

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 71: NPS- UD Removal of Car Parking Minimums – Consequential Technical Amendments

SUMMARY OF DECISIONS REQUESTED

Enclosed:

- **Explanation**
- **Summary of Decisions Requested**
- **Submissions**

Explanation

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by 10 June 2022
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

Summary of Decisions Requested

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
1	1.1	Brodie Miller	brodiemiller@xtra.co.nz	Approve the plan change with the amendments I requested	Decline the plan change in relation to the removal of car parking minimums.
2	2.1	Luke Thornhill	173 Totara Road Whenuapai Auckland 0618	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
3	3.1	Allan Tito	bugzfuru@yahoo.co.nz	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
4	4.1	Leon Mascarenhas	leon.mascarenhas@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
5	5.1	Judy Wang	spongy.22@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
6	6.1	Dianne Campton	dianne@camptonconsulting.co.nz	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
7	7.1	Annabel Olsen	annabelc.olsen@gmail.com	Approve the plan change with the amendments I requested	Decline the plan change in relation to the removal of car parking minimums.
8	8.1	John Steward	jsteward555@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
9	9.1	Al Gibson	silentarrow92@gmail.com	Approve the plan change	Approve the plan change as notified.
10	10.1	Gladys Lamug	gladys.lamug@gmail.com	Decline the plan change	No relief specified.
11	11.1	Rhys Stickings	rhys.stickings@outlook.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
12	12.1	Kris Habraken	khabraken@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
13	13.1	M C ROGERS LIMITED Attn: Martin Rogers Rogers	martinrogers@live.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
14	14.1	Kyung Hee Cho	k.cecilia.cho@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
15	15.1	Erica Olesson	eolesson@gmail.com	Approve the plan change	Approve the plan change as notified.
16	16.1	Kashif Iqbal	kashif.iq82@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
17	17.1	Harrison Fernandes-Burnard	harrison.j.d.burnard@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the addition of a travel plan requirement
17	17.2	Harrison Fernandes-Burnard	harrison.j.d.burnard@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Seeks that the travel plan requirement and all associated provisions be deleted from the plan change.
18	18.1	David Allen	davidallen.global@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
19	19.1	Business North Harbour Incorporated Attn: Kevin O'Leary	kevin@businessnh.org.nz	Not stated	Seeks that a more thorough Section 32 evaluation report be commissioned to assess the economic effects of the plan change, more specifically, those related to economic and employment growth or reduction.

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19	19.2	Business North Harbour Incorporated Attn: Kevin O'Leary	kevin@businessnh.org.nz	Not stated	Seeks consideration be given to sufficient car parking being included in any new development applications on a case-by-case basis in commercial/industrial areas. A blanket 'no minimums' approach to applications would result in a number of current problems being exacerbated.
19	19.3	Business North Harbour Incorporated Attn: Kevin O'Leary	kevin@businessnh.org.nz	Not stated	Seeks case-by-case consideration of whether or not the provision of other mode opportunities and services available for commuters to, from and around the area involved are adequate, before granting development applications with no parking requirements.
19	19.4	Business North Harbour Incorporated Attn: Kevin O'Leary	kevin@businessnh.org.nz	Not stated	Seeks consideration of options for electric vehicle charging if the removal of parking minimums results in people not having parking spaces at their homes or workplaces.
20	20.1	Fendi Huang	fendi.089@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
21	21.1	Joelize De Leon Santos	santoslize@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
22	22.1	Chang Woo Ryoo	cryo001@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
23	23.1	Viscount Investment Corporation Limited Attn: Chris Arbuckle	c.arbuckle@crownapg.com	Approve the plan change	Approve the plan change as notified.
24	24.1	Universal Homes Attn: Andrew Crosby		Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the addition of a travel plan requirement
24	24.2	Universal Homes Attn: Andrew Crosby		Decline the plan change, but if approved, make the amendments I requested	Require a travel plan only if the application seeks to provide less parking than MHU and MHS zones currently require
25	25.1	Lorraine Mary Ward	cklmward@xtra.co.nz	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
26	26.1	Fernando Rodrigues	FER.SOUZA1508@GMAIL.COM	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
27	27.1	Rosebank Business Association Attn: Kim Watts	kim@rosebankbusiness.co.nz	Approve the plan change with the amendments I requested	Seeks that a more thorough Section 32 evaluation report be commissioned to assess the economic effects of the plan change, more specifically, those related to economic and employment growth or reduction.
27	27.2	Rosebank Business Association Attn: Kim Watts	kim@rosebankbusiness.co.nz	Approve the plan change with the amendments I requested	Seeks consideration be given to sufficient car parking being included in any new development applications on a case-by-case basis in commercial/industrial areas. A blanket 'no minimums' approach to applications would result in a number of current problems being exacerbated.

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27	27.3	Rosebank Business Association Attn: Kim Watts	kim@rosebankbusiness.co.nz	Approve the plan change with the amendments I requested	Seeks case-by-case consideration of whether or not the provision of other mode opportunities and services available for commuters to, from and around the area involved are adequate, before granting development applications with no parking requirements.
27	27.4	Rosebank Business Association Attn: Kim Watts	kim@rosebankbusiness.co.nz	Approve the plan change with the amendments I requested	Seeks consideration of options for electric vehicle charging if the removal of parking minimums results in people not having parking spaces at their homes or workplaces.
28	28.1	Daniel James Kinnoch	daniel.kinnoch@colabplanning.co.nz	Decline the plan change	Decline the plan change as it relates to the submission and the following provisions: <ul style="list-style-type: none"> • Travel demand threshold at E27.4.1(A3a) • Standard E27.6.1A • Matters for discretion at E27.8.1(4A) • Assessment criteria at E27.8.2(3A) • Special information requirement at E27.9(2)(b)
29	29.1	Shantelle Scott	shantelle.scott555@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
30	30.1	Diocesan School for Girls Attn: Iain McManus	iain@civitas.co.nz	Decline the plan change	Decline the plan change in relation to the addition of a travel plan requirement. Seeks that the travel plan requirement and all associated provisions be deleted from the plan change.
31	31.1	King's College Attn: Iain McManus	iain@civitas.co.nz	Decline the plan change	Decline the plan change in relation to the addition of a travel plan requirement. Seeks that the travel plan requirement and all associated provisions be deleted from the plan change.
32	32.1	Michael and Sandra Wallace	mikesclub2@hotmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
33	33.1	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Seeks that the travel plan requirement and all associated provisions be deleted from the plan change.
33	33.2	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending B8.6 Explanation and principal reasons for adoption as notified.
33	33.3	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	In relation to amendments proposed to E27.1 Background - That the proposed insertion in reference to parking demand and maximum parking limits are deleted.
33	33.4	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(3) as: (3) Manage the number, location and type of parking and loading spaces, including and bicycle parking and associated end-of-trip facilities to support all of the following
33	33.5	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(9) as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.

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33	33.6	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(6) as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by : (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.
33	33.7	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E27.3(6A) as notified.
33	33.8	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports deletion of Policy E27.3(7) as notified.
33	33.9	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed activity rule E27.4.1(A3a).
33	33.10	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed standard E27.6.1A.
33	33.11	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending standard E27.6.2(5) as notified.
33	33.12	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E27.6.3.1(1)(c) as notified.
33	33.13	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Deleted proposed matter of discretion E27.8.1(4a).
33	33.14	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed assessment criteria E27.8.2(3A).
33	33.15	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(2) as notified.
33	33.16	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Deleted Special Information Requirement E27.9(2)(b).
33	33.17	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(3) as notified.
33	33.18	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E38.9.1.2(1) as notified.
33	33.19	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E40.3(5) as notified.
33	33.20	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment Criteria E40.8.2(2) as notified.
33	33.21	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy F2.17.3(3) as notified.
33	33.22	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(3) as notified.

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33	33.23	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(4) as notified.
33	33.24	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(3) as notified.
33	33.25	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(4) as notified.
33	33.26	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(1) as notified.
33	33.27	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(3) as notified.
33	33.28	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(1) as notified.
33	33.29	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(8) as notified.
33	33.30	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H1.8.2(1) as notified.
33	33.31	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H2.8.2(1) as notified.
33	33.32	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H3.8.2(1) as notified.
33	33.33	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H4.8.2(1) as notified.
33	33.34	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H5.8.2(1) as notified.
33	33.35	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H6.8.2(1) as notified.
33	33.36	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H20.8.2(1) as notified.
33	33.37	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H21.8.2(1) as notified.
33	33.38	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amendments to the following definitions as notified: - Accessory activities - Non-accessory parking - Off-site parking
33	33.39	Kiwi Property Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Delete the proposed amendments to the following definitions: - Travel plan
34	34.1	Takapuna Beach Business Association Attn: Terence Harpur	Terence@takapunabeach.org.nz	Not stated	Seeks that a more thorough Section 32 evaluation report be commissioned to assess the economic effects of the plan change, more specifically, those related to economic and employment growth or reduction.
34	34.2	Takapuna Beach Business Association Attn: Terence Harpur	Terence@takapunabeach.org.nz	Not stated	Seeks consideration be given to sufficient car parking being included in any new development applications on a case-by-case basis in commercial/industrial areas. A blanket 'no minimums' approach to applications would result in a number of current problems being exacerbated.

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34	34.3	Takapuna Beach Business Association Attn: Terence Harpur	Terence@takapunabeach.org.nz	Not stated	Seeks case-by-case consideration of whether or not the provision of other mode opportunities and services available for commuters to, from and around the area involved are adequate, before granting development applications with no parking requirements.
34	34.4	Takapuna Beach Business Association Attn: Terence Harpur	Terence@takapunabeach.org.nz	Not stated	Seeks consideration of options for electric vehicle charging if the removal of parking minimums results in people not having parking spaces at their homes or workplaces.
35	35.1	Mike Greer Developments Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Decline the plan change in relation to the addition of a travel plan requirement.
35	35.2	Mike Greer Developments Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed activity table E27.4.1(A3a)
35	35.3	Mike Greer Developments Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed standard E27.6.1A
35	35.4	Mike Greer Developments Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed matter of discretion E27.8.1
35	35.5	Mike Greer Developments Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed special information requirement E27.9(2)(b)
36	36.1	Universal Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Decline the plan change in relation to the addition of a travel plan requirement
36	36.2	Universal Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed activity table E27.4.1(A3a)
36	36.3	Universal Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed standard E27.6.1A
36	36.4	Universal Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed matter of discretion E27.8.1
36	36.5	Universal Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed special information requirement E27.9(2)(b)
37	37.1	Auckland International Airport Limited Attn: Matthew Dugmore	matthew.dugmore@aucklandairport.co.nz	Decline the plan change	Decline the plan change in relation to the addition of a travel plan requirement
37	37.2	Auckland International Airport Limited Attn: Matthew Dugmore	matthew.dugmore@aucklandairport.co.nz	Decline the plan change	Delete proposed activity rule E27.4.1(A3a).
37	37.3	Auckland International Airport Limited Attn: Matthew Dugmore	matthew.dugmore@aucklandairport.co.nz	Decline the plan change	Delete proposed standard E27.6.1A
37	37.4	Auckland International Airport Limited Attn: Matthew Dugmore	matthew.dugmore@aucklandairport.co.nz	Decline the plan change	Delete proposed matter of discretion E27.8.1(4A)

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37	37.5	Auckland International Airport Limited Attn: Matthew Dugmore	matthew.dugmore@aucklandairport.co.nz	Decline the plan change	Delete proposed assessment criteria E27.8.2(3A).
37	37.6	Auckland International Airport Limited Attn: Matthew Dugmore	matthew.dugmore@aucklandairport.co.nz	Decline the plan change	Delete proposed special information requirement E27.9(2)(b)
38	38.1	Benjamin Ross	ben@colab.nz	Decline the plan change, but if approved, make the amendments I requested	Seeks that travel plans be produced by Auckland Council/Auckland Transport at a regional, sub-regional and centre level rather than for small and medium scale developments
38	38.2	Benjamin Ross	ben@colab.nz	Decline the plan change, but if approved, make the amendments I requested	<p>Amend minimum thresholds for the requirement of travel plans as:</p> <p>a. Residential</p> <ul style="list-style-type: none"> i. All residential developments over 300 dwellings whether it be in a single complex or brand-new greenfield development like Paerata Rise ii. All non-complying activities set in the unitary plan residential zones iii. Any developments providing more than 1 car park per dwelling for the total development iv. Any development over 75 dwellings in size within 800m of a rapid transit station and 400m of a frequent service route with more than 0.5 car parks per development. <p>b. Business Zones (single use structures)</p> <ul style="list-style-type: none"> i. All commercial and/or office developments over 15,000m² in floor area in a Metropolitan Centre or City Centre zone. ii. All commercial and/or office developments over 4,500m² not in the City Centre or Metropolitan Centre zones. iii. All commercial and office developments wanting 50 or more car parks regardless of size and zone. iv. All non-complying activity per the Business Zone activity tables in the Unitary Plan.

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38	38.3	Benjamin Ross	ben@colab.nz	Decline the plan change, but if approved, make the amendments I requested	<p>c. Business Zones (Mixed Use or Multi Use Structures)</p> <p>i. Neighbourhood, Local and Town centres:</p> <p>1. any development with more than 0.75 car parks per dwelling and 1 car park per 100m2 of commercial floor space.</p> <p>ii. Metropolitan and City Centre</p> <p>1. Any development with more than 0.5 car parks per dwelling and 1 car park per 150m2 of commercial floor space.</p> <p>d. Business Zones (Industry)</p> <p>i. Any non-complying activity per the activity table in the Unitary Plan.</p> <p>ii. Any industrial activity generating over 25 freight movements and/or 20 car/van movements in a day in Light Industrial zones OR 100 freight movements and/or more than 50 car/van movements a day in the Heavy Industry zone.</p> <p>e. Other</p> <p>i. Churches that generate over 100 car movements in a single day at least once per week including Sundays in all zones except residential zones where the limit is 50 car movements in a single day at least once a week.</p>
39	39.1	Kevin White	dino246@xtra.co.nz	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
40	40.1	Susan McKinnon	suemckinnon01@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
41	41.1	Equal Justice Project Attn: Hannah Jang	advocacy@equaljusticeproject.co.nz	Approve the plan change	Approve the plan change as notified.
42	42.1	Kristin Edgeworth	kristin@360edge.co.nz	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
43	43.1	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Table E27.6.1A.1 as follows: Add the following activities to the table - <u>(T15B) Marinas - New marinas accommodating a minimum of 20 berths or additional berths proposed to existing marinas</u> <u>(T16B) Marine and port activities - New boat launching facilities or changes to existing boat launching facilities.</u>
43	43.2	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Policy F2.17.3(3) as: <u>(3) Require adequate land-based facilities to accommodate travel demand; for car parking, rubbish disposal, and wastewater pump-out to be provided when existing local water transport facilities increase their capacity or when local water transport services increase their scale of operations at those facilities.</u>

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43	43.3	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Matter of Discretion F3.8.1(1)(e) as: (e) The effects on existing uses and activities, including access and parking.
43	43.4	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Assessment Criteria F3.8.2(3)(c) as: (c) whether the provision of parking is adequate for the site and the proposal, having considered any alternative parking available in the area and access to public transport whether the travel demand of the proposal can be accommodated given the functional parking needs of the existing marina.
43	43.5	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Assessment Criteria F3.8.2(4)(f) as: (f) the extent to which the need for the travel demand for the proposal conflicts with the main marina use and should be integrated with public transport.
43	43.6	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Assessment Criteria F5.8.2(1)(c) as: (c) whether parking is adequate for the site whether access to parking accommodates the functional needs of the minor port facility.
43	43.7	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Policy I504.3(7) as: (7) Require the retention of appropriate facilities for boating, such as public boat ramps and car with boat trailer parking spaces and marina car parking spaces commensurate with the transport demand for associated with the marina and boat ramp.
43	43.8	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Policy I504.3(12) as: (12) Require that, residential, or other non-marine related activities such as restaurants and cafes are provided for only where sufficient space remains available as required for marina, ferry service, and public access, recreation, public transport and boating activities, including associated car with boat trailer and any marina car parking.
43	43.9	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Table I504.4.1(A1)(c) as: (c) 20 car with and boat trailer parking spaces
43	43.10	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Table I504.4.1(A4)(c) as: (c) 20 car with and boat trailer parking spaces
43	43.11	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Assessment Criteria I504.8.2(4) as: (b) the extent to which the provision of parking does not impact on the operational needs of the marina and boat ramp, and ensures the amount of parking is adequate for the site and the proposal, and considers effects on alternative parking available in the area and access to the public transport network.

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
43	43.12	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend Special Information Requirement I504.9(1)(b)(ii) as: (ii) an assessment of parking, confirming the amount of parking is adequate for the application area and the proposal is where provided, including consideration of effects on alternative parking available in the area and access to the public transport network.
43	43.13	Bayswater Marina Berth-Holders Association Inc Attn: Kaaren Rosser	Kaaren@rosser-jones.com	Not stated	Amend the following precincts in accordance with the amendments suggested for the Bayswater Marina Precinct: - Okahu Marine Precinct - Gulf Harbour Marina Precinct
44	44.1	Angela Lin	angela.qi.lin@gmail.com	Approve the plan change with the amendments I requested	Amend the wording of the travel plan requirement to provide greater clarity and stronger linkage to policy direction. Include maximum parking thresholds for zones and/or activities.
45	45.1	Frances Fergusson	kaiwhakahaere@tewhareaio.org.nz	Decline the plan change	Referring to removal of a no parking sign outside residence - opposes removal of signage.
46	46.1	Southside Group Management Ltd Attn: Cary Bowkett	cary@southside.co.nz	Decline the plan change	Decline the plan change in relation to the addition of a travel plan requirement.
46	46.2	Southside Group Management Ltd Attn: Cary Bowkett	cary@southside.co.nz	Decline the plan change	Delete proposed activity table E27.4.1(A3a)
46	46.3	Southside Group Management Ltd Attn: Cary Bowkett	cary@southside.co.nz	Decline the plan change	Delete proposed standard E27.6.1A
46	46.4	Southside Group Management Ltd Attn: Cary Bowkett	cary@southside.co.nz	Decline the plan change	Delete proposed matter of discretion E27.8.1
46	46.5	Southside Group Management Ltd Attn: Cary Bowkett	cary@southside.co.nz	Decline the plan change	Delete proposed special information requirement E27.9(2)(b)
47	47.1	Scott Hanson	thekiwihansons@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums. Ensure all developments have on-site car parking (two parks per dwelling) and enable parking on berms.
48	48.1	Christy Warren	christywarrennz@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
49	49.1	National Mini Storage Ltd Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Decline the plan change in relation to the addition of a travel plan requirement.
49	49.2	National Mini Storage Ltd Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed activity table E27.4.1(A3a)
49	49.3	National Mini Storage Ltd Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed standard E27.6.1A
49	49.4	National Mini Storage Ltd Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed matter of discretion E27.8.1

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
49	49.5	National Mini Storage Ltd Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed special information requirement E27.9(2)(b)
50	50.1	Summerset Group Holdings Limited Attn: Aaron Smail	aaron.smail@summerset.co.nz stephanie.muller@summerset.co.nz	Decline the plan change	Decline the plan change in relation to the addition of a travel plan requirement. Requests that Council engages with the RVA on the proposed plan change.
51	51.1	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Seeks that the travel plan requirement and all associated provisions be deleted from the plan change.
51	51.2	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending B8.6 Explanation and principal reasons for adoption as notified.
51	51.3	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	In relation to amendments proposed to E27.1 Background - That the proposed insertion in reference to parking demand and maximum parking limits are deleted.
51	51.4	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(3) as: (3) Manage the number, location and type of parking and loading spaces, including and bicycle parking and associated end-of-trip facilities to support all of the following
51	51.5	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(9) as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
51	51.6	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(6) as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by : (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.
51	51.7	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E27.3(6A) as notified.
51	51.8	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports deletion of Policy E27.3(7) as notified.

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
51	51.9	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed activity rule E27.4.1(A3a).
51	51.10	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed standard E27.6.1A.
51	51.11	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending standard E27.6.2(5) as notified.
51	51.12	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E27.6.3.1(1)(c) as notified.
51	51.13	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Deleted proposed matter of discretion E27.8.1(4a).
51	51.14	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed assessment criteria E27.8.2(3A).
51	51.15	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(2) as notified.
51	51.16	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Deleted Special Information Requirement E27.8(2)(b).
51	51.17	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(3) as notified.
51	51.18	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E38.9.1.2(1) as notified.
51	51.19	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E40.3(5) as notified.
51	51.20	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment Criteria E40.8.2(2) as notified.
51	51.21	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy F2.17.3(3) as notified.
51	51.22	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(3) as notified.
51	51.23	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(4) as notified.
51	51.24	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(3) as notified.

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
51	51.25	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(4) as notified.
51	51.26	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(1) as notified.
51	51.27	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(3) as notified.
51	51.28	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(1) as notified.
51	51.29	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(8) as notified.
51	51.30	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H1.8.2(1) as notified.
51	51.31	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H2.8.2(1) as notified.
51	51.32	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H3.8.2(1) as notified.
51	51.33	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H4.8.2(1) as notified.
51	51.34	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H5.8.2(1) as notified.
51	51.35	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H6.8.2(1) as notified.
51	51.36	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H20.8.2(1) as notified.
51	51.37	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H21.8.2(1) as notified.
51	51.38	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Supports amendments to the following definitions as notified: - Accessory activities - Non-accessory parking - Off-site parking
51	51.39	Bentley Studios Limited Attn: Rachel Morgan	rachelm@barker.co.nz	Approve the plan change with the amendments I requested	Delete the proposed amendments to the following definitions: - Travel plan

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
52	52.1	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Seeks that the travel plan requirement and all associated provisions be deleted from the plan change.
52	52.2	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending B8.6 Explanation and principal reasons for adoption as notified.
52	52.3	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	In relation to amendments proposed to E27.1 Background - That the proposed insertion in reference to parking demand and maximum parking limits are deleted.
52	52.4	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(3) as: (3) Manage the number, location and type of parking and loading spaces, including and bicycle parking and associated end-of-trip facilities to support all of the following
52	52.5	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(9) as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
52	52.6	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(6) as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by : (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.
52	52.7	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E27.3(6A) as notified.
52	52.8	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports deletion of Policy E27.3(7) as notified.
52	52.9	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed activity rule E27.4.1(A3a).
52	52.10	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed standard E27.6.1A.

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
52	52.11	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending standard E27.6.2(5) as notified.
52	52.12	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E27.6.3.1(1)(c) as notified.
52	52.13	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Deleted proposed matter of discretion E27.8.1(4a).
52	52.14	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed assessment criteria E27.8.2(3A).
52	52.15	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(2) as notified.
52	52.16	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Deleted Special Information Requirement E27.8(2)(b).
52	52.17	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(3) as notified.
52	52.18	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E38.9.1.2(1) as notified.
52	52.19	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E40.3(5) as notified.
52	52.20	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment Criteria E40.8.2(2) as notified.
52	52.21	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy F2.17.3(3) as notified.
52	52.22	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(3) as notified.
52	52.23	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(4) as notified.
52	52.24	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(3) as notified.
52	52.25	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(4) as notified.
52	52.26	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(1) as notified.

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
52	52.27	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(3) as notified.
52	52.28	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(1) as notified.
52	52.29	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(8) as notified.
52	52.30	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H1.8.2(1) as notified.
52	52.31	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H2.8.2(1) as notified.
52	52.32	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H3.8.2(1) as notified.
52	52.33	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H4.8.2(1) as notified.
52	52.34	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H5.8.2(1) as notified.
52	52.35	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H6.8.2(1) as notified.
52	52.36	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H20.8.2(1) as notified.
52	52.37	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H21.8.2(1) as notified.
52	52.38	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Supports amendments to the following definitions as notified: - Accessory activities - Non-accessory parking - Off-site parking
52	52.39	Vital Healthcare Property Trust Attn: Matt Norwell	mattn@barker.co.nz	Approve the plan change with the amendments I requested	Delete the proposed amendments to the following definitions: - Travel plan
53	53.1	Classic Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Decline the plan change in relation to the inclusion of a travel plan requirement
53	53.2	Classic Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete activity table E27.4.1
53	53.3	Classic Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed standard E27.6.1A

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
53	53.4	Classic Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed matter of discretion E27.8.1
53	53.5	Classic Homes Attn: Michael Campbell	michael@campbellbrown.co.nz	Decline the plan change	Delete proposed special information requirement E27.9(2)(b)
54	54.1	Olesya Zaglyadimova	olesyazaglyadimova@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the removal of car parking minimums
55	55.1	Deborah Selina LeGrice	debbie.legrice11@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
56	56.1	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Seeks that the travel plan requirement and all associated provisions be deleted from the plan change.
56	56.2	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending B8.6 Explanation and principal reasons for adoption as notified.
56	56.3	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	In relation to amendments proposed to E27.1 Background - That the proposed insertion in reference to parking demand and maximum parking limits are deleted.
56	56.4	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(3) as: (3) Manage the number, location and type of parking and loading spaces, including and bicycle parking and associated end-of-trip facilities to support all of the following
56	56.5	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(9) as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
56	56.6	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(6) as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by : (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
56	56.7	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E27.3(6A) as notified.
56	56.8	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports deletion of Policy E27.3(7) as notified.
56	56.9	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Delete proposed activity rule E27.4.1(A3a).
56	56.10	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Delete proposed standard E27.6.1A.
56	56.11	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending standard E27.6.2(5) as notified.
56	56.12	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E27.6.3.1(1)(c) as notified.
56	56.13	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Deleted proposed matter of discretion E27.8.1(4a).
56	56.14	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Delete proposed assessment criteria E27.8.2(3A).
56	56.15	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(2) as notified.
56	56.16	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Deleted Special Information Requirement E27.8(2)(b).
56	56.17	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(3) as notified.
56	56.18	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E38.9.1.2(1) as notified.
56	56.19	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E40.3(5) as notified.
56	56.20	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment Criteria E40.8.2(2) as notified.
56	56.21	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy F2.17.3(3) as notified.
56	56.22	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(3) as notified.

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
56	56.23	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(4) as notified.
56	56.24	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(3) as notified.
56	56.25	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(4) as notified.
56	56.26	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(1) as notified.
56	56.27	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(3) as notified.
56	56.28	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(1) as notified.
56	56.29	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(8) as notified.
56	56.30	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H1.8.2(1) as notified.
56	56.31	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H2.8.2(1) as notified.
56	56.32	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H3.8.2(1) as notified.
56	56.33	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H4.8.2(1) as notified.
56	56.34	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H5.8.2(1) as notified.
56	56.35	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H6.8.2(1) as notified.
56	56.36	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H20.8.2(1) as notified.
56	56.37	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H21.8.2(1) as notified.
56	56.38	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Supports amendments to the following definitions as notified: - Accessory activities - Non-accessory parking - Off-site parking

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56	56.39	Fletcher Residential Limited and Fletcher Development Limited Attn: Mitchell Tweedie	mtweedie@frl.co.nz	Approve the plan change with the amendments I requested	Delete the proposed amendments to the following definitions: - Travel plan
57	57.1	Jennifer Clements	jenniferclements114@hotmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums
58	58.1	Waitemata District Health Board Attn: Craig McGarr	cmcgarr@bentley.co.nz	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the inclusion of a travel plan requirement.
58	58.2	Waitemata District Health Board Attn: Craig McGarr	cmcgarr@bentley.co.nz	Decline the plan change, but if approved, make the amendments I requested	Requests that the travel plan requirement should not apply to properties zoned Special Purpose Healthcare Facility and Hospital Zone
58	58.3	Waitemata District Health Board Attn: Craig McGarr	cmcgarr@bentley.co.nz	Decline the plan change, but if approved, make the amendments I requested	Amend proposed standard E27.6.1A as: E27.6.1A Travel Demand (1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required. (2) Standard E27.6.1A does not apply where: (a) a proposal is located in the Business - City Centre Zone, Business - Metropolitan Centre Zone, Business - Town Centre Zone, or Residential - Terrace Housing and Apartment Building Zone, <u>Special Purpose Healthcare Facility and Hospital Zone</u> or Centre Fringe Office Control as shown on the planning maps;
58	58.4	Waitemata District Health Board Attn: Craig McGarr	cmcgarr@bentley.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete 'healthcare facilities' and 'community facilities' from Table E27.6.1A.1 of proposed standard E27.6.1A.
59	59.1	Waitemata District Health Board and Auckland District Health Board and Counties Manukau District Health Board Attn: Craig McGarr	cmcgarr@bentley.co.nz	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the inclusion of a travel plan requirement Requests that the travel plan requirement should not apply to properties zoned Special Purpose Healthcare Facility and Hospital Zone
59	59.2	Waitemata District Health Board and Auckland District Health Board and Counties Manukau District Health Board Attn: Craig McGarr	cmcgarr@bentley.co.nz	Decline the plan change, but if approved, make the amendments I requested	Amend proposed standard E27.6.1A as: E27.6.1A Travel Demand (1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required. (2) Standard E27.6.1A does not apply where: (a) a proposal is located in the Business - City Centre Zone, Business - Metropolitan Centre Zone, Business - Town Centre Zone, or Residential - Terrace Housing and Apartment Building Zone, <u>Special Purpose Healthcare Facility and Hospital Zone</u> or Centre Fringe Office Control as shown on the planning maps;

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
59	59.3	Waitemata District Health Board and Auckland District Health Board and Counties Manukau District Health Board Attn: Craig McGarr	cmcgarr@bentley.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete 'healthcare facilities' and 'community facilities' from Table E27.6.1A.1 of proposed standard E27.6.1A.
60	60.1	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Requests amendments to the changes proposed for the I504 Bayswater Marina Precinct text
60	60.2	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy F2.17.3(3) as notified.
60	60.3	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(3) as notified.
60	60.4	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(4) as notified.
60	60.5	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(3) as notified.
60	60.6	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(4) as notified.
60	60.7	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Amend Policy I504.3(5) as: (5) Ensure space is available for publicly managed transport facilities for the ferry, and bus, including park-and-ride and cycle parking.
60	60.8	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Amend Policy I504.3(7) as: (7) Require the retention of appropriate facilities for boating, such as the public boat ramps, and boat trailer parking spaces associated with the marina and boat ramp.
60	60.9	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Amend Policy I504.3(12) as: (12) Require that, residential, or other non-marine related activities such as restaurants and cafes are provided for only where sufficient space remains available as required for marina, ferry service, and public access, recreation, public transport and boating activities, including associated boat trailer parking.
60	60.10	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Delete Assessment Criteria I504.8.2(4)(b).

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
60	60.11	Empire Capital Limited Attn: Craig Shearer	craig@craigshearer.co.nz	Approve the plan change with the amendments I requested	Amend Special Information Requirement I504.9(1) as: (1) An application for dwellings or food and beverage activities in Sub-precinct B must be accompanied by the following information: (b) the exact location and design of vehicle access and car parking (including any proposed shared parking) and: (ii) an assessment of parking, confirming the amount of parking is adequate for the application area and the proposal where provided, including consideration of effects on alternative parking available in the area and access to the public transport network.
61	61.1	Dilworth Trust Board Attn: Anthony Blomfield	ablomfield@bentley.co.nz	Decline the plan change	Decline the plan change in relation to the inclusion of a travel plan requirement.
62	62.1	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the inclusion of a travel plan requirement, particularly in relation to educational facilities.
62	62.2	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Amend Policy E27.3(6) to include separate policies for educational facilities and hospitals.
62	62.3	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Delete Activity Table E27.4.1
62	62.4	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Standard E27.6.1A and Table E27.6.1A.1
62	62.5	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Deleted proposed Matter of Discretion E27.8.1(4a).
62	62.6	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Assessment Criteria E27.8.2(3a).
62	62.7	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Delete Special Information Requirement E27.9(2)
62	62.8	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Retain references to car parking and assessment criteria in I549 Akoranga Precinct

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
62	62.9	Auckland University of Technology (AUT) Attn: Tina Kalmar	tina.kalmar@wsp.com	Decline the plan change, but if approved, make the amendments I requested	Amend the definition of 'travel plan' to clarify and/or limit the scope as it is currently too broad.
63	63.1	Melinda Kay McMillan	mcmillanm72@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
64	64.1	Janice Anne Bryant	jannebryant@mac.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
65	65.1	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Seeks that the travel plan requirement and all associated provisions be deleted from the plan change.
65	65.2	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending B8.6 Explanation and principal reasons for adoption as notified.
65	65.3	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	In relation to amendments proposed to E27.1 Background - That the proposed insertion in reference to parking demand and maximum parking limits are deleted.
65	65.4	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(3) as: (3) Manage the number, location and type of parking and loading spaces, including and bicycle parking and associated end-of-trip facilities to support all of the following
65	65.5	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(9) as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
65	65.6	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Amend Policy E27.3(6) as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by : (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.
65	65.7	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E27.3(6A) as notified.
65	65.8	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports deletion of Policy E27.3(7) as notified.
65	65.9	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed activity rule E27.4.1(A3a).

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
65	65.10	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed standard E27.6.1A.
65	65.11	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending standard E27.6.2(5) as notified.
65	65.12	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E27.6.3.1(1)(c) as notified.
65	65.13	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Deleted proposed matter of discretion E27.8.1(4a).
65	65.14	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Delete proposed assessment criteria E27.8.2(3A).
65	65.15	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(2) as notified.
65	65.16	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Deleted Special Information Requirement E27.8(2)(b).
65	65.17	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Special Information Requirement E27.9(3) as notified.
65	65.18	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Standard E38.9.1.2(1) as notified.
65	65.19	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy E40.3(5) as notified.
65	65.20	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment Criteria E40.8.2(2) as notified.
65	65.21	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Policy F2.17.3(3) as notified.
65	65.22	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(3) as notified.
65	65.23	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Matter of discretion F3.8.1(4) as notified.
65	65.24	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(3) as notified.
65	65.25	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F3.8.2(4) as notified.
65	65.26	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(1) as notified.
65	65.27	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F5.8.2(3) as notified.
65	65.28	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(1) as notified.
65	65.29	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria F6.3(8) as notified.
65	65.30	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H1.8.2(1) as notified.
65	65.31	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H2.8.2(1) as notified.
65	65.32	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H3.8.2(1) as notified.
65	65.33	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H4.8.2(1) as notified.

