use, Terrace Housing and Apartment Buildings zones; and the City Centre Fringe overlay.
- b. the unique nature and/or operation of the proposed activities on the site requires additional parking spaces.
- c. the vehicle movements associated with the additional parking spaces will not have a more than minor adverse effect on the safe and efficient operation of the adjacent transport network, including public transport and the movements of pedestrians, cyclists and general traffic. This includes considering the effect of additional parking on trip generation from the site during peak commuter times.
- d. there is insufficient alternative parking in the surrounding area, including on street and public parking, to provide the additional parking sought for the proposal.
- e. there is a lack of access to the Rapid and Frequent Service Network, because the site is not within walking distance of a stop or station on the Rapid and Frequent Service Network. Walking distance is generally considered to be 1km for a stop on the rapid transit network and 800m for other stops on the Rapid and Frequent Service Network. However, walking distance will vary depending on the slope, terrain, attractiveness of the pedestrian network, and the type of pedestrian
- f. the applicant has demonstrated that it is not practicable to provide the additional parking by entering into a shared parking arrangement with another site or sites in the immediate vicinity
- g. the applicant has demonstrated that the demand for the additional parking cannot be adequately addressed by management of existing or permitted parking. Depending on number of additional parking spaces proposed, the number of employees, and the location of the site, this may need to be supported by a detailed travel plan outlining measures and commitments for the activity or activities on-site will minimise the need for private vehicle use and make efficient use of any parking provided.'

The assessment criteria for proposals to infringe the parking minimums are as follows:

- a. the amount of parking proposed is sufficient for the proposal due to:
  - i. the nature of the operation including the interaction between activities on the site
  - ii. the availability and accessibility of the site by public transport
  - iii. the measures and commitments outlined in a detailed travel plan for the site which will reduce the need for vehicle use to a level where parking demands can be satisfactorily addressed through efficient use of the proposed parking.
- b. the reduction in parking will not result in more than minor adverse effects from parking overspill on adjacent activities and the safe and efficient operation of the adjoining transport network.
- c. there is public parking on-street or off-street in the immediate vicinity with capacity and availability at the times required to serve the proposal. The council must have a reasonable expectation that the parking will continue to be available to provide for the proposal.
- d. whether the parking requirements of the proposal will be met by entering into a shared parking arrangement with another site in the immediate vicinity that has available parking spaces which are not required at the same time as the proposed activity. For example, the proposed activity operates outside of normal business hours and the activity on the other site only operates during normal business hours.

In such a situation, the council will require a legal agreement between the applicant and owner and occupiers of the site confirming the arrangement.'

### **1.10 Reference to other Evaluations**

The list below identifies the s32 evaluations of most relevance to this report. This section 32 report should be read in conjunction with these evaluations.

- 2.1 Urban form and land supply
- 2.3 Residential zones
- 2.4 Business
- 2.6 Business building form and design
- 2.21 Affordable housing
- 2.37 Schools
- 2.38 Non-accessory parking
- 2.39 Traffic in centres
- 2.40 Cycle parking
- 2.42 Crossings on arterial roads
- 2.46 City Centre precincts
- 2.50 Retirement Villages

The s32 evaluations listed above are of most relevance to this report where they address the following matters:

- achieving a quality, compact urban form
- focussing residential intensification and enabling higher residential densities within and adjacent to centres and the Rapid and Frequent Service Network
- encouraging and enabling commercial intensification in centres
- supporting more sustainable transport modes - public transport, walking and cycling
- achieving an attractive built environment.

## **2 Objectives, Policies and Rules**

### **2.1 Objectives (RPS level) - Appropriateness**

#### *Growth in a quality, compact urban form*

The following objectives under 2.1 Providing for growth in a quality compact urban form (RPS), are relevant:

1. A quality compact urban form with a clear defensible limit (Rural Urban Boundary - RUB) to the urban expansion of the metropolitan area, satellite towns, rural and coastal towns and serviced villages.
2. Urban growth is primarily focussed within the metropolitan area 2010.
3. Land within and adjacent to centres, frequent public transport routes and facilities is the primary focus for residential intensification with a lesser degree of intensification in surrounding neighbourhoods.'

These objectives are relevant because the approach to accessory parking has implications for urban form, intensification and the efficient use of land.

#### *Commercial and industrial growth*

The following objective under 3.1 Commercial and industrial growth (RPS) is relevant:

'2. Commercial growth is focussed within a hierarchy of centres and identified growth corridors that support the compact urban form.'

This objective is relevant because the approach to accessory parking can support or detract from the achievement of a compact urban form.

### *Transport*

The following objectives under 3.3 Transport (RPS) are most 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 space 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*

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 objectives at 2.1 and 3.1, relate to providing for and managing growth. The adoption of a quality compact urban form, where residential and commercial growth is focussed in the manner set out in these objectives, is a way of achieving sustainable management as set out in section 5(2). The transport system, which includes parking space and structures, is a physical resource which needs to be sustainably managed. In accordance with section 5(2), the objectives at 3.3 Transport seek 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*

This section 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 include specific reference to these matters. However these matters are addressed by other Regional Policy Statement level objectives in the Plan.

### *Section 7*

This section 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*

This section 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 residential, commercial and industrial growth and 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:'

Providing for and managing growth is a matter of regional significance. The use, development, or protection of the transport system, including parking spaces and structures, is of regional significance under s30(1)(b). Parking is related to the strategic integration of the transport network with land use in accordance with s30(1)(gb).

The Unitary Plan will contribute to the achievement of the transport 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 the transport objectives:

- the construction, operation and maintenance of transport infrastructure and provision of transport services 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.

### **Reasonableness**

The objectives do not set an outcome that has greater costs than benefits. The objectives about a quality compact urban form, and commercial and industrial growth, are reasonable because they seek to manage growth. The transport 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**

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

#### **2.1.1 Policies (Transport - RPS level)**

##### *Growth in a quality, compact urban form*

The following policy under 2.1 Providing for growth in a quality compact urban form (RPS) is relevant to the objectives (also under 2.1), and to the topic of accessory parking:

- ‘2. Enable higher residential densities and the efficient use of land in neighbourhoods:
- a. within and around centres and within moderate walking distances from the city, metropolitan, town and local centres
  - b. in areas close to the frequent public transport routes and facilities
  - c. in close proximity to existing or proposed large open spaces, community facilities, education and healthcare facilities
  - d. adequately serviced by existing physical infrastructure or where infrastructure can be efficiently upgraded.’

This policies has been identified because it is relevant to the use of parking policy to give effect to the objectives. The extent to which the Unitary Plan permits or requires accessory parking in association with land use development affects residential densities and the efficient use of land. Reducing or removing accessory parking requirements in areas where higher residential densities are sought contributes towards enabling intensification.

##### *Commercial and industrial growth*

The following policies under 3.1 Commercial and industrial growth (RPS) are relevant to the objective (also under 3.1), and to the topic of accessory parking:

- ‘1. 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.

2. Encourage the growth of commercial activities that serve the function, role and amenity of the city centre, and metropolitan and town centres (including new centres).
3. Sustain and enhance the role and function of centres as focal points for community interaction, by ensuring development within centres positively contributes to:
  - a. an attractive, functional and efficient urban environment with a distinctive sense of place, and a quality public realm
  - b. a diversity of activities including retail, with the greatest mix and concentration of activities in the City Centre, and a distribution of compact centres that provide for the needs of Auckland and its communities
  - c. increased employment opportunities with compatible residential development
  - d. a character and form that supports or serves compact mixed use environments
  - e. the efficient use of land, buildings and infrastructure and the redevelopment of sites
  - f. economic development and business activity
  - g. high-quality street environments including pedestrian and cycle networks and facilities.
4. Require development within identified growth corridors to primarily be of a character and form that supports or serves compact mixed use environments.'

These policies have been identified because they are relevant to the use of parking policy to give effect to the objective. The extent to which the Unitary Plan permits or requires accessory parking in association with land use development affects the growth and intensification of commercial activities (with particular reference to the city centre, metropolitan and town centres, and identified growth corridors), economic development and business activity, achievement of 'an attractive, functional and efficient urban environment', and the 'efficient use of land, buildings and infrastructure and the redevelopment of sites'.

### *Transport*

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

- '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
  - ...

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 requires accessory parking in association with land use development affects 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 Objectives (District level) - Appropriateness

The following objective at 1.2 Transport (District level) 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 objective is 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.’

### Relevance - Addressing the key Unitary Plan issues

These 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

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 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 wellbeing 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)-(c)
- economic - objective 1; objective 3(a)-(e)
- cultural - objective 3(a)
- health and safety - objective 3(b), (c).

### *Section 6*

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 supply of accessory parking. Some of these matters may however be of relevance to a specific site or a specific proposal involving accessory parking.

### *Section 7*

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 supply of accessory 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 the objectives have most regard to the 'other matters' listed above.

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

### *Section 8*

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 resource consent proposals involving accessory parking.

The objectives assist in achieving environmental outcomes identified throughout the Unitary Plan in relation to built environment, compact urban form, and economic wellbeing.

### **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 objective will be achieved by a combination of approaches as follows:

- Rules in the Unitary Plan which control the amount of accessory parking permitted or required on a site.
- Management of Auckland Transport's on-street and off-street parking to complement the Unitary Plan approach.



- preparation and implementation of Comprehensive Parking Management Plans by Auckland Transport. Such plans consider parking in a particular area - usually a centre.
- Monitoring and review.
- Education and advocacy to encourage changes in travel behaviour which reduce private car use (and associated parking demand) particularly during peak periods.

### **Reasonableness**

The objectives do not set an outcome that has greater costs than benefits. The objectives are reasonable because they adopt a balanced approach and recognise that parking supply needs to support a range of outcomes.