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
65	65.34	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H5.8.2(1) as notified.
65	65.35	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H6.8.2(1) as notified.
65	65.36	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H20.8.2(1) as notified.
65	65.37	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amending Assessment criteria H21.8.2(1) as notified.
65	65.38	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Supports amendments to the following definitions as notified: - Accessory activities - Non-accessory parking - Off-site parking
65	65.39	Goodman Property Trust Attn: Kasey Zhai	kaseyz@barker.co.nz	Approve the plan change with the amendments I requested	Delete the proposed amendments to the following definitions: - Travel plan
66	66.1	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the inclusion of a travel plan requirement.
66	66.2	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Retain Policy E27.3(6)
66	66.3	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete Policy E27.3(6)(a) and (b) and replace with proposed wording: (6) Provide for flexible on-site parking in the Business - Metropolitan Centre zone, Business - Town Centre zone, Business - Local Centre zone and Business - Mixed Use zone (with the exception of specified non urban town and local centres and the Mixed use zone adjacent to those specified centres). (6A) Provide maximum parking limits for education facilities and hospitals in the Business - Metropolitan Centre zone, Business - Town Centre zone, Business - Local Centre zone, and Business - Mixed Use zone (with the exception of specified non-urban town and local centres and the Mixed Use zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.
66	66.4	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Activity Rule E27.4.1(A3a).
66	66.5	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Standard E27.6.1A

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66	66.6	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Table E27.6.1A.1
66	66.7	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Matter of Discretion E27.8.1(4A)
66	66.8	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Assessment Criteria E27.8.2(3A).
66	66.9	AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke Incorporated Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed amendment to Special Information Requirement E27.9(2)(b)
67	67.1	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the inclusion of a travel plan requirement
67	67.2	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Retain Policy E27.3(6)
67	67.3	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete Policy E37.3(6)(a) and (b) and replace with proposed wording: (6) Provide for flexible on-site parking in the Business - Metropolitan Centre zone, Business - Town Centre zone, Business - Local Centre zone and Business - Mixed Use zone (with the exception of specified non urban town and local centres and the Mixed use zone adjacent to those specified centres). (6A) Provide maximum parking limits for education facilities and hospitals in the Business - Metropolitan Centre zone, Business - Town Centre zone, Business - Local Centre zone, and Business - Mixed Use zone (with the exception of specified non-urban town and local centres and the Mixed Use zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.
67	67.4	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Activity Rule E27.4.1(A3a).
67	67.5	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Standard E27.6.1A
67	67.6	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Table E27.6.1A.1
67	67.7	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Matter of Discretion E27.8.1(4A)

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
67	67.8	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Assessment Criteria E27.8.2(3A).
67	67.9	Argosy Property No. 1 Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed amendment to Special Information Requirement E27.9(2)(b)
68	68.1	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Amend Table E27.6.1A.1 as follows: Add the following activities to the table - (T15B) Marinas - Accommodating 20 berths or additional to existing (T16B) Marine and port activities - New boat launching facilities or changes to existing boat launching facilities or other accessory activities.
68	68.2	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Amend Policy F2.17.3(3) as: (3) Require <u>accessory adequate</u> land-based facilities for <u>car parking, access, rubbish disposal, and wastewater pump-out</u> to be provided when existing local water transport facilities increase their capacity or when local water transport services increase their scale of operations at those facilities.
68	68.3	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Amend Matter of Discretion F3.8.1(1)(e) as: (e) The effects on existing uses and activities, <u>including access and parking.</u>
68	68.4	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Delete Assessment Criteria F3.8.2(3)(c) and replace with the following: (c) <u>whether the provision of parking is adequate for the site and the proposal, having considered any alternative parking available in the area and access to public transport whether access to parking accommodates the long term operational needs (or meets the functional needs?) of the marina and its related services, facilities and amenities.</u>
68	68.5	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Amend Assessment Criteria F3.8.2(4)(f) as: (f) the extent to which <u>the need for the proposed parking or transport facilities conflicts with the main marina use and should be integrated with public transport.</u> so that the meaning better reflects the intended changes and the transport requirements for marine industry. As worded, the meaning could be interpreted to reflect that marinas do not need parking or transport facilities. As marinas have a functional need for vehicle assess, any proposal should be assessed against this.

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
68	68.6	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Delete Assessment Criteria F5.8.2(1)(c) and replace with the following: (c) <u>whether parking is adequate for the site-whether access to parking accommodates the operational needs (or meets the functional needs?) of the minor port facility</u>
68	68.7	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Supports the amendments proposed by the Bayswater Marina Berth Holders Association (Submission #43) to the Bayswater Marina Precinct and seeks that a consistent approach is applied across all marina precincts.
68	68.8	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Amend Policy I504.3(7) as: (7) Require the retention of appropriate facilities for boating, such as public boat ramps and <u>boat trailer parking spaces and marina parking spaces commensurate with the transport demand for associated with the marina and boat ramp.</u>
68	68.9	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Amend Policy I504.3(12) as: (12) Require that, residential, or other non-marine related activities such as restaurants and cafes are provided for only where sufficient space remains available as required for marina, ferry service, and public access, recreation, public transport and boating activities, including associated boat trailer <u>and any marina</u> parking.
68	68.10	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Amend Assessment Criteria I504.8.2(4) as: (b) <u>the extent to which the provision of parking does not impact on the operational needs of the marina and boat ramp, and ensures the amount of parking is adequate for the site and the proposal, and considers effects on alternative parking available in the area and access to the public transport network.</u>
68	68.11	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Amend Special Information Requirement I504.9(1)(b)(ii): (ii) <u>an assessment of parking, confirming the amount of parking is adequate for the application area and the proposal where provided,</u> including consideration of effects on alternative parking available in the area and access to the public transport network.
68	68.12	Auckland Marina Users Association Inc Attn: Richard Steel	richard.alecia.steel@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Consider whether transport and parking requirements contained within marina precinct plans might be better located under Chapter F3 - to provide consistency across the marina zone and avoid conflicts of interpretation between Chapter F3 and precinct plans.

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
69	69.1	Imogen Trupinic	imogen.trupinic@gmail.com	Decline the plan change	Decline the plan change in relation to the inclusion of a travel plan requirement
70	70.1	Waka Kotahi New Zealand Transport Agency Attn: Sonya McCall	sonya.mccall@nzta.govt.nz	Approve the plan change with the amendments I requested	Supports proposed consequential amendments with the exception of changes to the travel plan definition and development thresholds which trigger the need for a travel plan.
70	70.2	Waka Kotahi New Zealand Transport Agency Attn: Sonya McCall	sonya.mccall@nzta.govt.nz	Approve the plan change with the amendments I requested	Amend the definition of 'Travel Plan' as: A plan which sets out how travel demand is to be managed for a particular site or proposal to: - maximise the efficient use of transport networks and systems; and - promote and enable the use of more sustainable and active modes of transport such as public transport, walking and cycling, and carpooling, <u>car</u> sharing, and micro mobility as alternatives to sole occupancy private cars; and - manage the efficient use of limited resources such as car parking and loading areas.
70	70.3	Waka Kotahi New Zealand Transport Agency Attn: Sonya McCall	sonya.mccall@nzta.govt.nz	Approve the plan change with the amendments I requested	Delete Standard E27.6.1A and all related tables, matters of discretion and assessment criteria.
71	71.1	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the inclusion of a travel plan requirement
71	71.2	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Retain Policy E27.3(6)
71	71.3	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete Policy E37.3(6)(a) and (b) and replace with proposed wording: (6) Provide for flexible on-site parking in the Business - Metropolitan Centre zone, Business - Town Centre zone, Business - Local Centre zone and Business - Mixed Use zone (with the exception of specified non urban town and local centres and the Mixed use zone adjacent to those specified centres). (6A) Provide maximum parking limits for education facilities and hospitals in the Business - Metropolitan Centre zone, Business - Town Centre zone, Business - Local Centre zone, and Business - Mixed Use zone (with the exception of specified non-urban town and local centres and the Mixed Use zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.
71	71.4	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Activity Rule E27.4.1(A3a).

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
71	71.5	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Standard E27.6.1A
71	71.6	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Table E27.6.1A.1
71	71.7	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Matter of Discretion E27.8.1(4A)
71	71.8	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Assessment Criteria E27.8.2(3A).
71	71.9	Oyster Management Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed amendment to Special Information Requirement E27.9(2)(b)
72	72.1	Auckland Council Attn: Celia Davison, Manager Central South, Plans and Places, Auckland Council	Celia.Davison@AucklandCouncil.govt.nz	Approve the plan change with the amendments I requested	Delete proposed Standard E27.6.1A(2)(d)
72	72.2	Auckland Council Attn: Celia Davison, Manager Central South, Plans and Places, Auckland Council	Celia.Davison@AucklandCouncil.govt.nz	Approve the plan change with the amendments I requested	Amend the development threshold for education facilities in Table E27.6.1A.1 as: <u>All Education facilities accommodating an additional 50 or more people</u>
72	72.3	Auckland Council Attn: Celia Davison, Manager Central South, Plans and Places, Auckland Council	Celia.Davison@AucklandCouncil.govt.nz	Approve the plan change with the amendments I requested	Amend Assessment Criteria E27.8.2(3A)(a)(i) as: - the accessibility and frequency of public transport services <u>for all users</u>
73	73.1	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the inclusion of a travel plan requirement
73	73.2	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Retain Policy E27.3(6)

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
73	73.3	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete Policy E37.3(6)(a) and (b) and replace with proposed wording: <u>(6) Provide for flexible on-site parking in the Business - Metropolitan Centre zone, Business - Town Centre zone, Business - Local Centre zone and Business - Mixed Use zone (with the exception of specified non urban town and local centres and the Mixed use zone adjacent to those specified centres).</u> <u>(6A) Provide maximum parking limits for education facilities and hospitals in the Business - Metropolitan Centre zone, Business - Town Centre zone, Business - Local Centre zone, and Business - Mixed Use zone (with the exception of specified non-urban town and local centres and the Mixed Use zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.</u>
73	73.4	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Activity Rule E27.4.1(A3a).
73	73.5	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Standard E27.6.1A
73	73.6	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Table E27.6.1A.1
73	73.7	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Matter of Discretion E27.8.1(4A)
73	73.8	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Assessment Criteria E27.8.2(3A).
73	73.9	Southern Cross Healthcare Limited Attn: Bianca Tree	bianca.tree@minterellison.co.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed amendment to Special Information Requirement E27.9(2)(b)
74	74.1	Ryman Healthcare Limited (Ryman) Attn: Nicola de Wit	luke.hinchey@chapmantripp.com nicola.dewit@chapmantripp.com	Decline the plan change	Decline the plan change in relation to the inclusion of a travel plan requirement
75	75.1	Retirement Villages Association of New Zealand Incorporated (RVA) Attn: Nicola de Wit	luke.hinchey@chapmantripp.com nicola.dewit@chapmantripp.com	Decline the plan change	Decline the plan change in relation to the inclusion of a travel plan requirement
76	76.1	North Eastern Investments Limited Attn: Amanda Coats	amanda@proarch.co.nz johnnyfarquhar@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in respect of proposed text amendments
76	76.2	North Eastern Investments Limited Attn: Amanda Coats	amanda@proarch.co.nz johnnyfarquhar@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Consider that the inclusion of all National Planning Standard definitions in the AUP (operative in part) follow the mandatory direction set by the Ministry for the Environment and promote clarity to the planning systems of AC.

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
77	77.1	Ockham Group Limited Attn: Mark James Todd	mark@ockham.co.nz	Decline the plan change	Decline the plan change in relation to the inclusion of a travel plan requirement
77	77.2	Ockham Group Limited Attn: Mark James Todd	mark@ockham.co.nz	Decline the plan change	Delete the residential activities (T1B), (T2B), and (T3B) from the development thresholds in Table E27.6.1A.1 (if the plan change is approved).
78	78.1	Civix Ltd Attn: Lance William Hessel	lance@civix.co.nz	Approve the plan change with the amendments I requested	Seeks that the wording of specific provisions relating to the travel plan requirement are revised to remove the requirement for resource consent for the activities prescribed in Activity Table Rule E27.6.4.1(3a)
79	79.1	CivilPlan Consultants Ltd Attn: Aaron Grey	aaron@civilplan.co.nz	Decline the plan change, but if approved, make the amendments I requested	Seeks that the travel plan requirement and all associated provisions be deleted from the plan change. If the travel plan requirement is not deleted, then make the amendments suggested.
79	79.2	CivilPlan Consultants Ltd Attn: Aaron Grey	aaron@civilplan.co.nz	Decline the plan change, but if approved, make the amendments I requested	Amend Standard E27.6.1A(2) as: (2) Standard E27.6.1A does not apply where: (a) a proposal is located in: (i) the Business - City Centre Zone, Business - Metropolitan Centre Zone, Business - Town Centre Zone, <u>Business - Local Centre Zone</u> or, Business - Mixed Use Zone, or (ii) a residential zone, or (iii) a rural zone Residential – Terrace Housing and Apartment Building Zone or Centre Fringe Office Control as shown on the planning maps;- (b) development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;- (c) the activity is permitted in the H7 Open space zones; or (d) there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities;- <u>or</u>
79	79.3	CivilPlan Consultants Ltd Attn: Aaron Grey	aaron@civilplan.co.nz	Decline the plan change, but if approved, make the amendments I requested	continued... (e) <u>the activity is a discretionary or non-complying activity in the applicable zone rules or precinct rules.</u>

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
79	79.4	CivilPlan Consultants Ltd Attn: Aaron Grey	aaron@civilplan.co.nz	Decline the plan change, but if approved, make the amendments I requested	Amend Matter of Discretion E27.8.1(4A) as: (4A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A: (a) adequacy of the <u>any</u> travel plan required under E27.9(2)(b) (b) effects on the transport network
79	79.5	CivilPlan Consultants Ltd Attn: Aaron Grey	aaron@civilplan.co.nz	Decline the plan change, but if approved, make the amendments I requested	Amend Assessment Criteria E27.8.2(3A) as: (c) the extent to which the <u>any</u> travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b). (d) the extent to which the development is being <u>undertaken on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment.</u>
79	79.6	CivilPlan Consultants Ltd Attn: Aaron Grey	aaron@civilplan.co.nz	Decline the plan change, but if approved, make the amendments I requested	Amend Special Information Requirement E27.9(2) as: (2) Travel plan: (a) a travel plan may be required as part of an assessment of environmental effects where a proposal exceeds the trip generation threshold, <u>exceeds a new development threshold in Standard E27.6.1A,</u> or provides more parking than the maximums specified or fewer than the minimums specified. A travel plan will not be required where the infringement of the parking standards is minor in relation to the scale of the activity and associated parking proposed. (b) a travel plan is required as part of an assessment of environment effects where a proposal meets or exceeds a new development threshold in Standard E27.6.1A.
80	80.1	Ockham Group Limited Attn: Mark James Todd	mark@ockham.co.nz	Decline the plan change	Decline the plan change in relation to the addition of the travel plan requirement.
81	81.1	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the addition of the travel plan requirement.

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
81	81.2	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Amend E27.1 Background to retain the following: <u>Accommodating growth in areas where land is scarce and a highly valued resource requires reconsideration of the use, and benefits and costs of onsite parking. The planning framework to facilitate this growth recognises that removing the requirement to provide parking will have direct land use benefits in regard to reducing development costs, improving housing affordability, optimising investment in parking facilities and supporting the use of public transport</u>
81	81.3	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Amend Objective E27.2(3) as: (3) Parking and loading <u>is managed to support</u> -urban growth and the quality compact urban form.
81	81.4	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Amend Objective E27.2(4) as: (4) <u>The provision of safe and efficient Pparking, loading and access is safe and efficient and, where parking is provided, it is commensurate with the character, scale and intensity and alternative transport options of the zone location.</u>
81	81.5	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Amend Policy E27.3(6) as: <u>Limit the supply of on-site parking for education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips, and manage effects on the safe and efficient operation of the transport network</u>
81	81.6	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Amend E27.3(6A) as: (6A) <u>Support activities providing no or reduced on-site parking where it will enable better built form outcomes.</u>
81	81.7	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports deletion of Policy E27.3(7) as notified.
81	81.8	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed activity in Activity Table E27.4.1(A3a)
81	81.9	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Standard E27.6.1A

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Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
81	81.10	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Table E27.6.1A.1
81	81.11	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Standard E27.6.2(5) as notified.
81	81.12	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Standard E27.6.3.1(1)(c) as notified.
81	81.13	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Matter of Discretion E27.8.1
81	81.14	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Assessment Criteria E27.8.2(3A).
81	81.15	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Amend Special Information Requirement E27.9(2)(a) as: (a) a travel plan may be required as part of an assessment of environmental effects where a proposal exceeds the trip generation threshold, or provides more parking than the maximums specified or fewer than the minimums specified. A travel plan will not be required where the infringement of the parking standards <u>maximums</u> is minor in relation to the scale of the activity and associated parking proposed.
81	81.16	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Delete proposed Special Information Requirement E27.9(2)(b)
81	81.17	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Special Information Requirement E27.9(3) as notified.
81	81.18	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Standard E38.9.1.2(1) as notified.
81	81.19	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Policy E40.3(5) as notified.
81	81.20	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment Criteria E40.8.2(2) as notified.
81	81.21	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending B8.6 Explanation and principal reasons for adoption as notified.
81	81.22	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Policy F2.17.3(3) as notified.
81	81.23	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Matter of Discretion F3.8.1(3) as notified.

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
81	81.24	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Matter of discretion F3.8.1(4) as notified.
81	81.25	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria F3.8.2(3) as notified.
81	81.26	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria F3.8.2(4) as notified.
81	81.27	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria F5.8.2(1) as notified.
81	81.28	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria F5.8.2(3) as notified.
81	81.29	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Policy F6.3(1) as notified.
81	81.30	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Policy F6.3(8) as notified.
81	81.31	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria H1.8.2(1) as notified.
81	81.32	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria H2.8.2(1) as notified.
81	81.33	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria H3.8.2(1) as notified.
81	81.34	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria H4.8.2(1) as notified.
81	81.35	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria H5.8.2(1) as notified.
81	81.36	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria H6.8.2(1) as notified.
81	81.37	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria H20.8.2(1) as notified.
81	81.38	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending Assessment criteria H21.8.2(1) as notified.
81	81.39	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending the following definitions as notified: - Accessory activities - Non-accessory parking - Off-site parking

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
81	81.40	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	<p>Amend the definition of ‘travel plan’ as: Travel Plan A plan which sets out how travel demand is to be managed for a particular site or proposal to:</p> <ul style="list-style-type: none"> •maximise the efficient use of transport networks and systems; and •promote and enable the use of more sustainable and active modes of transport such as public transport, walking and cycling, and carpooling, car sharing and micro mobility as alternatives to sole occupancy private cars, and •manage the efficient use of limited <u>land</u> resources such as <u>by removing or limiting onsite</u> car parking and loading areas. <p>A travel plan <u>may</u> include:</p> <ul style="list-style-type: none"> •a description of the site and the proposal; •details of the physical infrastructure that is or will be established on the site to support the use of walking and cycling, public transport, carpooling, car sharing and micro mobility; •details of the ongoing activities and processes that will be used to support the use of walking and cycling, public transport, carpooling, car sharing and micro mobility; •details of how the travel plan is to be communicated, promoted, implemented, and monitored and reviewed; •information about the amount and nature of any onsite parking and loading (whether onsite or on the street) and how this is to be managed to support efficient use and promote alternatives travel modes; and •expected outcomes from its implementation. <p><u>Note Best practice guidance on the preparation of a travel plan can be provided by Auckland Transport. A travel plan is also</u></p>
81	81.41	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending all precincts as notified.
81	81.42	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending all Special Housing Areas as notified
81	81.43	Kāinga Ora – Homes and Communities (“Kāinga Ora”) Attn: Brendon Liggett	developmentplanning@kaingaora.govt.nz	Decline the plan change, but if approved, make the amendments I requested	Supports amending all proposed changes to the Auckland Council District Plan - Hauraki Gulf and Islands Section as notified.
82	82.1	Ministry of Education Attn: Adriene Grafia	adriene.grafia@beca.com	Decline the plan change	Decline the plan change as it relates to the travel plan requirement, particularly for education facilities and care centres.

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
82	82.2	Ministry of Education Attn: Adriene Grafia	adriene.grafia@beca.com	Decline the plan change	Amend Policy E27.3(6) as: Limit the supply of on-site parking for <u>office activities</u> , education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non- urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.
82	82.3	Ministry of Education Attn: Adriene Grafia	adriene.grafia@beca.com	Decline the plan change	Amend Table E27.6.1A.1 as follows: Remove the following activities and associated development thresholds from the table: (T4B) Education facilities - Primary (T5B) Education facilities - Secondary (T6B) Education facilities - Tertiary (T11B) Community - Care Centres
82	82.4	Ministry of Education Attn: Adriene Grafia	adriene.grafia@beca.com	Decline the plan change	Amend Assessment Criteria E27.8.2(3A)(a) as: (a) the extent to which the travel demands of the activity are provided for, <u>which may include</u> , including but not limited to: ...
82	82.5	Ministry of Education Attn: Adriene Grafia	adriene.grafia@beca.com	Decline the plan change	Requests consultation with the Council on the removal of minimum car parking requirements from all Ministry designations.
83	83.1	Joshua Iain Bradley	Joshua.iain.bradley@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change in relation to the removal of car parking minimums.
83	83.2	Joshua Iain Bradley	Joshua.iain.bradley@gmail.com	Decline the plan change, but if approved, make the amendments I requested	Adjust the minimum car parking requirement to at least one car park per house.
84	84.1	Jeremy Song	jeremyjsong@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
85	85.1	Jing Fung Kee	kazeden@yahoo.com	Approve the plan change with the amendments I requested	Decline the plan change in relation to the removal of car parking minimums.
85	85.2	Jing Fung Kee	kazeden@yahoo.com	Approve the plan change with the amendments I requested	Seeks that high density development be permitted only if the developer incorporate a minimum of two carparks.
86	86.1	Swee Huat Sim	shsimm@hotmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
87	87.1	Shu Zhang	shu.greenfins@hotmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
88	88.1	Sentinel Planning Limited Attn: Gerard McCarten	gerard@sentinelplanning.co.nz	Decline the plan change	Decline the plan change as it relates to the travel plan requirement. The travel plan should be subject to a separate plan change.

Plan Change 71 - NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Relief Sought
89	89.1	Lynley Webster	michaellynleywebster@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.
90	90.1	Lauren Hawken	Lauren@upo.co.nz	Approve the plan change with the amendments I requested	Amend the development threshold in Table E27.6.1A.1 as: Reduce the threshold for the Mixed Housing Suburban zone to 4 residential dwellings and above and require a loading bay.
91	91.1	Joseph Donis	digitaly.ko@gmail.com	Decline the plan change	Decline the plan change in relation to the removal of car parking minimums.

Submissions

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Brodie Miller
Date: Saturday, 26 February 2022 2:01:01 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Brodie Miller

Organisation name:

Agent's full name:

Email address: brodiemiller@xtra.co.nz

Contact phone number: 0275848724

Postal address:

56 Pamu Road

Whenuapai

Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Other provisions

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

If you are so worried about traffic being caused by people having cars and carparks, maybe you should build better infrastructure that can accommodate the traffic in Auckland. And, instead of building it for the traffic we currently have and it being outdated by the time it is finished, build for the future. Also, reducing carpark requirements won't reduce the amount of cars on the road, it will just make the streets more clustered and make people have to park down the road of their house. If you do still reduce the amount of parks available, stating that it will encourage people to use public transport, maybe you could actually put some money into it and have a rail line out this way, or more bus options because at the moment the options are pretty shocking.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Oppose plan change 71

Submission date: 26 February 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Luke Thornhill
Date: Saturday, 26 February 2022 4:01:01 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Luke Thornhill

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:
173 Totara Road
Whenuapai
Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Removal of car park minimums

Property address: 173 Totara Road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The reduction of car parks is ridiculous. As it stands, there aren't enough car parks for residents. They have been taken for cycle ways on both sides of the road. However, having lived here for over a year I can count on both hands how many cyclists use the lane. They continue to use the road. I encourage Auckland Council to take a pragmatic approach to car parks, rather than sit in their office making up changes to make themselves feel valuable.

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2022

Attend a hearing

2.1

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Allan Tito
Date: Monday, 28 February 2022 3:46:36 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Allan Tito

Organisation name:

Agent's full name:

Email address: bugzfuru@yahoo.co.nz

Contact phone number:

Postal address:

Hobsonville Point
Auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Property address: 49 Station Street

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
the removal of car park minimums from the Auckland Unitary Plan AUP is a poor choice and doesn't encourage the use of public transport if you are providing space for more parking.

3.1

I or we seek the following decision by council: Decline the plan change

Submission date: 28 February 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Leon Mascarenhas
Date: Tuesday, 1 March 2022 6:15:48 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Leon Mascarenhas
Organisation name:
Agent's full name: Leon Mascarenhas
Email address: leon.mascarenhas@gmail.com
Contact phone number:
Postal address:
leon.mascarenhas@gmail.com
Kumeu
Kumeu 0810

Submission details

This is a submission to:

Plan change number: Plan Change 71
Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Proposed plan change 71 removal of car parking
Property address:
Map or maps:
Other provisions:
Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
There is no public transport in the region. Hence we need additional mode of transport(personal cars) and need to park them somewhere.

4.1

I or we seek the following decision by council: Decline the plan change

Submission date: 1 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Judy Wang
Date: Tuesday, 1 March 2022 7:45:47 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Judy Wang

Organisation name:

Agent's full name:

Email address: spongy.22@gmail.com

Contact phone number:

Postal address:
82 Mapou Road
Hobsonville
Auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Removal of car parking minimums

Property address: 82 Mapou Road

Map or maps: Hobsonville

Other provisions:
NA

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

There is already a huge shortage of parking in the area with many people parking illegally. Cars and bikes cannot drive safely through the road due to illegally parked cars on side of road. Also a danger to pedestrians and turning traffic as the parked cars obscure views. The public transport here is almost non-existent. Ferries unreliable! Minimal bus options - prob takes 2 hours on bus for just a 30mins journey if we drive ourselves. Or we have to transfer buses like 4 times for a destination only 20mins drive away. Plus there's always a 10mins walking distance to each bus stop. It just gets ridiculous for the whole journey. Hobsonville is also built for "families". It is very hard for families to not have cars! And not have parking! School pick up and drop offs almost always require cars if it's not within walking distance. I.e if I had to to school pick up straight after work. Taking kids to after school activities etc is also very difficult to get to if only relying on public transport.

5.1

I or we seek the following decision by council: Decline the plan change

Submission date: 1 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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email may be those of the individual sender and may not necessarily reflect the views of Council.

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

Telephone: Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

Plan Change/Variation Name

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or
Property Address

Or
Map

Or
Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are: _____

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

6.1

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter
(or person authorised to sign on behalf of submitter)

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

PC71 NPS-UD Removal of Car Parking Minimums

Changing from minimum spaces to maximum spaces severely disadvantages those ratepayers living in the suburbs of Greater Auckland region.

These areas do not have viable public transport alternatives to allow them to travel for work, family commitments, education or leisure.

They have no viable alternatives open to them other than using private or company vehicles and parking now is extremely limited.

Street parking is often not available and, when it is, it is impossible as it adds to congestion by restricting road space for two-way traffic.

Those living outside the city centre (majority of ratepayers) who have public transport alternatives are directed into the city centre whether they want or need to go in that direction.

The city centre no longer is the main provider of jobs, recreational opportunities or schooling.

People live in an area they want and can afford and travel across the city for work.

For example, residents in the Rodney area often work on the North Shore. Currently there is no viable public transport option available. Buses from this area to Albany are limited and there are no trains.

Those from this area that work either in the central city or southern areas have no train service. For those who use the trains they need to drive to Swanson Station as there are no buses to transport them in a timely manner to catch trains.

Ferries offer the same barrier. No other means of getting to the ferry terminal other than using their car.

The limited bus service is not effective as the journey takes too long. The Council missed their opportunity to have dedicated bus section (as the Northern Expressway) when the motorway was widened.

Buses now compete with commuter traffic and trucks with limited bus lanes which are ineffective as buses still need to merge with the commuter traffic at every on and off ramp and bridge.

Buses also do not go direct from the suburb in question to the Motorway to the city centre. There again, passengers have to transfer two or three times to get to their destination which is not the city centre.

This plan is designed to help encourage people out of their vehicles and into public transport.

As explained above, this is a flawed concept as public transport is not, at the moment or in the foreseeable future, a truly viable option.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Annabel Olsen
Date: Thursday, 3 March 2022 1:30:19 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Annabel Olsen

Organisation name:

Agent's full name:

Email address: annabelc.olsen@gmail.com

Contact phone number:

Postal address:
14 Ringa Matau Road
Hobsonville
Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Carparking minimums

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Carparking minimums can not be removed for new developments that are lacking in good public transport options - ie Hobsonville Point.

Currently street parking is already a nightmare and people frequently park over driveways and footpaths because there is no parking nearby.

The public transport options in Hobsonville point are not adequate enough to warrant removing car parking minimums - the ferry services do not run frequently enough during the day or on the weekend, and bus services are slow and require interchanges.

People still need to drive to the ferry terminal too - the bus service from the terminal is useless and often leaves before the ferry has docked or let everyone off.

7.1

With all the new developments happening in Hobsonville, there is simply no scope for removing carparking minimums as carparking is already a MASSIVE issue and this will make things worse.

Please exclude carparking minimums from new development areas such as Hobsonville Point, Scott Point, Whenuapai, etc.

Thank you.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Carparking minimums should remain in new developments that are not serviced well enough by public transport such as Hobsonville Point.

Submission date: 3 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - John Steward
Date: Thursday, 3 March 2022 3:30:48 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: John Steward

Organisation name:

Agent's full name: John Steward

Email address: jsteward555@gmail.com

Contact phone number:

Postal address:
8 mangatawhiri road RD6
warkworth
Auckland
New Zealand 0986

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
nps-ud Removal of car parking minimums.
You need off street parking for residential housing to keep the cars off the streets and have them safe from damage and theft etc.

Property address: any house in new zealand

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
as above

I or we seek the following decision by council: Decline the plan change

Submission date: 3 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Al Gibson
Date: Thursday, 3 March 2022 3:45:32 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Al Gibson
Organisation name:
Agent's full name:
Email address: silentarrow92@gmail.com
Contact phone number:
Postal address:

Auckland

Submission details

This is a submission to:

Plan change number: Plan Change 71
Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Remove All Parking Minimums
Property address: Auckland-wide
Map or maps:
Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I support the removal of mandatory parking minimums. I also support the establishment of parking maximums. Studies have found that when you build more parking, you get an increase in vehicle miles traveled. It takes up a lot of space to build a parking space, it decreases the walkability of neighbourhoods, it reduces housing affordability, and it increases congestion and pollution. This will allow for the "right-sizing" of parking availability based on actual demand. Removing parking minimums is a small step towards planning for people over vehicles, and will allow more opportunities for greater travel choice.

9.1

I or we seek the following decision by council: Approve the plan change without any amendments

Details of amendments:

Submission date: 3 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) gladys lamug

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

12 alexander willis crescent hobsonville

Telephone: 221887334 Fax/Email: gladys.lamug@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number PC 71

Plan Change/Variation Name NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or
Property Address

Or
Map

Or
Other (specify)

I dont understand anything that you are proposing. Why cant you use simple english instead of all these jargons
I dont understand anything that you are proposing. Why cant you use simple english instead of all these jargons

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

plans are written with the council jargon and not in simple english that normal people can understand. How would they properly submit their views if you dont provide with clear explanation of what you all proposing

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

10.1

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Gladys Lamug

03/03/2022

Signature of Submitter
(or person authorised to sign on behalf of submitter)

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Rhys Stickings
Date: Friday, 4 March 2022 9:45:47 am

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Rhys Stickings

Organisation name:

Agent's full name:

Email address: rhys.stickings@outlook.com

Contact phone number: 0212777197

Postal address:
18 corsair Street,
Hobsonville
auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
proposed plan change 71 to the Auckland unitary plan (NPS-UD Removal of car park minimums)

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Removing the requirements for future developments to not consider parking within the design or planning will have a catastrophic effect of both road users and the community.

The community in Hobsonville already has very limited on street parking following construction of 3-6 bedroom homes and apartments without sufficient parking. this is paired with limited ferry/bus services to enable commuters to access the city without the use of a vehicle.

We are seeing more high rise developments and less thoughts on where future owners and tenants will park vehicles. most vehicles in areas across Hobsonville are parked across footpaths which then forces pedestrian foot traffic onto the road. This will not be highlighted enough until there is an accident, which is when the issue becomes more public and is further increased a direct result of Auckland Councils plan changes and poor long term planning thought process.

I or we seek the following decision by council: Decline the plan change

Submission date: 4 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Kris Habraken
Date: Friday, 4 March 2022 11:45:16 am

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kris Habraken

Organisation name:

Agent's full name:

Email address: khabraken@gmail.com

Contact phone number:

Postal address:
78 Rangihina Road
Hobsonville
Auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
I603 Hobsonville Corridor Precinct.
I605 Hobsonville Point Precinct.
SHA Whenuapai 1.

All other proposed changes to the unitary plan that remove consideration for car parking.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

As a resident of Hobsonville Point, and a frequent traveler through the Hobsonville and Whenuapai areas, I have observed significant negative effects near housing blocks where developers have not provided sufficient parking:

* Residents' vehicles end up occupying nearby on-street parking. This leaves little or no on-street parking available for visitors to those or neighboring residents, or for visitors to nearby amenities (parks, walkways, shops etc).

* Some roads are narrow enough that when cars are (legally) parked on both sides of the road, there is longer room for two moving vehicles to pass each other.

* When nearby on-street parking becomes full or restricts movement, vehicles end up spilling over

into places they should not be, such as in driveways blocking footpaths, partially or fully mounting berms, and blocking other residents driveways or private laneways.

* These aspects together diminish the aesthetic and appeal of these new suburbs.

The nature of the housing market and economy means that these new medium density areas are some of the few places where first home buyers (typically couples and young families) can afford to buy in Auckland. The majority of these households will need two cars (and thus access and space to park them), because each adult will need to get to work in order to pay the rent/mortgage. Public transport is too sparse, and too inflexible in terms of times and destinations, to be a realistic option for most of these people.

If developers and the council are not required to provide appropriate consideration for vehicle parking and access, they won't (because it reduces costs), but that does not stop people with vehicles buying/renting in these areas (because they have no other option).

I therefore oppose the removal of consideration for car parking and car access in these (Hobsonville, Hobsonville Point, Whenuapai).

For similar reasons, I also oppose the removal of consideration of car parking and car access in all other suburban areas.

While it may align with council or govt ideology, it does not align with the wants and needs of most suburban new zealanders, and especially not those of young families and first home buyers who need the flexibility and mobility afforded by private vehicles.

Car parking and access is one of those things the market does not adequately provide, due to the power imbalance between developers/council and buyers, and the static nature of housing and infrastructure. Once parking and access is removed (or if not provided in the first place), it is effectively impossible for the market to provide after-the-fact.

I or we seek the following decision by council: Decline the plan change

Submission date: 4 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - martin rogers
Date: Friday, 4 March 2022 5:30:17 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: martin rogers

Organisation name: M C ROGERS LIMITED

Agent's full name: Martin Rogers Rogers

Email address: martinrogers@live.com

Contact phone number:

Postal address:
 22 Chaffinch Rd
 Hobsonville Point
 Auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
 Removing the minimum car park requirements in developments

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

All residential developments should retain the requirement to provide a minimum number of car parks for occupants.

Ideally

- 1 bedroom property (NO requirement for car parks)
- 2 bedroom property (requirement for 1 car park space)
- 3 bedroom property upwards (requirement for 2 car park space)

Reason.

Due to the irregular and inadequate public transport system across Auckland most households require 2 vehicles for transport of household members and at least one external park on the road way is needed for visitors.

Unfortunately public transport cannot serve the requirements of most.

13.1

Example: Using public transport to travel from Hobsonville to Howick on average takes 4 hours

I or we seek the following decision by council: Decline the plan change

Submission date: 4 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Kyung Hee Cho
Date: Saturday, 5 March 2022 4:00:25 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kyung Hee Cho

Organisation name: n/a

Agent's full name: n/a

Email address: k.cecilia.cho@gmail.com

Contact phone number: 0212564906

Postal address:
7/2 Warrant Officer Lane
Hobsonville
Hobsonville
Auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
NPS-UD Removal of Car Parking Minimums

Property address: n/a

Map or maps: hobsonville

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

All residential dwellings built in hobsonville point area MUST have at least one designated parking. It takes 30 mins by bus to travel to Albany (constellation) or Westgate either way. Without own car, Hobsonville point is a large prison where you are essentially trapped. Public transportation currently in place is far sub-par to support any dwellings to be built with no designated parking. Street parking is near full capacity where it is getting difficult for cars to properly see the oncoming traffic.

I or we seek the following decision by council: Decline the plan change

Submission date: 5 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Erica Olesson
Date: Sunday, 6 March 2022 9:45:15 am

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Erica Olesson

Organisation name:

Agent's full name: Erica Olesson

Email address: eolesson@gmail.com

Contact phone number:

Postal address:

Hobsonville
Auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
(It says this is optional)

Property address: (It says this is optional)

Map or maps:

Other provisions:
(It says this is optional)

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We need to make decisions now for how we will live in the future, not for how we have lived in the past. While there will be a potentially challenging transition period where we have current vehicle usage, not requiring car parking will ultimately support reduced reliance on private vehicles and increase the design of communities for people, rather than vehicles, and encourage alternative transport means.

15.1

I or we seek the following decision by council: Approve the plan change without any amendments

Details of amendments:

Submission date: 6 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Kashif Iqbal
Date: Sunday, 6 March 2022 11:00:14 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kashif Iqbal

Organisation name:

Agent's full name:

Email address: kashif.iq82@gmail.com

Contact phone number:

Postal address:
168 hobsonville point road
Hobsonville
Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
PC71

Property address: 168 Hobsonville Point Road, Hobsonville

Map or maps: N/A

Other provisions:
N/A

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

With a low scale public transport system, ferry time schedules, congested town planning, and along with many other factors which impacts us as a community, we object this proposal and would not like to support at all.

I or we seek the following decision by council: Decline the plan change

Submission date: 6 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Harrison Fernandes-Burnard
Date: Monday, 7 March 2022 2:45:53 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Harrison Fernandes-Burnard

Organisation name:

Agent's full name:

Email address: harrison.j.d.burnard@gmajll.com

Contact phone number: 0212137745

Postal address:
45c Rangeview Road
Sunnyvale
Auckland 0612

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
The travel demand thresholds.

Property address: N/A

Map or maps: N/A

Other provisions:
N/A

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Firstly, the new travel demand rules are poorly worded and confusing. As currently written, it is not clear when exactly consent would be required under these rules or not, particularly due to the way that paragraphs (b) and (d) are worded.

Secondly, the thresholds for triggering this activity are unreasonably low. It appears that this rule would be triggered for most small to medium scale urban redevelopments, adding cost and further complexity to the process. This is especially undesirable given that resource consents inexplicably require input from both Council's traffic engineers and Auckland Transport, who sometimes contradict each other or replicate each other's requests during the 's92 process'. It is even acknowledged in the s32 analysis that this consent rule would be unpopular in the development sector and would add time and cost. Auckland is already by far the most expensive location in New

Zealand to obtain a resource consent and the Council charge unreasonable fees for this service. Requiring a travel plan for every development that exceeds the thresholds (regardless of how much or how little parking is provided) will add thousands of dollars to the cost of every resource consent and will reduce the incentive for developers, especially at the lower end of the scale.

There also appears to be little evidence or justification for setting such a low travel demand threshold, especially for dwellings and offices. Based on my five years in the land development and transport sector as a planner I have seen little evidence that such small scale developments cause adverse effects on the transport network. Most developers typically provide one parking spaces per dwelling for attached housing, and this appear to offer a good balance between enabling residents to access their day to day needs, while also not reducing the available supply of housing due to the need to provide excessive parking. Further, developers are highly unlikely to not provide any parking supply at all unless there are the conditions for alternative forms of transport, such as proximity to high quality bus or train services. This is because units will not sell if no parking is provided and there are no feasible ways to travel without driving.

Overall, this proposed rule undermines that 'market lead' approach to parking that the NPS-UD seeks to offer and will just add cost, complexity and time to the resource consent process for little obvious gain. This is just typical Council micromanaging of the consent process.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Delete rules in entirety.

Submission date: 7 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - David Allen
Date: Tuesday, 8 March 2022 8:30:07 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: David Allen

Organisation name:

Agent's full name:

Email address: davidallen.global@gmail.com

Contact phone number:

Postal address:

16 lester Street

Hobsonville

Auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Basic change to remove parking consideration limits for new buildings

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Parking capability should be increased not reduced. Berms will be overloaded causing accidents due to poor visibility. Public transport is nowhere near suitable for the vast majority of Aucklanders.

I or we seek the following decision by council: Decline the plan change

Submission date: 8 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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SUBMISSION: PC71 NPS-UD REMOVAL
OF CAR PARKING MINIMUMS
11TH MARCH 2022

Business North Harbour Incorporated

Kevin O'Leary – General Manager

PO Box 303 126

North Harbour 0751

Phone 09 968 2222 or 0274 799 563

Email: kevin@businessnh.org.nz



11th March 2022

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

unitaryplan@aucklandcouncil.govt.nz

Submission to PC71 NPS-UD Removal Of Car Parking Minimums

Introduction

Business North Harbour (BNH) representing the North Harbour Business Improvement District (BID) welcomes the opportunity to make this Submission to PC71 NPS-UD Removal of Car Parking Minimums.

BNH is a significant commercial and industrial BID, representing over 4,500 commercial property owners and businesses within the North Harbour area. Collectively they employ over 35,000 Auckland residents and ratepayers.

The organisation is located within the Upper Harbour Local Board area, which remains one of the fastest growing areas in the country, in both absolute and percentage population terms, which brings both challenges and opportunities to the North Harbour business district.

BNH represents and works with a wide range of businesses comprising of a mix of sole traders, Small Medium Enterprises (SME), through to multi-national organisations representing sectors such as ICT, business services, specialist manufacturing, light – medium warehousing, logistics, retail and hospitality. In addition, we have key educational institutions within or on our boundary, including Massey University, Albany and AUT Millennium, along with a variety of primary and secondary schools including Rangitoto College, the largest secondary school in New Zealand.

Our primary interests are decisions which:

- Impact on the cost of business – across a short to medium timeframe
- Impact on economic development and the ability to leverage value from location
- Support or restrict business growth opportunities
- Impact on access to both regional and localised transport hubs
- Impact on R&D and investment – sector development and capability
- Provide the scope to leverage natural assets for economic development across the leisure and tourism sectors – **enhancing Auckland's reputation**

Background

The **Government's National Policy Statement on Urban Development ('NPS-UD')** required Auckland Council and a number of other 'urban' councils to remove provisions that have the effect of requiring developments to provide a minimum number of car parks ('car parking minimums') from their plans without going through a plan change (Non-Schedule 1) process. That is, without the usual plan change public consultation process. In Auckland, the removal of minimums occurred on 11th February 2022.¹

The purpose of the Government's NPS-UD was to enable more housing and commercial developments, particularly in higher density areas where people do not necessarily need to own or use a car to access jobs, services, or amenities. The Government believed it would enable urban space to be used for higher value purposes other than car parking and remove a significant cost for higher density developments. Developers could still choose to provide car parking in many areas, said the Government, but the number of car parks would be driven by market demand.²

When it was introduced, some commentators raised concerns that the removal of car parking minimums under the NPS-UD would result in it becoming increasingly difficult over time to get on-street parking in some locations.³ Some commentators saw a benefit for small format retailers because bulk retailers such as Bunnings and the Warehouse, who had traditionally enjoyed the benefits from minimum car parking requirements (as they possessed the scale and balance sheet to acquire larger parcels of land), would no longer have that advantage.⁴

¹ <https://ourauckland.aucklandcouncil.govt.nz/news/2022/02/minimum-car-parking-rules-removed/>

² Ministry for the Environment, Factsheet - 'National Policy Statement on Urban Development 2020 – Car Parking'.
<https://environment.govt.nz/assets/Publications/Files/car-parking-factsheet.pdf>

³ <https://www.civitas.co.nz/news/new-national-policy-statement-on-urban-development/>

⁴ <https://asapfinance.co.nz/blog/property-developers-guide-nps-ud-2020/>

Business North Harbour Feedback

1. BNH understands that as a result of removing car parking minimums under the NPS-UD, there are a number of consequential changes required to the Auckland Unitary Plan. Additionally, Council says that the proposed changes are necessary to ensure that the Unitary Plan continues to function as intended following the removal of car parking minimums.

However, BNH believes that there does not appear to have been a thorough analysis of the implications for businesses of the removal of car parking minimums under the NPS-UD, especially businesses in commercial and industrial zones and it also appears that to date, the business community has not been consulted.

This belief is based upon the fact that for any proposed plan change, the Council must undertake an evaluation required by section 32 of the Resource Management Act 1991 ('RMA'). **A section 32 Evaluation Report must contain an assessment of the** environmental, economic, social, and cultural effects of the plan change, including the opportunities for economic growth that is anticipated to be provided or reduced and employment that is anticipated to be provided or reduced.

Auckland Council has prepared a section 32 Evaluation Report for this plan change.⁵ However, because Plan Change 71 only concerns the consequential amendments necessary following the removal of car parking minimums, the section 32 Evaluation Report does not really address the effects of the removal of car parking minimums themselves, nor the above assessments.⁶

BNH therefore requests that a more thorough Evaluation Report be commissioned to assess the economic effects of the plan change, more specifically, those related to economic and employment growth or reduction.

19.1

⁵ Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan – Section 32 Evaluation Report (24 February 2022).

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc71-and-pm14-s32-report.pdf>

⁶ For commentary on the general effects of the removal of car parking minimums, see, for example: <https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-car-parking-fact-sheet/>

2. Although government legislation and the proposed changes to the AUP would not require it, in a commercial / industrial area such as the BNH BID, we would ask that due consideration be given to sufficient car parking being included in any new development applications on a case-by-case basis. BNH believes that a blanket **'no minimums' approach** to applications would result in a number of current problems being exacerbated, including but not limited to:

19.2

- o Increased on-street parking due to employees attending new workplaces
- o Insufficient on-street parking for the increased number of employees accessing their workplace
- o Increased on-street parking causing access difficulties for emergency vehicles
- o Increased on-street parking causing access difficulties for delivery vehicles, particularly large trucks requiring space to manoeuvre

3. BNH would also ask that on a case-by-case basis, Council considers whether or not the provision of other mode opportunities and services available for commuters to, from and around the area involved are adequate, before granting development applications with no parking requirements. Some people simply have no choice but to use their vehicles to get to their place of work and anyone cruising around in an attempt to find a parking space will add to our emissions at a time when the emphasis is on reducing them, as per Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan.

19.3

4. As the number of electric vehicles increases in response to climate change reduction targets, serious consideration needs to be given to where people will charge these vehicles if there are no parking spaces at their homes or their places of work.

19.4

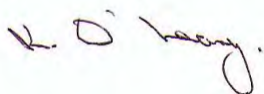
5. Parking, which is already at a premium in our BID area, will become even more difficult for everyone as any new local residents, particularly those who own more than one vehicle, seek to park their additional vehicles near to their homes. This will become an issue for those people who already use the available parking spaces and will also result in the area being less attractive to visit, thus adversely affecting businesses in the area.

Conclusions

BNH asks that Council take the actions requested above and would also ask that Council give due consideration to the needs of businesses in the vicinity of any new development applications, especially if the developer does not intend to include any provision for parking.

Should there be any questions or other matters arising from this Submission, we would be pleased to respond to those.

Yours sincerely,



Kevin O'Leary
General Manager

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Fendi Huang
Date: Saturday, 12 March 2022 8:00:46 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Fendi Huang

Organisation name:

Agent's full name:

Email address: fendi.089@gmail.com

Contact phone number:

Postal address:

Whenuapai
Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Car parking removal

Property address: 32A Brigham creek rd

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
No benefits for residents and road users

I or we seek the following decision by council: Decline the plan change

Submission date: 12 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Joelizze De Leon Santos
Date: Saturday, 12 March 2022 8:01:05 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Joelizze De Leon Santos

Organisation name:

Agent's full name:

Email address: santoslizze@gmail.com

Contact phone number:

Postal address:

Whenuapai
Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Property address: 32A Brigham Creek Road, Whenuapai

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
No benefit for residence and road users.

I or we seek the following decision by council: Decline the plan change

Submission date: 12 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Chang Woo Ryoo
Date: Monday, 14 March 2022 8:15:41 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Chang Woo Ryoo

Organisation name:

Agent's full name:

Email address: cryo001@gmail.com

Contact phone number: 021865812

Postal address:
4 Claremont Way
East Tamaki Heights
Auckland 2016

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
NPS-UD

Property address: 103 Glidepath Road Hobsonville

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Area proposed to remove carpark minimum are already short of car parks

I or we seek the following decision by council: Decline the plan change

Submission date: 14 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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VISCOUNT INVESTMENT CORPORATION LIMITED
P.O. BOX 33562, Takapuna, Auckland 0740
Phone 486 1462 Fax: 486 1464

16th March 2022

The Planning Technician
Auckland Wide Planning Unit
Auckland Council
Private Bag 92300
Auckland 1142.

Email: unitaryplan@auckland.council.govt.nz

Re: Submission on Proposed Plan Change 71 to the Auckland Unitary Plan and Proposed Plan Modification 14 to the Auckland Council District Plan.

Dear Sir,

I refer to recent correspondence dated 22nd February 2022 in relation to the proposed plan amendments which may affect the properties Viscount Investment Corporation Limited (VICL) owns at the above address.

I confirm that we support the proposed changes as outlined in Plan Change 71 as notified and we seek that Council adopt Plan Change 71 as notified without further amendments.

23.1

I confirm that VICL will not gain an advantage in trade competition through this submission, and we do not wish to be heard in support of this submission.

Should you have any queries in relation to this, please contact the writer.

Yours Faithfully,



Chris Arbuckle
Director.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Andrew Crosby
Date: Thursday, 17 March 2022 12:31:12 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Andrew Crosby

Organisation name: Universal Homes

Agent's full name:

Email address:

Contact phone number: 021982444

Postal address:
23A Shore Road
Remuera
Auckland 1050

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

the requirement to submit a travel plan with each development consent

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Another cost about to hit all home buyers, make applications more subjective and slow down the resource consent process and set up a new consulting industry (the travel plan industry) again. Regulations seem to be going backwards.

As a compromise: Why not do it only if the application seeks to provide less parking than MHU and MHS currently require?

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Require a travel plan only if the application seeks to provide less parking than MHU and MHS currently require?

Submission date: 17 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Lorraine Mary Ward
Date: Thursday, 17 March 2022 2:31:18 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lorraine Mary Ward

Organisation name:

Agent's full name: Lorraine Mary Ward

Email address: cklmward@xtra.co.nz

Contact phone number:

Postal address:

10 Kainga Lane

Whenuapai

Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Property address: 10 kainga Lane, Whenuapai

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Whenuapai does not have the public transport links needed to live here without a vehicle. Often two cars per household to get to work or activities. And in multi generational dwellings often more cars are needed. Where are these cars going to park?

A lot of employment in Auckland is in South Auckland. My job is in East Tamaki. If I left my home at 6.30 it would take me 2.5 hours to get to work.

I or we seek the following decision by council: Decline the plan change

Submission date: 17 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

25.1

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - FERNANDO RODRIGUES
Date: Thursday, 17 March 2022 9:30:56 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: FERNANDO RODRIGUES

Organisation name:

Agent's full name:

Email address: FER.SOUZA1508@GMAIL.COM

Contact phone number:

Postal address:
6 NEVILL ROAD
HOBSONVILLE
AUCKLAND 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Property address: 6 NEVILL ROAD

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
WE NEED EACH HOUSE TO HAVE A CARPARK., THIS WILL BECAME A SLAM.

I or we seek the following decision by council: Decline the plan change

Submission date: 17 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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SUBMISSION: PC71 NPS-UD REMOVAL
OF CAR PARKING MINIMUMS
18TH MARCH 2022

Rosebank Business Association
Kim Watts – Executive Engagement Manager
Phone 09 820 0551 or 021 639 509
Email: kim@rosebankbusiness.co.nz

Stronger together

www.rosebankbusiness.co.nz

18 Jomac Place, Rosebank, Auckland 1026
PO Box 151190, New Lynn, 0640, Auckland, Phone: 820 0551





18th March 2022

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

unitaryplan@aucklandcouncil.govt.nz

Submission to PC71 NPS-UD Removal of Car Parking Minimums

Introduction

The Rosebank Business Association (RBA) representing the Rosebank Business Improvement District (BID) welcomes the opportunity to make this Submission to PC71 NPS-UD Removal of Car Parking Minimums.

The RBA is a significant industrial Business Improvement District (BID), representing over 600 commercial property owners and businesses within the West Auckland area. Collectively they employ over 9,000 Auckland residents and ratepayers. The organisation is located within the Whau Local Board area and is one of the leading commercial and industrial areas within Auckland.

The RBA represents and works with a wide range of businesses comprising of a mix of sole traders, Small Medium Enterprises (SME), through to multi-national organisations representing sectors such as ICT, business services, specialist manufacturing, light-medium warehousing, logistics, retail, and hospitality. In addition, we have key educational institutions bordering our boundary, including Rosebank School, Avondale Intermediate, and Avondale College.

Our primary interests are decisions which:

- Impact on the cost of business – across a short to medium timeframe
- Impact on economic development and the ability to leverage value from location
- Support or restrict business growth opportunities
- Impact on access to both regional and localised transport hubs
- Impact on R&D and investment – sector development and capability
- Provide the scope to leverage natural assets for economic development across the leisure and tourism sectors – **enhancing Auckland's reputation**

Background



The Government's National Policy Statement on Urban Development ('NPS-UD') required Auckland Council and a number of other 'urban' councils to remove provisions that have the effect of requiring developments to provide a minimum number of car parks ('car parking minimums') from their plans without going through a plan change (non-Schedule 1) process. That is, without the usual plan change public consultation process. In Auckland, the removal of minimums occurred on 11th February 2022.¹

The purpose of the Government's NPS-UD was to enable more housing and commercial developments, particularly in higher-density areas where people do not necessarily need to own or use a car to access jobs, services, or amenities. The Government believed it would enable urban space to be used for higher-value purposes other than car parking and remove a significant cost for higher density developments. Developers could still choose to provide car parking in many areas, said the Government, but the number of car parks would be driven by market demand.²

When it was introduced, some commentators raised concerns that the removal of car parking minimums under the NPS-UD would result in it becoming increasingly difficult over time to get on-street parking in some locations.³ Some commentators saw a benefit for small format retailers because bulk retailers such as Bunnings and the Warehouse, who had traditionally enjoyed the benefits from minimum car parking requirements (as they possessed the scale and balance sheet to acquire larger parcels of land), would no longer have that advantage.⁴

¹ <https://ourauckland.aucklandcouncil.govt.nz/news/2022/02/minimum-car-parking-rules-removed/>

² Ministry for the Environment, Factsheet - 'National Policy Statement on Urban Development 2020 – Car Parking'.
<https://environment.govt.nz/assets/Publications/Files/car-parking-factsheet.pdf>

³ <https://www.civitas.co.nz/news/new-national-policy-statement-on-urban-development/>

⁴ <https://asapfinance.co.nz/blog/property-developers-guide-nps-ud-2020/>

Rosebank Business Association Feedback

1. The RBA understands that as a result of removing car parking minimums under the NPS-UD, there are a number of consequential changes required to the Auckland Unitary Plan. Additionally, Council says that the proposed changes are necessary to ensure that the Unitary Plan continues to function as intended following the removal of car parking minimums.

However, the RBA believes that there does not appear to have been a thorough analysis of the implications for businesses of the removal of car parking minimums under the NPS-UD, especially businesses in commercial and industrial zones and it also appears that to date, the business community has not been consulted.

This belief is based upon the fact that for any proposed plan change, the Council must undertake an evaluation required by section 32 of the Resource Management Act 1991 ('RMA'). A section 32 Evaluation Report must contain an assessment of the environmental, economic, social, and cultural effects of the plan change, including the opportunities for economic growth that is anticipated to be provided or reduced and employment that is anticipated to be provided or reduced.

Auckland Council has prepared a section 32 Evaluation Report for this plan change.⁵ However, because Plan Change 71 only concerns the consequential amendments necessary following the removal of car parking minimums, the section 32 Evaluation



Report does not really address the effects of the removal of car parking minimums themselves, nor the above assessments.⁵

The RBA, therefore, requests that a more thorough Evaluation Report be commissioned to assess the economic effects of the plan change, more specifically, those related to economic and employment growth or reduction.

27.1

⁵ Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan – Section 32 Evaluation Report (24 February 2022).

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc71-and-pm14-s32-report.pdf>

⁶ For commentary on the general effects of the removal of car parking minimums, see, for example: <https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-car-parking-fact-sheet/>

2. Although government legislation and the proposed changes to the AUP would not require it, in an industrial area such as the RBA BID, we would ask that due consideration be given to sufficient car parking being included in any new development applications on a case-by-case basis. **The RBA believes that a blanket 'no minimums' approach to applications would result in a number of current problems being exacerbated, including but not limited to:**

27.2

- Increased on-street parking due to employees attending new workplaces
- Insufficient on-street parking for the increased number of employees accessing their workplace
- Increased on-street parking causing access difficulties for emergency vehicles
- Increased on-street parking causing access difficulties for delivery vehicles, particularly large trucks requiring space to manoeuvre

3. The RBA would also ask that on a case-by-case basis, Council considers whether or not the provision of other mode opportunities and services available for commuters to, from, and around the area involved are adequate, before granting development applications with no parking requirements. Some people simply have no choice but to use their vehicles to get to their place of work and anyone cruising around in an attempt to find a parking space will add to our emissions at a time when the emphasis is on reducing them, as per Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan.

27.3

4. As the number of electric vehicles increases in response to climate change reduction targets, serious consideration needs to be given to where people will charge these vehicles if there are no parking spaces at their homes or their places of work.

5. Parking, which is already at a premium in our BID area, will become even more difficult for everyone as any new local residents, particularly those who own more than one vehicle, seek to park their additional vehicles near to their homes. This will become an issue for those people who already use the available parking spaces and will also result in the area being less attractive to visit, thus adversely affecting businesses in the area.

27.4

Conclusions

The RBA asks that Council take the actions requested above and would also ask that Council give due consideration to the needs of businesses in the vicinity of any new development applications, especially if the developer does not intend to include any provision for parking.



Should there be any questions or other matters arising from this Submission, we would be pleased to respond to those.

Yours sincerely,

A handwritten signature in black ink that reads "Kim Watts". The signature is written in a cursive style with a large initial "K" and "W".

Kim Watts
Executive Engagement Manager

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Kim Watts
Date: Monday, 21 March 2022 12:15:47 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kim Watts

Organisation name: Rosebank Business Association

Agent's full name:

Email address: kim@rosebankbusiness.co.nz

Contact phone number: 021 639 509

Postal address:

18 Jomac Place

Avondale

Auckland 1026

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Plan Change 71

Property address: 18 Jomac Place, Avondale

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

See attached document

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: see attached documents

Submission date: 21 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Daniel James Kinnoch
Date: Sunday, 20 March 2022 1:31:07 am
Attachments: [PC 71 Submission - Personal.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Daniel James Kinnoch

Organisation name:

Agent's full name:

Email address: daniel.kinnoch@colabplanning.co.nz

Contact phone number: 022 091 7233

Postal address:

Point England
Auckland 1072

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
See attached document.

Property address: See attached document.

Map or maps: See attached document.

Other provisions:
See attached document.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
See attached document.

I or we seek the following decision by council: Decline the plan change

Submission date: 20 March 2022

Supporting documents
PC 71 Submission - Personal.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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Submission on a notified proposal for plan change

Clause 6 of Schedule 1, Resource Management Act 1991 (“RMA”)

[Form 5](#)

To Auckland Council
(via online submission)

Time and Date of Submission

20/03/2022

Submitter details

Name of submitter:	<input type="text" value="Daniel James Kinnoch"/>
Email address:	<input type="text" value="daniel.kinnoch@colabplanning.co.nz"/>
Telephone:	<input type="text" value="022 091 7233"/>
Postal address:	<input type="text" value="3C Anderson Avenue, Point England, Auckland NZ 1072"/>
Contact person:	<input type="text" value="As above"/>

Scope of submission

This is a submission on a change proposed to the following plan (the proposal):

Auckland Unitary Plan Operative in part (“AUP OP”)

[PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments](#)

I could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that my submission relates to are:

- The travel demand threshold rule at E27.4.1(A3a)
- Standard E27.6.1A
- Matters for discretion at E27.8.1(4A)
- Assessment criteria at E27.8.2(3A)
- Special information requirement at E27.9(2)(b)

My submission is:

- I oppose the specific provisions identified above.

28.1

- The reasons for my opposition are:
 - The plan change is described as being ‘consequential technical amendments’ required as a result of the NPS-UD removal of car parking minimums. The introduction of a travel demand threshold rule is not a technical amendment, and the proposed rule should be declined on that basis. The rule would be more appropriately subject to a standalone plan change with a title that is clear to the community as to what is included within it.
 - The volume of resource consent applications processed by Auckland Council is significant and increasing. The proposed rule is unlikely to satisfy the local authority’s requirement under [section 18A](#) of the RMA for all persons acting under it to use timely, efficient, consistent and cost-effective processes that are proportionate to its functions or powers. The National Policy Statement for Urban Development 2020 (“**NPS-UD**”) encourages local authorities to use comprehensive parking management plans, though this is for the local authority to pursue.
 - The [NPS-UD Fact Sheet on car parking](#) states at page 2 that district plans mat contain ‘*a policy stating that... travel demand management... are [an] appropriate means of managing the demand and supply effects of car parking*’. While this fact sheet is only the view of the Government and is neither law nor binding, this suggests that the Government through the NPS-UD was not envisaging an outcome where travel demand management rules would be introduced and mandated; merely that a policy may be included in plans that would acknowledge travel demand management as one way of managing such effects. Further, our reading of this part of the fact sheet is that these plans would be something for the local authority to pursue, and not for individual applicants.
 - The residential thresholds at (T1B) through (T3B) will not apply in the major residential zones. In the Residential – Mixed Housing Suburban Zone and Residential – Mixed Housing Urban Zone, there are already matters for discretion that allow for an assessment of traffic effects at these thresholds. The proposed exclusion at E27.6.1A(2)(d) then means that the travel demand standard does not apply. The same applies for the community uses listed at (T11B) through (T13B). It is therefore unclear where it is expected that these activities will be located at these thresholds that would necessitate a travel demand assessment. The main possibilities would be the Business – Mixed Use Zone and Business – Local Centre Zone, which are not listed at E27.6.1A(2)(a) as excluded zones. It seems unusual that a travel demand assessment is required where the listed activities are to be located in these zones (which usually have good access to active and public transport modes), but not the above residential zones.
 - It appears that the list of exclusions where the proposed standard does not apply at E27.6.1A(2) have been copied verbatim from Standard E27.6.1 Trip Generation. It appears that this has been done without any analysis or consideration of suitability in association with the proposed rule.
 - Plan provisions should be worded clearly to enable the plan user to judge meaning and effect at face value without having to resort to using explanations or seeking advice from those who wrote it. There are parts of rule E27.4.1(A3a) and standard E27.6.1A that are potentially confusing for the following reasons:

- Rule E27.4.1(A3a) refers to exceeding ‘the travel demand thresholds’ set out in Standard E27.6.1A. There are no travel demand thresholds set out in the standard, there are only development thresholds.
 - It is unclear whether rule E27.4.1(A3a) applies only to new development at the specified threshold, or whether it applies to development that could increase an existing development above the threshold. For example, if an existing integrated residential development complex had 49 units, and 5 more were proposed, does this trigger the stated development threshold? The proposed special information requirement at E27.9(2)(b) refers to ‘new development’, but this is the only location in the provision set where the word ‘new’ is used.
 - Rule E27.4.1(A3a) states that it applies to subdivision. It appears that this has been copied verbatim from rule E27.4.1(A3) for trip generation assessment, which does apply to subdivision per standard E27.6.1(c). However, there is no mention of subdivision in the proposed standard E27.6.1A, and so the reference to subdivision in the rule is superfluous.
 - There activity status and resource consent requirement is restated at standard E27.6.1A(1), which is superfluous when this is already referred to in proposed rule E27.4.1(A3a). It is not best practice to include references to activity status within standards.
 - The standard is drafted poorly in that it doesn’t actually state a requirement of any kind. The requirement behind the standard for a travel demand management plan will be ‘buried’ in the Special Information Requirements section at the end of Chapter E27. There is no cross-reference in the standard to the Special Information Requirements, which means a layperson reading the standard has no idea what is required of them. Rather than improving on the poor setting out of the trip generation standard at E27.6.1, it appears that the layout and structure has just been replicated.
 - The exclusion clause at standard E27.6.1A(2)(b) will require consent history research, which is not an infallible process for either an applicant or the consent authority. It is unclear what “provisions approved on the basis of an Integrated Transport Assessment” would mean. There is no AUP OP definition for “Integrated Transport Assessment”. Determining whether “effects are the same or similar in character, intensity and scale to those identified in the previous assessment” has the potential to be subjective and discretionary.
 - The exclusion clause at standard E27.6.1A(2)(d) could lead to confusion where, for example, there is a requirement in a zone to consider effects of parking. Is this considered a ‘transport effect’ for this exclusion? Lack of clarity here could result in debate between applicants and the consent authority as to what zone or precinct provisions are captured by this exclusion. Debate as a result of poorly written plan provisions is inefficient, and wastes time and money.
- The section 32 analysis acknowledges that the proposed threshold rule will be unpopular, and would add time and cost. Auckland is already by far the

most expensive location in New Zealand to obtain a resource consent and develop land. Requiring a travel plan for every development that exceeds the stated thresholds (regardless of how much or how little parking is provided) has the potential to add thousands of dollars to the cost of every resource consent. The rule will simply have the outcome of being a proxy for the local authority to require on-site car parking. The quandary is that if parking is provided that would have complied with the now-removed minimums, a travel demand assessment will still be required, which is a greater requirement than before.

- The proposed rule has the potential to undermine the 'market led' approach to parking that the NPS-UD seeks to offer, and will add cost, complexity and time to the resource consent process for little environmental gain. The proposed rule also has the potential to undermine development capacity, with some developers choosing to supply less units or floor area in order to save time and cost as part of the consent process.
- Other other local authorities in New Zealand (for example, Queenstown Lakes District Council) that have removed parking minimums as directed by Policy 11 in the NPS-UD have not as far as we are aware sought to introduce additional development threshold rules to their plans. The urban areas within the limits of these local authorities have significantly less access to public transport and active modes than Auckland. As such, it is unclear why under the RMA there is a Part 2 resource management need for this proposed rule package in Auckland, and not in other parts of the country.
- There appears to be little evidence base in the section 32 evaluation to support the development thresholds that are proposed for the specific activities listed. There are residential activities like boarding houses and supported residential care that apparently have no requirement for travel demand management, which these uses could equally have similar demand effects.
- It is unclear what expert evidence the local authority has relied upon outside of any input provided by Auckland Transport. There is no internal or independent expert report included with the section 37 evaluation. Such a report would usually be present for any private plan change that could affect the transport network, so it seems unusual that such a report has not been prepared for a transport-based plan change that affects all of Auckland. We expect that there will be a significant volume of expert evidence presented at the hearing on this plan change by suitably qualified and experienced transport planners, who will present a strong case in opposition of this proposed rule.
- It is accepted that on-street parking is a public asset that does require suitable cost mechanisms in play to manage its use and demand. However this is the responsibility of Auckland Transport to manage as appropriate. While there may in-part be political opposition to further limiting or charging for on-street parking, this does not mean that it is appropriate to defer cost and responsibility to private developers given the clear market-led direction of NPS-UD Policy 11.

I seek the following decision from the local authority:

- Decline the proposed plan change as it relates to the submission and the provisions above.

Hearing

I wish to be heard in support of my submission.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Signature

 Recoverable Signature

X 

Signature of submitter
(or person authorised to sign for submitter)
Signed by: c404dca8-3673-48a9-9191-110d2db04307

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - shantelle scott
Date: Monday, 21 March 2022 1:01:25 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: shantelle scott

Organisation name:

Agent's full name:

Email address: shantelle.scott555@gmail.com

Contact phone number:

Postal address:
35 mcrobbie road,
Kingseat
Auckland 2580

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Car parking minimums

Property address: 35 mcrobbie road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
removing minimal parking, will mean more cars parked on the streets.. meaning more traffic build up, and there is absolutely no infrastructure in this area for public transport..

I or we seek the following decision by council: Decline the plan change

Submission date: 21 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

29.1

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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Submission on Proposed Plan Change 71
NPS-UD Removal of Car Parking Minimums –
Consequential Technical Amendments
Auckland Unitary Plan (Operative in Part) 2016

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

From: Diocesan School for Girls
Clyde Street
Epsom
Auckland 1051

Address for Service: Iain McManus, Civitas Ltd
PO Box 47020
Ponsonby
Auckland 1144
Ph: 09 360 8070
Email: iain@civitas.co.nz

Introduction

1. Diocesan School for Girls ("**submitter**") provides independent education for girls from year 0 (pre-school foundation year) to year 13.
2. The submitter owns a 5.14 hectare block of land bordered by Clyde Street, Margot Street and Mt St John Avenue in Epsom (the main campus).
3. The submitter also owns about two-thirds of the block bordered by Great South Road, Erin Street, Clyde Street and Ngaire Avenue, directly opposite the main campus.