### **2.2.1 Policies (District level)**

The following policies at 1.2 Transport (District level) are relevant to the objective:

'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:

- 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.

3. Require activities and development located outside the areas covered by policy 2 to provide a minimum level of on-site parking in recognition of the more limited alternatives to private vehicle travel unless it can be demonstrated that a lesser amount of on-site parking is needed for a particular site or proposal.'

'4. Limit the supply of on-site parking for office development in all locations to:  
a. minimise the growth private vehicle trips by commuters travelling during peak periods  
b. support the approach taken to providing for larger scale office developments in the Metropolitan Centre, Town Centre, Mixed Use, General Business and Business Park zones.'

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.'

...

'21. Avoid vehicle access to and from sites subject to a Vehicle Access Restriction - general within the City Centre zone to:  
a. give high priority to pedestrian movement, safety and amenity along the main pedestrian streets in the City Centre zone  
b. provide for continuity of building frontage and associated activities at street level.

22. Avoid vehicle access to and from sites subject to the Key Retail Frontage overlay in the Metropolitan Centre, Town Centre and Mixed Use zones to:  
a. give high priority to pedestrian movement, safety and amenity  
b. provide for continuity of building frontage and associated activities at street level.'

The next portion of this report considers how policies listed above contribute to achieving the objectives 1 and 3 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 Centres and Mixed Use zone**

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

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

When policy 2 and 3 are read together it becomes apparent that there is no requirement for businesses and other land uses (including residential land uses) to provide on-site parking in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; and the Terrace Housing and Apartment Buildings zone. This allows businesses and developers (including residents) to choose not to provide parking. This gives businesses and developers greater flexibility to adjust their on-site parking and develop their sites more intensively taking into account the needs of their business or prospective residents, the parking available in the area, and the cost of providing parking. When taken together, policy 2 and 3 contribute to achieving objective 3(a) in areas where there are no parking minimums.

Policy 4 limits the supply of on-site parking for office development in all locations. This to avoid a parking approach which attracts offices to out of centre locations because of the ability to provide unlimited parking. This policy therefore contributes to achieving objective 3(a).

Policy 5 supports approaches to parking which use land and parking more efficiently. This is contributes to achieving objective 3(a).

Policies 21 and 22 avoid vehicle access from the main pedestrian and retail frontages in the City Centre, Metropolitan and Town Centres zones and in the Mixed Use zone. This is given effect to by rules which do not permit parking where vehicle access would be within part of a site subject to a Vehicle Access Restriction - General in the City Centre or a Key Retail Frontage overlay in the other zones. These controls are designed to protect key pedestrian streets. These policies are for the purposes of supporting pedestrian safety and amenity and providing for the continuity of building frontage and associated activities. The policy also promotes intensification because of the associated parking and access restrictions. These policies therefore contribute to achieving objective 3(a).

### **Objective 3(b) - Effective, efficient and safe operation of the transport network**

Objective 3(b) requires the number, location and type of parking spaces to support 'the effective, efficient and safe operation of the transport network'.

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. This policy contributes to achieving objective 3(b) because the effective, efficient and safe operation of the Rapid and Frequent Service Network is supported by a policy of parking restraint in and around the centres and mixed use corridors.

Policy 3 requires a minimum level of on-site parking in areas not covered by the parking maximum rules. These areas have more limited alternatives to private vehicle travel. In these locations, promoting intensification is less important and the council is more concerned about the effects of overflow parking on general amenity and the transport network. Overflow parking occurs when there is not enough parking on the site to accommodate traffic associated with activities on the site. Depending on the extent of alternative parking available in the vicinity, overflow parking can result in illegal parking - for example on grass verges, or within identified 'no-parking' areas. Lack of on-site parking can also cause delays on the road network as vehicles circulate looking for a park. Requiring some parking in these locations as provided for policy 3 contributes to achieving objective 3(b).

### **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'.

Policy 2 identifies the link between the locations where parking supply is limited, and recognition of the existing and future accessibility of these locations to the Rapid and Frequent Service Network. This policy contributes to achieving objective 3(c) because the use of the Rapid and Frequent Service Network is supported by a policy of parking restraint in areas well-served by that network.

Policies 21 and 22 avoid vehicle access from the main pedestrian and retail frontages in the City Centre, Metropolitan and Town Centres zones and in the Mixed Use zone. This is given effect to by rules which do not permit parking where vehicle access would be within part of a site subject to a Vehicle Access Restriction - General in the City Centre or a Key Retail Frontage overlay in the other zones. These policies are for the purposes of supporting pedestrian safety and amenity and providing for the continuity of building frontage and associated activities. These policies contribute to achieving objective 3(c)

### **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'.

Policy 2 limits the supply of on-site parking in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; and the Terrace Housing and Apartment Buildings zone. The policy does however provide for some on-site parking. This allows businesses to choose to provide a certain amount of on-site parking to cater for employees and visitors. Policy 2 therefore contributes to achieving objective 3(d).

When policy 2 and 3 are read together it becomes apparent that there is no requirement for businesses to provide on-site parking in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; and the Terrace Housing and Apartment Buildings zone. This allows businesses and developers to choose not to provide parking, or to provide less parking than parking minimums might require. This gives businesses and developers greater flexibility to adjust their on-site parking taking into account the needs of their business, the parking available in the area, and the cost of providing parking. When taken together, policies 2 and 3 contribute to achieving objective 3(d) in areas where there are no parking minimums.

Policies 21 and 22 are intended to protect key retail frontages which are primary places for public interaction. Protecting these streets as attractive and safe pedestrian environments supports the economic activity of adjacent businesses and contributes to achieving objective 3(d).

### **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'.

Policy 2 limits the supply of on-site parking in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; and the Terrace Housing and Apartment Buildings zone. It therefore contributes to achieving objective 3(e). Parking can take up an extensive amount of land for a use that does not directly generate economic activity, provide space for employment or housing. Limiting the extent to which scarce land in centres (particularly the City Centre) is dedicated to parking is likely to result in more efficient long-term use of that land.

When read together, policy 2 and 3 allow businesses and developers to choose not to provide on-site parking the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; and the Terrace Housing and Apartment Buildings zone. This gives businesses and developers greater flexibility to adjust their on-site parking and develop their site more intensively taking into account the needs of their business or prospective residents, the parking available in the area, the cost of providing parking, and the most efficient use of their land. When taken together, policies 2 and 3 contribute to achieving objective 3(e) in areas where there are no parking minimums.

Policy 5 provides for shared, consolidated and off-site parking. Accessory parking is by definition located on the site of the activity it services. Often adjacent uses have their peak parking demand at different times of the day or different days during the week eg a church and an office building. In locations where parking maximums apply, this facilitates shared parking as there is no requirement for sites to individually provide parking. In locations where parking minimums apply, the Unitary Plan still does provide for shared parking by means of resource consent. This provides for situations where the parking requirements of a site can be met by entering into an arrangement with another site in the immediate vicinity that has available parking spaces which are not required at the same time as the proposed activity. Such proposals require a modification to the minimum parking rules and are treated as a restricted discretionary activity. Policy 5 contributes to achieving objective 3(e) as sharing parking arrangements allow more efficient use of land. Requiring sites with different timing of peak demands to provide sufficient parking to meet their own requirements while ignoring spare parking capacity nearby which could be used, is an inefficient use of land.

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

The proposed provisions are summarised in 1.9 above.

The rules propose to apply maximums in the following zones and areas: 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. The parking maximums are most limiting in the City Centre zone where development is most intensive and public transport is of the highest standard. The other locations, outside the City Centre zone, where parking maximums apply are those where a high level of development intensity is provided for and where there is a high level of access to the existing or proposed access to the public transport network. Of all the alternatives considered in 3, these rules are the most effective in achieving the objectives. The rules manage parking in a manner 'that is integrated with, and supports, a quality, compact form of urban growth and associated land use' (objective 3 at 3.3 Transport (RPS)). These rules are effective in enabling residential and commercial growth and intensification in the locations where parking maximums apply. The rules contribute to objective 3 of 2.1 Providing for growth in a quality compact urban form (RPS), whereby 'land within and adjacent to centres, frequent public transport routes and facilities is the primary focus for residential intensification'. Similarly the rules contribute to the outcome where 'commercial growth is focussed within a hierarchy of

centres and identified growth corridors that support the compact urban form' - as per objective 2 in 3.1 Commercial and industrial growth (RPS).

In 'other areas', outside of the zones and areas listed in the preceding paragraph, it is proposed to apply parking minimums, with the exception of office development, and of dwellings in the Mixed Housing Urban zone. Both of these activities will be subject to both a maximum and a minimum. A traditional approach of parking minimums has otherwise been retained in these locations. These are locations where a relatively lower level of development intensity is provided for and / or there is less access to the existing or proposed public transport network. The rules in these 'other areas' contribute to achieving objective 3(b) Transport (RPS) i.e. the number, location and type of parking spaces supports the effective, efficient and safe operation of the transport network. This applies when the effective, efficient and safe operation of the transport network is considered from the perspective of avoiding localised congestion effects that can arise from parking overspill. The retention of parking minimums in these 'other areas' will allow Auckland Transport to focus its resources, including the implementation of comprehensive parking management plans, in and around centres. Where parking minimums are removed it is anticipated that Auckland Transport will need to manage its on-street and off-street parking more actively through such measures such as pricing, time limits and residents' parking schemes.