Scope of Submission

4. The submitter **opposes** the travel demand management provisions proposed in Plan Change 71 ("**plan change**"), as summarised in Attachment D of the plan change, particularly as they apply to education facilities.

Reasons for Submission

5. The proposed travel demand management provisions:
 - a. Will not achieve the purpose of the Resource Management Act 1991 ("**RMA**");
 - b. Will not assist in meeting the reasonably foreseeable needs of future generations for education facilities;
 - c. Will not enable the efficient use and development of valuable natural and physical resources, particularly education facilities;
 - d. Are not the most efficient or effective way of achieving the outcomes the Council is seeking in respect of education facilities;
 - e. Will impose significant new and additional costs on independent and state-integrated education facilities;
 - f. Could have the (presumably unintended) consequence of hindering schools from providing parking (which would be a perverse outcome given the genesis of the provisions); and
 - g. Are contrary to both the intent and wording of the National Policy Statement on Urban Development 2020 ("**NPS-UD**") and, as a consequence, are contrary to section 74(1) of the RMA which requires Council to change its district plan in accordance with the NPS-UD and section 75(3) of the RMA which requires the district plan to give effect to the NPS-UD.
6. The Council's section 32 report does not comply with section 32 of the RMA, particularly with regard to the travel demand management provisions.

7. Without limiting the generality of the above, the submitter makes the following specific points:

The proposed travel demand management provisions cast the net far too wide with regard to schools

8. The proposed travel demand management provisions will impose significant new costs on independent and state-integrated schools (the provisions will not impact state schools as they are designated and do not need to apply the district plan provisions of the AUP). This will divert school funds away from more beneficial uses.
9. The proposed travel demand management provisions require schools to apply for resource consent and to submit for Council review a travel management plan for any and all education facilities which, given the AUP definition of education facilities, includes accommodation, administrative, cultural, religious, health, retail and communal facilities accessory to schools.
10. As a consequence, the plan change will require resource consent and the submission of a travel plan for Council review for many activities that will generate little or no additional travel demand. For example:
- a. Replacement of existing education facilities in a way that does not increase the roll and therefore does not increase travel demand (e.g. replacement of X pre-fabricated classrooms with X permanent classrooms).
 - b. Construction of a single additional classroom or small number of additional classrooms even though the increase in travel demand would be negligible in the context of existing travel demand for most Auckland schools.
 - c. Construction of communal and specialist education facilities (e.g. a day house, common room, music room, woodwork room or science lab). These types of facilities do not permit an increase in the school roll and do not generate traffic or parking demand in their own right.
 - d. Construction of sports and recreation facilities accessory to a school (e.g. a playground, confidence course, tennis court or turf). These facilities do not permit an increase in the school roll and generally do not generate traffic or parking demand in their own right.
 - e. Construction of religious facilities accessory to a school (e.g. a school chapel, temple or prayer room). These types of facilities do not permit an increase in the school roll

and rarely generate traffic or parking demand in their own right (e.g. through use independent of the school).

- f. Construction of boarding houses accessory to a school even though these generate a very low level of travel demand, and negligible travel demand during peak hours, as boarders rarely have cars, and generally only leave the grounds by car on the weekend when they do have cars.

11. The submitter contends that:

- a. Requiring resource consent and the submission of a travel plan for Council review for proposals that will generate little or no additional travel demand is not necessary or appropriate;
- b. It is not a good use of scarce school resources to be applying for resource consent and submitting travel plans for Council review for activities that generate little or no additional travel demand;
- c. It is not a good use of scarce Council resources to be processing applications for the above types of activities; and
- d. The costs of requiring resource consent and travel plans in scenarios like those noted above outweigh the benefits.

The proposed travel demand management provisions will not achieve the outcome the Council is seeking to achieve

12. The submitter doubts that Council has the legal scope through the plan change to require a travel plan for a school in its entirety when the application is for something less than a school in its entirety.
13. The submitter notes that applications to construct new schools are rare and that the vast majority of applications related to education facilities are for the replacement of existing facilities or addition of new facilities at existing schools.
14. That being the case, for the vast majority of applications, the proposed travel demand management provisions will give Council scope to require a travel plan for the replacement facility or additional facility but not the entire school.
15. The submitter contends that there is little practical value in having a travel plan for only a small component of a much larger facility and that as a consequence the plan change will not be effective in achieving the outcome Council is seeking.

16. Consequently, the submitter contends that the proposed provisions are not the most appropriate way of achieving the purpose of the plan change.

The proposed travel demand management provisions could have the (presumably unintended) consequence of hindering the supply of parking

17. The submitter notes that the proposed travel demand management provisions could have the effect of requiring schools to apply for resource consent for the construction of additional parking and allowing Council officers to refuse consent to construct that additional parking. In this regard, the submitter notes that:
- a. Arguably, parking accessory to a school falls within the AUP definition of an education facility (as the definition includes activities and facilities accessory to a school);
 - b. One of the amended purposes of a travel plan is to *"promote and enable the use of more sustainable and active modes of transport such as public transport, walking and cycling, ride sharing, car sharing and micro mobility as alternatives to sole occupancy private cars"*¹; and
 - c. The assessment criteria for assessment of applications focus on providing *"a viable alternative to private vehicle travel"*, *"the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking"*, and *"the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement"*².
18. The submitter notes that the genesis of the plan change is concern about the consequences of parties **not** providing parking now that minimum parking requirements have been removed from the AUP.
19. It would be perverse to put in place provisions that could require parties to apply for resource consent to provide parking and to then give Council officers the ability to decline consent to such applications when the driver for the plan change is concern about **insufficient** parking and the adverse effects of that on the transport network.

¹ Refer definition of "travel plan" as proposed to be amended in Plan Change 71.

² Refer the new assessment criteria in E27.8.2(3A) proposed in Plan Change 71.

The proposed travel demand management provisions are contrary to the NPS-UD and Council's statutory obligations under the RMA

20. The Council documentation claims that the proposed provisions are *"necessary to give effect to Policy 11 of the NPS-UD"*³. This is not correct.
21. Policy 11 has two parts: the first part prohibits the use of minimum parking requirements in district plans (other than for accessible parking) and the second part "strongly" encourages councils to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.
22. The proposed travel demand management provisions are not necessary to give effect to the removal of minimum parking requirements (the latter can be removed without the former) nor are they necessary to enable Council to manage effects associated with the supply and demand of parking through comprehensive parking management plans. As a consequence, they are not necessary to give effect to Policy 11 of the NPS-UD.
23. In reality, the proposed travel demand management provisions are designed to put the onus onto individual parties either to provide car parking or to otherwise manage effects associated with the supply and demand of car parking so that the Council does not have to address effects associated with the supply and demand of car parking through comprehensive parking management plans.
24. In this regard, the submitter contends that the proposed provisions are designed to give Council the power to decline resource consent to applications that do not include on-site parking, or do not include the amount of on-site parking that the Council considers to be necessary, even though no parking is required under the plan, where Council deems the adverse effects of insufficient parking to be unacceptable.
25. As such, the submitter contends that the proposed travel demand management provisions are not "consequential technical amendments" to the plan as repeatedly described in the plan change documentation but rather an attempt to get around the clear direction of the NPS-UD to remove provisions that have the effect of requiring a minimum number of parking spaces by giving Council the ability to refuse consent to applications where Council deems the effects of not providing a certain (now unspecified) number of parking spaces to be unacceptable.

³ Auckland Council, Section 32 Evaluation Report, 24 February 2022, para 16.

26. The submitter further contends that the proposed travel demand management provisions will have “the effect of requiring a minimum number of car parks to be provided for a particular development, land use or activity” contrary to the direction of part 3.38(1) of the NPS-UD – all Council is doing is changing the mechanism by which it does that from a simple, transparent and procedurally cost-effective minimum parking requirement rule to a more complex, subjective and procedurally more expensive individual assessment process.
27. The submitter contends that the above is contrary to both the intent and clear wording of the NPS-UD and therefore contrary to the requirement in section 74(1) of the RMA for Council to change its district plan in accordance with a national policy statement and the requirement in section 75(3) of the RMA for a district plan to give effect to a national policy statement.

The Council’s section 32 report does not comply with section 32 of the RMA

28. The submitter contends that the Council’s section 32 report:
 - a. Does not adequately define the problem that the plan change is seeking to fix, particularly in respect of schools.
 - b. Does not demonstrate that the plan change objectives are the most appropriate way to achieve the purpose of the Act.
 - c. Does not demonstrate that the proposed travel demand management provisions are the most appropriate way to achieve the objectives of the plan change.
 - d. Gives insufficient consideration and weight to the costs that will be imposed on applicants, particularly schools, in applying for resource consents. The report makes no attempt to understand, let alone quantify these costs, making it impossible for Council to make a reasonable decision on the provisions.
 - e. Gives insufficient consideration to reasonably practicable alternatives to the proposed travel demand management provisions. Of note, the Council report ignores the most obvious option for managing travel demand effects being the option specifically identified in the NPS-UD, namely Council-initiated comprehensive parking management plans. It also ignores the option of promoting and/or better funding Auckland Transport’s Travelwise programme (which helps schools to develop travel plans). The submitter contends that the latter option would be more efficient and effective than requiring schools to apply for resource consent and

submit a travel plan for Council review every time a school wants to add or replace a building or facility.

- f. Does not adequately assess the risk of not acting, particularly in respect of parking provision at schools. The report does not assess the likelihood or probability of an adverse effect occurring if the Council does not act in respect of schools., nor does it assess the scale or significance of the consequences of not acting in respect of schools.
 - g. Is largely devoid of evidence to support the report's conclusions.
29. The submitter notes that the Council's section 32 report does not specifically address education facilities at all despite education facilities being significantly impacted by the proposed plan change. The submitter considers this to be a significant flaw in Council's compliance with section 32 of the RMA which makes it impossible for a decision maker to make a reasonable decision on the plan change insofar as it applies to schools.

Relief Sought

30. The submitter seeks the following relief:
- a. Deletion of the travel demand management provisions summarised in Attachment D of the plan change.
 - b. Any alternative, consequential and/or other changes that will address the concerns identified in this submission.

30.1

Other Matters

- 31. The submitter wishes to be heard in support of its submission.
- 32. If others make a similar submission, the submitter would consider presenting a joint case with them at the hearing.
- 33. The submitter could not gain an advantage in trade competition through this submission.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Iain', written over a light grey rectangular background.

Iain McManus

Authorised Agent for the Submitter

21 March 2022

Submission on Proposed Plan Change 71
NPS-UD Removal of Car Parking Minimums –
Consequential Technical Amendments
Auckland Unitary Plan (Operative in Part) 2016

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

From: King's College
41 Golf Avenue
Otahuhu
Auckland 1062

Address for Service: Iain McManus, Civitas Ltd
PO Box 47020
Ponsonby
Auckland 1144
Ph: 09 360 8070
Email: iain@civitas.co.nz

Introduction

1. King's College ("**submitter**") provides independent education for boys in years 9-13 and girls in years 11-13.
2. The submitter owns 21.61 hectares of land at 41 Golf Avenue, Otahuhu and 1.56 hectares of land on an adjoining site at 28 Hospital Road, Papatoetoe.

Scope of Submission

3. The submitter **opposes** the travel demand management provisions proposed in Plan Change 71 ("**plan change**"), as summarised in Attachment D of the plan change, particularly as they apply to education facilities.

Reasons for Submission

4. The proposed travel demand management provisions:
 - a. Will not achieve the purpose of the Resource Management Act 1991 ("**RMA**");
 - b. Will not assist in meeting the reasonably foreseeable needs of future generations for education facilities;
 - c. Will not enable the efficient use and development of valuable natural and physical resources, particularly education facilities;
 - d. Are not the most efficient or effective way of achieving the outcomes the Council is seeking in respect of education facilities;
 - e. Will impose significant new and additional costs on independent and state-integrated education facilities;
 - f. Could have the (presumably unintended) consequence of hindering schools from providing parking (which would be a perverse outcome given the genesis of the provisions); and
 - g. Are contrary to both the intent and wording of the National Policy Statement on Urban Development 2020 ("**NPS-UD**") and, as a consequence, are contrary to section 74(1) of the RMA which requires Council to change its district plan in accordance with the NPS-UD and section 75(3) of the RMA which requires the district plan to give effect to the NPS-UD.
5. The Council's section 32 report does not comply with section 32 of the RMA, particularly with regard to the travel demand management provisions.

6. Without limiting the generality of the above, the submitter makes the following specific points:

The proposed travel demand management provisions cast the net far too wide with regard to schools

7. The proposed travel demand management provisions will impose significant new costs on independent and state-integrated schools (the provisions will not impact state schools as they are designated and do not need to apply the district plan provisions of the AUP). This will divert school funds away from more beneficial uses.
8. The proposed travel demand management provisions require schools to apply for resource consent and to submit for Council review a travel management plan for any and all education facilities which, given the AUP definition of education facilities, includes accommodation, administrative, cultural, religious, health, retail and communal facilities accessory to schools.
9. As a consequence, the plan change will require resource consent and the submission of a travel plan for Council review for many activities that will generate little or no additional travel demand. For example:
- a. Replacement of existing education facilities in a way that does not increase the roll and therefore does not increase travel demand (e.g. replacement of X pre-fabricated classrooms with X permanent classrooms).
 - b. Construction of a single additional classroom or small number of additional classrooms even though the increase in travel demand would be negligible in the context of existing travel demand for most Auckland schools.
 - c. Construction of communal and specialist education facilities (e.g. a day house, common room, music room, woodwork room or science lab). These types of facilities do not permit an increase in the school roll and do not generate traffic or parking demand in their own right.
 - d. Construction of sports and recreation facilities accessory to a school (e.g. a playground, confidence course, tennis court or turf). These facilities do not permit an increase in the school roll and generally do not generate traffic or parking demand in their own right.
 - e. Construction of religious facilities accessory to a school (e.g. a school chapel, temple or prayer room). These types of facilities do not permit an increase in the school roll

and rarely generate traffic or parking demand in their own right (e.g. through use independent of the school).

- f. Construction of boarding houses accessory to a school even though these generate a very low level of travel demand, and negligible travel demand during peak hours, as boarders rarely have cars, and generally only leave the grounds by car on the weekend when they do have cars.

10. The submitter contends that:

- a. Requiring resource consent and the submission of a travel plan for Council review for proposals that will generate little or no additional travel demand is not necessary or appropriate;
- b. It is not a good use of scarce school resources to be applying for resource consent and submitting travel plans for Council review for activities that generate little or no additional travel demand;
- c. It is not a good use of scarce Council resources to be processing applications for the above types of activities; and
- d. The costs of requiring resource consent and travel plans in scenarios like those noted above outweigh the benefits.

The proposed travel demand management provisions will not achieve the outcome the Council is seeking to achieve

11. The submitter doubts that Council has the legal scope through the plan change to require a travel plan for a school in its entirety when the application is for something less than a school in its entirety.
12. The submitter notes that applications to construct new schools are rare and that the vast majority of applications related to education facilities are for the replacement of existing facilities or addition of new facilities at existing schools.
13. That being the case, for the vast majority of applications, the proposed travel demand management provisions will give Council scope to require a travel plan for the replacement facility or additional facility but not the entire school.
14. The submitter contends that there is little practical value in having a travel plan for only a small component of a much larger facility and that as a consequence the plan change will not be effective in achieving the outcome Council is seeking.

15. Consequently, the submitter contends that the proposed provisions are not the most appropriate way of achieving the purpose of the plan change.

The proposed travel demand management provisions could have the (presumably unintended) consequence of hindering the supply of parking

16. The submitter notes that the proposed travel demand management provisions could have the effect of requiring schools to apply for resource consent for the construction of additional parking and allowing Council officers to refuse consent to construct that additional parking. In this regard, the submitter notes that:
- a. Arguably, parking accessory to a school falls within the AUP definition of an education facility (as the definition includes activities and facilities accessory to a school);
 - b. One of the amended purposes of a travel plan is to *"promote and enable the use of more sustainable and active modes of transport such as public transport, walking and cycling, ride sharing, car sharing and micro mobility as alternatives to sole occupancy private cars"*¹; and
 - c. The assessment criteria for assessment of applications focus on providing *"a viable alternative to private vehicle travel"*, *"the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking"*, and *"the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement"*².
17. The submitter notes that the genesis of the plan change is concern about the consequences of parties **not** providing parking now that minimum parking requirements have been removed from the AUP.
18. It would be perverse to put in place provisions that could require parties to apply for resource consent to provide parking and to then give Council officers the ability to decline consent to such applications when the driver for the plan change is concern about **insufficient** parking and the adverse effects of that on the transport network.

¹ Refer definition of "travel plan" as proposed to be amended in Plan Change 71.

² Refer the new assessment criteria in E27.8.2(3A) proposed in Plan Change 71.

The proposed travel demand management provisions are contrary to the NPS-UD and Council's statutory obligations under the RMA

19. The Council documentation claims that the proposed provisions are *"necessary to give effect to Policy 11 of the NPS-UD"*³. This is not correct.
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22. In reality, the proposed travel demand management provisions are designed to put the onus onto individual parties either to provide car parking or to otherwise manage effects associated with the supply and demand of car parking so that the Council does not have to address effects associated with the supply and demand of car parking through comprehensive parking management plans.
23. In this regard, the submitter contends that the proposed provisions are designed to give Council the power to decline resource consent to applications that do not include on-site parking, or do not include the amount of on-site parking that the Council considers to be necessary, even though no parking is required under the plan, where Council deems the adverse effects of insufficient parking to be unacceptable.
24. As such, the submitter contends that the proposed travel demand management provisions are not "consequential technical amendments" to the plan as repeatedly described in the plan change documentation but rather an attempt to get around the clear direction of the NPS-UD to remove provisions that have the effect of requiring a minimum number of parking spaces by giving Council the ability to refuse consent to applications where Council deems the effects of not providing a certain (now unspecified) number of parking spaces to be unacceptable.

³ Auckland Council, Section 32 Evaluation Report, 24 February 2022, para 16.

25. The submitter further contends that the proposed travel demand management provisions will have “the effect of requiring a minimum number of car parks to be provided for a particular development, land use or activity” contrary to the direction of part 3.38(1) of the NPS-UD – all Council is doing is changing the mechanism by which it does that from a simple, transparent and procedurally cost-effective minimum parking requirement rule to a more complex, subjective and procedurally more expensive individual assessment process.
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The Council’s section 32 report does not comply with section 32 of the RMA

27. The submitter contends that the Council’s section 32 report:
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 - b. Does not demonstrate that the plan change objectives are the most appropriate way to achieve the purpose of the Act.
 - c. Does not demonstrate that the proposed travel demand management provisions are the most appropriate way to achieve the objectives of the plan change.
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 - e. Gives insufficient consideration to reasonably practicable alternatives to the proposed travel demand management provisions. Of note, the Council report ignores the most obvious option for managing travel demand effects being the option specifically identified in the NPS-UD, namely Council-initiated comprehensive parking management plans. It also ignores the option of promoting and/or better funding Auckland Transport’s Travelwise programme (which helps schools to develop travel plans). The submitter contends that the former option would be more efficient and effective than requiring schools to apply for resource consent and

submit a travel plan for Council review every time a school wants to add or replace a building or facility.

- f. Does not adequately assess the risk of not acting, particularly in respect of parking provision at schools. The report does not assess the likelihood or probability of an adverse effect occurring if the Council does not act in respect of schools., nor does it assess the scale or significance of the consequences of not acting in respect of schools.
 - g. Is largely devoid of evidence to support the report's conclusions.
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Relief Sought

29. The submitter seeks the following relief:
- a. Deletion of the travel demand management provisions summarised in Attachment D of the plan change.
 - b. Any alternative, consequential and/or other changes that will address the concerns identified in this submission.

31.1

Other Matters

30. The submitter wishes to be heard in support of its submission.
31. If others make a similar submission, the submitter would consider presenting a joint case with them at the hearing.
32. The submitter could not gain an advantage in trade competition through this submission.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Iain', written in a cursive style.

Iain McManus

Authorised Agent for the Submitter

21 March 2022

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Mr Michael Mrs Sandra Wallace
Date: Tuesday, 22 March 2022 6:00:43 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Mr Michael Mrs Sandra Wallace

Organisation name:

Agent's full name:

Email address: mikesclub2@hotmail.com

Contact phone number:

Postal address:

21 Konoba Ave

Kumeu

Auckland 0810

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Huapai Triangle Special Housing Area amendments:

Removal of parking for purposed sites

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

This will add to parking congestion on the public streets. This is already an issue.

Several parking bays have already been removed due to changes in building developments already, further increasing parking on the road leading to congestion.

There have already been access difficulties with construction vehicles despite there being lots of parking bays available.

At present council green areas already being used for parking due to lack of parking bays.

Increased density of housing has resulted in more vehicles having to park on the road due to a lack of public transport facilities in the area. This causes issues for emergency services to access houses and streets if both sides of the street are filled with parked cars.

It is currently not functional to remove off street parking requirements when there is insufficient

32.1

public transport to support the current housing areas.

I or we seek the following decision by council: Decline the plan change

Submission date: 22 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)



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our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Kasey Zhai

Organisation Name (if submission is made on behalf of Organisation)

Kiwi Property

Address for service of Submitter

PO Box 1986, Shortland Street, Auckland 1140

Telephone:

273058458

Fax/Email:

kaseyz@barker.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 71

Plan Change/Variation Name

NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Please refer to the attached submission

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are: Please refer to the attached submission

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Kevin
Signature of Submitter
(or person authorised to sign on behalf of submitter)

03/23/2022
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

23 March 2022

Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1010
Submission via email: unitaryplan@aucklandcouncil.govt.nz

Submission on Proposed Plan Change 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan on behalf of Kiwi Property Limited

Introduction

Kiwi Property is one of the leading property development and investment companies in New Zealand. Over the last 30 years Kiwi Property has developed a number of New Zealand’s largest retail and office assets and currently owns and manages multiple large-scale retail and office developments in Auckland including existing centres such as Sylvia Park, LynnMall, Auckland CBD and Westgate Lifestyle. Kiwi’s property assets are currently valued at approximately \$3.2 billion.

Scope of Submission

The specific aspects of Proposed Plan Change 71 to the Auckland Unitary Plan (Operative in Part) that this submission relates to are detailed in the table at Appendix 1.

The Submission

Kiwi generally supports the consequential technical amendments to ensure that the Auckland Unitary Plan (“AUP”) removes all minimum carparking requirements to give effect to the National Policy Statement on Urban Development (“NPS-UD”).

Kiwi opposes the aspects of the Proposed Plan Change that seek to introduce requirements to prepare and assess a travel plan for development through a resource consent process. These requirements are contrary to the NPS-UD for the reasons set out in the submission below.

The table at **Appendix 1** provides further details and sets out:

- The provisions that Kiwi supports, opposes or seeks to amend;
- Kiwi’s reasons for their stated position;
- The decision sought from Council.

Intent of the NPS-UD

The NPS-UD sets out a significant shift in how cities plan for and manage carparking; from one regulated broadly by Councils through District Plans, to a more flexible market-led approach, where those developing

land generally decide the amount of parking that is necessary to meet demand. This is intended to achieve more efficient land use, provide more space for housing, and ensure parking is more responsive to demand, acknowledging that minimum parking regulations have historically resulted in an oversupply of parking. This relates to the wider objectives of the NPS-UD to achieve a well-functioning urban environment that supports a reduction in greenhouse gas emissions. The Section 32 report for the NPS-UD explains this approach in more detail¹.

The NPS-UD does not suggest that carparking is irrelevant to urban planning decisions. Rather, it encourages Councils to use non-regulatory methods to manage effects, particularly by preparing and implementing comprehensive parking management plans (Policy 11). The other non-regulatory methods available include Council investment in improvements to public transport and walking and cycling infrastructure where it is needed to meet increased demand. Kiwi encourages the Council to take steps to implement these methods.

The proposal to require a travel plan to be prepared and assessed through a resource consent process is not consistent with the NPS-UD, given that in many cases it may have the effect of requiring carparking through assessment criteria. This is contrary to Policy 11 and to clause 3.38(1), which requires Councils to remove any assessment criteria that have the effect of requiring a minimum number of carparks. While the criteria themselves do not set a minimum as a metric, the Council would have discretion to require carparking, with the assessment involving a significantly greater level of uncertainty than the operative provisions. In Kiwi's view, this is clearly not the intent of the NPS-UD.

Kiwi is concerned that the proposed provisions for travel plans incorrectly emphasise the need to reduce the demand for private vehicle use and car parking. While the NPS-UD seeks good accessibility outcomes in urban environments by way of public or active transport, it was not the intent to discourage private vehicle use within individual developments. Where travel demand within a development is well managed and does not affect the surrounding transport network, the mode of travel choice should be determined by those developing the land.

For the reasons given above, Kiwi considers that the travel plan provisions of the Proposed Plan Change do not give effect to the NPS-UD as required by s75(3) of the Resource Management Act 1991 ("RMA").

Efficiency and Effectiveness of Travel Plans

In addition to the policy issues outlined above, the way in which travel plans are proposed to be applied in the Plan Change is not an efficient or effective method for achieving the transport objectives of the AUP.

Travel plans are documents typically prepared for employment and educational activities with the aim of optimising the use of the transport system, often by encouraging use of a range of modes. They typically involve detailing the operational measures that can be put in place to support this, including management of parking areas, provision for active transport facilities, communications and promotion for public transport and provision for shared transport programmes, amongst others². Given the operational nature of these measures, they require on-going monitoring by businesses and authorities to ensure they are operating as intended.

¹ See [NPS-UD Section 32 report](#)

² See [Waka Kotahi guidelines](#) and [Auckland Transport guidelines](#)

Plan Change 71 proposes to require travel plans for a wide range of residential and commercial activities outside of centres and other identified zones as set out in Table E27.6.1A.1. In Kiwi's view this is unnecessary, inefficient and ineffective for the following reasons:

- Significant time and cost inefficiencies would be involved, including those associated with additional consenting requirements as well as on-going monitoring (for established developments and the Council) and any associated entities or processes that would need to be established. In some cases, the need for a restricted discretionary activity consent for a travel plan will be the only reason for consent (e.g., if the application was for a new warehouse on industrial zoned land). This would add further delays to enabling development to occur, which is not the intent of the NPSUD.
- The activity thresholds set out in Table E27.6.1A.1 are poorly correlated with the potential effects on the transport network. For example, industrial activities of up to 2000m² are likely to accommodate low staff numbers and generate low demand on the transport network. Similarly, retirement villages (integrated residential development) typically have lower levels of demand on the transport network.
- There are existing provisions of the AUP which address the effects of travel demand management where it may be appropriate for larger scale developments. This includes the existing provisions (E27.6.1) requiring the preparation of an Integrated Transport Assessment ("ITA").
- Given the wide range of matters that a travel plan needs to assess and the broad nature of the assessment criteria proposed in E27.8.2(3A), the Plan Change provides little or no certainty to applicants on the specific outcomes to be achieved by a travel plan. The Plan Change has the potential to be more onerous and involve more costs than the operative provisions in E27 – Transport. For example, the assessment criteria include matters external to the proposed development (the availability of public and active modes), or duplicates matters that are otherwise managed under the AUP (minimum levels of cycle parking). There is also a presumption that developments exceeding the proposed thresholds will create parking overspill to the transport network, with no acknowledgement that developers may choose to provide parking on site. Other concerns regarding the assessment criteria are included at Appendix 2.

Relief Sought

Kiwi supports with amendments those aspects of Proposed Plan Change 71 that are consequential technical amendments to the AUP that support the removal of car parking minimums.

Kiwi requests further amendments to Policy E27.3(3) and E27.3(9) to give effect to the objectives of Plan Change, and opposes other amendments as set out in Appendix 1. Kiwi would consider other consequential amendments as appropriate or necessary to address the concerns set out in this submission.

Kiwi wishes to be heard in support of its submission.

If other parties make a similar submission, Kiwi would consider presenting a joint case with them at any hearing.

Barker & Associates Limited



Kasey Zhai

Senior Planner

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Address for Service

Kiwi Property

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Appendix 1: Summary of relief sought and reasons

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
B8 Coastal Environment amendments				
1. Amend B8.6 Explanation and principal reasons for adoption	Support	Retain	The reference to required car parking is not consistent with the NPS-UD.	That the B8.6 Explanation and principal reasons for adoption be amended as notified.
E27 Transport amendments				
2. Amend E27.1 Background	Support in Part	Amend	The management of parking demand through a district plan is not consistent with the intent of the NPS-UD. Clarifying the approach to managing maximum parking limits is outside the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPS-UD and adverse effects after the removal of minimum car parking requirements.	That the proposed insertions in reference to parking demand and maximum parking limits are deleted.
3. Additional requested amendment to Policy E27.3(3)	N/A	Amend Policy E27.3(3)	The reference to managing the number, location, and type of parking is not consistent with the NPS-UD. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (3) Manage the number, location and type of parking and loading spaces, <u>including and</u> bicycle parking and associated end-of-trip facilities to support all of the following:

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Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
4. Additional requested amendment to Policy E27.3(9)	N/A	Amend Policy E27.3(9)	The reference to providing for flexible approaches to parking is not necessary. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
5. Amend Policy E27.3(6)	Support in Part	Amend	Amending the policy framework for managing maximum parking limits is outside of the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPS-UD and adverse effects after the removal of minimum car parking requirements.	That the policy be amended as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by: (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail

33.5

33.6

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
				and motor vehicle sales) and commercial service activities.
6. Delete Policy E27.3(6A)	Support	Retain	The reference to where parking may be reduced is not necessary.	That the policy be amended as notified.
7. Delete Policy E27.3(7)	Support	Retain	The reference to where minimum car parking requirements do not apply is not necessary.	That the policy be deleted as notified.
8. Add a new activity rule to Table E27.4.1	Oppose	Delete	Managing the efficient use of car parking and the effects of car parking provision on the transport network through an activity rule is not consistent with the intent of the NPS-UD. A travel plan is not an efficient or effective planning method for managing the potential effects of the specified activities on the transport network.	That E27.4.1(A3a) be deleted.
9. Add a new Standard E27.6.1A	Oppose	Delete	Please refer to commentary in the main submission.	That E27.6.1A be deleted.
10. Amend Standard E27.6.2(5)	Support	Retain	The reference to required minimum car parking in the Business – Neighbourhood Centre Zone is not consistent with the NPS-UD.	That the standard be amended as notified.
11. Amend Standard E27.6.3.1(1)(c)	Support	Retain	The management of the use of any parking spaces that are provided is not necessary.	That the standard be amended as notified.
12. Add a new E27.8.1 Matter of discretion	Oppose	Delete	Please refer to commentary in the main submission.	That E27.8.1(4a) be deleted.

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Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
13. Add a new E27.8.2 Assessment criteria	Oppose	Delete	Please refer to commentary in the main submission and Appendix 2	That E27.8.2(3A) be deleted.	33.14
14. Amend Special Information Requirement E27.9(2)	Oppose in Part	For E27.9(2)(a): Retain	For E27.9(2)(a): Requiring a travel plan where less than the minimum number of parking spaces are provided is not necessary.	That Special Information Requirement E27.9(2) be amended as notified.	33.15
		For E27.9(2)(b): Delete	For E27.9(2)(b): Please refer to commentary in the main submission.	That Special Information Requirement E27.8(2)(b) be deleted.	33.16
15. Amend Special Information Requirement E27.9(3)	Support	Retain	The reference to parking requirements and required parking is not consistent with the NPS-UD.	That the special information requirement is amended as notified.	33.17
Subdivision – Urban amendments					
16. Amend Standard E38.9.1.2(1)	Support	Retain	The reference to required parking spaces is not consistent with the NPS-UD.	That the standard be amended as notified	33.18
Temporary activities amendments					
17. Amend Policy E40.3(5)	Support	Retain	Requiring certain temporary activities provide sufficient parking is not consistent with the NPS-UD.	That the policy is amended as notified.	33.19
18. Amend Assessment criteria E40.8.2(2)	Support	Retain	Assessing the extent that adequate parking will address relevant adverse effects is not consistent with the NPS-UD.	That the assessment criteria is amended as notified.	33.20
F2 Coastal - General Coastal Marine Zone amendments					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
19. Amend Policy F2.17.3(3)	Support	Retain	Requiring adequate car parking be provided is not consistent with the NPS-UD.	That the policy is amended as notified.	33.21
F3 Coastal - Marina Zone amendments					
20. Amend Matter of discretion F3.8.1(3)	Support	Retain	Assessing the effects from any parking requirements is not consistent with the NPS-UD	That the matters of discretion are amended as notified.	33.22
21. Amend Matter of discretion F3.8.1(4)					33.23
22. Amend Assessment criteria F3.8.2(3)	Support	Retain	Assessing whether adequate car parking has been provided and the need for car parking is not consistent with the NPS-UD.	That the assessment criteria are amended as notified.	33.24
23. Amend Assessment criteria F3.8.2(4)					33.25
F5 Coastal – Minor Port Zone amendments					
24. Amend Assessment Criteria F5.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent the NPS-UD.	That the assessment criteria are amended as notified.	33.26
25. Amend Assessment Criteria F5.8.2(3)					33.27
F6 Coastal – Ferry Terminal Zone amendments					
26. Amend Policy F6.3(1)	Support	Retain	Requiring that sufficient car parking be provided is not consistent with the NPS-UD.	That the policies are amended as notified.	33.28
27. Amend Policy F6.3(8)					33.29
H1 Residential – Large Lot Zone amendments, H2 Residential – Rural and Coast Settlement Zone amendments, H3 Residential – Single House Zone amendments, H4 Residential – Mixed Housing Suburban Zone amendments, H5 Residential – Mixed Housing Urban Zone amendments, H6 Residential – Terrace Housing and Apartment Buildings Zone amendments, H20 Rural – Waitakere Foothills Zone amendments, H21 Rural – Waitakere Ranges Zone amendments					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
28. Amend Assessment Criteria H1.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent with the NPS-UD.	That the assessment criteria are amended as notified.	33.30
29. Amend Assessment Criteria H2.8.2(1)					33.31
30. Amend Assessment Criteria H3.8.2(1)					33.32
31. Amend Assessment Criteria H4.8.2(1)					33.33
32. Amend Assessment Criteria H5.8.2(1)					33.34
33. Amend Assessment Criteria H6.8.2(1)					33.35
34. Amend Assessment Criteria H20.8.2(1)					33.36
35. Amend Assessment Criteria H21.8.2(1)					33.37
J – Definitions amendments					
36. Amend the definitions as follows:					
Accessory activities Non-accessory parking Off-site parking	Support	Retain	The reference to required car parking is not consistent with the intent of the NPS-UD.	That the definitions are amended as notified.	33.38

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
Travel Plan	Oppose	Delete	Please refer to commentary in the main submission.	That the amendments to the definition are deleted.