The rules assist in achieving objectives in the Unitary Plan about compact urban form, quality built environment and economic wellbeing by:

- not requiring on-site parking to be provided in the main areas zoned for intensification - this reduces development costs; increases development potential; supports efficient use of land; supports use of more sustainable transport modes such as public transport, walking and cycling; and encourages shared or consolidated parking rather than requiring parking to be provided on a site by site basis
- restricting the level of on-site parking which can be provided in the main areas zoned for intensification - this helps manage congestion by controlling the number of vehicle trips to locations, and supports choice of more sustainable transport options such as public transport, walking and cycling
- selective application of parking maximums or minimums (or both for office activity) to support choice of transport modes, minimise adverse impacts of spillover parking, and manage congestion.

In terms of efficiency, the rules are relatively easily implemented at building consent or resource consent stage when applicants are required to identify activities and existing or proposed parking spaces. Implementation does become more difficult when changes of use occur over time.

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

- Management of Auckland Transport's on-street and off-street parking to complement the Unitary Plan approach
- Preparation and implementation of Comprehensive Parking Management Plans by Auckland Transport. Such plans consider parking in a particular area - usually a centre
- Education and advocacy to encourage changes in travel behaviour which reduce private car use (and associated parking demand) 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 the costs and benefits, is provided in both a qualitative and a quantitative manner. Quantification of the economic impacts of the parking

approach has been undertaken by MRCagney<sup>8</sup> and their findings are summarised below under ‘economic impacts’.

The removal of parking minimums does have the potential to encourage and provide opportunities for economic growth by supporting efficient use of land, quality urban design, and intensification in areas identified in the Unitary Plan for growth. It can also reduce development costs as there is no requirement to provide parking. Economic growth has the potential to provide opportunities for employment.

### **Economic impacts - MRCagney report**

A summary of the quantification of economic impacts of the parking approach is outlined in the section below. MRCagney<sup>9</sup> identified the following primary economic impacts of parking provisions:

<b>Regulation</b>	<b>Benefits</b>	<b>Costs</b>
<b>Minimums</b>	<ul style="list-style-type: none"> <li>• Reduces parking spill-over [residents]</li> <li>• Improves ease of finding car-park [drivers]</li> <li>• Avoids need for parking management [Auckland Transport]</li> </ul>	<ul style="list-style-type: none"> <li>• Reduces value of development [developers]</li> <li>• Increases traffic congestion [drivers]</li> <li>• Creates compliance costs [developers / council]</li> </ul>
<b>Maximums</b>	<ul style="list-style-type: none"> <li>• Reduces traffic congestion [drivers]</li> <li>• Improves amenity [pedestrians]</li> </ul>	<ul style="list-style-type: none"> <li>• Reduces value of development [developers]</li> <li>• Increases parking management costs [Auckland Transport]</li> <li>• Creates compliance costs [developers/ council]</li> </ul>

The key consideration in assessing economic impact is the extent to which the parking minimums and maximums are ‘binding’ on any development – that is, the extent to which the regulations change what the developer would have otherwise preferred to have done. If they had the choice, would they have provided more or less parking than the regulations require or permit. The broad approach of the rules has been to make parking regulation less ‘binding’ than in Legacy Plans.

### *Distributional impacts of parking regulations*

MRCagney note that parking regulations have both economic costs and benefits, and that these impacts are dispersed unequally over a range of actors. The following paragraphs from their report usefully outline ‘who wins and who loses, and how these distributional impacts may influence parking policy settings’:

‘In terms of minimums, we suggest the clear winners are existing residents, who benefit from minimums because they reduce their exposure to parking spill-over associated with new developments. Newer retail activities that provide large amounts of parking may also win from retaining minimums, because the regulations introduce barriers to redevelopment and intensification. In this way minimums may actually increase the market power of newer retail areas compared to older areas, where redevelopment and intensification cannot occur without the provision of parking.

In contrast, the clear losers are developers, for whom minimums reduce the potential value of their development and create additional compliance costs. Hence, we have a situation where residents have an incentive to regulate to the detriment of

<sup>8</sup> MRCagney Pty Ltd, Economic Impacts of Parking Requirements in Auckland, August 2014

<sup>9</sup> MRCagney, 2014, p4

developers. As developers are primarily acting in response to perceived future demand, we suggest that the primary impact of minimums is to reduce the space that is available for accommodating future residents and commercial activities. This is a crucial point: The economic cost of minimum parking requirements is mainly an *opportunity cost*, in that they reduce the land and/or floor space available for other potential uses, rather than a *financial cost* associated with the construction of parking itself.'

'... We suggest this opportunity cost is primarily borne first by developers and secondly by new residents and businesses, who are prevented from establishing due to minimums.

In terms of maximums, the primary winners are transport users that benefit from reduced congestion. This includes drivers that continue to drive, in spite of there being less parking available; bus users, who benefit from less congested road space; and pedestrians, who must contend with fewer vehicles. On the other hand, the clear loser is again developers, who are subject to a regulation that will constrain their ability to supply parking at a level that they consider to best meet the market demand.'

#### *Parking Minimums*

MRCagney found that the economic costs of parking minimums exceeded the benefits by a ratio of between 6.1:1 and 11.7:1 depending on whether property was valued using a low, medium or high estimate<sup>10</sup>.

Economic analysis by MRCagney highlights that the case for removing parking minimums is strongest in the highest intensity zones (e.g. City Centre and Metropolitan Centre zones) and weakest in the lowest intensity zones. This is because the most significant economic impact of parking minimums is on development potential. Where zones allow the greatest level of development potential, the economic impact of parking minimums will be greatest.

Transport modelling undertaken as part of MRCagney's analysis highlighted that while removing parking minimums would lead to some increased localised congestion from people searching for parking spaces, this was outweighed by the modal shift away from driving which reduced congestion. Therefore, in areas of greatest current congestion (often areas with high intensity zoning), the argument for removing parking minimums is highest.

MRCagney's analysis (undertaken before the Mixed Housing zone was divided into two zones - Mixed Housing Urban and Mixed Housing Suburban) assesses the extent to which there is a strong argument for removing parking minimums. This was based on a detailed analysis of Takapuna, Onehunga and the Dominion Road corridor, with the results of that analysis applied 'pro-rata' to other parts of Auckland according to land value. Land value was found to be the most accurate variable that reflects the economic impact of parking minimums. The findings of the analysis are outlined in the figure below:

**Figure: Relationship between draft Unitary Plan zones, parking provisions, population statistics, and minima<sup>11</sup>**

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<sup>10</sup> MRCagney 2013, p28

<sup>11</sup> Percentages for some small zones are rounded to zero.

Draft Unitary Plan Zones	Minima or Maxima	% of Total Employment	% of Total Population	Case for removing minimums		
				Strong	Moderate	Weak
A City Centre	Maxima	14%	2%	67%	1%	32%
B Metropolitan Centre	Maxima	5%	0%	81%	4%	15%
C Town Centre	Maxima	4%	1%	82%	7%	11%
D Local Centre	Maxima	1%	0%	75%	7%	18%
E Mixed Use	Maxima	9%	2%	75%	14%	11%
F Terrace Housing and Apartment Buildings	Maxima	5%	7%	85%	7%	8%
G Neighbourhood Centre	Minima	0.2%	0.3%	73%	10%	17%
H Mixed Housing	Minima	12%	46%	77%	10%	13%
I Single House	Minima	7%	30%	69%	11%	21%
J Large Lot	Minima	1%	2%	13%	10%	77%
K General Business	Minima	1%	0.1%	37%	13%	50%
L Business Park	Minima	1%	0.0%	42%	48%	10%
M Light Industry	Minima	24%	1%	54%	18%	29%
N Heavy Industry	Minima	5%	0%	34%	20%	47%
O Rural (All Rural Zones & Future Urban)	Minima	3%	7%	0%	0%	100%
P Other	Minima	9%	2%	1%	1%	98%

Based on this analysis, MRCagney, drew the following inferences for the approach taken in the March 2013 draft Unitary Plan:

- strong support for the removal of the minimums in zones A-F
- moderate support for retaining the minimums in zones J, K, and N
- weak support for retaining the minimums in zones G-I, L and M.

This analysis suggests that there would be advantages in having no parking minimums in the Neighbourhood Centre and Mixed Housing zones, but otherwise supports the approach of the Unitary Plan. Since this analysis was undertaken, there have been changes to the parking provisions in the Mixed Housing zones - the zone has been split into two, and the level of minimums has been reduced. MRCagney's findings would support this to a greater extent than the previous approach in the March 2013 draft Unitary Plan of requiring two spaces per dwelling (for any dwelling larger than 1 bedroom).

#### *Parking Maximums*

MRCagney noted that the primary external economic benefits of parking maximums relate to their effects on congestion. MRCagney assumed that parking maximums would reduce the level of parking supplied by 5% by 2041, and estimated that the congestion reduction benefits would be \$33.1 million per annum by 2041, which equates to \$140 million over a 30 year period.<sup>12</sup>

The economic costs of parking maximums are mainly related to their impacts on development - ie the extent to which they will constrain the ability for a developer to provide the amount of parking that they consider optimal for their development. MRCagney were unable to quantify the costs associated with parking maximums but noted that if the maximums were set at the level that was only moderately binding for most developments, then they would be likely to have only moderate costs<sup>13</sup>.

Parking maximums have the greatest benefit in areas with the most significant current congestion, with capacity constrained access and with the highest quality public transport alternatives enabling a modal shift away from driving. The MRCagney analysis highlights that maximums are most justified in Centre and Metropolitan Centres – the same zones where not applying parking minimums is most strongly supported.

<sup>12</sup> MRCagney, 2013, pp36-38

<sup>13</sup> MRCagney, 2013, p38



MRCagney also found that over time the market adapts to the application of parking maximums, with fewer consents applied for to infringe the controls in the City Centre over the past decade. This analysis highlights that parking maximums are likely to become less binding over time as travel expectations adapt and as transport alternatives improve<sup>14</sup>.

### Cost of providing parking<sup>15</sup>

As identified in the table in 3, parking minimums can result in unwanted parking being provided. Businesses and developers (including residents) may choose to comply with the parking requirements and avoid a resource consent process even though a better outcome could be achieved for a particular site by waiving or reducing the parking requirements. This results in both opportunity costs and the cost of actually providing the parking. The monetised costs of providing parking and the amount of land required are outlined below:

**Table: Cost of providing car parking**

Type of parking	Cost per m <sup>2</sup> *	Notes	Cost per car park
At grade car parking	\$120-150	Depending on ground conditions, there could be significant additional cost involved.	\$3,600 - \$6,750
Structured car parking building:	\$750-800	Including architectural façade and sub-ground structure; some additional cost could be incurred in poor ground conditions	\$22,500 - \$36,000
Basement car parking (above water table)	\$900–1000	Depending on ground conditions.	\$27,000 - \$45,000
Basement car parking (below water table)	\$2000–2500	Requires a building on top to hold the car park down against water pressure	\$60,000 - \$112,000

\* These figures do not include costs for GST, land costs, design fees, resource consent, building consent, site contamination etc.

**Table: Amount of land required for parking per car<sup>16</sup>**

Average area of land (m <sup>2</sup> ) per car	Qualifiers
30m <sup>2</sup>	per car for a very efficient building (double loaded 'corridor' – ie one isle feeding two rows of car parks)
up to 45m <sup>2</sup>	per car for an inefficient building (single bay per isle/irregular floor plate).

## 2.2.4 Adequacy of Information and Risk of Not Acting

### Parking maximums

In the areas where it is proposed to apply maximums, there is a lack of information about the following:

<sup>14</sup> MRCagney, 2013, pp16-20

<sup>15</sup> NZTA (2011) Travel planning toolkit guidelines and resources, Resource 1 – Facts and figures

<sup>16</sup> NZTA (2011) Travel planning toolkit guidelines and resources, Resource 1 – Facts and figures.

- the extent to which parking maximums may harm the economic success of businesses by not allowing businesses to provide as much parking as they wish to
- the extent to which the market will be successful in managing parking in the absence of parking minimums
- the existing supply and demand for parking in the areas where parking maximums are proposed
- the extent to which applying parking maximums in centres may encourage out of centre development
- the extent to which parking maximums will be perceived by developers as a ‘target’ rather than an upper limit.

As part of this approach, Auckland Transport may increase its parking fees and charges to better manage its public parking and to recoup costs involved with increased parking management. There is therefore a risk of council being perceived as influencing the market for parking to increase its revenue from parking.

There are some political and reputational risks to the council as some people will remain of the view that ensuring an adequate supply of on-site parking (by applying parking minimums) is a council responsibility and should not be left to the market.

For parking maximums, MRCagney<sup>17</sup> identified three risks of unintended consequences which were described as reinforcing market power, locking-in existing parking supply, and sense of entitlement. MRCagney noted that these consequences may not eventuate but they should be acknowledged, and the situation monitored accordingly. The unintended consequences are outlined by MRCagney as follows:

- **‘Reinforce market power** – By restricting the supply of parking supplied with new developments, parking maximums may enable pre-existing developments to exert market power with regards to the supply of parking.’
- **‘Lock-in existing parking supply** – Parking maximums may signal to existing properties that parking will become increasingly scarce in the future. These properties could in turn support a level of on-site parking that is in excess of the parking maximums. Parking maximums may therefore discourage owners of these properties from re-developing in order to maintain their current levels of parking, i.e. the existing level of parking risks being “locked-in”.
- **Sense of entitlement** – in areas where parking maximums are applied people may have increased expectations that Council will provide alternatives to driving, such as public transport. However, the perceived viability of alternatives is subjective rather than objective, hence the risk exists that parking maximums will place further responsibility on Council for meeting the travel needs of individuals that are looking to travel to these areas.’

Having regard to the matters identified above, it is considered that the risk of not acting in accordance with the preferred rules is higher than the risk of acting. If current parking minimums are not replaced by the proposed parking maximums in these areas, there is a risk of greater congestion and not achieving the intensification and quality urban design sought by the Unitary Plan. The Unitary Plan will be less enabling of appropriate development in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; and the Terrace Housing and Apartment Buildings zone.

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<sup>17</sup> MRCagney, 2013, p39

### **Parking minimums**

In the areas where it is proposed to apply minimums, there is a lack of information about the following:

- the extent to which the parking minimums are set at a level which results in developers and businesses being required to provide more parking than they would want to provide
- the extent to which parking minimums may undermine the ability to provide affordable housing due to the cost associated with providing parking
- the extent to which parking minimums may undermine the ability to achieve quality urban design outcomes where applied in zones that anticipate some intensification eg the Mixed Housing zone
- the extent to which parking minimums may undermine strategic goals to encourage the use of public transport, walking and cycling.
- the extent to which having parking minimums (and no maximums) in these locations will encourage development to locate outside centres and the Mixed Use zone
- the existing supply and demand for parking in the areas where minimums are proposed.

This approach is similar to existing legacy plans, but with generally lower parking requirements, so there is a reasonable level of knowledge about how it applies. Acting in accordance with approach alleviates the risks associated with spillover parking which results in localised congestion and a need for greater management of Auckland Transport's parking resources.

### **3 Alternatives**

The proposed preferred alternatives are discussed in 2.0 above. The status quo alternative is noted in 1.5 above.

The alternatives considered are:

- Status quo: Retain approach of legacy plans
- Alternative 1: No rules - leave it to the market
- Alternative 2a: Preferred approach - for City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centre zones; Mixed Use zone; Terrace Housing and Apartment Buildings zone; and the Mixed Housing Urban zone
- Alternative 2b: Preferred approach for 'other areas' (not covered by alternative 2a).

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

	Status quo-Retain approach of the legacy plans	Alternative 1-No rules - leave it to the market	Alternative 2a-Preferred approach for 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	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)
	<b>Description –</b> Status quo - Retain the approaches of the legacy district plans	<b>Description –</b> Do not include any rules in the Plan either requiring or limiting accessory parking. Allow the individual property owner or business to decide whether or not to provide on-site parking, and how much.	<b>Description –</b> Apply parking maximums in the City Centre; City Centre Fringe overlay; Metropolitan, Town and Local Centre zones; Mixed Use zone; Terrace Housing and Apartment Buildings zone; and the Mixed Housing Urban zone. The maximum parking rates are set out in tables 2, 3 and 4 <sup>18</sup> found in the Auckland-wide Transport rules.	<b>Description –</b> Apply parking minimums outside of the areas covered under alternative 2a. Apply both maximums and minimums to dwellings in the Mixed Housing Urban zone. Apply maximum parking rates to offices in all locations. The parking rates are set out in Table 2 found in the Auckland-wide Transport rules
Appropriateness	<p>Outside of the City Centre zone, the existing provisions generally do not address the issues. There are some exceptions in locations where parking maximums or reduced minimums have been introduced - usually as part of a plan change. One example of this is Newmarket.</p> <p>In particular, the existing provisions do not address the issues because:</p> <ul style="list-style-type: none"> <li>The rules may force land to be used for parking at cost to the developer when there is a more optimal alternative use. This increases costs affecting the viability and affordability of development and the economic activity of businesses, limits development potential and undermines efficient use of land.</li> <li>Rules requiring a significant amount of parking may compromise achievement of a quality built environment</li> <li>The cost of parking spaces is less transparent and it is less likely that visitors and employees will be charged for their use. This retains a 'subsidy' for private vehicle use, undermining strategic objectives and not supporting choice of more sustainable transport modes such as public transport, walking and cycling.</li> <li>Not applying parking maximums in key zones where more intensive development is envisaged may make it more difficult to manage traffic congestion.</li> </ul>	<p>By not requiring parking, this alternative addressed the issues in the following ways:</p> <ul style="list-style-type: none"> <li>Land does not have to be used for parking if there is a more optimal use. This reduces costs, increases development potential, supports efficient use of land and the economic activity of businesses. It supports intensification in zones where more intensive development is provided for.</li> <li>A quality built environment is possible as the rules do not require significant amounts of land to be set aside for parking and support shared or consolidated parking arrangements.</li> <li>The cost of parking spaces is more transparent and it is more likely that visitors and employees will be charged for their use. This removes a 'subsidy' for private vehicle use, supporting choice of more sustainable transport modes such as public transport, walking and cycling.</li> </ul> <p>The absence of parking maximums under this alternative may not control congestion as effectively as Alternative 2a. This is particularly the case in areas of high intensity activity.</p>	<p>By not requiring parking in zones where intensification is sought, and where there is access to the Rapid and Frequent Service Network, this alternative addresses the issues in the following ways:</p> <ul style="list-style-type: none"> <li>Land does not have to be used for parking if there is a more optimal use. This reduces costs, increases development potential, supports efficient use of land and the economic activity of businesses. It supports intensification in zones where more intensive development is provided for.</li> <li>A quality built environment is possible as the rules do not require significant amounts of land to be set aside for parking and support shared and consolidated parking arrangements.</li> <li>The cost of parking spaces is more transparent and it is more likely that visitors and employees will be charged for their use. This removes a 'subsidy' for private vehicle use, supporting choice of more sustainable transport modes such as public transport, walking and cycling.</li> </ul> <p>This alternative has the potential to address congestion more effectively than the status quo or Alternative 1 because it includes a parking maximum which can limit the likely number of vehicles travelling through an area.</p>	<p>This alternative addresses some of the issues in the following ways:</p> <ul style="list-style-type: none"> <li>There is likely to be plenty of parking available which can promote the economic wellbeing of any businesses in these locations</li> <li>Localised congestion, which would otherwise require more intensive parking management, may be avoided.</li> </ul> <p>This alternative may not address the key issues for the same reasons as outlined for the Status quo. However these issues are expected to be present to a lesser extent in these 'other areas' as this alternative generally applies parking minimums in zones where less intensive development is envisaged.</p>
Effectiveness	This alternative will not be successful in achieving the objectives. It does not manage 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 will not result in the number, location and type of parking spaces commensurate with supporting the outcomes	This alternative has the potential to be partially successful in achieving the objectives since it removes parking minimums from areas where intensification is desired. However the absence of parking maximums limits the successfulness of this alternative.	This alternative has the highest effectiveness in achieving the objectives. This alternative manages 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)). This approach will contribute to achieving objective 3 of 1.2 Transport (District level).	This alternative contributes to achieving objective 3(b) of 1.2 Transport (District level) i.e. the number, location and type of parking spaces support the effective, efficient and safe operation of the transport network. This applies when the effective, efficient and safe operation of the transport network is considered from the perspective of avoiding localised congestion

<sup>18</sup> The only maximum parking rates found in Table 4 are for offices.