33.39

Appendix 2: Commentary on proposed assessment criteria (E27.8.2(3A))

Proposed Assessment Criteria	Comment
E27.8.2(3A)(a): The extent to which the travel demands of the activity are provided for, including but not limited to: (i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:	Please refer to commentary below.
the accessibility and frequency of public transport services	Public transport accessibility and frequency is directly controlled by Auckland Transport. Kiwi is concerned that should the existing accessibility and frequency of public transport services not be acceptable, then provisions of public transport services may fall upon developers to fund (or partially fund), or development may be delayed until appropriate funded services be available. This is not the intent of the NPS-UD.
the standard of active modes infrastructure for all users	Kiwi provides appropriate active mode infrastructure within their sites as a matter of course, however Kiwi is concerned that this criterion may require infrastructure to be provided beyond the site boundaries to provide an appropriate standard of infrastructure. This goes well beyond the intent of the NPS-UD.
the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments	Kiwi is concerned this criterion will require additional assessment within urban areas that have been zoned in recognition that an acceptable level of connectivity to a range of locations is available. In cases where land is already zoned for commercial and industrial activities, proposals should be assessed in accordance with existing AUP assessment processes, and not require the additional burden of proving why urban zoned land is acceptable for the proposed activity.
(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking	Kiwi is concerned this criterion is poorly linked to effects on the transport network and will require developers to actively reduce the demand for

Proposed Assessment Criteria	Comment
	private vehicle travel and car parking. While the NPS-UD seeks good accessibility outcomes in urban environments by way of public or active transport, it was not the intent to discourage private vehicle use within individual developments.
E27.8.2(3A)(b): the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.	Kiwi is concerned this criterion will result in the default provision of on site car parking to manage the effects of potential parking overflow on the adjacent road network. This is not consistent with the intent of the NPS-UD and potentially disincentivises parking management through non-regulatory methods such as preparing and implementing comprehensive parking management plans and Council investment in improvements to public transport and walking and cycling infrastructure.
E27.8.2(3A)(c): the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).	Please refer to commentary above.

23rd March 2022

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Auckland Council
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Auckland 1142

unitaryplan@aucklandcouncil.govt.nz

Submission to PC71 NPS-UD Removal of Car Parking Minimums

Introduction

Takapuna Beach Business Association (TBBA) representing the Takapuna Business Improvement District (BID) welcomes the opportunity to make this Submission to PC71 NPS-UD Removal of Car Parking Minimums.

TBBA is a significant business district, representing over close to 1000 commercial property owners and businesses within the Takapuna area.

Takapuna Beach Business Association Feedback

1. TBBA understands that as a result of removing car parking minimums under the NPS-UD, there are a number of consequential changes required to the Auckland Unitary Plan. Additionally, Council says that the proposed changes are necessary to ensure that the Unitary Plan continues to function as intended following the removal of car parking minimums.

However, TBBA believes that there does not appear to have been a thorough analysis of the implications for businesses of the removal of car parking minimums under the NPS-UD. It also appears that to date, the business community has not been consulted.

This belief is based upon the fact that for any proposed plan change, the Council must undertake an evaluation required by section 32 of the Resource Management Act 1991 ('RMA'). A **section 32 Evaluation Report** must contain an assessment of the environmental, economic, social, and cultural effects of the plan change, including the opportunities for economic growth that is anticipated to be provided or reduced and employment that is anticipated to be provided or reduced.

Auckland Council has prepared a section 32 Evaluation Report for this plan change.⁵ However, because Plan Change 71 only concerns the consequential amendments necessary following the removal of car parking minimums, the section 32 Evaluation Report does not really address the effects of the removal of car parking minimums themselves, nor the above assessments.⁶

TBBA therefore requests that a more thorough Evaluation Report be commissioned to assess the economic effects of the plan change, more specifically, those related to economic and employment growth or reduction.

34.1

⁵ Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan – Section 32 Evaluation Report (24 February 2022).

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc71-and-pm14-s32-report.pdf>

⁶ For commentary on the general effects of the removal of car parking minimums, see, for example: <https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-car-parking-fact-sheet/>

2. Although government legislation and the proposed changes to the AUP would not require it, we would ask that due consideration be given to sufficient car parking being included in any new development applications on a case-by-case basis. TBBA believes that a blanket **'no minimums' approach to applications would result in a number of current** problems being exacerbated, including but not limited to:

34.2

- o Increased on-street parking demand due to employees attending new workplaces
- o Insufficient on-street parking for the increased number of employees accessing their workplace or customers accessing businesses.
- o Increased on-street parking causing access difficulties for emergency vehicles
- o Increased on-street parking causing access difficulties for delivery vehicles, particularly large trucks requiring space to manoeuvre
- o Reduced parking amenities for retail customers, reducing retail spending
- o Increased competition for remaining car parking, reducing retail spending.

3. TBBA would also ask that on a case-by-case basis, Council considers whether or not the provision of other mode opportunities and services available for commuters to, from and around the area involved are adequate, before granting development applications with no parking requirements. Some people simply have no choice but to use their vehicles to get to their place of work and anyone driving around in an attempt to find a parking space will add to our emissions at a time when the emphasis is on reducing them, as per **Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan**.

34.3

4. As the number of electric vehicles increases in response to climate change reduction targets, serious consideration needs to be given to where people will charge these vehicles if there are no parking spaces at their homes or their places of work.

34.4

5. Parking, which is already at a premium in our BID area, will become even more difficult for everyone as any new local residents, particularly those who own more than one vehicle, seek to park their additional vehicles near to their homes. This will become an issue for those people who already use the available parking spaces and will also result in the area being less attractive to visit, thus adversely affecting businesses in the area.

Conclusions

TBBA asks that Council take the actions requested above and would also ask that Council give due consideration to the needs of businesses in the vicinity of any new development applications, especially if the developer does not intend to include any provision for parking.

Should there be any questions or other matters arising from this Submission, we would be pleased to respond to those.

Yours sincerely,



Terence Harpur
Chief Executive
Takapuna Beach Business Association

FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 71

AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitter: Mike Greer Developments

Mike Greer Developments (“the Submitter”) provides this submission on Proposed Plan Change 71 (“**PC71**”) to the Auckland Unitary Plan (Operative in Part).

The submitter owns a substantial number of properties that the Plan Change applies to. The submitter is one of the largest home builders in Auckland.

The Submitter could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.

The submission relates to the proposed amendments to the text and provisions of the Auckland Unitary Plan set out in PC71. The Submitter opposes the following provisions:

- Proposed new activity in Table E27.4.1 (A3a);
- Proposed new Standard E27.6.1A Travel Demand;
- Proposed new matter of discretion E27.8.1(4a);
- Proposed new assessment criteria E27.8.2(3a);
- Proposed new Special Information requirement E27.9(2)(b).

35.1

Reasons for submission

- The proposed amendments seek to require a travel plan for certain developments. Rule E27.4.1(A3a) provides for any activity or subdivision which meets or exceeds the new travel demand thresholds in Standard E27.6.1A as a restricted discretionary activity. Any activity meeting or exceeding the development thresholds in Table E27.6.1A will require a travel plan as part of an assessment of environmental effects. This requirement has been included as a new special information requirement (E27.9(2)(b));
- The submitter opposes this proposed Travel Plan approach in its entirety;

- The submitter considers that the proposed change does not constitute addressing consequential technical amendments in the AUP and HGI Plan, and the proposed changes will result in additional compliance costs for applicants;
- The submitter notes that the requirement for a Travel Plan applies to a site regardless is whether parking is provided or not;
- The section 32 evaluation of options is considered to be inappropriate as it does not give proper consideration to alternatives that do not require a Travel Plan;
- PC71 is contrary to sound resource management practice; and,
- The submitter considers that this proposed change to the Unitary Plan is contrary to the outcomes sought by the National Policy Statement for Urban Development 2020 and may effectively act as a means of maintaining parking requirements.

Relief sought

The Submitter seeks the following decision from Auckland Council in respect of PC71:

- That the following sections of PC71 are deleted;
 - Activity Table E27.4.1 (A3a); | 35.2
 - Standard E27.6.1A Travel demand; | 35.3
 - E27.8.1. Matters of discretion; | 35.4
 - E27.9(2)(b) Special Information requirements; and | 35.5
- Such other amendments to the provisions of the AUP as may be necessary to give effect to the relief sought in this submission.

The Submitter wishes to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.



Michael Campbell
Campbell Brown Planning Limited
For and on behalf of Mike Greer Developments

23 March 2022

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AUCKLAND 1144

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FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 71

AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitter: Universal Homes

Universal Homes (“the Submitter”) provides this submission on Proposed Plan Change 71 (“**PC71**”) to the Auckland Unitary Plan (Operative in Part).

The submitter owns a substantial number of properties that the Plan Change applies to. The submitter is one of the largest home builders in Auckland.

The Submitter could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.

The submission relates to the proposed amendments to the text and provisions of the Auckland Unitary Plan set out in PC71. The Submitter opposes the following provisions:

- Proposed new activity in Table E27.4.1 (A3a);
- Proposed new Standard E27.6.1A Travel Demand;
- Proposed new matter of discretion E27.8.1(4a);
- Proposed new assessment criteria E27.8.2(3a);
- Proposed new Special Information requirement E27.9(2)(b).

36.1

Reasons for submission

- The proposed amendments seek to require a travel plan for certain developments. Rule E27.4.1(A3a) provides for any activity or subdivision which meets or exceeds the new travel demand thresholds in Standard E27.6.1A as a restricted discretionary activity. Any activity meeting or exceeding the development thresholds in Table E27.6.1A will require a travel plan as part of an assessment of environmental effects. This requirement has been included as a new special information requirement (E27.9(2)(b));
- The submitter opposes this proposed Travel Plan approach in its entirety;

- The submitter considers that the proposed change does not constitute addressing consequential technical amendments in the AUP and HGI Plan, and the proposed changes will result in additional compliance costs for applicants;
- The submitter notes that the requirement for a Travel Plan applies to a site regardless is whether parking is provided or not;
- The section 32 evaluation of options is considered to be inappropriate as it does not give proper consideration to alternatives that do not require a Travel Plan;
- PC71 is contrary to sound resource management practice; and,
- The submitter considers that this proposed change to the Unitary Plan is contrary to the outcomes sought by the National Policy Statement for Urban Development 2020 and may effectively act as a means of maintaining parking requirements.

Relief sought

The Submitter seeks the following decision from Auckland Council in respect of PC71:

- That the following sections of PC71 are deleted;
 - Activity Table E27.4.1 (A3a); | 36.2
 - Standard E27.6.1A Travel demand; | 36.3
 - E27.8.1. Matters of discretion; | 36.4
 - E27.9(2)(b) Special Information requirements; and | 36.5
- Such other amendments to the provisions of the AUP as may be necessary to give effect to the relief sought in this submission.

The Submitter wishes to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.



Michael Campbell
Campbell Brown Planning Limited
For and on behalf of Universal Homes

23 March 2022

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**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN
CHANGE OR VARIATION UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE
MANAGEMENT ACT 1991**

TO: Auckland Council

SUBMITTER: Auckland International Airport Limited

SUBMISSION ON: Proposed Plan Change 71 (“**PC71**”): NPS UD Removal of Car Parking Minimums - Consequential Technical Amendments to the Auckland Unitary Plan -Operative in Part (“**AUP**”).

Introduction

1. Auckland International Airport Limited (“**AIAL**”) owns and is developing all the land identified as the Auckland Airport Precinct in the AUP. The Precinct objectives and policies recognise that the Precinct is suitable for office and industrial activities including warehousing and storage activities.
2. AIAL could not gain an advantage in trade competition through this submission and the submission does not relate to trade competition or the effects of trade competition.

Scope of submission

3. AIAL is directly affected by some elements of PC71 and in particular:
 - (a) new activity rule E27.4.1(A3a)
 - (b) new standard E27.6.1A;
 - (c) new matter of discretion E27.8.1(4A)
 - (d) new assessment criteria in E27.8.2(3A); and
 - (e) new special information requirement E27.9.(2)(b).

Submission

4. AIAL **opposes** the specific provisions identified above.

| 37.1

Reasons for submission

5. PC71 seeks to introduce a new rule relating to “travel demand” which would require all offices over 500m² GFA, all warehousing and storage activities over 2000m² GFA and all other industrial activities over 1000m² GFA to require a resource consent for a restricted discretionary activity. These thresholds are inappropriately low and would capture almost all new office, warehousing and industrial development within the Auckland Airport Precinct.
6. There is already an existing requirement (Rule E27.4.1(A3)) to obtain a resource consent for trip generation in relation to the development of offices, warehousing and storage and other industrial activities in accordance with the new development thresholds set out in Table

E27.6.1.1. This rule and these thresholds are considered the most appropriate way of managing the issue and achieving the objectives and policies of the AUP. The proposal to introduce a new rule to manage “travel demand” in addition to “trip generation” will lead to duplication and result in further unnecessary and inefficient resource consent processes.

7. The proposed assessment criteria appear to be designed to transfer the responsibility of providing adequate public transport services and reducing private vehicle usage to the private sector, and will, if implemented in their current form, lead to the reduction of development and employment opportunities throughout the Auckland Airport Precinct and the Auckland region as a whole.
8. Rule E27.6.1A and the assessment criteria in E27.8.2(3A) fail to consider the situation where a developer provides sufficient onsite parking to meet demand and there is no adequate public transport available in the vicinity.
9. The intent of the National Policy Statement - Urban Development 2020 in requiring car parking minimums to be removed from the AUP was, at least in part, to reduce consenting barriers to urban development, yet PC71 seeks to impose new and more onerous barriers in place of car parking requirements.
10. In general, AIAL considers that PC71:
 - (a) will not promote sustainable management of resources, and therefore will not achieve the purpose and principles of the Resource Management Act 1991 ("**RMA**");
 - (b) will not meet the reasonably foreseeable needs of future generations;
 - (c) will not enable social, economic and cultural wellbeing;
 - (d) will not avoid, remedy or mitigate adverse effects on the environment; and
 - (e) does not represent the most appropriate way to achieve the objectives of the Auckland Unitary Plan, in terms of section 32 of the RMA.

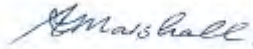
Decision sought

11. AIAL seeks that PC71 be amended by deleting the following provisions from PC71:

(a)	new activity rule E27.4.1(A3a)	37.2
(b)	new standard E27.6.1A;	37.3
(c)	new matter of discretion E27.8.1(4A)	37.4
(d)	new assessment criteria in E27.8.2(3A); and	37.5
(e)	new special information requirement E27.9.(2)(b).	37.6
12. AIAL wishes to be heard in support of this submission.

13. If others make a similar submission consideration would be given to presenting a joint case with them at any hearing.

AUCKLAND INTERNATIONAL AIRPORT LIMITED:



Signature:

Andrea Marshall

Head of Masterplanning and Sustainability
Auckland International Airport Limited

Date:

23 March 2022

Address for Service:

C/- Matthew Dugmore

Statutory Planner
Auckland International Airport Limited
PO Box 73020
MANUKAU 2150

Telephone:

+64 27 218 4760

Email:

matthew.dugmore@aucklandairport.co.nz

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Benjamin Ross
Date: Wednesday, 23 March 2022 1:01:17 pm
Attachments: [Submission against PC71.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Benjamin Ross

Organisation name:

Agent's full name:

Email address: ben@colab.nz

Contact phone number: 0223364789

Postal address:
3 Tasman Street
Pukekohe
Auckland 2120

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
See Separate attachment

Property address: See Separate attachment

Map or maps: See Separate attachment

Other provisions:
See Separate attachment

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
See Separate attachment

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: See Separate attachment

Submission date: 23 March 2022

Supporting documents
Submission against PC71.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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Submission against PC71

Ben Ross

South Auckland

ben@colab.nz

22/03/2022

Opening Remarks

1. I oppose PC71 in its entirety as it is an unnecessary bureaucratic exercise for the private sector that the public sector should be doing in the first place.

Those places where the public sector steps in being:

- a. The Auckland Spatial Plan to meet strategic requirements under the incoming Strategic Planning Act.
 - b. Any sub regional planning documents especially those that cover the larger Metropolitan Centres/Nodes again for the incoming Strategic Planning Act.
 - c. Regional Land Transport Plan to justify the methodology and goals of the RLTP.
 - d. The Unitary Plan for very large developments whether that be residential, commercial, office or industrial that will have high impacts on local, sub regional AND regional transport system.
2. While every small and medium development do not need individual Travel Plans (owing to the risk of fragmentation of a sub-regional and regional approach to travel) larger development should (1D). I will cover in Point Six what type of developments should need Individual Travel Plans at certain trigger points owing to their impact at sub regional or regional level.
 3. It is understandable and perhaps noble of Auckland Council wanting Travel Plans from private sector developments given their impacts upon the region. However, the rationale behind wanting Travel Plans at site specific level

(especially with small and medium developments) rather than regional, sub regional and even Centre level runs the risk of fragmentation in dealing with Travel Demand triggered by said developments.

4. I would question how these developments would know what another nearby development is doing and the impacts it might have on them and the existing community. Council and its CCOs has access to gauging the Travel Demand situation thus any production of Travel Plans from a series of developments. We must remember it is the role of the Council to influence Travel Demand and Supply through nudging developments along. We will find developments are quite agile in adapting as we see more carpark-less developments cropping up through Auckland, however it falls on Auckland Transport to ensure on-street parking is managed on behalf of the region – not the developer.
5. Also given it is Auckland Transport that controls the transit system, a partnership approach should be taken between the developers and Auckland Transport to ensure the developments get maximum utility on transit and transit best meets the demand from said developments. Again, Council and AT are in the best position for this given they have the resources for a more holistic if not coordinated approach at regional, sub regional, and Centre level. This approach is based on historic, current, and future demand/supply via the Unitary Plan also influenced by the directives in any Spatial Plan set by the Strategic Planning Act.

Large and contravening developments

6. While the rationale for demanding Travel Plans for small and medium develops is illogical owing to time consumption producing such plans for the size of the development, Travel Plans for large developments or land uses deemed Non-Complying in the Unitary Plan does have logic behind it.
7. As I have mentioned before it is the responsibility for Auckland Council and Auckland Transport to produce Travel Plans at regional, sub regional and even Centre level as part of the Auckland Plan, Unitary Plan Activity Tables, and the Regional Land Transport Plan. However, very large or non-complying developments can have severe consequences on the transport network if not managed properly thus such developments should be required to produce Travel Plans.
8. The following are the minimum thresholds that would trigger the requirement for travel plans:
 - a. Residential
 - i. All residential developments over 300 dwellings whether it be in a single complex or brand-new Greenfield development like Paerata Rise.
 - ii. Any Non-Complying Activities set in the Unitary Plan Residential Zones.
 - iii. Any developments providing more than 1 car park per dwelling for the total development.
 - iv. Any development over 75 dwellings in size within 800m of a rapid transit station and 400m of a frequent service route with more than 0.5 car parks per development.
 - b. Business Zones (single use structures)
 - i. All commercial and/or office developments over 15,000m² in floor area in a Metropolitan Centre or City Centre Zone.
 - ii. All commercial and/or office developments over 4,500m² not in the City Centre or Metropolitan Centre Zones.
 - iii. All Commercial and Office developments wanting 50 or more car parks regardless of size and Zone.

38.2

- iv. All Non-Complying Activity per the Business Zone activity tables in the Unitary Plan.
- c. Business Zones (Mixed Use or Multi Use Structures)
 - i. Neighbourhood, Local and Town Centres:
 - 1. Any development with more than 0.75 car parks per dwelling and 1 car park per 100m² of commercial floor space.
 - ii. Metropolitan and City Centre
 - 1. Any development with more than 0.5 car parks per dwelling and 1 car park per 150m² of commercial floor space.
- d. Business Zones (Industry)
 - i. Any non-complying activity per the activity table in the Unitary Plan
 - ii. Any industrial activity generating over 25 freight movements and/or 20 car/van movements a day in Light Industrial zones OR 100 freight movements and/or more than 50 car/van movements a day in Heavy industry zones.
- e. Other
 - i. Churches that generate over 100 car movements in a single day at least once per week including Sundays in all zones except Residential Zones where the limit is 50 car movements in a single day at least once a week.

38.3

Travel Plans produced by Auckland Council at regional, sub regional, and Centre level, as well as the Regional Land Transport Plan

9. As mentioned in the Opening Remarks, it is the responsibility of Auckland Council and Auckland Transport to produce Travel Plans at regional, sub regional, and Centre level. Why?
10. The incoming Strategic Planning Act (one of two replacements to the Resource Management Act) will require the Council to produce Spatial Plans at regional AND sub regional level and for other plans included in the Natural/Built Environment Act, and the Land Transport Act to give weight to said Spatial Plans.
11. These Spatial Plans need to include both where travel supply is coming from (aka roads, transit, and active modes), and where the demand will be generated from - both residential and employment. Given Spatial Planning is also about influencing behaviour and spatial form, Travel Plans at these high levels would be best suited here as key influencers.
12. How would Travel Plans work at Regional Level (and beyond):
 - a. What are the key residential areas?
 - b. What are the key employment areas?
 - c. Where are the major amenities including Civic Infrastructure, malls, regional parks etc?
 - d. What and where are the Rapid Transit Network (RTN) spines including stations, and interchanges?
 - e. Where are the Frequent Service Routes?
 - f. The likely travel demand situations between 12.A, 12.B and 12.C while taking into account 12.D and 12.E
 - g. 1.6km radii from all RTN stops, Metropolitan Centres, and 800m from all Frequent Service Routes, Town Centres, Local Centres and Neighbourhood Centres would indicate where maximum levels of intensification should occur followed by stepping down in intensity beyond those radii
 - h. With all the above factored in Council and Auckland Transport should be able to determine travel demand thus needed travel supply and how to best influence both behaviour and spatial form to make best use of

resources of the transport system while complying with relevant Climate Change legislation, policies, and initiatives

13. At Sub Regional Level:

- a. The Strategic Planning Act also allows for Spatial Plans to be developed at sub regional level where intensity of population or activities would warrant a complementary Spatial Plan to help guide behaviours and spatial forms in that sub region
- b. The Southern Auckland sub region would be an example of 13.A given it is the largest and fastest growing sub region in Auckland, has four of the five heavy industrial complexes, has half of its population commute within the sub region, and has strategic communication and supply links with the rest of the nation.
- c. The question becomes how Travel Plans can balance the competing needs for transport infrastructure in the Sub Regional that does not hinder regional and even inter regional needs
- d. How can developments, spatial forms and behaviours be influenced to benefit the sub region rather than negatively impact it? How can Travel Plans assist?

14. At a Centre Level:

- a. Our larger Metropolitan Centres like Manukau City Centre can generate significant travel demand situations that can have impacts on surrounding sub regional and regional transport infrastructure.
- b. This is not a bad thing as it shows that the Metropolitan Centre is an economic asset but does show proper Travel Plans need to be put into place to allow efficient use of transport infrastructure in the area that serves local, sub regional, and regional needs of said Metropolitan Centre.

Conclusion

15. Again, apart from large developments mentioned in 8, it is the responsibility for the Council and Auckland Transport to produce these Travel Plans as they can be used as key influencers against behaviour and spatial form in the region. Relying on smaller developers risks fragmentation.

38.1

16. Thus, I oppose Travel Plans as proposed in Plan Change 71, but do recommend changes as listed above at the full policy level

-ends-

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Kevin White
Date: Wednesday, 23 March 2022 3:25:27 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kevin White

Organisation name:

Agent's full name: Kevin White

Email address: dino246@xtra.co.nz

Contact phone number:

Postal address:
30 Joseph McDonald Drive
Whenuapai
Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc71-and-pm-14-proposed-amendments.pdf>

Property address: Whenuapai residential development

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

In current new build areas around Brigham Creek (Oyster Capital / Fletcher Residential) terrace properties (especially 3 and 4 bedroom dwellings) already suffer from restricted parking allocation when there can be 3, 4 or more cars per household. Many property owners are using garages as accommodation, pushing cars onto driveways, laneways and overflowing onto streets with already insufficient parking capacity. Current parking restrictions result in private vehicle overflow onto surrounding streets. Overflows already result in vehicles parking on berms and footpaths. Proposed further parking restrictions will not only continue to restrict already minimal vehicular accommodation but also exacerbate this poor parking behaviour to the detriment of public safety.

Further exacerbating the problem is the currently poor public transport (infrequent buses) in this new and fast growing suburb. In the absence of buses serving the new builds and people numbers

growth, adequate vehicle parking is a must and restricted parking is a hinderance to moving around the suburb and further afield.

In summary, until we are 5 to 10 years down the public transport maturity path towards providing adequate and regular/reliable public transport in this area/region, continued provision of adequate vehicular parking for existing and additional residential growth must be allowed to continue.

I or we seek the following decision by council: Decline the plan change

39.1

Submission date: 23 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Susan McKinnon
Date: Wednesday, 23 March 2022 4:31:22 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Susan McKinnon

Organisation name:

Agent's full name:

Email address: suemckinnon01@gmail.com

Contact phone number:

Postal address:

17 Tarras Road

Huapai

Auckland 0891

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Removal of car parking minimums

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

It is difficult enough to drive a vehicle down residential streets as it is now even when there are parking bays in place. if a vehicle is parked on the road then the road basically becomes a one way road. emergency vehicles, rubbish trucks etc have to get someone to move a vehicle for them to get past a parked car, remove the parking bays and it will become total chaos. While i can understand that you are trying to make people use public transport, but you have to have public transport options to use and many people do not. For many trips using public transport often involve hours of travel and using several different buses or bus/train options meaning the trip can take two or three times as long as a trip by car For older people of people with limited mobility or preschoolers asking them to walk several kilometers to a bus or train station is an impossibility. Having people use public transport in Auckland in place of private vehicles is not going in my lifetime or even my children's life times

I or we seek the following decision by council: Decline the plan change

Submission date: 23 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Hannah Jang
Date: Wednesday, 23 March 2022 6:31:16 pm
Attachments: [EJP Submission to Plan Change 71.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Hannah Jang

Organisation name: Equal Justice Project

Agent's full name:

Email address: advocacy@equaljusticeproject.co.nz

Contact phone number: 0211374777

Postal address:

Auckland
Auckland

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
NA

Property address: NA

Map or maps: NA

Other provisions:
NA

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
Reasons stated in the letter attached

I or we seek the following decision by council: Approve the plan change without any amendments

| 41.1

Details of amendments:

Submission date: 23 March 2022

Supporting documents
[EJP Submission to Plan Change 71.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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Auckland Council
Private Bag 92300
AUCKLAND 1142



SUBMISSION ON PLAN CHANGE 71 – NPS-UD REMOVAL OF CAR PARKING MINIMUMS – CONSEQUENTIAL TECHNICAL AMENDMENTS

We are writing to you on behalf of the Equal Justice Project (EJP), a pro bono charity run by students from the University of Auckland law school. The group aims to advocate for social and environmental justice within our community and we are passionate about advocacy on climate action.

Background

By way of background, the Government’s National Policy Statement on Urban Development (‘NPS-UD’) required the Auckland Council and a number of other ‘urban’ councils to remove provisions that have the effect of requiring developments to provide a minimum number of car parks (‘car parking minimums’) from their plans without going through a plan change (Non-Schedule 1) process. That is, without the usual plan change public consultation process. In Auckland, the removal of minimums occurred on 11 February 2022.¹

The purpose of the Government’s NPS-UD was to enable more housing and commercial developments, particularly in higher density areas where people do not necessarily need to own or use a car to access jobs, services, or amenities. The Government believed it would enable urban space to be used for higher value purposes other than car parking, and remove a significant cost for higher density developments. Developers could still choose to provide car parking in many areas, said the Government, but the number of car parks would be driven by market demand.²

Removing parking minimums from district plans will have a positive effect on reducing greenhouse gas emissions as parking minimums mandate an oversupply of parking that acts as an incentive for driving motor vehicles. Removing parking minimums dis-incentivises driving motor vehicles, supports active and public transport, and supports compact urban development which in turn promotes lower energy use.³

Turning to Plan Change 71, as a result of removing car parking minimums under the NPS-UD, Auckland Council believes there are a number of consequential changes required to the Auckland Unitary Plan. These changes fall outside the scope of the non-Schedule 1 changes and therefore must be the subject of a plan change and public consultation.

Therefore, Plan Change 71 proposes to make these consequential amendments. The Council says that the proposed changes are necessary to ensure that the Unitary Plan continues to function as intended following the removal of car parking minimums.

For any proposed plan change, the Council must undertake an evaluation required by section 32 of the Resource Management Act 1991 (‘RMA’). A section 32 Evaluation Report must contain an assessment of the environmental, economic, social, and cultural effects of the plan change, including the opportunities for economic growth that is anticipated to be provided or reduced and employment that are anticipated to be provided or reduced. Auckland Council has prepared a section 32 Evaluation Report for this plan change.⁴ However, because Plan Change 71 only concerns the consequential amendments necessary following the

¹ <https://ourauckland.aucklandcouncil.govt.nz/news/2022/02/minimum-car-parking-rules-removed/>

² Ministry for the Environment, Factsheet - ‘National Policy Statement on Urban Development 2020 – Car Parking’.
<https://environment.govt.nz/assets/Publications/Files/car-parking-factsheet.pdf>

³ <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc71-and-pm14-s32-report.pdf>

⁴ Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan – Section 32 Evaluation Report (24 February 2022).
<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc71-and-pm14-s32-report.pdf>

removal of car parking minimums, the section 32 Evaluation Report does not really address the effects of the removal of car parking minimums themselves, nor the above assessments.⁵

Overall, the section 32 Evaluation Report identified seven issues that needed to be addressed immediately: (1) Inconsistent text; (2) Policy hierarchy in Chapter E27 of the AUP; (3) Implied minimums; (4) References to parking 'requirements' and 'required parking'; (5) References to 'reduction in parking'; (6) Improving clarity; (7) Assessment of travel demand in the AUP.

Further to these, the section 32 Evaluation Report also identified several other matters outside the scope of the plan change that would require further investigation: • The provision of accessible parking; • Private pedestrian-only access to sites; • Property access, including pick-up and drop-off / loading facilities and provision for emergency services access, where no vehicle access is proposed, with consideration of potential adverse effects of these on the transport network; • The provision for and design of on-site bicycle access and bicycle parking where no vehicle access is proposed; • The provision for and design of on-site electric vehicle charging facilities and shared spaces where no vehicle parking is proposed. Where and when appropriate, Council says that these matters will be addressed through a future plan change process.

The Equal Justice Project (EJP) would also like to speak to the hearings panel about our feedback.

Submission

The Equal Justice Project (EJP) supports the purpose of the Government's NPS-UD to enable more housing and commercial developments, particularly in higher density areas where people do not necessarily need to own or use a car to access jobs, services, or amenities. The EJP supports enabling urban space to be used for higher value purposes other than car parking, and remove a significant cost for higher density developments.

The EJP believe removing parking minimums from district plans will have a positive effect on reducing greenhouse gas emissions as parking minimums mandate an oversupply of parking that acts as an incentive for driving motor vehicles. Removing parking minimums dis-incentivises driving motor vehicles, supports active and public transport, and supports compact urban development which in turn promotes lower energy use.⁶

Overall, the EJP supports Plan Change 71 which proposes to make the consequential amendments to ensure that the Unitary Plan continues to function as intended following the removal of car parking minimums.

The EJP supports the overall conclusions of the section 32 Evaluation Report, which identified seven issues that needed to be addressed immediately: (1) Inconsistent text; (2) Policy hierarchy in Chapter E27 of the AUP; (3) Implied minimums; (4) References to parking 'requirements' and 'required parking'; (5) References to 'reduction in parking'; (6) Improving clarity; (7) Assessment of travel demand in the AUP.

The EJP would also like to see further emphasis on the mitigation of climate change and greenhouse emissions in the consequential amendments being made in Plan Change 71.

The EJP also supports other matters identified in the section 32 Evaluation Report that are outside the scope of the plan change that would require further investigation: • The provision of accessible parking; • Private pedestrian-only access to sites; • Property access, including pick-up and drop-off / loading facilities and provision for emergency services access, where no vehicle access is proposed, with consideration of potential adverse effects of these on the transport network; • The provision for and design of on-site bicycle access and bicycle parking where no vehicle access is proposed; • The provision for and design of on-site electric vehicle charging facilities and shared spaces where no vehicle parking is proposed.

Yours sincerely,

Equal Justice Project (advocacy@equaljusticeproject.co.nz)

⁵ For commentary on the general effects of the removal of car parking minimums, see, for example: <https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-car-parking-fact-sheet/>

⁶ <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc71-and-pm14-s32-report.pdf>

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Kristin Edgeworth
Date: Wednesday, 23 March 2022 8:16:02 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kristin Edgeworth

Organisation name:

Agent's full name:

Email address: kristin@360edge.co.nz

Contact phone number: 0274333704

Postal address:
83 Esperance Road
Glendowie
Auckland 1071

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

Property address:

Map or maps:

Other provisions:
Removing car parks from properties means there are more cars parked on the road. While I applaud those who can work their lives around our poor public transport network, the majority of families have at least one car. If parking isn't provided onsite, then the cars will block the roads. With many new developments having narrow roads eg: Stonefields, this causes a headache for the entire community.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
I think it's short-sighted and not beneficial for the community in the long term.

I or we seek the following decision by council: Decline the plan change

Submission date: 23 March 2022

42.1

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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SUBMISSION ON PROPOSED PLAN CHANGE 71**SUBMISSION BY BAYSWATER MARINA BERTHHOLDERS ASSOCIATION**

To: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1142

Name and address of person making submission:

Bayswater Marina Berth-Holders Association Inc
21 Sir Peter Blake Parade
Bayswater
AUCKLAND 0622

Attention: Kaaren Rosser

1. Introduction

The NPS-UD requires the council to remove provisions (that have the effect of requiring that development provide a minimum number of car parks) from the AUP and the HGI Plan. As a result of removing parking minimums, PC71 proposes a number of changes to the Unitary Plan that fall outside the scope of the Schedule 1 plan change process.

Of these changes, the Bayswater Marina Berth-Holders Association Inc (BMBHA) is concerned that the plan change does not address the accessibility and travel demands on marinas. BMBHA suggests some amendments to the Plan Change to ensure that marinas continue to function and provide for sufficient access and parking. Marinas are the gateway to the sea for a large and growing population. There are very very few locations that provide the opportunity to meet the demand for marine activities. Therefore, access by the Auckland population to this finite resource (s7g of RMA) needs to be secured and supported.