	Status quo-Retain approach of the legacy plans	Alternative 1-No rules - leave it to the market	Alternative 2a-Preferred approach for 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	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)
	set out in objective 3 of 1.2 Transport (District level).		This alternative is effective in enabling residential and commercial growth and intensification in the locations where it applies. It contributes to objective 3 of 2.1 Providing for growth in a quality compact urban form (RPS), whereby 'land within and adjacent to centres, frequent public transport routes and facilities is the primary focus for residential intensification'. Similarly this alternative will 'encourage the growth of commercial activities that service the function, role and amenity of the city centre, and metropolitan and town centres' - as per objective 2 in 3.1 Commercial and industrial growth (RPS).	effects that can arise from parking overspill.
Efficiency	<p>Continuation of the status quo would be relatively easy to implement, though the differences in standards across Auckland does cause some difficulties. This approach is least reliant on Auckland Transport increasing its management of on-street parking and any off-street parking under its control.</p> <p>This approach can be implemented at building consent or resource consent stage when applicants are required to identify activities and existing or proposed parking spaces. Implementation does become more difficult when changes of use occur over time and monitoring and enforcement is required.</p> <p>As is currently the case, continuation of the status quo would result in regular consents being applied for by applicants seeking to provide less parking than the standard requirement.</p>	<p>This alternative would be easiest to implement from a resource management perspective as the council would not need to regulate the provision of parking in the Unitary Plan.</p> <p>This approach would require Auckland Transport to address spillover parking by increasing its management of on-street parking and any off-street parking under its control. However, analysis has shown that the costs associated with increased parking management are significantly outweighed by the benefits of removing parking minimums.</p>	<p>This alternative would require Auckland Transport to address spillover parking by increasing its management of on-street parking and any off-street parking under its control. However, analysis has shown that the costs associated with increased parking management (to address spillover effects) are significantly outweighed by the benefits of removing parking minimums.</p> <p>This alternative can be implemented at building consent or resource consent stage when applicants are required to identify activities and existing or proposed parking spaces. Implementation does become more difficult when changes of use occur over time and monitoring and enforcement is required.</p>	<p>This alternative would be a continuation of the status quo over part of Auckland, but with uniform parking requirements. It would be relatively easy to implement. This approach is least reliant on Auckland Transport increasing its management of on-street parking and any off-street parking under its control. It would also allow Auckland Transport to focus its resources, including the implementation in the parking maximum areas covered by Alternative 2a.</p> <p>This alternative can be implemented at building consent or resource consent stage when applicants are required to identify activities and existing or proposed parking spaces. Implementation does become more difficult when changes of use occur over time and monitoring and enforcement is required.</p> <p>As is currently the case, regular consents would be applied for by applicants seeking to provide less parking than the standard requirement.</p>
Costs	<p>In summary, the costs are:</p> <ul style="list-style-type: none"> <li>Overemphasis on parking overspill</li> <li>Inconsistent with Directive 10.6 of Auckland Plan</li> <li>Inconsistent approach across Auckland</li> <li>City Centre - Residential parking standards - misses opportunity to modify these</li> <li>City Centre - Non-residential parking standards - misses an opportunity to modify these</li> </ul>	<p>In summary, the costs are:</p> <ul style="list-style-type: none"> <li>May result in too much parking</li> <li>May result in too little parking</li> <li>Costs of parking management - Auckland Transport</li> <li>Costs of parking management - businesses</li> <li>Costs of parking spaces (parking fees)</li> <li>Does not give effect to Directive 10.6 of the Auckland Plan</li> <li>Less on-site accessible parking for people</li> </ul>	<p>In summary, the costs are:</p> <ul style="list-style-type: none"> <li>May result it too little parking</li> <li>Costs of parking management - Auckland Transport</li> <li>Costs of parking management - businesses</li> <li>Costs of parking spaces (parking fees)</li> <li>Resource consent costs</li> <li>Less on-site accessible parking for people with disabilities</li> <li>The economic costs of maximums</li> </ul>	<p>In summary, the costs are:</p> <ul style="list-style-type: none"> <li>Not efficient use of land</li> <li>Housing less affordable</li> <li>Cost of parking spaces less transparent</li> <li>Resource consent costs</li> <li>Economic costs of retaining minimums</li> <li>Inconsistent as applies only to some zones</li> </ul> <p>These costs are further outlined below:</p>

<sup>19</sup> MRCagney 2013, p24-26

<sup>20</sup> New Zealand Building Code D1/AS1 New Zealand Standard for Design for Access and Mobility - Buildings and Associated Facilities (NZS 4121-2001)

<sup>21</sup> MRCagney 2013, p24-26

	Status quo-Retain approach of the legacy plans	Alternative 1-No rules - leave it to the market	Alternative 2a-Preferred approach for 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	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)
	<ul style="list-style-type: none"> <li>City Centre Fringe overlay - does not recognise the need for a different approach in this location</li> <li>Other costs - as per the other alternatives depending on the particular legacy plan approach</li> </ul> <p>These costs are further outlined below:</p> <p><b>Overemphasis on parking overspill</b> With some exceptions, most of the parking approaches in the legacy plans outside of the Central Area place too much emphasis on requiring on-site parking to avoid parking overspill. The rules therefore require parking in most locations. The amount of parking required is also higher than the proposed rules specify for areas where parking minimums apply. There is a need for a more balanced approach particularly in areas where intensification is proposed.</p> <p><b>Inconsistent with Directive 10.6 of Auckland Plan</b> This approach 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>Inconsistent approach across Auckland</b> The approach is not consistent across Auckland. There will be inconsistent application of parking minimums and maximums, and there will be different parking rates for the same activities in similar types of location.</p> <p><b>City Centre - Residential parking standards</b> Retaining the legacy approach misses an opportunity to modify the parking maximums for dwellings in the City Centre zone when compared with the legacy plan. The draft rules separate out visitor parking. This is proposed to reduce potential oversupply in residential parking in new apartment developments while providing for adequate supply of off-street visitor parking.</p> <p><b>City Centre - Non-residential parking standards</b> Retaining the legacy approach misses an opportunity to simplify and, in some cases,</p>	<p>with disabilities</p> <p>These costs are further outlined below:</p> <p><b>Too much parking</b> 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. 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 most of the time i.e. the parking area is rarely full. This makes it easier to find a parking space, and also means that there is more parking available to serve peak requirements.</p> <p><b>Too little parking</b> May result in too little parking, and parking overspill particularly in locations where there is a lack of alternative parking or alternative means of travel such as walking, cycling and public transport. This can also result in localised congestion as people drive around searching for a parking space. It can also result in illegal parking such as on grass verges, footpaths, or across vehicle access ways. Parking may also encroach onto adjacent sites causing a nuisance to businesses, residents or other activities occupying those sites.</p> <p>There are likely to be additional costs to the council in explaining to residents and businesses why the council no longer takes any responsibility for ensuring on-site parking is provided in any areas of Auckland. This will be of concern to residents and businesses who believe that they are adversely affected by parking overspill.</p> <p><b>Costs of parking management - Auckland Transport</b> Auckland Transport will incur additional costs in</p>	<ul style="list-style-type: none"> <li>Inconsistent as applies only to some zones</li> </ul> <p>These costs are further outlined below:</p> <p><b>Too little parking</b> May result in too little parking, and parking overspill particularly in locations where there is a lack of alternative parking or alternative means of travel such as walking, cycling and public transport. This can also result in localised congestion as people drive around searching for a parking space. It can also result in illegal parking such as on grass verges, footpaths, or across vehicle access ways. Parking may also encroach onto adjacent sites causing a nuisance to businesses, residents or other activities occupying those sites.</p> <p>There will be additional costs to the council in explaining to residents and businesses why the council no longer takes any responsibility for ensuring on-site parking is provided in any areas of Auckland. This will be of concern to residents and businesses who believe that they are adversely affected by parking overspill.</p> <p><b>Costs of parking management - Auckland Transport</b> Auckland Transport will incur additional costs in supporting the parking approach. Those costs include:</p> <ul style="list-style-type: none"> <li>undertaking comprehensive parking management plans</li> <li>introducing residents' parking schemes as required to ensure that residents with no on-site parking have access to on-street parking near their property</li> <li>undertaking more active management of on-street parking in areas where there has not previously been a need for parking restrictions and enforcement</li> <li>purchasing and servicing parking meters.</li> </ul> <p>Some of these costs can be offset by parking fees and charges, potentially resulting in a fiscally neutral outcome.</p> <p>MRCagney has estimated that parking minimums help Auckland Transport to avoid costs of parking management to the value of \$14.5 million over 30 years<sup>21</sup>.</p>	<p><b>Not efficient use of land</b> Businesses and developers may need to incur financial and opportunity costs associated with providing parking in excess of what they want or need in order to meet planning requirements. This can result in less efficient use of land and gives less flexibility to business and developers in designing their developments. In economic terms, this is an opportunity cost because it reduces the space available for alternative uses. Parking requirements may also be a barrier to developing or redeveloping a site for a more efficient land use.</p> <p><b>Housing less affordable</b> There is potential for housing to be less affordable because developers may be required to provide more parking than they would have otherwise done. This cost tends to have a greater effect on lower income households.</p> <p><b>Cost of parking spaces less transparent</b> Employees and customers are generally not charged for using on-site parking. Rather the costs are absorbed and not transparent. Parking must always be paid for in some way, and retention of parking minimums means that the cost of providing parking is more likely to be internalised into the price of goods and services, the price of property, or the level of wages to be paid to employees. Retention of parking minimums is likely to make other transport modes less attractive and competitive.</p> <p><b>Resource consent costs</b> Parking minimums which apply generically are not always the most appropriate standards for a particular site proposal. There are costs and uncertainty associated with obtaining a resource consent to depart from minimum parking requirements. Resource consents are a regulatory barrier which can discourage appropriate development. 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. Businesses and developers (including residents) may choose to comply with the parking requirements and avoid a resource consent process even though a better outcome could be</p>