2. About the Submitter

BMBHA was founded in 2015 and while it is a membership-based association, it acts for the benefit of all berth holders. The purposes and objectives of the Association (of particular relevance to this Submission) are to:

- (a) Promote and protect the interests of Bayswater Marina berth-holders;
- (b) Foster and promote the safety and security of all vessels berthed within the Marina;

In a wider sense, the BMBHA advocates for continued access to the sea for all marine users.

The BMBHA therefore has concerns that the amendments proposed under PC71 do not sufficiently recognise and provide for the purpose and operational requirements of Bayswater Marina and its associated marine activities and facilities. The types of both public and private recreation activities enjoyed and provided for within this marina environment require access to the coast by car. The changes requested below by BMBHA reflect the need to maintain and acknowledge this functional requirement in these provisions of the AUP.

3. Proposed Amendments to PC 71

Overall, the Submitter is neutral with regards to PC71, but opposes the following parts of the Plan Change unless the marina user travel demand is recognised through the following requested amendments as detailed below.

The National Policy Statement on Urban Development (NPS-UD), which has driven the need for PC71, outlines that the purpose of the direction is to enable more housing and commercial development, however by default this requires access to sea to be maintained, given there will be an increased population and demand on coastal access resulting. Therefore, ensuring the effects of parking on the operation of these coastal access locations still needs to be included in the AUP(OP).

E27.6.1A Travel Demand

Marinas and boat ramps need to be added to the bottom of Table E27.6.1A.1 to accommodate travel demand for these uses. The categories under the table as proposed under PC71 do not cover marinas or publicly accessible boat ramps.

Persons accessing the sea need to do so with either towing a vessel or bringing sufficient gear to a stationary vessel within a marina. This is virtually impossible to achieve by any other means than a car. There is also extremely high demand on

good weather days, particularly at weekends. Set-up room for boat ramps is also required. While other travel choices are encouraged and sharing of parking may be possible where users have different peak hours, the particular characteristics of these marine gateway locations needs to be recognised. The MfE has identified in its car parking factsheet 1 that the effects of parking can still be assessed.

Requested additions to Table E27.6.1A.1

(T14B)	<u>Entertainment facilities</u>		<u>Accommodating 50 or more people</u>
(T15B)	<u>Marinas</u>		<u>New marinas accommodating a minimum of 20 berths or additional berths proposed to existing marinas</u>
(T16B)	<u>Marine and port activities</u>		<u>New boat launching facilities or changes to existing boat launching facilities</u>

43.1

F2 Coastal – General Coastal Marine Zone amendments

Reword Policy F2.17.3(3) as follows:

(3) Require adequate land-based facilities **to accommodate travel demand**; for car parking; rubbish disposal, and wastewater pump-out to be provided when existing local water transport facilities increase their capacity or when local water transport services increase their scale of operations at those facilities.

43.2

F3 Coastal - Marina Zone amendments

Amend the matter for discretion F3.8.1(1) as follows:

(e) The effects on existing uses and activities, **including access and parking**.

43.3

If deleting the existing assessment criteria F3.8.2.(3)(c), then replacement with the following:

(c) whether the provision of parking is adequate for the site and the proposal; having considered any alternative parking available in the area and access to

43.4

~~public transport~~ whether the travel demand of the proposal can be accommodated given the functional parking needs of the existing marina.

Further amend Assessment criteria F3.8.2(4)(f) so that the meaning better reflects the intended changes and the transport requirements for the marine industry. As worded, the meaning could be interpreted to reflect that marinas do not need parking or transport facilities. As marinas have a functional need for vehicle access, any proposal should be assessed against this.

F3.8.2(4)(f).

(f) the extent to which ~~the need for~~ the travel demand for the proposal conflicts with the main marina use and should be integrated with public transport.

43.5

F5 Coastal – Minor Port Zone amendments

Delete the existing assessment criteria F5.8.2.(1)(c) and replace with the following:

43.6

(c) ~~whether parking is adequate for the site~~ whether access to parking accommodates the functional needs of the minor port facility.

I504 Bayswater Marina Precinct amendments

Policy I504.3(7)

It is nonsensical to have a policy that only addresses 'boat trailer' parking spaces when a vehicle is required to tow said boat trailer. The two cannot exist separately. Parking spaces within this marina are also essential to its functional operation. Accordingly, it is requested that the following further amendment is made:

... (7) Require the retention of appropriate facilities for boating, such as public boat ramps and car with boat trailer parking spaces and marina car parking spaces commensurate with the transport demand for ~~associated with~~ the marina and boat ramp.

43.7

Policy I504.3(12)

Similarly, the functional need for marina parking still needs to be considered in this policy. Changing the wording as proposed in PC71 assumes that no marina parking is needed, when this is not the case. Some allowance for parking demand must be provided. The requested addition would still allow effects of parking to be assessed. It is therefore requested that Policy I504.3(12) be amended as follows:

(12) Require that, residential, or other non-marine related activities such as restaurants and cafes are provided for only where sufficient space remains available as required for marina, ferry service, and public access, recreation, public transport and boating activities, including associated car with boat trailer and any marina car parking.

43.8

Table I504.4.1 (A1)(c) and A4 (c)

We seek amendment to this clause to clarify that boat trailers need cars to tow them, noting that they are not carparking spaces but spaces for launching and retrieving boats. Therefore, the following amendment is requested:

43.9

(c) 20 car car with and boat trailer parking spaces

43.10

Assessment Criteria I504.8.2(4)

While food and beverage activities within the ferry terminal, maritime passenger facilities and park and ride facilities are the only RD activities in the precinct, the assessment criteria needs to consider the functional transport needs of the marina and boat ramp. It is requested that the assessment criteria be amended as follows:

43.11

(b) the extent to which the provision of parking does not impact on the operational needs of the marina and boat ramp, and ~~ensures the amount of parking is adequate for the site and the proposal, and~~ considers effects on alternative parking available in the area and access to the public transport network.

Amend Special Information Requirement I504.9(1)(b)(ii)

The proposed changes require further amendment to ensure that an assessment of parking is provided and is not optional.

43.12

(ii) an assessment of parking; ~~confirming the amount of parking is adequate for the application area and the proposal~~ is where provided, including consideration of effects on alternative parking available in the area and access to the public transport network.

4. Other Marina Precincts

The principle of the above proposed amendments should also be applied to the other marinas which have amendments under PC71. The relevant marinas are:

43.13

- a. Okahu Marine Precinct
- b. Gulf Harbour Marina Precinct

5. Procedural Matters

The Submitter wishes to be heard in support of this submission.

The submitter reserves the right to comment on and seek amendments to any other matters arising from this submission.

The Submitter would consider presenting a joint case with any other party

seeking similar relief.

The Submitter agrees to participate in mediation or other alternative dispute resolution and would be pleased to discuss the content of this submission with Council staff as part of their reporting considerations.



Kaaren Rosser

23 March 2022

on behalf of Bayswater Marina Berth-Holders Association

Address for Service:

Paul Glass
108 Vauxhall Road
Narrow Neck
Auckland 0624

Attention: Kaaren Rosser

Telephone: 0211146831

Email: Kaaren@rosser-jones.com

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Angela Lin
Date: Wednesday, 23 March 2022 10:16:02 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Angela Lin

Organisation name:

Agent's full name:

Email address: angela.qi.lin@gmail.com

Contact phone number:

Postal address:

Kingsland
Auckland 1023

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

My submission relates to the thresholds to require a preparation of a travel plan. I support this to be provided, considered and require consent.

However, the matters of discretion, assessment criteria and the associated linkage to policy direction is weak. It is unclear from the wording of the matters of discretion/assessment criteria, the nature of information required and importantly, to what extent a consent could be declined and notified on these grounds - if for example, this was the only reason for consent.

It is unclear whether a consent could be declined on the basis that the alternatives to private vehicles are unsuitable for the site and proposal, whether this is dependent on the quantity/type/frequency of alternatives and if so, this depends largely on the infrastructure provided by Auckland Transport and Waka Kotahi, not the development in question.

I recommend further clarity around how the provision of a travel plan relates to patronage of alternatives, or improvements of alternatives to vehicles and this be stipulated in the background text to E27, or directed through objectives and policies.

44.1

I recommend that if the intention is to limit vehicle trips and associated traffic generation, that maximum limits are applied to zones, or through a threshold limit of GFA for certain activities and this be used in tandem with the provision of a travel plan.

I question how compliance and monitoring (and associated conditions) will enforce the outcomes sought by the travel plan, particularly noting the speed of development in Auckland.

Overall, I recommend stronger language to enforce modal shift in E27 under the proposed

provisions, which is one of the many tools to address climate change that regulations can offer.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I support the removal of minimum parking requirements as this embeds private vehicle reliance in the design of our city, which is both socially inequitable, unsustainable (economically and environmentally) and inefficient. I request that maximum requirements are applied either per zone, or for activities. Resource consent should be sought where maximums are breached.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Amend language around the matters of discretion around travel plans, include maximum parking limits for all zones and developments

44.1

Submission date: 23 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Frances Fergusson](#)
To: [Unitary Plan](#)
Subject: NPS-UD Removal of Car Parking Minimums - Consequential Technical Amendments
Date: Wednesday, 23 March 2022 10:31:59 pm
Attachments: [image001.png](#)
[image002.png](#)
[198 ihumatau Road.docx](#)

Kia ora,

I am responding to a letter I received dated 22 February 2022 proposing the removal of a no parking sign outside the house I reside in.

Our house is at 198 Ihumatao Road Mangere, Auckland 2022.

Us as the residents of this property wish to object to the removal of the no parking sign.

We are on the main road that is zoned at 100kph, and we sit on the flat of two bends in the road, with the traffic coming from both directions at 100kph.

We reside opposite an industrial site that has their staff park on the road, and also a large number of delivery trucks that go in and out of this site.

We are opposing this proposal based on Health and safety reasoning.

If this were to become a parking area we would no doubt have our view blocked and unable to see past the trucks to see the vehicles coming from around the bends.

The signs were put up due to the requests from other residents in our house due to that health and safety reasoning. The previous complainant was Audrey Buchanan, she sent photos and requests to put the signs in, and it took 11 months for them to be put in place.

I have attached photos of the bends and so you can see the verge to understand the amount of parking that is available on this verge. You can also clearly see where the signs are.

We have two gravel driveways, and have rang a number of times over the period that the signs have been in place to notify council that there are vehicles parked there.

Because the house is not clear from the road we constantly have problems already with people parking across our driveways. If the signs were removed we would have even more problems with this.

Working with Womens refuge I work a crisis line and need to be able to get out quickly and safely to our vulnerable wahine and tamariki seeking refuge. My Partner also works in the South Auckland Community with our vulnerable communities.

This is not an excuse, but if the signs are removed it would be open season for the trucks that access the industrial site across the road from us to

1. Block us in
2. Hinder our view to a safe view of the road before we pull into the traffic that may I remind you is travelling at 100kmph around either of the two bends in the road.

I appreciate your time to consider our objection to the removal of these signs.

And if this is not possible please consider engaging with us to find another solution rather than complete removal of the signage.

Considering the reasons the signs were initially approved to be placed it does not make sense why the signs are now being removed. Those reasons for the signs being placed have not changed and if they have I wish to be notified how they have changed.

Take care and stay safe.

Ngā mihi,

Frances Fergusson | Kaiwhakahaere

Te Whare Aio Maori Women's Refuge and Whare Atawhai Nui Transitional Housing
75925 Manurewa, Auckland 2102

Mobile: 0272606133

Phone: (09) 267-2475

Email: kaiwhakahaere@tewhareaio.org.nz



"National Collective of Independent Women's Refuges (NCIWR) Incorporated emails and attachment(s) are intended only for the person(s) or entity (entities) addressed. The information it contains may be classified as in confidence and may be legally privileged. Without prior permission, this communication must not be blind copied or forwarded to third parties. If you are not the intended recipient any use, disclosure or copying of the message or attachment(s) is strictly prohibited. If you have received this message in error please notify NCIWR immediately and destroy it and any attachment(s). Contact phone 04 802 5078 or fax 04 802 5079. We are not responsible for changes made to this message or to any attachment(s) after transmission from NCIWR".







FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 71

AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitter: Southside Group Management Ltd

Southside Group Management Ltd (“the Submitter”) provides this submission on Proposed Plan Change 71 (“PC71”) to the Auckland Unitary Plan (Operative in Part).

The Submitter owns (through related entities) a number of properties that the Plan Change applies to (and intends to own many more in future).

The Submitter could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.

The submission relates to the proposed amendments to the text and provisions of the Auckland Unitary Plan set out in PC71. The Submitter opposes the following provisions:

- Proposed new activity in Table E27.4.1 (A3a);
- Proposed new Standard E27.6.1A Travel Demand;
- Proposed new matter of discretion E27.8.1(4a);
- Proposed new assessment criteria E27.8.2(3a);
- Proposed new Special Information requirement E27.9(2)(b).

46.1

Reasons for submission

- The proposed amendments seek to require a travel plan for certain developments. Rule E27.4.1(A3a) provides for any activity or subdivision which meets or exceeds the new travel demand thresholds in Standard E27.6.1A as a restricted discretionary activity. Any activity meeting or exceeding the development thresholds in Table E27.6.1A will require a travel plan as part of an assessment of environmental effects. This requirement has been included as a new special information requirement (E27.9(2)(b));
- The submitter opposes this proposed Travel Plan approach in its entirety;

- The submitter considers that the proposed change does not constitute addressing consequential technical amendments in the AUP and HGI Plan, and the proposed changes will result in additional compliance costs for applicants;
- The submitter notes that the requirement for a travel demand plan applies to a site regardless is whether parking is provided or not;
- The section 32 evaluation of options is considered to be inappropriate as it does not give proper consideration to alternatives that do not require a travel plan;
- PC71 is contrary to sound resource management practice; and,
- The submitter considers that this proposed change to the Unitary Plan is contrary to the outcomes sought by the National Policy Statement for Urban Development 2020 and may effectively act as a means of maintaining parking requirements.

Relief sought

The Submitter seeks the following decision from Auckland Council in respect of PC71:

- That the following sections of PC71 are deleted;
 - Activity Table E27.4.1 (A3a); | 46.2
 - Standard E27.6.1A Travel demand; | 46.3
 - E27.8.1. Matters of discretion; | 46.4
 - E27.9(2)(b) Special Information requirements; and | 46.5
- Such other amendments to the provisions of the AUP as may be necessary to give effect to the relief sought in this submission.

The Submitter does not wish to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.



Cary Bowkett
Southside Group Management Ltd

23 March 2022

Address for service of submitter:

PO Box 8988
Symonds Street
AUCKLAND 1150

Attention: Cary Bowkett
Mobile: (0277) 888 666
Email: cary@southside.co.nz

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Scott Hanson

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

7 Granada Place, Glendowie, Auckland

Telephone:

212853505

Fax/Email:

thekiwihansons@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 71

Plan Change/Variation Name

NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

E27 Transport Amendments

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

Sierra Street and Pembroke are congested with parked cars, we need developments to be able to have resident cars parked on their own property and not on the public roads. We constantly see our roads blocked with cars can cannot get through. many times rubbish trucks simply cant get through due to so many parked cars.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

all developments must ensure each dwelling has two car parks per dwelling

Take out all grass berms and replace with car park spaces on roads


allow cars to park on grass berms

47.1

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing


Signature of Submitter

(or person authorised to sign on behalf of submitter)

03/24/2022

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Christy Warren
Date: Thursday, 24 March 2022 8:00:57 am

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Christy Warren

Organisation name:

Agent's full name:

Email address: christywarrennz@gmail.com

Contact phone number:

Postal address:

18 Bay Rd
St Heliers
Auckland 1071

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Removal of car park requirements for residential developments

Property address: Auckland Coty

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Road safety, roads are already narrow, lack of visibility coming out of driveways, lack of visibility crossing roads, no street parking available for visitors to residents homes, buses already cause danger on narrow roads, crime, theft and damage to cars parked on roads is out of control already! No police follow up on these incidents now so will only get worse.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)



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FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 71

AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitter: National Mini Storage Ltd

National Mini Storage (“the Submitter”) provides this submission on Proposed Plan Change 71 (“**PC71**”) to the Auckland Unitary Plan (Operative in Part).

The submitter owns a number of properties that PC71 applies to.

The Submitter could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.

The submission relates to the proposed amendments to the text and provisions of the Auckland Unitary Plan set out in PC71. The Submitter opposes the following provisions:

- Proposed new activity in Table E27.4.1 (A3a);
- Proposed new Standard E27.6.1A Travel Demand;
- Proposed new matter of discretion E27.8.1(4a);
- Proposed new assessment criteria E27.8.2(3a);
- Proposed new Special Information requirement E27.9(2)(b).

49.1

Reasons for submission

- The proposed amendments seek to require a travel plan for certain developments. Rule E27.4.1(A3a) provides for any activity or subdivision which meets or exceeds the new travel demand thresholds in Standard E27.6.1A as a restricted discretionary activity. Any activity meeting or exceeding the development thresholds in Table E27.6.1A will require a travel plan as part of an assessment of environmental effects. This requirement has been included as a new special information requirement (E27.9(2)(b));
- The submitter opposes this proposed Travel Plan approach in its entirety;

- The submitter considers that the proposed change does not constitute addressing consequential technical amendments in the AUP and HGI Plan, and the proposed changes will result in additional compliance costs for applicants;
- The submitter notes that the requirement for a travel demand plan applies to a site regardless of whether parking is provided or not;
- The proposed development thresholds are not suitable for industrial activities as the thresholds are considered to be arbitrary;
- The proposed development threshold for industrial activities is not related to numbers of people that could be expected to use or occupy an industrial site;
- National Mini Storage Ltd operates a number of storage facilities in Auckland. Due to the characteristics of the storage activity, public transport is unlikely to be utilised by customers as it is not a suitable mode of transport for moving goods in and out of storage;
- Due to the characteristics of the storage activity, many customers travel at off peak times;
- The section 32 evaluation of options is considered to be inappropriate as it does not give proper consideration to alternatives that do not require a travel plan;
- PC71 is contrary to sound resource management practice; and,
- The submitter considers that this proposed change to the Unitary Plan is contrary to the outcomes sought by the National Policy Statement for Urban Development 2020 and may effectively act as a means of maintaining parking requirements.

Relief sought

The Submitter seeks the following decision from Auckland Council in respect of PC71:

- That the following sections of PC71 are deleted;
 - Activity Table E27.4.1 (A3a);
 - Standard E27.6.1A Travel demand;
 - E27.8.1. Matters of discretion;
 - E27.9(2)(b) Special Information requirements; and
- Such other amendments to the provisions of the AUP as may be necessary to give effect to the relief sought in this submission.

| 49.2
| 49.3
| 49.4
| 49.5

The Submitter wishes to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.



Michael Campbell
Campbell Brown Planning Limited
For and on behalf of National Mini Storage Ltd.

24 March 2022

Address for service of submitter:

C/- Campbell Brown Planning Limited
PO Box 147001
Ponsonby
AUCKLAND 1144

Attention: Michael Campbell

Telephone: (09) 394 1694

Mobile: (021) 2789018

Email: michael@campbellbrown.co.nz



Summerset Group Holdings Limited
Level 27, Majestic Centre, 100 Willis St, Wellington
PO Box 5187, Wellington 6140
Phone: 04 894 7320 | **Fax:** 04 894 7319
Website: www.summerset.co.nz

24 March 2022

To: Auckland Council
By email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

Submission on Auckland Council Proposed Plan Change 71 to the Auckland Unitary Plan (Operative in Part) on behalf of Summerset Group Holdings Limited

Background

Summerset is one of New Zealand's leading and fastest growing retirement village operators, with more than 6,600 residents living in our village communities. We offer a range of independent living options and care, meaning that as our residents' needs change, we have support and options within the village. Summerset has 35 villages which are either completed or in development, spanning from Whangārei to Dunedin. We employ over 1,800 staff members across our various sites.

Proposed Plan Change 71

Summerset has reviewed Proposed Plan Change 71 and welcomes the opportunity to provide feedback to the Council.

Summerset wishes to express its support for the submission of the Retirement Villages Association of New Zealand in its entirety. Summerset requests the Council engages constructively with the Retirement Villages Association in relation to Proposed Plan Change 71.

50.1

Yours faithfully,

A handwritten signature in blue ink that reads "A Smail".

Aaron Smail
General Manager Development

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Rachel Morgan

Organisation Name (if submission is made on behalf of Organisation)

Bentley Studios Limited

Address for service of Submitter

PO Box 1986, Shortland Street, Auckland 1140

Telephone:

21638797

Fax/Email:

rachelm@barker.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 71

Plan Change/Variation Name

NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Please refer to the attached submission

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

Please refer to the attached submission

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

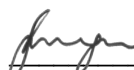
Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter
(or person authorised to sign on behalf of submitter)

03/24/2022

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

24 March 2022

Auckland Council

Private Bag 92300

Victoria Street West

Auckland 1010

Submission via email: unitaryplan@aucklandcouncil.govt.nz

Submission on Proposed Plan Change 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan

Introduction

Bentley Studios Limited makes the submission set out below to proposed plan change 71 to the Auckland Unitary Plan (Operative in Part) (“AUP”). The submitter has extensive experience in residential development across New Zealand and has completed multiple projects in Auckland, with several more underway.

Scope of Submission

The specific aspects of Proposed Plan Change 71 to the AUP that this submission relates to are detailed in the table at Appendix 1.

The Submission

The submitter acknowledges the consequential technical amendments to ensure that the Auckland Unitary Plan (“AUP”) removes all minimum carparking requirements to give effect to the National Policy Statement: Urban Development (“NPSUD”).

The submitter opposes the aspects of the Proposed Plan Change that seek to introduce requirements to prepare and assess a travel plan for development through a resource consent process. These requirements are contrary to the NPSUD for the reasons set out in the submission below.

51.1

The table at **Appendix 1** provides further details and sets out:

- The provisions that the submitter either supports, opposes or seeks to amend;
- The reasons for the stated position;
- The decision sought from Council.

Intent of the NPSUD

The NPSUD sets out a significant shift in how cities plan for and manage carparking; from one regulated broadly by Councils through District Plans, to a more flexible market-led approach, where those developing land generally decide the amount of parking that is necessary to meet demand. This is intended to achieve more efficient land use, provide more space for housing, and ensure parking is more responsive to demand, acknowledging that minimum parking regulations have historically resulted in an oversupply of parking. This relates to the wider objectives of the NPSUD to achieve a well-functioning urban environment that supports

a reduction in greenhouse gas emissions. The Section 32 report for the NPSUD explains this approach in more detail¹.

The NPSUD does not suggest that carparking is irrelevant to urban planning decisions. Rather, it encourages Councils to use non-regulatory methods to manage effects, particularly by preparing and implementing comprehensive parking management plans (Policy 11). The other non-regulatory method available includes Council investment in improvements to public transport and walking and cycling infrastructure where it is needed to meet increased demand. The submitter encourages the Council to take steps to implement these methods.

The proposal to require a travel plan to be prepared and assessed through a resource consent process is not consistent with the NPSUD, given that in many cases it may have the effect of requiring carparking through assessment criteria. This is contrary to Policy 11 and to clause 3.38(1), which requires Councils to remove any assessment criteria that have the effect of requiring a minimum number of carparks. While the criteria themselves do not set a minimum as a metric, the Council would have discretion to require carparking, with the assessment involving a significantly greater level of uncertainty than the operative provisions.

For the reasons given above the submitter considers that the travel plan provisions of the Proposed Plan Change do not give effect to the NPSUD as required by s75(3) of the RMA.

Efficiency and Effectiveness of Travel Plans

In addition to the policy issues outlined above, the way in which travel plans are proposed to be applied in the Plan Change is not an efficient or effective method for achieving the transport objectives of the AUP.

Travel plans are documents typically prepared for employment and educational activities with the aim of optimising the use of the transport system, often by encouraging use of a range of modes. They typically involve detailing the operational measures that can be put in place to support this, including management of parking areas, provision for active transport facilities, communications and promotion for public transport and provision for shared transport programmes, amongst others². Given the operational nature of these measures, they require on-going monitoring by businesses and authorities to ensure they are operating as intended.

Plan Change 71 proposes to require travel plans for a wide range of residential and commercial activities outside of centres and other identified zones as set out in Table E27.6.1A.1 This is unnecessary, inefficient and ineffective for the following reasons:

- Travels plans would be impractical for many residential developments to implement. This would require a body corporate or incorporated society to be established to ensure that the requirements of a travel plan are implemented, monitored, and reviewed on an ongoing basis. This would be unreasonable for developments that have no other purpose for these entities, including developments that do not result in the creation of shared or common areas, (such as jointly owned access lots (“JOALS”) and shared parking areas) and will commonly exceed the 10-dwelling threshold.
- Significant time and cost inefficiencies would be involved, including those associated with additional consenting requirements as well as on-going monitoring (for established developments and the

¹ See [NPSUD Section 32 report](#)

² See [Waka Kotahi guidelines](#) and [Auckland Transport guidelines](#)

Council) and any associated entities or processes that would need to be established. In some cases, the need for a restricted discretionary activity consent for a travel plan will be the only reason for consent. This would add further delays to enabling development to occur, which is not the intent of the NPSUD.

- The activity thresholds set out in Table E27.6.1A.1 are poorly correlated with the potential effects on the transport network.
- There are existing provisions of the AUP which address the effects of travel demand management where it may be appropriate for larger scale developments. This includes the existing provisions (E27.6.1) requiring the preparation of an Integrated Transport Assessment (“ITA”). It is inefficient to include additional regulations to manage the same effects.
- Given the wide range of matters that a travel plan needs to assess and the broad nature of the assessment criteria proposed in E27.8.2(3A), the Plan Change provides little or no certainty to applicants on the specific outcomes to be achieved by a travel plan. The Plan Change has the potential to be more onerous and involve more costs than the operative provisions in E27 – Transport. For example, the assessment criteria include matters external to the proposed development (the availability of public and active modes), or duplicates matters that are otherwise managed under the AUP (minimum levels of cycle parking). There is also a presumption that developments exceeding the proposed thresholds will create parking overspill to the transport network, with no acknowledgement that developers may choose to provide parking on site. Other concerns regarding the assessment criteria are included at Appendix 2.

Relief Sought

Bentley Studios Limited considers that the travel plan provisions of the Proposed Plan Change do not give effect to the NPSUD as required by s75(3) of the RMA.

They therefore request further amendments to Policy E27.3(3) and E27.3(9) to give effect to the objectives of Plan Change, and opposes other amendments as set out in Appendix 1. They would consider other consequential amendments as appropriate or necessary to address the concerns set out in this submission.

The submitter wishes to be heard in support of this submission.

If other parties make a similar submission, the submitter would consider presenting a joint case with them at any hearing.



Rachel Morgan, Barker & Associates Limited

(Person authorised to sign on behalf of the submitter)

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Bentley Studios Limited

C/o Barker & Associates Limited

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Shortland Street

Auckland 1140

Attention: Rachel Morgan

Phone: 021 638 797

Email: rachelm@barker.co.nz

Appendix 1: Summary of relief sought and reasons

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
B8 Coastal Environment amendments				
1. Amend B8.6 Explanation and principal reasons for adoption	Support	Retain	The reference to required car parking is not consistent with the NPSUD.	That the B8.6 Explanation and principal reasons for adoption be amended as notified.
E27 Transport amendments				
2. Amend E27.1 Background	Support in Part	Amend	The management of parking demand through a district plan is not consistent with the intent of the NPSUD. Clarifying the approach to managing maximum parking limits is outside the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPSUD and adverse effects after the removal of minimum car parking requirements.	That the proposed insertions in reference to parking demand and maximum parking limits are deleted.
3. Additional requested amendment to Policy E27.3(3)	N/A	Amend Policy E27.3(3)	The reference to managing the number, location, and type of parking is not consistent with the NPSUD. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (3) Manage the number, location and type of parking and loading spaces, including and bicycle parking and associated

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Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
				end-of-trip facilities to support all of the following:
4. Additional requested amendment to Policy E27.3(9)	N/A	Amend Policy E27.3(9)	The reference to providing for flexible approaches to parking is not necessary. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
5. Amend Policy E27.3(6)	Support in Part	Amend	Amending the policy framework for managing maximum parking limits is outside of the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPSUD and adverse effects after the removal of minimum car parking requirements.	That the policy be amended as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by: (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and

51.5

51.6

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
				development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.
6. Delete Policy E27.3(6A)	Support	Retain	The reference to where parking may be reduced is not necessary.	That the policy be amended as notified.
7. Delete Policy E27.3(7)	Support	Retain	The reference to where minimum car parking requirements do not apply is not necessary.	That the policy be deleted as notified.
8. Add a new activity rule to Table E27.4.1	Oppose	Delete	Managing the efficient use of car parking and the effects of car parking provision on the transport network through an activity rule is not consistent with the intent of the NPSUD. A travel plan is not an efficient or effective planning method for managing the potential effects of the specified activities on the transport network.	That E27.4.1(A3a) be deleted.
9. Add a new Standard E27.6.1A	Oppose	Delete	Please refer to commentary in the main submission.	That E27.6.1A be deleted.
10. Amend Standard E27.6.2(5)	Support	Retain	The reference to required minimum car parking in the Business – Neighbourhood Centre Zone is not consistent with the NPSUD.	That the standard be amended as notified.
11. Amend Standard E27.6.3.1(1)(c)	Support	Retain	The management of the use of any parking spaces that are provided is not necessary.	That the standard be amended as notified.

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Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
12. Add a new E27.8.1 Matter of discretion	Oppose	Delete	Please refer to commentary in the main submission.	That E27.8.1(4a) be deleted.	51.13
13. Add a new E27.8.2 Assessment criteria	Oppose	Delete	Please refer to commentary in the main submission and Appendix 2	That E27.8.2(3A) be deleted.	51.14
14. Amend Special Information Requirement E27.9(2)	Oppose in Part	For E27.9(2)(a): Retain	For E27.9(2)(a): Requiring a travel plan where less than the minimum number of parking spaces are provided is not necessary.	That Special Information Requirement E27.9(2) be amended as notified.	51.15
		For E27.9(2)(b): Delete	For E27.9(2)(b): Please refer to commentary in the main submission.	That Special Information Requirement E27.8(2)(b) be deleted.	51.16
15. Amend Special Information Requirement E27.9(3)	Support	Retain	The reference to parking requirements and required parking is not consistent with the NPSUD.	That the special information requirement is amended as notified.	51.17
Subdivision – Urban amendments					
16. Amend Standard E38.9.1.2(1)	Support	Retain	The reference to required parking spaces is not consistent with the NPSUD.	That the standard be amended as notified	51.18
Temporary activities amendments					
17. Amend Policy E40.3(5)	Support	Retain	Requiring certain temporary activities provide sufficient parking is not consistent with the NPSUD.	That the policy is amended as notified.	51.19
18. Amend Assessment criteria E40.8.2(2)	Support	Retain	Assessing the extent that adequate parking will address relevant adverse effects is not consistent with the NPSUD.	That the assessment criteria is amended as notified.	51.20

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
F2 Coastal - General Coastal Marine Zone amendments					
19. Amend Policy F2.17.3(3)	Support	Retain	Requiring adequate car parking be provided is not consistent with the NPSUD.	That the policy is amended as notified.	51.21
F3 Coastal - Marina Zone amendments					
20. Amend Matter of discretion F3.8.1(3)	Support	Retain	Assessing the effects from any parking requirements is not consistent with the NPSUD	That the matters of discretion are amended as notified.	51.22
21. Amend Matter of discretion F3.8.1(4)					51.23
22. Amend Assessment criteria F3.8.2(3)	Support	Retain	Assessing whether adequate car parking has been provided and the need for car parking is not consistent with the NPSUD.	That the assessment criteria are amended as notified.	51.24
23. Amend Assessment criteria F3.8.2(4)					51.25
F5 Coastal – Minor Port Zone amendments					
24. Amend Assessment Criteria F5.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent the NPSUD.	That the assessment criteria are amended as notified.	51.26
25. Amend Assessment Criteria F5.8.2(3)					51.27
F6 Coastal – Ferry Terminal Zone amendments					
26. Amend Policy F6.3(1)	Support	Retain	Requiring that sufficient car parking be provided is not consistent with the NPSUD.	That the policies are amended as notified.	51.28
27. Amend Policy F6.3(8)					51.29
H1 Residential – Large Lot Zone amendments, H2 Residential – Rural and Coast Settlement Zone amendments, H3 Residential – Single House Zone amendments, H4 Residential – Mixed Housing Suburban Zone amendments, H5 Residential – Mixed Housing Urban Zone amendments, H6 Residential –					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
Terrace Housing and Apartment Buildings Zone amendments, H20 Rural – Waitakere Foothills Zone amendments, H21 Rural – Waitakere Ranges Zone amendments					
28. Amend Assessment Criteria H1.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent with the NPSUD.	That the assessment criteria are amended as notified.	51.30
29. Amend Assessment Criteria H2.8.2(1)					51.31
30. Amend Assessment Criteria H3.8.2(1)					51.32
31. Amend Assessment Criteria H4.8.2(1)					51.33
32. Amend Assessment Criteria H5.8.2(1)					51.34
33. Amend Assessment Criteria H6.8.2(1)					51.35
34. Amend Assessment Criteria H20.8.2(1)					51.36
35. Amend Assessment Criteria H21.8.2(1)					51.37
J – Definitions amendments					
Amend the definitions as follows:					
Accessory activities Non-accessory parking Off-site parking	Support	Retain	The reference to required car parking is not consistent with the intent of the NPSUD.	That the definitions are amended as notified.	51.38
Travel Plan	Oppose	Delete	Please refer to commentary in the main submission.	That the amendments to the definition are deleted.	51.39

Appendix 2: Commentary on proposed assessment criteria (E27.8.2(3A))

Proposed Assessment Criteria	Comment
<p>E27.8.2(3A)(a): The extent to which the travel demands of the activity are provided for, including but not limited to:</p> <p>(i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:</p>	<p>It is unclear how the travel demands of a residential activity will be assessed as being appropriately provided. In many instances, the travel demands of residential activities will be dependent on individual residents and cannot be determined with certainty at the time of resource consent application.</p>
<p>the accessibility and frequency of public transport services</p>	<p>Public transport accessibility and frequency is directly controlled by Auckland Transport. The submitter is concerned that should the existing accessibility and frequency of public transport services not be acceptable, then provisions of public transport services may fall upon developers to fund (or partially fund), or development may be delayed until appropriate funded services be available. This is not the intent of the NPSUD.</p>
<p>the standard of active modes infrastructure for all users</p>	<p>The submitter provides appropriate active mode infrastructure within their sites as a matter of course, however they are concerned that this criterion may require infrastructure to be provided beyond the site boundaries to provide an appropriate standard of infrastructure. This goes well beyond the intent of the NPSUD.</p>
<p>the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments</p>	<p>The submitter is concerned this criterion will require additional assessment within urban areas that have been zoned in recognition that an acceptable level of connectivity to a range of locations is available. In cases where land is already zoned for residential activity, proposals should be assessed in accordance with existing AUP assessment processes, and</p>

	not require the additional burden of proving why urban zoned land is acceptable for the proposed activity.
(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking	The submitter is concerned this criterion is poorly linked to effects on the transport network and will require developers to actively reduce the demand for private vehicle travel and car parking. While the NPS-UD seeks good accessibility outcomes in urban environments by way of public or active transport, it was not the intent to discourage private vehicle use within individual developments.
E27.8.2(3A)(b): the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.	The submitter is concerned that this criterion will result in the default provision of on site car parking to manage the effects of potential parking overspill on the adjacent road network. This is not consistent with the intent of the NPSUD and potentially disincentivises parking management through non-regulatory methods such as preparing and implementing comprehensive parking management plans and Council investment in improvements to public transport and walking and cycling infrastructure.
E27.8.2(3A)(c): the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).	Please refer to commentary above.