<sup>22</sup> MRCagney, 2013, p38

	<b>Status quo-Retain approach of the legacy plans</b>	<b>Alternative 1-No rules - leave it to the market</b>	<b>Alternative 2a-Preferred approach for 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</b>	<b>Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)</b>
	<p>reduce the amount of parking permitted in the City Centre zone for non-residential activities.</p> <p><b>City Centre Fringe overlay</b> Existing approaches do not recognise the need for a different parking approach in the City Centre Fringe overlay due to its proximity to the City Centre zone.</p> <p><b>Other costs</b> In areas where parking maximums apply under the legacy plans, the costs listed in Alternative 2a under the following headings also apply:</p> <ul style="list-style-type: none"> <li>• Too little parking</li> <li>• Costs of parking management - Auckland Transport</li> <li>• Costs of parking management - businesses</li> <li>• Costs of parking spaces (parking fees)</li> <li>• Resource consent costs</li> <li>• Less on-site accessible parking for people with disabilities</li> <li>• The economic cost of maximums</li> </ul> <p>In area where parking minimums apply under the legacy plans, the costs listed in Alternative 2b under the following headings also apply:</p> <ul style="list-style-type: none"> <li>• Not efficient use of land</li> <li>• Housing less affordable</li> <li>• Cost of parking spaces less transparent</li> <li>• Resource consent costs</li> <li>• Economic costs of retaining minimums</li> </ul>	<p>supporting the parking approach. Those costs include:</p> <ul style="list-style-type: none"> <li>• undertaking comprehensive parking management plans</li> <li>• introducing residents' parking schemes as required to ensure that residents with no on-site parking have access to on-street parking near their property</li> <li>• undertaking more active management of on-street parking in areas where there has not previously been a need for parking restrictions and enforcement</li> <li>• purchasing and servicing parking meters.</li> </ul> <p>Some of these costs can be offset by parking fees and charges, potentially resulting in a fiscally neutral outcome.</p> <p>MRCagney has estimated that parking minimums help Auckland Transport to avoid costs of parking management to the value of \$14.5 million over 30 years<sup>19</sup>.</p> <p><b>Costs of parking management - businesses</b> Additional costs to businesses in managing their on-site parking. Businesses who provide parking for their own employees and customers may have manage that parking more actively to prevent it being used by commuters and customers of other businesses who have chosen not to provide parking.</p> <p><b>Costs of parking spaces (parking fees)</b> Additional costs to people wanting to park. They are increasingly likely to find that free on-site parking is not available. Rather they may have to pay for parking on the street or in a commercial parking building or car park. This cost will have a greater impact on those with lower incomes.</p> <p><b>Does not give effect to Directive 10.6 of the Auckland Plan</b> 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>Less on-site accessible parking for people with disabilities</b> Developments which choose to provide no parking do not trigger the parking requirements of the Building Code<sup>20</sup> in relation to parking for people with disabilities. When parking is provided,</p>	<p><b>Costs of parking management - businesses</b> Additional costs to businesses in managing their on-site parking. Businesses who provide parking for their own employees and customers may have to manage that parking more actively to prevent it being used by commuters and customers of other businesses who have chosen not to provide parking.</p> <p><b>Costs of parking spaces (parking fees)</b> Additional costs to people wanting to park. They are increasingly likely to find that free on-site parking is not available. Rather they may have to pay for parking on the street or in a commercial parking building or car park. This cost will have a greater impact on those with lower incomes.</p> <p><b>Resource consent costs</b> Parking maximums which apply generically are not always the most appropriate standards for a particular site or proposal. There are costs and uncertainty associated with obtaining a resource consent to depart from maximum parking requirements. Resource consents are a regulatory barrier which can discourage appropriate development. The costs and uncertainty associated with resource consent requirements are incurred by businesses, developers, and residents. Processing costs are incurred by the council. While the council can recover costs from the applicant, this does not always cover the full cost of processing.</p> <p>The reasonableness of the resource consent costs will vary according to location. The City Centre zone is well served by the Rapid and Frequent Service Network and there is also a good supply of commercial parking. The road network serving the city centre is also at capacity during peak periods. There should be less ability to justify providing more parking than the parking maximums permit. However in some other locations which are not yet well served by the Rapid and Frequent Service Network and where there is no alternative off-site parking available, there may be more justification for providing additional parking.</p> <p>The extent to which resource consent costs are likely to be incurred will also vary depending on the level at which the parking maximums are set.</p> <p>The costs and uncertainties are reduced by the</p>	<p>achieved for a particular site by waiving or reducing the parking requirements. Resource consent costs are therefore a regulatory barrier which can discourage appropriate development.</p> <p>The extent to which resource consent costs are likely to be incurred will also vary depending on the level at which the parking minimums are set. In general the parking requirements are lower than those set in legacy plans.</p> <p>The costs and uncertainties are reduced by the use of the restricted discretionary activity status. Also the Unitary Plan states that such applications will be considered without the need for public or limited notification.</p> <p><b>Economic costs of retaining minimums</b> MRCagney found that the economic costs of parking minimums exceeded the benefits by a ratio of between 6.1:1 and 11.7:1 depending on whether property was valued using a low, medium or high estimate. MRCagney suggested that the extent of the economic impacts was directly proportional to two key values:</p> <ul style="list-style-type: none"> <li>• the value of floor space</li> <li>• the degree to which parking substitutes for floorspace.</li> </ul> <p>The negative impacts of parking minimums are therefore likely to be less where density and property values are lower.</p> <p><b>Inconsistent as applies only to some zones</b> The approach is not consistent across Auckland. Parking minimums apply outside the City Centre zone; the City Centre Fringe overlay; Metropolitan, Town and Local Centres; Mixed Use zone; Terrace Housing and Apartment Buildings zone. Some anomalies will occur, particularly around the fringes of the zones. It may be difficult to justify applying parking minimums where a site is located adjacent to a zone where no parking is required.</p>

	Status quo-Retain approach of the legacy plans	Alternative 1-No rules - leave it to the market	Alternative 2a-Preferred approach for 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	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)
		<p>the Building Code requires a certain number of parking spaces to be provided for people with disabilities. There will need to be a greater reliance on disabled parking being provided on the street or in other public parking areas.</p>	<p>use of the restricted discretionary activity status. Also, outside of the City Centre zone, the Unitary Plan states that such applications will be considered without the need for public or limited notification. Applications to exceed the parking maximums in the City Centre zone will be subject to the normal tests for notification under the RMA.</p> <p><b>Less on-site accessible parking for people with disabilities</b>  Developments which choose to provide no parking do not trigger the parking requirements of the Building Code in relation to parking for people with disabilities. When parking is provided, the Building Code requires a certain number of parking spaces to be provided for people with disabilities. There will need to be a greater reliance on disabled parking being provided on the street or in other public parking areas.</p> <p><b>The economic costs of maximums</b>  The economic costs of parking maximums are mainly related to their impacts on development - ie the extent to which they are 'binding' and will constrain the ability for a developer to provide the amount of parking that they consider optimal for their development. MRCagney considered it too difficult to quantify the costs associated with parking maximums but noted that if the maximums were set at the level that was only moderately binding for most developments, then they would be likely to have only moderate costs<sup>23</sup>.</p> <p><b>Inconsistent as applies only to some zones</b>  The approach is not consistent across Auckland - there are different standards for the City Centre zone as compared with the other zones and locations where parking maximums apply. Parking minimums apply outside of the City Centre zone; the City Centre Fringe overlay; Metropolitan, Town and Local Centres; Mixed Use zone the Terrace Housing and Apartment Buildings zone; and the Mixed Housing Urban zone. Some anomalies will occur, particularly around the fringes of the zones. Some activities may seek to locate in zones where there are no upper limits on the amount of parking that can be provided.</p>	
Benefits	<p>In summary, the benefits are:</p> <ul style="list-style-type: none"> <li>• Familiarity with existing approach</li> </ul>	<p>In summary, the benefits are:</p> <ul style="list-style-type: none"> <li>• Efficient use of land</li> </ul>	<p>In summary, the benefits are:</p> <ul style="list-style-type: none"> <li>• Gives effect to Directive 10.6 of Auckland</li> </ul>	<p>In summary, the benefits are:</p> <ul style="list-style-type: none"> <li>• Not inconsistent with Directive 10.6 of the</li> </ul>