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

Please refer to the attached submission

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter
(or person authorised to sign on behalf of submitter)

03/24/2022
Date

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(a) adversely affects the environment; and

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24 March 2022

Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1010
Submission via email: unitaryplan@aucklandcouncil.govt.nz

Submission on Proposed Plan Change 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan

Introduction

Vital Healthcare Property Trust (“**Vital**”) is an NZX-listed fund that invests in healthcare related properties in New Zealand and Australia. Vital’s tenants are private hospital and healthcare operators who provide a wide range of medical and health services. Vital have four properties within Auckland, including hospitals healthcare facilities, and offices in Green Lane, Ellerslie, Albany and South Auckland.

Scope of Submission

The specific aspects of Proposed Plan Change 71 to the Auckland Unitary Plan (Operative in Part) that this submission relates to are detailed in the table at Appendix 1.

The Submission

Vital generally supports the consequential technical amendments to ensure that the Auckland Unitary Plan (“**AUP**”) removes all minimum carparking requirements to give effect to the National Policy Statement: Urban Development (“**NPS-UD**”).

Vital opposes the aspects of the Proposed Plan Change that seek to introduce requirements to prepare and assess a travel plan for development through a resource consent process. These requirements are contrary to the NPS-UD for the reasons set out in the submission below.

52.1

The table at **Appendix 1** provides further details and sets out:

- The provisions that Vital supports, opposes or seeks to amend;
- Vital’s reasons for their stated position;
- The decision sought from Council.

Intent of the NPS-UD

The NPS-UD sets out a significant shift in how cities plan for and manage carparking; from one regulated broadly by Councils through District Plans, to a more flexible market-led approach, where those developing land generally decide the amount of parking that is necessary to meet demand. This is intended to achieve

more efficient land use, provide more space for housing, and ensure parking is more responsive to demand, acknowledging that minimum parking regulations have historically resulted in an oversupply of parking. This relates to the wider objectives of the NPS-UD to achieve a well-functioning urban environment that supports a reduction in greenhouse gas emissions. The Section 32 report for the NPS-UD explains this approach in more detail¹.

The NPS-UD does not suggest that carparking is irrelevant to urban planning decisions. Rather, it encourages Councils to use non-regulatory methods to manage effects, particularly by preparing and implementing comprehensive parking management plans (Policy 11). The other non-regulatory method available includes Council investment in improvements to public transport and walking and cycling infrastructure where it is needed to meet increased demand. Vital encourages the Council to take steps to implement these methods.

The proposal to require a travel plan to be prepared and assessed through a resource consent process is not consistent with the NPS-UD, given that in many cases it may have the effect of requiring carparking through assessment criteria. This is contrary to Policy 11 and to clause 3.38(1), which requires Councils to remove any assessment criteria that have the effect of requiring a minimum number of carparks. While the criteria themselves do not set a minimum as a metric, the Council would have discretion to require carparking, with the assessment involving a significantly greater level of uncertainty than the operative provisions.

Vital is concerned that the proposed provisions for travel plans incorrectly emphasise the need to reduce the demand for private vehicle use and car parking. While the NPS-UD seeks good accessibility outcomes in urban environments by way of public or active transport, it was not the intent to discourage private vehicle use within individual developments. Where travel demand within a development is well managed and does not affect the surrounding transport network, the mode of travel choice should be determined by those developing the land.

For the reasons given above, Vital considers that the travel plan provisions of the Proposed Plan Change do not give effect to the NPS-UD as required by s75(3) of the Resource Management Act 1991 (“RMA”).

Efficiency and Effectiveness of Travel Plans

In addition to the policy issues outlined above, the way in which travel plans are proposed to be applied in the Plan Change is not an efficient or effective method for achieving the transport objectives of the AUP.

Travel plans are documents typically prepared for employment and educational activities with the aim of optimising the use of the transport system, often by encouraging use of a range of modes. They typically involve detailing the operational measures that can be put in place to support this, including management of parking areas, provision for active transport facilities, communications and promotion for public transport and provision for shared transport programmes, amongst others². Given the operational nature of these measures, they require on-going monitoring by businesses and authorities to ensure they are operating as intended.

¹ See [NPS-UD Section 32 report](#)

² See [Waka Kotahi guidelines](#) and [Auckland Transport guidelines](#)

Plan Change 71 proposes to require travel plans for a wide range of residential, commercial, and community based activities outside of centres and other identified zones as set out in Table E27.6.1A.1. In Vital's view this is unnecessary, inefficient and ineffective for the following reasons:

- Significant time and cost inefficiencies would be involved, including those associated with additional consenting requirements as well as on-going monitoring (for established developments and the Council) and any associated entities or processes that would need to be established. In some cases, the need for a restricted discretionary activity consent for a travel plan will be the only reason for consent (e.g., if the application was for a new warehouse on industrial zoned land). This would add further delays to enabling development to occur, which is not the intent of the NPSUD.
- The activity thresholds set out in Table E27.6.1A.1 are poorly correlated with the potential effects on the transport network. For example, healthcare facilities of up to 200m² are likely to accommodate low staff numbers and generate low demand on the transport network. Similarly, retirement villages (integrated residential development) typically have lower levels of demand on the transport network.
- There are existing provisions of the AUP which address the effects of travel demand management where it may be appropriate for larger scale developments. This includes the existing provisions (E27.6.1) requiring the preparation of an Integrated Transport Assessment ("ITA").
- Given the wide range of matters that a travel plan needs to assess and the broad nature of the assessment criteria proposed in E27.8.2(3A), the Plan Change provides little or no certainty to applicants on the specific outcomes to be achieved by a travel plan. The Plan Change has the potential to be more onerous and involve more costs than the operative provisions in E27 – Transport. For example, the assessment criteria includes matters external to the proposed development (the availability of public and active modes), or duplicates matters that are otherwise managed under the AUP (minimum levels of cycle parking). There is also a presumption that developments exceeding the proposed thresholds will create parking overspill to the transport network, with no acknowledgement that developers may choose to provide parking on site. Other concerns regarding the assessment criteria are included at Appendix 2.

Relief Sought

Vital supports with amendments those aspects of Proposed Plan Change 71 that are consequential technical amendments to the AUP that support the removal of car parking minimums.

Vital requests further amendments to Policy E27.3(3) and E27.3(9) to give effect to the objectives of Plan Change, and opposes other amendments as set out in Appendix 1. Vital would consider other consequential amendments as appropriate or necessary to address the concerns set out in this submission.

Vital wishes to be heard in support of its submission.

If other parties make a similar submission, Vital would consider presenting a joint case with them at any hearing.

Barker & Associates Limited



Matt Norwell

Director

029 850 2780 | mattn@barker.co.nz

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Appendix 1: Summary of relief sought and reasons

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
B8 Coastal Environment amendments				
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E27 Transport amendments				
2. Amend E27.1 Background	Support in Part	Amend	The management of parking demand through a district plan is not consistent with the intent of the NPS-UD. Clarifying the approach to managing maximum parking limits is outside the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPS-UD and adverse effects after the removal of minimum car parking requirements.	That the proposed insertions in reference to parking demand and maximum parking limits are deleted.
3. Additional requested amendment to Policy E27.3(3)	N/A	Amend Policy E27.3(3)	The reference to managing the number, location, and type of parking is not consistent with the NPS-UD. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (3) Manage the number, location and type of parking and loading spaces, <u>including and</u> bicycle parking and associated end-of-trip facilities to support all of the following:

52.2

52.3

52.4

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
4. Additional requested amendment to Policy E27.3(9)	N/A	Amend Policy E27.3(9)	The reference to providing for flexible approaches to parking is not necessary. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
5. Amend Policy E27.3(6)	Support in Part	Amend	Amending the policy framework for managing maximum parking limits is outside of the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPS-UD and adverse effects after the removal of minimum car parking requirements.	That the policy be amended as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by: (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail

52.5

52.6

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
				and motor vehicle sales) and commercial service activities.
6. Delete Policy E27.3(6A)	Support	Retain	The reference to where parking may be reduced is not necessary.	That the policy be amended as notified.
7. Delete Policy E27.3(7)	Support	Retain	The reference to where minimum car parking requirements do not apply is not necessary.	That the policy be deleted as notified.
8. Add a new activity rule to Table E27.4.1	Oppose	Delete	Managing the efficient use of car parking and the effects of car parking provision on the transport network through an activity rule is not consistent with the intent of the NPS-UD. A travel plan is not an efficient or effective planning method for managing the potential effects of the specified activities on the transport network.	That E27.4.1(A3a) be deleted.
9. Add a new Standard E27.6.1A	Oppose	Delete	Please refer to commentary in the main submission.	That E27.6.1A be deleted.
10. Amend Standard E27.6.2(5)	Support	Retain	The reference to required minimum car parking in the Business – Neighbourhood Centre Zone is not consistent with the NPS-UD.	That the standard be amended as notified.
11. Amend Standard E27.6.3.1(1)(c)	Support	Retain	The management of the use of any parking spaces that are provided is not necessary.	That the standard be amended as notified.
12. Add a new E27.8.1 Matter of discretion	Oppose	Delete	Please refer to commentary in the main submission.	That E27.8.1(4a) be deleted.

52.7

52.8

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52.12

52.13

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
13. Add a new E27.8.2 Assessment criteria	Oppose	Delete	Please refer to commentary in the main submission and Appendix 2	That E27.8.2(3A) be deleted.	52.14
14. Amend Special Information Requirement E27.9(2)	Oppose in Part	For E27.9(2)(a): Retain	For E27.9(2)(a): Requiring a travel plan where less than the minimum number of parking spaces are provided is not necessary.	That Special Information Requirement E27.9(2) be amended as notified.	52.15
		For E27.9(2)(b): Delete	For E27.9(2)(b): Please refer to commentary in the main submission.	That Special Information Requirement E27.8(2)(b) be deleted.	52.16
15. Amend Special Information Requirement E27.9(3)	Support	Retain	The reference to parking requirements and required parking is not consistent with the NPS-UD.	That the special information requirement is amended as notified.	52.17
Subdivision – Urban amendments					
16. Amend Standard E38.9.1.2(1)	Support	Retain	The reference to required parking spaces is not consistent with the NPS-UD.	That the standard be amended as notified	52.18
Temporary activities amendments					
17. Amend Policy E40.3(5)	Support	Retain	Requiring certain temporary activities provide sufficient parking is not consistent with the NPS-UD.	That the policy is amended as notified.	52.19
18. Amend Assessment criteria E40.8.2(2)	Support	Retain	Assessing the extent that adequate parking will address relevant adverse effects is not consistent with the NPS-UD.	That the assessment criteria is amended as notified.	52.20
F2 Coastal - General Coastal Marine Zone amendments					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
19. Amend Policy F2.17.3(3)	Support	Retain	Requiring adequate car parking be provided is not consistent with the NPS-UD.	That the policy is amended as notified.	52.21
F3 Coastal - Marina Zone amendments					
20. Amend Matter of discretion F3.8.1(3)	Support	Retain	Assessing the effects from any parking requirements is not consistent with the NPS-UD	That the matters of discretion are amended as notified.	52.22
21. Amend Matter of discretion F3.8.1(4)					52.23
22. Amend Assessment criteria F3.8.2(3)	Support	Retain	Assessing whether adequate car parking has been provided and the need for car parking is not consistent with the NPS-UD.	That the assessment criteria are amended as notified.	52.24
23. Amend Assessment criteria F3.8.2(4)					52.25
F5 Coastal – Minor Port Zone amendments					
24. Amend Assessment Criteria F5.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent the NPS-UD.	That the assessment criteria are amended as notified.	52.26
25. Amend Assessment Criteria F5.8.2(3)					52.27
F6 Coastal – Ferry Terminal Zone amendments					
26. Amend Policy F6.3(1)	Support	Retain	Requiring that sufficient car parking be provided is not consistent with the NPS-UD.	That the policies are amended as notified.	52.28
27. Amend Policy F6.3(8)					52.29
H1 Residential – Large Lot Zone amendments, H2 Residential – Rural and Coast Settlement Zone amendments, H3 Residential – Single House Zone amendments, H4 Residential – Mixed Housing Suburban Zone amendments, H5 Residential – Mixed Housing Urban Zone amendments, H6 Residential – Terrace Housing and Apartment Buildings Zone amendments, H20 Rural – Waitakere Foothills Zone amendments, H21 Rural – Waitakere Ranges Zone amendments					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
28. Amend Assessment Criteria H1.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent with the NPS-UD.	That the assessment criteria are amended as notified.	52.30
29. Amend Assessment Criteria H2.8.2(1)					52.31
30. Amend Assessment Criteria H3.8.2(1)					52.32
31. Amend Assessment Criteria H4.8.2(1)					52.33
32. Amend Assessment Criteria H5.8.2(1)					52.34
33. Amend Assessment Criteria H6.8.2(1)					52.35
34. Amend Assessment Criteria H20.8.2(1)					52.36
35. Amend Assessment Criteria H21.8.2(1)					52.37
J – Definitions amendments					
36. Amend the definitions as follows:					
Accessory activities Non-accessory parking Off-site parking	Support	Retain	The reference to required car parking is not consistent with the intent of the NPS-UD.	That the definitions are amended as notified.	52.38

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
Travel Plan	Oppose	Delete	Please refer to commentary in the main submission.	That the amendments to the definition are deleted.

52.39

Appendix 2: Commentary on proposed assessment criteria (E27.8.2(3A))

Proposed Assessment Criteria	Comment
E27.8.2(3A)(a): The extent to which the travel demands of the activity are provided for, including but not limited to: (i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:	Please refer to commentary below.
the accessibility and frequency of public transport services	Public transport accessibility and frequency is directly controlled by Auckland Transport. Vital is concerned that should the existing accessibility and frequency of public transport services not be acceptable, then provisions of public transport services may fall upon developers to fund (or partially fund), or development may be delayed until appropriate funded services be available. This is not the intent of the NPS-UD.
the standard of active modes infrastructure for all users	Vital provides appropriate active mode infrastructure within their sites as a matter of course, however Vital is concerned that this criterion may require infrastructure to be provided beyond the site boundaries to provide an appropriate standard of infrastructure. This goes well beyond the intent of the NPS-UD.
the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments	Vital is concerned this criterion will require additional assessment within urban areas that have been zoned in recognition that an acceptable level of connectivity to a range of locations is available. In cases where land is already zoned for commercial and industrial activities, proposals should be assessed in accordance with existing AUP assessment processes, and not require the additional burden of proving why urban zoned land is acceptable for the proposed activity.
(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking	Vital is concerned this criterion is poorly linked to effects on the transport network and will require developers to actively reduce the demand for

Proposed Assessment Criteria	Comment
	private vehicle travel and car parking. While the NPS-UD seeks good accessibility outcomes in urban environments by way of public or active transport, it was not the intent to discourage private vehicle use within individual developments.
E27.8.2(3A)(b): the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.	Vital is concerned this criterion will result in the default provision of on site car parking to manage the effects of potential parking overspill on the adjacent road network. This is not consistent with the intent of the NPS-UD and potentially disincentivises parking management through non-regulatory methods such as preparing and implementing comprehensive parking management plans and Council investment in improvements to public transport and walking and cycling infrastructure.
E27.8.2(3A)(c): the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).	Please refer to commentary above.

FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 71

AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitter: Classic Homes

Classic Homes (“the Submitter”) provides this submission on Proposed Plan Change 71 (“**PC71**”) to the Auckland Unitary Plan (Operative in Part).

The submitter owns a substantial number of properties that the Plan Change applies to. The submitter is one of the largest home builders in Auckland.

The Submitter could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.

The submission relates to the proposed amendments to the text and provisions of the Auckland Unitary Plan set out in PC71. The Submitter opposes the following provisions:

- Proposed new activity in Table E27.4.1 (A3a);
- Proposed new Standard E27.6.1A Travel Demand;
- Proposed new matter of discretion E27.8.1(4a);
- Proposed new assessment criteria E27.8.2(3a);
- Proposed new Special Information requirement E27.9(2)(b).

53.1

Reasons for submission

- The proposed amendments seek to require a travel plan for certain developments. Rule E27.4.1(A3a) provides for any activity or subdivision which meets or exceeds the new travel demand thresholds in Standard E27.6.1A as a restricted discretionary activity. Any activity meeting or exceeding the development thresholds in Table E27.6.1A will require a travel plan as part of an assessment of environmental effects. This requirement has been included as a new special information requirement (E27.9(2)(b));
- The submitter opposes this proposed Travel Plan approach in its entirety;

- The submitter considers that the proposed change does not constitute addressing consequential technical amendments in the AUP and HGI Plan, and the proposed changes will result in additional compliance costs for applicants;
- The submitter notes that the requirement for a Travel Plan applies to a site regardless is whether parking is provided or not;
- The section 32 evaluation of options is considered to be inappropriate as it does not give proper consideration to alternatives that do not require a Travel Plan;
- PC71 is contrary to sound resource management practice; and,
- The submitter considers that this proposed change to the Unitary Plan is contrary to the outcomes sought by the National Policy Statement for Urban Development 2020 and may effectively act as a means of maintaining parking requirements.

Relief sought

The Submitter seeks the following decision from Auckland Council in respect of PC71:

- That the following sections of PC71 are deleted;
 - Activity Table E27.4.1 (A3a); | 53.2
 - Standard E27.6.1A Travel demand; | 53.3
 - E27.8.1. Matters of discretion; | 53.4
 - E27.9(2)(b) Special Information requirements; and | 53.5
- Such other amendments to the provisions of the AUP as may be necessary to give effect to the relief sought in this submission.

The Submitter wishes to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.



Michael Campbell
Campbell Brown Planning Limited
For and on behalf of Classic Homes

24 March 2022

Address for service of submitter:

C/- Campbell Brown Planning Limited
PO Box 147001
Ponsonby
AUCKLAND 1144

Attention: Michael Campbell
Telephone: (09) 394 1694
Mobile: (021) 2789018
Email: michael@campbellbrown.co.nz

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Olesya Zaglyadimova
Date: Thursday, 24 March 2022 12:31:09 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Olesya Zaglyadimova

Organisation name:

Agent's full name:

Email address: olesyazaglyadimova@gmail.com

Contact phone number:

Postal address:

Hobsonville
Auckland 0616

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Car Parking Minimums

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

With lots of new houses are been building now, and people usually having more than one car in the family, we still need to have car parking minimums, otherwise, developers won't build them or build less that previously required. I live in Hobsonville and I see that many people struggle to find off-street parking in the evening. If minimums were removed, it would be more difficult. I have seen that the Parking strategy is coming, but it should have come already so people can see what other options are if car parking minimums are removed.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: To see alternatives of car parking minimums removed

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)



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Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Deborah Selina LeGrice

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

95 Vinistra Road Kumau 0810

Telephone:

0224 185279

Fax/Email:

debbie.legrice11@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 71

Plan Change/Variation Name

NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Removal of car parking minimums

Or

Property Address

95 Vinistra Road Kumau

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are: that taking away parking spaces will not make the cars disappear they will then park on the road which is very narrow and this will make it very difficult for police, fire and ambulance services to get passed. Asking people in this area to walk long distances with no street lights or footpaths (continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

55.1

money to be spent on better footpaths lighting street and road and Rail system. Its Broken and has been for 40 years or more.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

D L
Signature of Submitter
(or person authorised to sign on behalf of submitter)

26/3/2022
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could / could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

which would be 13 mins walk to the Neareness Bus
#55
Stop. please get the Transport System working Better
Before taking away parking spaces we need Better
Footpaths, lighting and Rail system ~~before~~ put the
Money towards the above things first.

All Auckland Transport people I have seen
Travel in cars Not on public TRANSPORT
Shows you how good it is.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Mitchell Tweedie
Date: Thursday, 24 March 2022 1:16:31 pm
Attachments: [Submission on Plan Change 71.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Mitchell Tweedie

Organisation name: Fletcher Residential Limited and Fletcher Development Limited

Agent's full name:

Email address: mtweedie@frl.co.nz

Contact phone number: 021453331

Postal address:
Private Bag 99922
Newmarket
Auckland 1149

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
See submission attached

Property address:

Map or maps:

Other provisions:
See submission attached

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
See submission attached

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: See submission attached

Submission date: 24 March 2022

Supporting documents
Submission on Plan Change 71.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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24 March 2022

Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1010

Submission via email: unitaryplan@aucklandcouncil.govt.nz

Submission on Proposed Plan Change 71: NPS:UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan

Introduction

Fletcher Residential Limited (“**FRL**”) and Fletcher Development Limited (“**FDL**”) make the submission set out below to proposed plan change 71 to the Auckland Unitary Plan (Operative in Part) (“**AUP**”).

FRL is the residential development and delivery arm of Fletcher Building. It is one of the largest developers of new residential communities in New Zealand, having built and sold thousands of homes over the last five years. FRL is an experienced developer of quality homes that are developed to meet the needs of the community and customers, whether that be social, affordable or open market homes. Currently, FRL has over 20 developments underway in Auckland, located across the full spectrum of urban and suburban, brownfield and greenfield locations. FRL’s pipeline is in excess of 5,000 dwellings. FRL delivers a full mix of typologies, including apartments, townhouses, and houses.

FDL acquires and develops industrial land that supports Fletcher Building property requirements or is developed and sold to other purchasers. FDL deliver significant capital expenditure investment projects within key growth areas in Auckland where industrial development is well supported by infrastructure, market demand and employment.

Scope of Submission

The specific aspects of Proposed Plan Change 71 to the AUP that this submission relates to are detailed in the table at Appendix 1.

The Submission

FRL and FDL acknowledge the consequential technical amendments to ensure that the Auckland Unitary Plan (“**AUP**”) removes all minimum carparking requirements to give effect to the National Policy Statement: Urban Development (“**NPSUD**”).

FRL and FDL oppose the aspects of the Proposed Plan Change that seek to introduce requirements to prepare and assess a travel plan for development through a resource consent process. These requirements are contrary to the NPSUD for the reasons set out in the submission below.

56.1

The table at **Appendix 1** provides further details and sets out:

- The provisions that FRL and FDL support, oppose or seek to amend;
- The reasons for the stated position;
- The decision sought from Council.

Intent of the NPSUD

The NPSUD sets out a significant shift in how cities plan for and manage carparking; from one regulated broadly by Councils through District Plans, to a more flexible market-led approach, where those developing land generally decide the amount of parking that is necessary to meet demand. This is intended to achieve more efficient land use, provide more space for housing, and ensure parking is more responsive to demand, acknowledging that minimum parking regulations have historically resulted in an oversupply of parking. This relates to the wider objectives of the NPSUD to achieve a well-functioning urban environment that supports a reduction in greenhouse gas emissions. The Section 32 report for the NPSUD explains this approach in more detail¹.

The NPSUD does not suggest that carparking is irrelevant to urban planning decisions. Rather, it encourages Councils to use non-regulatory methods to manage effects, particularly by preparing and implementing comprehensive parking management plans (Policy 11). The other non-regulatory method available includes Council investment in improvements to public transport and walking and cycling infrastructure where it is needed to meet increased demand. FRL and FDL encourage the Council to take steps to implement these non-regulatory methods.

The proposal to require a travel plan to be prepared and assessed through a resource consent process is not consistent with the NPSUD, given that in many cases it may have the effect of requiring carparking through assessment criteria. This is contrary to Policy 11 and to clause 3.38(1) of the NPSUD, which requires Councils to remove any assessment criteria that have the effect of requiring a minimum number of carparks. While the criteria themselves do not set a minimum as a metric, the Council would have discretion to require carparking, with the assessment involving a significantly greater level of uncertainty than the Operative Plan provisions.

For the reasons given above, FRL and FDL consider that the travel plan provisions of the Proposed Plan Change do not give effect to the NPSUD as required by s75(3) of the RMA. For these reasons FRL and FDL oppose the travel plan provisions of the Proposed Plan Change and seek further amendments to the Proposed Plan Change as outlined in this submission.

Efficiency and Effectiveness of Travel Plans

In addition to the policy issues outlined above, the way in which travel plans are proposed to be applied in the Plan Change is not an efficient or effective method for achieving the transport objectives of the AUP.

Travel plans are documents typically prepared for employment and educational activities with the aim of optimising the use of the transport system, often by encouraging use of a range of modes. They typically involve detailing the operational measures that can be put in place to support this, including management of parking

¹ See [NPSUD Section 32 report](#)

areas, provision for active transport facilities, communications and promotion for public transport and provision for shared transport programmes, amongst others². Given the operational nature of these measures, they require on-going monitoring by businesses and authorities to ensure they are operating as intended.

Plan Change 71 proposes to require travel plans for a wide range of residential and commercial activities outside of centres and other identified zones as set out in Table E27.6.1A.1. This is unnecessary, inefficient and ineffective for the following reasons:

- Travel plans would be impractical for many residential developments to implement. This would require a body corporate or incorporated society to be established to ensure that the requirements of a travel plan are implemented, monitored, and reviewed on an ongoing basis. This would be unreasonable for developments that have no other purpose for these entities, including developments that do not result in the creation of shared or common areas, (such as jointly owned access lots (“JOALS”) and shared parking areas) and will commonly exceed the 10-dwelling threshold e.g., a vacant lot subdivision.
- Significant time and cost inefficiencies would be involved, including those associated with additional consenting requirements as well as on-going monitoring (for established developments and the Council) and any associated entities or processes that would need to be established. In some cases, the need for a restricted discretionary activity consent for a travel plan will be the only reason for consent (e.g., if the application was for a new warehouse on industrial zoned land). This would add further delays to enabling development to occur, which is not the intent of the NPSUD.
- The activity thresholds set out in Table E27.6.1A.1 are poorly correlated with the potential effects on the transport network. For example, industrial activities of up to 2000m² are likely to accommodate low staff numbers and generate low demand on the transport network. Similarly, retirement villages (integrated residential development) typically have lower levels of demand on the transport network.
- There are existing provisions of the AUP which address the effects of travel demand management where it may be appropriate for larger scale developments. This includes the existing provisions (E27.6.1) requiring the preparation of an Integrated Transport Assessment (“ITA”).
- Given the wide range of matters that a travel plan needs to assess and the broad nature of the assessment criteria proposed in E27.8.2(3A), the Plan Change provides little or no certainty to applicants on the specific outcomes to be achieved by a travel plan. The Plan Change has the potential to be more onerous and involve more costs than the operative provisions in E27 – Transport. For example, the assessment criteria include matters external to the proposed development (the availability of public and active modes), or duplicates matters that are otherwise managed under the AUP (minimum levels of cycle parking). There is also a presumption that developments exceeding the proposed thresholds will create parking overspill to the transport network, with no acknowledgement that developers may choose to provide parking on site. Other concerns regarding the assessment criteria are included at Appendix 2.

² See [Waka Kotahi guidelines](#) and [Auckland Transport guidelines](#)

Relief Sought

FRL and FDL consider that the travel plan provisions of the Proposed Plan Change do not give effect to the NPSUD as required by s75(3) of the RMA.

FRL and FDL request further amendments to Policy E27.3(3) and E27.3(9) to give effect to the objectives of Plan Change, and opposes other amendments as set out in Appendix 1. FRL and FDL would consider other consequential amendments as appropriate or necessary to address the concerns set out in this submission

FRL and FDL wish to be heard in support this submission.

If other parties make a similar submission, FRL and FDL would consider presenting a joint case with them at any hearing.

Yours faithfully



Aidan Donnelly
General Manager
Fletcher Residential Living

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Appendix 1: Summary of relief sought and reasons

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
B8 Coastal Environment amendments				
1. Amend B8.6 Explanation and principal reasons for adoption	Support	Retain	The reference to required car parking is not consistent with the NPSUD.	That the B8.6 Explanation and principal reasons for adoption be amended as notified.
E27 Transport amendments				
2. Amend E27.1 Background	Support in Part	Amend	The management of parking demand through a district plan is not consistent with the intent of the NPSUD. Clarifying the approach to managing maximum parking limits is outside the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPSUD and adverse effects after the removal of minimum car parking requirements.	That the proposed insertions in reference to parking demand and maximum parking limits are deleted.
3. Additional requested amendment to Policy E27.3(3)	N/A	Amend Policy E27.3(3)	The reference to managing the number, location, and type of parking is	That the policy be amended as: (3) Manage the number,

56.2

56.3

56.4

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
			not consistent with the NPSUD. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	location and type of parking and loading spaces, including and bicycle parking and associated end-of-trip facilities to support all of the following:
4. Additional requested amendment to Policy E27.3(9)	N/A	Amend Policy E27.3(9)	The reference to providing for flexible approaches to parking is not necessary. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
5. Amend Policy E27.3(6)	Support in Part	Amend	Amending the policy framework for managing maximum parking limits is outside of the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPSUD and adverse effects after the removal of minimum car	That the policy be amended as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town

56.5

56.6

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
			parking requirements.	and local centres and the Mixed Use Zone adjacent to those specified centres) by:- (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.
6. Delete Policy E27.3(6A)	Support	Retain	The reference to where parking may be reduced is not necessary.	That the policy be amended as notified.
7. Delete Policy E27.3(7)	Support	Retain	The reference to where minimum car parking requirements do not apply is not necessary.	That the policy be deleted as notified.
8. Add a new activity rule to Table E27.4.1	Oppose	Delete	Managing the efficient use of car parking and the effects of car parking provision on the transport	That E27.4.1(A3a) be deleted.

56.7

56.8

56.9

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
			network through an activity rule is not consistent with the intent of the NPSUD. A travel plan is not an efficient or effective planning method for managing the potential effects of the specified activities on the transport network.		
9. Add a new Standard E27.6.1A	Oppose	Delete	Please refer to commentary in the main submission.	That E27.6.1A be deleted.	56.10
10. Amend Standard E27.6.2(5)	Support	Retain	The reference to required minimum car parking in the Business – Neighbourhood Centre Zone is not consistent with the NPSUD.	That the standard be amended as notified.	56.11
11. Amend Standard E27.6.3.1(1)(c)	Support	Retain	The management of the use of any parking spaces that are provided is not necessary.	That the standard be amended as notified.	56.12
12. Add a new E27.8.1 Matter of discretion	Oppose	Delete	Please refer to commentary in the main submission.	That E27.8.1(4a) be deleted.	56.13
13. Add a new E27.8.2 Assessment criteria	Oppose	Delete	Please refer to commentary in the main submission and Appendix 2	That E27.8.2(3A) be deleted.	56.14

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
14. Amend Special Information Requirement E27.9(2)	Oppose in Part	For E27.9(2)(a): Retain For E27.9(2)(b): Delete	For E27.9(2)(a): Requiring a travel plan where less than the minimum number of parking spaces are provided is not necessary. For E27.9(2)(b): Please refer to commentary in the main submission.	That Special Information Requirement E27.9(2) be amended as notified. That Special Information Requirement E27.8(2)(b) be deleted.	56.15 56.16
15. Amend Special Information Requirement E27.9(3)	Support	Retain	The reference to parking requirements and required parking is not consistent with the NPSUD.	That the special information requirement is amended as notified.	56.17
Subdivision – Urban amendments					
16. Amend Standard E38.9.1.2(1)	Support	Retain	The reference to required parking spaces is not consistent with the NPSUD.	That the standard be amended as notified	56.18
Temporary activities amendments					
17. Amend Policy E40.3(5)	Support	Retain	Requiring certain temporary activities provide sufficient parking is not consistent with the NPSUD.	That the policy is amended as notified.	56.19
18. Amend Assessment criteria E40.8.2(2)	Support	Retain	Assessing the extent that adequate parking will address relevant adverse effects is not consistent with the NPSUD.	That the assessment criteria is amended as notified.	56.20
F2 Coastal - General Coastal Marine Zone amendments					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
19. Amend Policy F2.17.3(3)	Support	Retain	Requiring adequate car parking be provided is not consistent with the NPSUD.	That the policy is amended as notified.	56.21
F3 Coastal - Marina Zone amendments					
20. Amend Matter of discretion F3.8.1(3)	Support	Retain	Assessing the effects from any parking requirements is not consistent with the NPSUD	That the matters of discretion are amended as notified.	56.22
21. Amend Matter of discretion F3.8.1(4)					56.23
22. Amend Assessment criteria F3.8.2(3)	Support	Retain	Assessing whether adequate car parking has been provided and the need for car parking is not consistent with the NPSUD.	That the assessment criteria are amended as notified.	56.24
23. Amend Assessment criteria F3.8.2(4)					56.25
F5 Coastal – Minor Port Zone amendments					
24. Amend Assessment Criteria F5.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent the NPSUD.	That the assessment criteria are amended as notified.	56.26
25. Amend Assessment Criteria F5.8.2(3)					56.27
F6 Coastal – Ferry Terminal Zone amendments					
26. Amend Policy F6.3(1)	Support	Retain	Requiring that sufficient car parking be provided is not consistent with the NPSUD.	That the policies are amended as notified.	56.28
27. Amend Policy F6.3(8)					56.29
H1 Residential – Large Lot Zone amendments, H2 Residential – Rural and Coast Settlement Zone amendments, H3 Residential – Single House Zone amendments, H4 Residential – Mixed Housing Suburban Zone amendments, H5 Residential – Mixed Housing Urban Zone amendments, H6 Residential – Terrace Housing and Apartment Buildings Zone					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
amendments, H20 Rural – Waitakere Foothills Zone amendments, H21 Rural – Waitakere Ranges Zone amendments					
28. Amend Assessment Criteria H1.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent with the NPSUD.	That the assessment criteria are amended as notified.	56.30
29. Amend Assessment Criteria H2.8.2(1)					56.31
30. Amend Assessment Criteria H3.8.2(1)					56.32
31. Amend Assessment Criteria H4.8.2(1)					56.33
32. Amend Assessment Criteria H5.8.2(1)					56.34
33. Amend Assessment Criteria H6.8.2(1)					56.35
34. Amend Assessment Criteria H20.8.2(1)					56.36
35. Amend Assessment Criteria H21.8.2(1)					56.37
J – Definitions amendments					
Amend the definitions as follows:					
Accessory activities Non-accessory parking Off-site parking	Support	Retain	The reference to required car parking is not consistent with the intent of the NPSUD.	That the definitions are amended as notified.	56.38

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
Travel Plan	Oppose	Delete	Please refer to commentary in the main submission.	That the amendments to the definition are deleted.