<sup>23</sup> MRCagney 2013, pp28, 29

<sup>24</sup> MRCagney 2013, pp28, 29



	Status quo-Retain approach of the legacy plans	Alternative 1-No rules - leave it to the market	Alternative 2a-Preferred approach for 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	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)
	<ul style="list-style-type: none"> <li>Other benefits - as per the other alternatives depending on the particular legacy plan approach</li> </ul> <p>These benefits are further outlined below:</p> <p><b>Familiarity with existing approach</b> Users of the legacy plan (including applicants, developers, planning consultants and council officers) are familiar with, and used to applying, the existing approach.</p> <p><b>Other benefits</b> In areas where parking maximums apply under the legacy plans, the benefits listed in Alternative 2a under the following headings also apply:</p> <ul style="list-style-type: none"> <li>Directive 10.6 of the Auckland Plan</li> <li>Efficient use of land</li> <li>Affordable housing</li> <li>Avoids resource consent costs</li> <li>Cost of parking spaces more transparent</li> <li>Reduced congestion</li> <li>Economic benefits of removing minimums (assuming there are maximums but no minimums)</li> <li>Economic effects of maximums</li> </ul> <p>In area where parking minimums apply under the legacy plans, the benefits listed in Alternative 2b under the following headings also apply.</p> <ul style="list-style-type: none"> <li>Ensures minimum level of on-site parking.</li> </ul>	<ul style="list-style-type: none"> <li>Housing more affordable</li> <li>Avoids resource consent costs</li> <li>Cost of parking spaces more transparent</li> <li>Economic benefits of removing minimums</li> <li>Consistent approach</li> </ul> <p>These benefits are further outlined below:</p> <p><b>Efficient use of land</b> Businesses and developers do not need to incur the financial and opportunity costs associated with providing parking in excess of what they want or need in order to meet planning requirements. This can result in more efficient use of land and gives greater flexibility to business and developers in designing their developments. Removal of parking minimums removes a barrier to redevelopment and intensification, and increases the space that is potentially available to accommodate future residents and commercial activities.</p> <p><b>Housing more affordable</b> There is potential for housing to be more affordable because developers can choose to provide less parking or no parking.</p> <p><b>Avoids resource consent costs</b> Avoids the costs and uncertainty associated with obtaining a resource consent to depart from minimum or maximum parking requirements. Resource consents are a regulatory barrier which can discourage appropriate development. 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. Parking maximums or minimums which apply generically are not always the most appropriate standards for a particular site or proposal.</p> <p><b>Cost of parking spaces more transparent</b> There are more likely to be charges for parking. Rather than providing on-site parking, developers and businesses may leave it to visitors and employees to find paid parking on-street or in commercial parking areas. This is a benefit because parking costs become transparent, rather than being hidden and absorbed in the costs of</p>	<p>Plan</p> <ul style="list-style-type: none"> <li>Improvements over existing City Centre approach for: - <ul style="list-style-type: none"> <li>Residential parking standards</li> <li>Non-residential parking standards</li> </ul> </li> <li>City Centre Fringe overlay - recognises need for a different approach in this location</li> <li>Efficient use of land</li> <li>Housing more affordable</li> <li>Avoids resource consent costs</li> <li>Cost of parking spaces more transparent</li> <li>Reduced congestion</li> <li>Economic benefits of removing minimums</li> <li>Economic benefits of maximums</li> </ul> <p>These benefits are further outlined below:</p> <p><b>Gives effect to Directive 10.6 of Auckland Plan</b> This approach gives effect to Directive 10.6 of the Auckland Plan which seeks a parking approach which takes account of multiple objectives.</p> <p><b>City Centre - Residential parking standards</b> The proposed rules modify the parking maximums for dwellings in the City Centre zone when compared with the legacy plan. The proposed rules separate out visitor parking. This is proposed to reduce potential oversupply in residential parking in new apartment developments while providing for adequate supply of off-street visitor parking.</p> <p><b>City Centre - Non-residential parking standards</b> When compared with the legacy plan, the proposed rules simplify and, in some cases, reduce the amount of parking permitted in the City Centre zone for non-residential activities.</p> <p><b>City Centre Fringe overlay</b> The proposed approach recognises the need for a different parking approach in the City Centre Fringe overlay due to its proximity to the City Centre zone.</p> <p><b>Efficient use of land</b> Businesses and developers do not need to incur the financial and opportunity costs associated with providing parking in excess of what they want or need in order to meet planning requirements. This</p>	<p>Auckland Plan</p> <ul style="list-style-type: none"> <li>Ensures minimum level of on-site parking</li> </ul> <p>These benefits are further outlined below:</p> <p><b>Not inconsistent with Directive 10.6 of the Auckland Plan</b> This approach is not inconsistent with Directive 10.6 of the Auckland Plan. Sub-clause (a) of the directive refers to managing parking supply to support intensification in and around the city centre, metropolitan, town and local centres and within mixed use corridors.</p> <p><b>Ensures minimum level of on-site parking</b> This ensures that a minimum level of on-site parking is provided so reducing the potential adverse effects of parking overspill.</p> <p>This is a benefit to existing residents because it reduces their exposure to parking overspill associated with new development.</p> <p>Ensuring a minimum level of on-site parking can also avoid the localised congestion that occurs when vehicles drive around looking for parking spaces. MRCagney has estimated that parking minimums help Auckland Transport to avoid costs of parking management to the value of \$14.5 million over 30 years<sup>26</sup>.</p>

<sup>25</sup> MRCagney, 2013, pp36-38

<sup>26</sup> MRCagney 2013, p24-26

	Status quo-Retain approach of the legacy plans	Alternative 1-No rules - leave it to the market	Alternative 2a-Preferred approach for 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	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)
		<p>transactions. Parking must always be paid for in some way, and removal of parking minimums means that the cost of providing parking is less likely to be internalised into the price of goods and services, the price of property, or the level of wages to be paid to employees. Removal of parking minimums is likely to lead to car drivers facing the cost of their mode choice to a greater extent, making other transport modes more attractive and competitive.</p> <p><b>Economic benefits of removing minimums</b> MRCagney<sup>23</sup> found that the economic costs of parking minimums exceeded the benefits by a ratio of between 6.1:1 and 11.7:1 depending on whether property was valued using a low, medium or high estimate. MRCagney suggested that the extent of the economic impacts was directly proportional to two key values:</p> <ul style="list-style-type: none"> <li>• the value of floor space</li> <li>• the degree to which parking substitutes for floorspace.</li> </ul> <p>The negative impacts of parking minimums are therefore likely to increase with density and property values.</p> <p><b>Consistent approach</b> There are benefits in applying a consistent approach across Auckland. A consistent approach is easier to apply and avoids the anomalies that do occur when parking standards vary according to location and type of activity.</p>	<p>can result in more efficient use of land and can give greater flexibility to business and developers in designing their developments. Removal of parking minimums removes a barrier to redevelopment and intensification, and increases the space that is potentially available to accommodate future residents and commercial activities.</p> <p><b>Housing more affordable</b> There is potential for housing to be more affordable because developers can choose to provide less parking or no parking.</p> <p><b>Avoids resource consent costs</b> Avoids the costs and uncertainty associated with obtaining a resource consent to depart from minimum parking requirements. Resource consents are a regulatory barrier which can discourage appropriate development. Costs and uncertainty are incurred by businesses, developers, and residents. Processing costs are incurred by the council. While the council can recover costs from the applicant, this does not always cover the full cost of processing. Parking minimums which apply generically are not always the most appropriate standards for a particular site or proposal.</p> <p><b>Cost of parking spaces more transparent</b> There are more likely to be charges for parking. Rather than providing on-site parking, developers and businesses may leave it to visitors and employees to find paid parking on-street or in commercial parking areas. This is a benefit because parking costs become transparent, rather than being hidden and absorbed in the costs of transactions. Parking must always be paid for in some way, and removal of parking minimums means that the cost of providing parking is less likely to be internalised into the price of goods and services, the price of property, or the level of wages to be paid to employees. Removal of parking minimums is likely to lead to car drivers facing the cost of their mode choice to a greater extent, making other transport modes more attractive and competitive.</p> <p><b>Reduced congestion</b> Parking maximums can reduce overall congestion by resulting in parking costs increasing, and other modes (public transport, walking and cycling) being relatively more attractive. Reduced congestion benefits transport users - drivers that</p>	

	Status quo-Retain approach of the legacy plans	Alternative 1-No rules - leave it to the market	Alternative 2a-Preferred approach for 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	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)
			<p>continue to drive (despite less parking being available), bus users (less congested road space), and pedestrians (fewer vehicles)</p> <p><b>Economic benefits of removing minimums</b>  MRCagney<sup>24</sup> found that the economic costs of parking minimums exceeded the benefits by a ratio of between 6.1:1 and 11.7:1 depending on whether property was valued using a low, medium or high estimate. MRCagney suggested that the extent of the economic impacts was directly proportional to two key values:</p> <ul style="list-style-type: none"> <li>• the value of floor space</li> <li>• the degree to which parking substitutes for floorspace.</li> </ul> <p>The negative impacts of parking minimums are therefore likely to increase with density and property values.</p> <p><b>Economic benefits of maximums</b>  MRCagney noted that the primary external economic benefits of parking maximums relate to their effects on congestion. MRCagney assumed that parking maximums would reduce the level of parking supplied by 5% by 2041, and estimated that the congestion reduction benefits would be \$33.1 million per annum by 2041, which equates to \$140 million over a 30 year period.<sup>25</sup></p>	
Risks	<p>The content of the existing approaches are well-known. The effect of the approaches is not always well-known or measured.</p> <p>There is a lack of information about the following:</p> <ul style="list-style-type: none"> <li>• the extent to which the parking minimums are set at a level which results in developers and businesses being required to provide more parking than they would want to provide</li> <li>• the extent to which parking minimums may undermine the ability to provide affordable housing due to the cost associated with providing parking</li> <li>• the extent to which parking minimums may undermine the ability to achieve quality urban design outcomes where applied in zones that anticipate intensification</li> <li>• the extent to which parking minimums may undermine strategic goals to encourage</li> </ul>	<p>There is a lack of information about the following:</p> <ul style="list-style-type: none"> <li>• the extent to which the market will be successful in managing parking in the absence of regulation</li> </ul> <p>As part of this approach, Auckland Transport may increase its parking fees and charges to better manage its public parking and to recoup costs involved with increased parking management. There is therefore a risk of council being perceived as influencing the market for parking to increase its revenue from parking.</p> <p>There will be some political and reputational costs to the council as some people will remain of the view that ensuring an adequate supply of on-site parking (by applying parking minimums) is a council responsibility and should not be left to the market.</p> <p>This approach not consistent with Directive 10.6</p>	<p>There is a lack of information about the following:</p> <ul style="list-style-type: none"> <li>• the extent to which parking maximums may harm the economic success of businesses by not allowing businesses to provide as much parking as they wish to</li> <li>• the extent to which the market will be successful in managing parking in the absence of parking minimums</li> <li>• the existing supply and demand for parking in the areas where parking maximums are proposed</li> <li>• the extent to which applying parking maximums in centres may encourage out of centre development</li> <li>• the extent to which parking maximums will be perceived by developers as a 'target' rather than an upper limit.</li> </ul> <p>As part of this approach, Auckland Transport may increase its parking fees and charges to better manage its public parking and to recoup costs</p>	<p>There is a lack of information about the following:</p> <ul style="list-style-type: none"> <li>• the extent to which the parking minimums are set at a level which results in developers and businesses being required to provide more parking than they would want to provide</li> <li>• the extent to which parking minimums may undermine the ability to provide affordable housing due to the cost associated with providing parking</li> <li>• the extent to which parking minimums may undermine the ability to achieve quality urban design outcomes where applied in zones that anticipate some intensification eg the Mixed Housing zone</li> <li>• the extent to which parking minimums may undermine strategic goals to encourage the use of public transport, walking and cycling.</li> <li>• the extent to which having parking minimums (and no maximums) in these locations will encourage development to locate outside centres and the Mixed Use zone</li> </ul>

<sup>27</sup> MRCagney, 2014, p39

	Status quo-Retain approach of the legacy plans	Alternative 1-No rules - leave it to the market	Alternative 2a-Preferred approach for 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	Alternative 2b-Preferred approach for 'other areas' (not covered by alternative 2a)
	<p>the use of public transport, walking and cycling.</p> <ul style="list-style-type: none"> <li>the existing supply and demand for parking in the areas where minimums are proposed.</li> </ul> <p>It is known that the existing approaches are not consistent with Directive 10.6 of the Auckland Plan. There would therefore be a high risk in adopting this alternative. The Unitary Plan is a key document for giving effect to this directive.</p> <p>There are known inconsistencies and anomalies in the existing District Plans ('legacy plans') when they are compared to each other. This includes differences in parking rates as well as differences in the way activities are defined and grouped. Maintaining the existing approaches misses an opportunity to develop a more consistent and rationalised set of policies and rules. If the council does not rationalise the approach for the notified version of the Unitary Plan, it will have to do so in response to submissions.</p>	<p>of the Auckland Plan. There would therefore be a high risk in adopting this alternative. The Unitary Plan is a key document for giving effect to this directive.</p>	<p>involved with increased parking management. There is therefore a risk of council being perceived as influencing the market for parking to increase its revenue from parking.</p> <p>There are some political and reputational risks to the council as some people will remain of the view that ensuring an adequate supply of on-site parking (by applying parking minimums) is a council responsibility and should not be left to the market.</p> <p>MRCagney<sup>27</sup> identified the risk of unintended consequences in terms of reinforcing market power, locking-in existing parking supply, and sense of entitlement as follows:</p> <ul style="list-style-type: none"> <li>Market power, i.e. parking maximums could create barriers of entry into the commercial parking market and enable existing operators, including Council, to extract higher profits.</li> <li>Lock-in effects, i.e. parking maximums may discourage redevelopment of existing parking facilities. Other policy settings could seek to offset this incentive, for example enabling existing developments to roll-over existing parking supplies.</li> <li>Sense of entitlement, i.e. parking maximums create a public perception that Council will provide for their travel needs whenever they are unable to find/afford car-parking.</li> </ul> <p>MRCagney noted that these consequences may not eventuate but they should be acknowledged, and the situation monitored accordingly.</p> <p>However the risk of not acting in accordance with this alternative is considered to be higher than the risk of acting. If any existing parking minimums are not replaced by parking maximums in these areas, there is a risk of greater congestion and not achieving the intensification and quality urban design sought by the Unitary Plan. The Unitary Plan will be less enabling of appropriate development in the City Centre zone; City Centre Fringe overlay; Metropolitan, Town and Local Centres zones; Mixed Use zone; Terrace Housing and Apartment Buildings zone.</p>	<ul style="list-style-type: none"> <li>the existing supply and demand for parking in the areas where minimums are proposed.</li> </ul> <p>This approach is similar to existing legacy plans, but with generally lower parking requirements, so there is a reasonable level of knowledge about how it applies. Acting in accordance with approach alleviates the risks associated with spillover parking which results in localised congestion and a need for greater management of Auckland Transport's parking resources.</p>

## 4 Conclusion

Based on the above discussion, the following conclusions are drawn:

Alternative 2a is the preferred approach for 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. The use of parking maximums as proposed, and no parking minimums (except for in the Mixed Housing Urban zone), supports intensification and efficient use of land in these locations. It also supports the use of the Rapid and Frequent Service Network. Alternative 2b is the preferred approach for other areas, where the council considers that it is still desirable to require some on-site parking to be provided in conjunction with activities and development. This is to manage the localised congestion effects that can arise from parking overspill.

The following alternatives therefore are not recommended:

- Status quo - Retain the approach of the legacy district plans
- Alternative 1: No rules - leave it to the market

The following alternatives are therefore recommended:

- Alternative 2a: Preferred approach for 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
- 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 2.1 Providing for growth in a quality compact form (RPS), 3.1 Commercial and industrial growth (RPS), 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 identification of the City Centre Fringe overlay as shown on the infrastructure layer of the planning maps

## 5 Record of Development of Provisions

### 5.1 Information and Analysis

Date	Author	Title	Comments	Appendix
2011	NZTA	Travel planning toolkit guidelines and resources, Resource 1 – Facts and figures.	Provides information about costs associated with constructing car parking.	3.9.1
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.  However parking maximums applied to zones / areas in and around centres rather than being based on walking distances from frequent public transport network in centres as initially recommended by Flow.	3.9.3

<b>Date</b>	<b>Author</b>	<b>Title</b>	<b>Comments</b>	<b>Appendix</b>
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
2012-03	Auckland Council	Auckland Plan		
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 key stakeholders	3.9.7
2012-09-12	Flow Transportation Specialists	Technical Note: Criteria for Local Centres.	Useful as part of the chronology. However content largely superseded by later decisions.	3.9.8
2012-09-20	Flow Transportation Specialists	Technical Note: Additional Work.	Update to Jan 2012 report to take into account adopted Auckland Plan and updated Auckland Transport proposals for public transport network. Useful as part of the chronology. However content largely superseded by later decisions.	3.9.9
2012-10-24	Flow Transportation Specialists	Technical Note: Existing Plan Changes	Useful as part of the chronology. However content largely superseded by later decisions.	3.9.10
2012-11-14	MRCagney Pty Ltd	The Economic Impacts of Minimum Parking Requirements (an analysis of Dominion Road, Takapuna, and Onehunga)	Economic cost benefit analysis. Superseded by the 2014 MRCagney report which builds upon this work.	3.9.11
2012-12-20	Flow Transportation Specialists	Parking Provision Rates for Retail	Used as a basis changes to the following rates that occurred in response to feedback to the Aug 2012 draft: - retail rates - entertainment facilities, club rooms and community facilities	3.9.12
2012-08	MRCagney Pty Ltd	Economic Impacts of Parking Requirements in Auckland	Economic analysis of impacts of maximums and minimums, including specific consideration of the approach contained in the March 2013 draft Unitary Plan.	3.9.13

## Other

Date	Author	Title	Comments	Appendix
2012-10	Auckland Transport	Integrated Transport Assessment Guidelines	Final draft. Not to be finalised prior to Unitary Plan.	3.9.14

## Legacy documents

Date	Author	Title	Comments	Appendix
2009-03	Auckland Regional Council	Auckland Regional Parking Strategy	Sets a policy direction of progressively introducing maximum parking standards for non-residential development in town centres in conjunction with implementation of comprehensive parking management plans.	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, Key Retailers Group, Local Boards, the council's Built Environment Unit and Transport and Strategy Unit
2012-11-29	Auckland Council	Meeting with Key Retailers Group	Feedback received led to review of parking rates for retail, including a change to more permissive maximum parking rates.
2013	Auckland Council	Draft Unitary Plan, March 2013	A range of feedback received on parking generally. Some specific feedback received on the use of maximums / minimums, and on specific rates.

## 5.3 Decision-Making

Date	Political decision maker	Decision
2012-08-10	Political Working Party	Meeting approved approach to: maximum / minimum parking; and non-accessory parking (in city centre and associated fringe area)
2012-12-04	Political Working Party	Meeting agreed a direction of a more permissive parking maximums for retail.
2013-07-05	Auckland Plan Committee	Meeting endorsed the approach of the March draft. Asked council officers to investigate alternative provisions eg minimum parking provisions for rural / outer and local centres that are not and are unlikely to be well serviced by public transport.