56.39

Appendix 2: Commentary on proposed assessment criteria (E27.8.2(3A))

Proposed Assessment Criteria	Comment
E27.8.2(3A)(a): The extent to which the travel demands of the activity are provided for, including but not limited to: (i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:	It is unclear how the travel demands of a residential activity will be assessed as being appropriately provided. In many instances, the travel demands of residential activities will be dependent on individual residents and cannot be determined with certainty at the time of resource consent application.
the accessibility and frequency of public transport services	Public transport accessibility and frequency is directly controlled by Auckland Transport. FRL and FDL are concerned that should the existing accessibility and frequency of public transport services not be acceptable, then provisions of public transport services may fall upon developers to fund (or partially fund), or development may be delayed until appropriate funded services be available. This is not the intent of the NPSUD.
the standard of active modes infrastructure for all users	FRL and FDL provide appropriate active mode infrastructure within their sites as a matter of course, however FRL and FDL are concerned that this criterion may require infrastructure to be provided beyond the site boundaries to provide an appropriate standard of infrastructure. This goes well beyond the intent of the NPSUD.
the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments	FRL and FDL are concerned this criterion will require additional assessment within urban areas that have been zoned in recognition that an acceptable level of connectivity to a range of locations is available. In cases where land is already zoned for residential activity, proposals should be assessed in accordance with existing AUP

	assessment processes, and not require the additional burden of proving why urban zoned land is acceptable for the proposed activity.
(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking	FRL and FDL are concerned this criterion is poorly linked to effects on the transport network and will require developers to actively reduce the demand for private vehicle travel and car parking. While the NPS-UD seeks good accessibility outcomes in urban environments by way of public or active transport, it was not the intent to discourage private vehicle use within individual developments.
E27.8.2(3A)(b): the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.	FRL and FDL are concerned that this criterion will result in the default provision of on site car parking to manage the effects of potential parking overspill on the adjacent road network. This is not consistent with the intent of the NPSUD and potentially disincentivises parking management through non-regulatory methods such as preparing and implementing comprehensive parking management plans and Council investment in improvements to public transport and walking and cycling infrastructure.
E27.8.2(3A)(c): the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).	Please refer to commentary above.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Jennifer Clements
Date: Thursday, 24 March 2022 1:30:51 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jennifer Clements

Organisation name:

Agent's full name: Jennifer Clements

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Contact phone number: 02102454403

Postal address:

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Glendowie

Auckland 1071

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

You wish to no longer have a requirement to provide a carpark in new residential developments

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Everyone new residence should have the provision for car parking OFF road. In the last few years we have seen huge numbers of cars parked on roads, this makes driving more difficult for private, commercial and most importantly emergency vehicles to move efficiently around the city.

This will also mean more people trying to manoeuvre out of drives with difficulty, children crossing roads to school and to parks etc. Already we can see and have witnessed children being knocked down when trying to cross a road inbetween parked cars, cars that could have been in driveways The incidence of car thefts from roads has also increased exponentially and this will only increase if this is passed.

Crime should be high on your agenda and this would encourage more crime

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Waitemata District Health Board
Date: Thursday, 24 March 2022 1:46:09 pm
Attachments: [Waitemata DHB_Sub PC71_240322.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Waitemata District Health Board

Organisation name: Waitemata District Health Board

Agent's full name: Craig McGarr (Bentley & Co)

Email address: cmcgarr@bentley.co.nz

Contact phone number: 021741418

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Shortland Street
Auckland 1140

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Standard E27.6.1A Travel demand; Matters of discretion in E27.8.1(4A); Assessment criteria in E27.8.2(3A); Special information requirements in E27.9(2)(b).

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Refer attached submission

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Refer attached submission

Submission date: 24 March 2022

Supporting documents
[Waitemata DHB_Sub PC71_240322.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**SUBMISSION ON A PUBLICLY NOTIFIED PLAN CHANGE
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE
RESOURCE MANAGEMENT ACT 1991**

From: Waitematā District Health Board (Waitematā DHB)

Address for Service: C/- Bentley & Co Limited
PO Box 4492,
Shortland Street
Auckland 1140
Attn: Craig McGarr

To: Auckland Council

Address: Private Bag 92300, Auckland 1142

Submission on: Plan Change 71 – NPS-UD Removal of Car Parking
Minimums – Consequential Technical Amendments

Introduction

1. Waitematā DHB is a crown owned entity which provides health services to more than 630,000 residents in the North Shore, Waitakere and Rodney. It has the largest population of any district health board in New Zealand and is expected to service approximately 800,000 residents by 2036/2037. The Waitematā DHB employs more than 7,500 people in more than 182 buildings and 31 different locations in North and West Auckland including North Shore Hospital, Waitakere Hospital and the Mason Clinic.
2. Waitematā DHB is responsible for the public health needs of the North Shore, Waitakere and Rodney health wards, and its jurisdiction extends to the northern boundary of the Auckland Region.
3. Waitematā DHB owns and operates the Mason Clinic which is located at 81A Carrington Road, Mount Albert. The Mason Clinic was established in 1992, when existing forensic psychiatric services moved from Carrington and Kingseat hospitals. The Mason Clinic is a forensic psychiatric healthcare facility, which provides a range of services, including assessment, acute treatment, rehabilitation and custodial care for users with particular needs and requirements, including users who are admitted to the Mason Clinic under the jurisdiction of several statutes for ongoing secure care (such as users under remand).
4. The Mason Clinic also comprises a range of accessory activities and supporting services, including facilities for hosting rehabilitation support groups, supporting

healthcare services for users, tribunal hearings, education services for nursing and healthcare students, and physical spaces for visitors to spend time with users. Outdoor recreation is a component of the services provided, and several of the buildings on the site are integrated with external courtyards and recreation areas.

5. The Mason Clinic services the populations of the four Northern Region District Health Boards (Northland, Waitematā, Auckland and Counties Manukau) which collectively have a population of some 1.9 million people. The Mason Clinic also services populations from other District Health Boards within the North Island.
6. The Mason Clinic currently contains some 129 mental health ‘beds’ and 12 forensic intellectual disability ‘beds’. The existing facilities are all contained within the Mason Clinic Site located at 81A Carrington Road.
7. Waitematā DHB purchased two additional land parcels to the north (3A Carrington Road) and south (119A Carrington Road) of the original Mason Clinic property from the Ministry of Housing and Urban Development (“**HUD**”), in 2019. The land purchase was driven by the need to both replace the existing dilapidated buildings with high-quality facilities, and to expand the capacity of the Mason Clinic to cater for the anticipated growth in the demand for services as the regional and national population continues to increase.
8. Waitematā DHB has lodged a plan change to the Auckland Unitary Plan to align the zoning and planning provisions of these land parcels with that applying to the Mason Clinic, to facilitate the efficient future use, development and intensification of the existing Mason Clinic for a forensic healthcare activity, in an integrated and efficient manner.
9. Waitematā DHB supports the Auckland Council’s recent initiative to remove the minimum parking provisions from the Auckland Unitary Plan, in response to the directives of the National Policy Statement on Urban Development (“**NPS-UD**”), enabling the health sector to determine their parking needs relative to the nature and demands of the health services provided, as a component of enabling the delivery of the efficient operation and development of hospitals and healthcare facilities to support the community’s healthcare needs.
10. Integral to the efficient delivery of healthcare services is the implementation of suitable travel management measures, which the DHB undertakes through its own legislative and compliance framework, which includes the consideration of the travel plans of those (staff and visitors) who utilise its facilities and the development and implementation of tangible solutions for its facilities, including the integration of such plans across multiple facilities.

Scope of submission

11. Waitematā DHB's submission on Plan Change 71 relates to the following proposed provisions:
 - (a) Standard E27.6.1A Travel demand;
 - (b) Matters of discretion in E27.8.1(4A);
 - (c) Assessment criteria in E27.8.2(3A); and
 - (d) Special information requirements in E27.9(2)(b).
12. Specifically, Waitematā DHB's submission relates to the introduction (a threshold of activity) of a requirement to obtain a resource consent (for a restricted discretionary activity), which is required to address/demonstrate that:
 - (a) the travel demands of the activity are provided for, including the adequacy of travel choices by all modes as an alternative to private vehicle travel and proposed measures to reduce demand for travel by private vehicle.
 - (b) the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement; and
 - (c) the extent to which a travel plan (to be prepared to accompany an application) addresses the matters above.
13. Waitematā DHB is concerned with the unnecessary process, time, cost and efficiency implications of the future use and development of their existing and future landholdings being captured by the changes proposed by Plan Change 71, and necessitating resource consents being required for the development of offices, visitor accommodation, care centres, healthcare facilities and community facilities. The provision proposed to be changed by Plan Change 71 does not include/apply to 'hospitals', in terms of the proposed development thresholds where a travel plan is required. However, the Special Purpose Healthcare Facility and Hospital Zone is not included in the list of zones excluded.
14. This has the potential for future development within the Special Purpose Healthcare Facility and Hospital Zone for offices, visitor accommodation, care centres, healthcare facilities or community facilities being captured by proposed standard E27.6.1A.
15. Waitematā DHB also has healthcare facilities and community facilities located in the community on land in a variety of locations that are not zoned Special Purpose Healthcare Facility and Hospital Zone. Except where located in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, or Residential – Terrace Housing and Apartment Building Zone or Centre Fringe Office Control (as shown on the planning maps), such activities will require a resource consent where the thresholds are exceeded, based on the premise that there needs to be a process in place 'to adequately address any adverse effects on the transport

network after minimum car parking requirements are removed from the plan'¹, and based on the premise that such activities 'tend to generate travel demand.'²

16. There is no traffic or transportation rationale (or reporting) provided in the Council's section 32 assessment to demonstrate that healthcare facilities and community facilities in locations, other than those zones arbitrarily exempt, necessitate a requirement for a resource consent, in order for a travel plan to be required/prepared for consideration by Council.

Submission

17. Waitematā DHB opposes Plan Change 71.
18. Waitematā DHB could not gain an advantage in trade competition through this submission.
19. Waitematā DHB is directly affected by an effect of the subject matter that –
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition.
20. The nature of the proposed provisions will place an unreasonable and unnecessary time, cost, and process imposition on Waitematā DHB.
21. Waitematā DHB seeks to ensure that its landholdings, and related offices, visitor accommodation, care centres, healthcare facilities or community facilities are excluded/exempt from the restricted discretionary activity resource consent thresholds proposed to be introduced to the Auckland Unitary Plan by Plan Change 71.
22. Should the Waitematā DHB landholdings, and related activities not be excluded/exempt, the outcome of the Plan Change would:
 - (a) Be contrary to the sustainable management of natural and physical resources and be inconsistent with the purpose and principles of the Resource Management Act 1991 (RMA);
 - (b) Not be consistent with, or achieve, the purpose and principles of the RMA, including meeting the reasonably foreseeable needs of future generations and enabling people and communities to provide for their social, economic, and cultural well-being and for their health and safety;
 - (c) Not be consistent with the National Policy Statement on Urban Development 2020, by increasing the complexity, uncertainty, time and cost of enabling and providing critical health facilities and infrastructure that are required to support urban intensification and well-functioning urban environments that enable

¹ Auckland Council; Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan Section 32 Evaluation Report, page 17

² Ibid, page 21

- people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
- (d) Not be consistent with any other relevant objectives and policies of the Auckland Unitary Plan.

Decision Sought

23. Waitematā DHB seeks that Plan Change 71 is declined. | 58.1
24. If Plan Change 71 is not declined, Waitematā DHB seeks the following relief:
- (a) That the proposed Plan Change 71 provisions exclude the development/use of all land zoned Special Purpose Healthcare Facility and Hospital, by amending the proposed new standard E27.6.1A as follows (underlined added): | 58.2
- E27.6.1A Travel demand*
- (1) *Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required. (2) Standard E27.6.1A does not apply where:* | 58.3
- (a) *a proposal is located in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, or Residential – Terrace Housing and Apartment Building Zone, Special Purpose Healthcare Facility and Hospital Zone or Centre Fringe Office Control as shown on the planning maps;*
- (b) *development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;*
- (c) *the activity is permitted in the H7 Open space zones; or*
- (d) *there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities.*
- AND
- (b) Delete healthcare facilities and community facilities from Table E27.6.1A.1 of proposed Standard E27.6.1A. | 58.4
- AND
- (c) Such alternative relief that addresses the issues raised in this submission.
25. Waitematā DHB wishes to be heard in support of this submission.
26. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Signature

Waitematā District Health Board

by its planning and resource management consultants
Bentley & Co. Ltd.



Date: 24 March 2022

Craig McGarr

Address for Service:

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Auckland 1141
Attention: Craig McGarr

Telephone: (09) 309 5367

Mobile: 021 741 418

Email: cmcgarr@bentley.co.nz

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Waitemata District Health Board and Auckland District Health Board and Counties Manukau District Health Board
Date: Thursday, 24 March 2022 1:46:16 pm
Attachments: [Combined DHB_Sub_PC71_240322.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Waitemata District Health Board and Auckland District Health Board and Counties Manukau District Health Board

Organisation name: Waitemata District Health Board and Auckland District Health Board and Counties Manukau District Health Board

Agent's full name: Craig McGarr

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PO Box 4492
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Auckland 1140

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Standard E27.6.1A Travel demand; Matters of discretion in E27.8.1(4A); Assessment criteria in E27.8.2(3A); Special information requirements in E27.9(2)(b).

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Refer attached submission

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Refer attached submission

Submission date: 24 March 2022

Supporting documents
Combined DHB_Sub PC71_240322.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**SUBMISSION ON A PUBLICLY NOTIFIED PLAN CHANGE
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE
RESOURCE MANAGEMENT ACT 1991**

From: **Waitematā District Health Board (Waitematā DHB) and
Auckland District Health Board (Auckland DHB) and
Counties Manukau District Health Board (Counties
Manukau DHB)**

Address for Service: **C/- Bentley & Co Limited
PO Box 4492,
Shortland Street
Auckland 1140
Attn: Craig McGarr**

To: **Auckland Council**

Address: **Private Bag 92300, Auckland 1142**

Submission on: **Plan Change 71 – NPS-UD Removal of Car Parking
Minimums – Consequential Technical Amendments**

Introduction

1. This is a submission by Waitematā DHB, Auckland DHB and Counties Manukau DHB (collectively referred to as “**the DHBs**”). The DHBs are crown owned entities which provide health services to the Auckland Region.
2. Waitematā DHB provides services to more than 630,000 residents in the North Shore, Waitakere and Rodney. It has the largest population of any district health board in New Zealand and is expected to service approximately 800,000 residents by 2036/2037. The Waitematā DHB employs more than 7,500 people in more than 182 buildings and 31 different locations in North and West Auckland including North Shore Hospital, Waitakere Hospital and the Mason Clinic, and a variety of community based healthcare facilities and clinics in various locations.
3. Auckland DHB provides services to 494,000 residents in Auckland Central. The Auckland DHB employs more than 11,000 people, and operates the Auckland City Hospital, Greenlane Clinical Centre, and a variety of community based healthcare facilities and clinics in various locations.
4. Counties Manukau DHB provides services to approximately 570,000 residents in Manukau, Pukekohe and parts of the Waikato District, and is expected to serve a further 75,000 people by 2029. It services a diverse population which includes 11%

and 37% of New Zealand's Maori and Pacific populations respectively. The Counties Manukau DHB operates the Middlemore Hospital, Manukau Health Park, Franklin Memorial Hospital, Pukekohe Hospital, Botany SuperClinic and a variety of other community based healthcare facilities.

5. The DHBs (together with the Northland DHB) collectively formed the Northern Regional Alliance in 2013, which undertakes activities to support the respective DHBs in implementing Government health policies and Ministerial priorities. The Northern Regional Alliance supports the DHBs where there is benefit from working regionally to achieve these outcomes, as well as to proactively identify how to better enable the efficient delivery of health services, and to improve clinical and workforce sustainability. The Northern Regional Alliance is a reflection of the shared visions and goals of the DHBs, and the recognised benefits of collaborative relationships.
6. The DHBs are respectively undertaking significant development and redevelopment of their hospital facilities to both upgrade and retrofit existing assets, and to construct new assets to meet changing and growing demands on health services as the Auckland Region's population grows, and to reconfigure their services to better meet the needs of the population. The development programmes that are being undertaken by the DHBs are visionary, large-scale and complex, and represent significant central investment. Supporting the hospitals are a range of healthcare facilities which are dispersed throughout the region which provide smaller-scale, focussed clinical services to communities.
7. The ongoing development being undertaken by the DHBs is regularly influenced by the resource management framework. In this respect, the DHBs are reliant on, and consistently promote the need for, an efficient framework of planning regulation which supports and enables the DHBs to utilise, develop and intensify the valuable and scarce resources available.
8. This requirement for efficiency is further reinforced by the Health and Disability System Review ("**System Review**") prepared in March 2020 which underpins the Government's intentions for the future of New Zealand's public health sector. The Government's response to the System Review outlines a plan to unify the public health provision under two new national entities: Health New Zealand and the Māori Health Authority. The system reconfiguration recommends a range of responses targeted towards meeting the needs of individuals and communities in a more appropriate and efficient manner. A core element of the national strategy involves the transition of appropriate services from hospitals to within communities. The future health system will be more dispersed, with smaller facilities and services operating throughout the community in addition to the main hospital sites which will continue to focus on high acuity care.
9. The DHBs support the Auckland Council's recent initiative to remove the minimum parking provisions from the Auckland Unitary Plan, in response to the directives of the National Policy Statement on Urban Development ("**NPS-UD**"), enabling the

health sector to determine their parking needs relative to the nature and demands of the health services provided, as a component of enabling the delivery of the efficient operation and development of hospitals and healthcare facilities to support the community's healthcare needs.

10. Integral to the efficient delivery of healthcare services is the implementation of suitable travel management measures, which the DHBs undertake through their own legislative and compliance frameworks, which includes the consideration of the travel plans of those (staff and visitors) who utilise facilities and the development and implementation of tangible solutions for facilities, including the integration of such plans across multiple facilities.

Scope of submission

11. The DHBs' submission on Plan Change 71 relates to the following proposed provisions:
 - (a) Standard E27.6.1A Travel demand;
 - (b) Matters of discretion in E27.8.1(4A);
 - (c) Assessment criteria in E27.8.2(3A); and
 - (d) Special information requirements in E27.9(2)(b).
12. Specifically, the DHBs submission relates to the introduction (a threshold of activity) of a requirement to obtain a resource consent (for a restricted discretionary activity), which is required to address/demonstrate that:
 - (a) the travel demands of the activity are provided for, including the adequacy of travel choices by all modes as an alternative to private vehicle travel and proposed measures to reduce demand for travel by private vehicle;
 - (b) the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement; and
 - (c) the extent to which a travel plan (to be prepared to accompany an application) addresses the matters above.
13. The DHBs are concerned with the unnecessary process, time, cost and efficiency implications of the future use and development of their existing and future landholdings being captured by the changes proposed by Plan Change 71, and necessitating resource consents being required for the development of activities, particularly care centres, healthcare facilities and community facilities. The provisions proposed to be changed by Plan Change 71 does not include/apply to 'hospitals', in terms of the proposed development thresholds where a travel plan is required. However, the Special Purpose Healthcare Facility and Hospital Zone is not included in the list of zones excluded.
14. This has the potential for future development within the Special Purpose Healthcare Facility and Hospital Zone for offices, visitor accommodation, care centres, healthcare facilities or community facilities being captured by proposed standard E27.6.1A.

15. The DHBs also have (and have plans for) healthcare facilities and community facilities located in the community on land in a variety of locations that are not zoned Special Purpose Healthcare Facility and Hospital Zone, and it is expected that a wider range of such facilities will be required in the future to implement the Government's aspirations for the reform of the health system.
16. Except where located in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, or Residential – Terrace Housing and Apartment Building Zone or Centre Fringe Office Control (as shown on the planning maps), such activities will require a resource consent where the proposed thresholds are exceeded, based on the premise that there needs to be a process in place 'to adequately address any adverse effects on the transport network after minimum car parking requirements are removed from the plan'¹, and based on the premise that such activities 'tend to generate travel demand.'²
17. There is no traffic or transportation rationale (or reporting) provided in the Council's section 32 assessment to demonstrate that healthcare facilities and community facilities in locations, other than those zones arbitrarily exempt, necessitate a requirement for a resource consent, in order for a travel plan to be required/prepared for consideration by Council.

Submission

18. The DHBs oppose Plan Change 71.
19. The DHBs could not gain an advantage in trade competition through this submission.
20. The DHBs are directly affected by an effect of the subject matter that –
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition.
21. The nature of the proposed provisions will place an unreasonable and unnecessary time, cost, and process imposition on the DHBs. This effect will be amplified in future years as the strategic direction of the Health sector is to increase the provision of services in community based settings.
22. The DHBs seek to ensure that their landholdings, and related offices, visitor accommodation, care centres, healthcare facilities or community facilities are excluded/exempt from the restricted discretionary activity resource consent thresholds proposed to be introduced to the Auckland Unitary Plan by Plan Change 71.

¹ Auckland Council; Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan Section 32 Evaluation Report, page 17

² Ibid, page 21

23. Should the DHBs landholdings and related activities not be excluded/exempt, the outcome of the Plan Change would:
- (a) Be contrary to the sustainable management of natural and physical resources and be inconsistent with the purpose and principles of the Resource Management Act 1991 (RMA);
 - (b) Not be consistent with, or achieve, the purpose and principles of the RMA, including meeting the reasonably foreseeable needs of future generations and enabling people and communities to provide for their social, economic, and cultural well-being and for their health and safety;
 - (c) Not be consistent with the National Policy Statement on Urban Development 2020, by increasing the complexity, uncertainty, time and cost of enabling and providing critical health facilities and infrastructure that are required to support urban intensification and well-functioning urban environments that enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
 - (d) Not be consistent with any other relevant objectives and policies of the Auckland Unitary Plan.

Decision Sought

24. The DHBs seek that Plan Change 71 is declined.

59.1

25. If Plan Change 71 is not declined, the DHBs seek the following relief:

- (a) That the proposed Plan Change 71 provisions exclude the development/use of all land zoned Special Purpose Healthcare Facility and Hospital, by amending the proposed new standard E27.6.1A as follows (underlined added):

E27.6.1A Travel demand

(1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required. (2) Standard E27.6.1A does not apply where:

59.2

(a) a proposal is located in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, or Residential – Terrace Housing and Apartment Building Zone, Special Purpose Healthcare Facility and Hospital Zone or Centre Fringe Office Control as shown on the planning maps;

(b) development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;

(c) the activity is permitted in the H7 Open space zones; or

(d) there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities.

AND

- (b) Delete healthcare facilities and community facilities from Table E27.6.1A.1 of proposed standard E27.6.1A.

59.3

AND

- (c) Such alternative relief that addresses the issues raised in this submission.

26. The DHBs wish to be heard in support of this submission.

27. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Signature

Waitematā District Health Board; Auckland District Health Board; Counties Manukau District Health Board

by their planning and resource management consultants Bentley & Co. Ltd.



Date: 24 March 2022

Craig McGarr

Address for Service:

Bentley & Co. Ltd
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Attention: Craig McGarr

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Auckland Unitary Plan (Operative in Part) - Proposed Plan Change 71 Submission

23 March 2022

Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Attention: Planning Technician

Please find attached a formal submission to the Auckland Unitary Plan – Proposed Plan Change 15. The details of the submitter are:

Submitter Details

Full Name:	Craig Shearer
Submission on behalf of:	Empire Capital Limited
Address for service:	C/- Shearer Consulting Ltd, PO Box 60-240 Titirangi AUCKLAND 0644
Email:	craig@craigshearer.co.nz
Telephone number:	021 735914

Empire Capital Limited could not gain an advantage in trade competition through this submission.

The specific provisions of Proposed Plan Change 71 that my submission relates to are:

1. The whole Proposed Plan Change 71, but also in particular I504 Bayswater Marina Precinct:
 - a. I504 Bayswater Marina Precinct Policy (5);

- a. I504 Bayswater Marina Precinct Policy (7);
 - b. I504 Bayswater Marina Precinct Policy (12);
 - c. I504 Bayswater Marina Precinct Assessment Criteria I504.8.2(4);
 - d. I504 Bayswater Marina Precinct Policy Special Information Requirement I504.9(1);
2. The General Coastal Marine Zone provisions which are supported.
 3. The Coastal-Marina Zone provisions which are also supported.

Empire Capital Limited generally supports the Proposed Plan Change but requests amendments and changes to the provisions as set out in the following paragraphs.

The changes sought and reasons are set out in the Annexure attached to this submission below.

Empire Capital Limited does wish to be heard in support of this submission at a hearing.

Please contact the undersigned if you have any queries regarding this submission.

Yours faithfully



Craig Shearer
Director, Shearer Consulting Limited

ANNEXURE: AUCKLAND UNITARY PLAN, PROPOSED PLAN CHANGE 71, EMPIRE CAPITAL LIMITED SUBMISSION

Table 1:

Submission point	Specific provision AUP	Issue	Proposed recommendation	Reason for change	
1.	Whole of Proposed Plan Change 71	The Proposed Plan Change ('PPC') proposes to make changes to car parking provisions of the AUP required by the NPS-UD that are not required to go through the Schedule 1 of the RMA process.	That the Plan Change be adopted along with AUP provisions amended as proposed in this submission.	Enables comprehensive, consistent and integrated management of the provisions of car parking in the Auckland region in accordance with the NPS-UD 2020.	
2. (Amendt 18)	F3 Coastal – General Coastal marine Zone Policy F2.17.3(3)	Amend Policy F2.17.3(3) as follows: (3) Require adequate land-based facilities for car parking , rubbish disposal, and wastewater pump-out to be provided when existing local water transport facilities increase their capacity or when local water transport services increase their scale of operations at those facilities.	Support	Complies with the NPS-UD.	60.2
3. (Amendt 18)	F3 Coastal – Marina Zone Matter of discretion F3.8.1(3)	18. Amend Matter of discretion F3.8.1(3) as follows: (3) for marine industry other than the maintenance and servicing of vessels: (a) the effects from additional traffic as well as any parking requirements .	Support	Complies with the NPS-UD.	60.3
4. (Amendt 19)	F3 Coastal – Marina Zone Matter of discretion F3.8.1(4)	Amend Matter of discretion F3.8.1(4) as follows: (4) for maritime passenger operations and facilities established after 30 September 2013: (a) the effects from additional traffic. as well as any parking requirements	Support	Complies with the NPS-UD.	60.4
5. (Amendt 20)	F3 Coastal – Marina Zone Assessment criteria F3.8.2(3)	Amend Assessment criteria F3.8.2(3) as follows: (3) for traffic and parking: (a) refer to any relevant assessment criteria in E27.8.2 Transport; and (b) whether the proposal, including any additional vehicle	Support	Complies with the NPS-UD.	60.5

Submission point	Specific provision AUP	Issue	Proposed recommendation	Reason for change
		<p>movements, adversely affects the safe and efficient operation of the road network, including the operation of public transport and the movement of pedestrians, cyclists and general traffic.; and (e) [deleted] whether the provision of parking is adequate for the site and the proposal, having considered any alternative parking available in the area and access to public transport.</p>		
<p>6. (Amendt 21)</p>	<p>F3 Coastal – Marina Zone Assessment criteria F3.8.2(4)</p>	<p>(4) for marine industry other than the maintenance and servicing of vessels, maritime passenger facilities: (a) whether measures have been implemented to address reverse sensitivity effects on the surrounding Coastal – Marina Zone activities; (f) the extent to which the need for parking or transport facilities conflicts with the main marina use and should be integrated with public transport.</p>	<p>Support</p>	<p>Complies with the NPS-UD.</p>
<p>7.</p>	<p>I504 Bayswater Marina Precinct amendments – Amend Policy I504.3(5)</p>	<p>Policy (5) is as follows: (5) Ensure space is available for publicly managed transport facilities for the ferry, and bus, including park and ride and cycle parking.</p>	<p>That Policy (5) is changed as follows: (5) Ensure space is available for publicly managed transport facilities for the ferry, and bus, including park and ride and cycle parking.</p>	<p>Clause 3.38 of the NPS-UD requires policies that have the effect of requiring a minimum number of car parks to be provided. to be removed (other than accessible car parks). The current policy as written has the effect of “ensuring”, that is, it is mandatory that car parks are made available for park and ride parking. This is contrary to the NPS-UD. The provision of such car parks should be discretionary, not mandatory, so the AUP needs amendment as proposed.</p>

60.6

60.7

Submission point	Specific provision AUP	Issue	Proposed recommendation	Reason for change
8. (Amendt 51)	I504 Bayswater Marina Precinct amendments – Amend Policy I504.3(7)	<p>The proposed amendment to Policy (7) is as follows: (7) Require the retention of appropriate facilities for boating, such as public boat ramps and boat trailer parking spaces associated with the marina and boat ramp.</p> <p>This issue provides for the modification of Policy (7) to remove the reference to parking of cars, so that provisions is only made for the parking of boat trailers. The requirement to park cars which are needed to tow the boat trailers, has been removed.</p>	<p>Amend the proposed change as follows: (7) Require the retention of appropriate facilities for boating, such as the public boat ramps. and boat trailer parking spaces associated with the marina and boat ramp.</p>	<p>This change is not consistent with the NPS-UD. Provisions of “boat trailer” parking spaces can only occur if the boat trailer is linked to a car/vehicle, so effectively this policy as modified in the Plan Change is “requiring” car parking to be provided, contrary to Clause 3.38 (1) of the NPS-UD.</p> <p>Further, boat trailer parking spaces “associated with the marina” as set out in the modified PC 71 policy makes no sense – boats moored in the marina do not require boat trailers.</p>
9. (Amendt 52)	I504 Bayswater Marina Precinct Amend Policy I504.3(12)	<p>Policy (12) is: (12) Require that, residential, or other non-marine related activities such as restaurants and cafes are provided for only where sufficient space remains available as required for marina, ferry service, and public access, recreation, public transport and boating activities, including associated boat trailer parking.</p>	<p>Modify Policy (12) as follows: (12) Require that, residential, or other non-marine related activities such as restaurants and cafes are provided for only where sufficient space remains available as required for marina, ferry service, and public access, recreation, public transport and boating activities, including associated boat trailer parking.</p>	<p>Similar to the Policy (7) submission point above, this policy as modified by PPC71 is effectively “requiring” car parking to be provided, as cars and boat trailers are linked together. contrary to Clause 3.38 (1) of the NPS-UD.</p>
10. (Amendt 53)	I504 Bayswater Marina Precinct Amend Assessment Criteria I504.8.2(4)	<p>The Assessment Criteria has been amended as follows: Traffic and parking ... (b) the extent to which the provision of parking ensures the amount of parking is adequate for the site and the proposal, and considers effects on alternative parking available in the area and access to the public transport network</p>	<p>I suggest the assessment criterion be deleted in its entirety: (b) the extent to which the provision of parking ensures the amount of parking is adequate for the site and the proposal, and considers effects on alternative parking available in the area and access to the public transport</p>	<p>The reason why this change to the proposal has been suggested is that sub-section (b) is effectively having the effect of requiring minimum car parking for the site.</p>

60.8

60.9

60.10

Submission point	Specific provision AUP	Issue	Proposed recommendation	Reason for change
			network; and	
11. (Amendt 54)	I504 Bayswater Marina Precinct Amend Special Information Requirement I504.9(1)	This SIR has been modified as follows in PPC 71: (1) An application for dwellings or food and beverage activities in Sub-precinct B must be accompanied by the following information: (b) the exact location and design of vehicle access and car parking (including any proposed shared parking) and: (ii) an assessment of parking, confirming the amount of parking is adequate for the application area and the proposal where provided, including consideration of effects on alternative parking available in the area and access to the public transport network.	Modify the Special Information requirement as follows: (1) An application for dwellings or food and beverage activities in Sub-precinct B must be accompanied by the following information: (b) the exact location and design of vehicle access and car parking (including any proposed shared parking) and: (ii) an assessment of parking, confirming the amount of parking is adequate for the application area and the proposal where provided, including consideration of effects on alternative parking available in the area and access to the public transport network.	The reason why this change to the proposal has been suggested is that “consideration of effects on alternative parking available in the area” will potentially have the effect of requiring minimum car parking if it is considered that there is spillover car parking from the Marina Precinct. This would then be contrary to the NPS-UD.

60.11

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Dilworth Trust Board
Date: Thursday, 24 March 2022 2:01:08 pm
Attachments: [Dilworth_Sub PC71_240322.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Dilworth Trust Board

Organisation name: Dilworth Trust Board

Agent's full name: Anthony Blomfield (Bentley & Co)

Email address: ablomfield@bentley.co.nz

Contact phone number: 0211339309

Postal address:
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Shortland Street
Auckland 1140

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Standard E27.6.1A Travel demand; Matters of discretion in E27.8.1(4A); Assessment criteria in E27.8.2(3A); Special information requirements in E27.9(2)(b)

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
Refer attached submission

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

Supporting documents
[Dilworth_Sub PC71_240322.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**SUBMISSION ON A PUBLICLY NOTIFIED PLAN CHANGE
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE
RESOURCE MANAGEMENT ACT 1991**

From: Dilworth Trust Board

Address for Service: C/- Bentley & Co Limited
PO Box 4492,
Shortland Street
Auckland 1140
Attn: Anthony Blomfield

To: Auckland Council

Address: Private Bag 92300, Auckland 1142

Submission on: Plan Change 71 – NPS-UD Removal of Car Parking
Minimums – Consequential Technical Amendments

Introduction

1. The Dilworth School provides education and accommodation for boys from disadvantaged backgrounds, and has provided this service to the community for over 100 years since it was founded in the late 1800's by James Dilworth. The education is fully funded by the Dilworth School. The Dilworth School was codified as a Charitable Trust under an Act of Parliament - Dilworth Trust Board Act 1946.
2. The Dilworth Trust Board ("Dilworth") oversees and runs Dilworth School, which operates from two Auckland City campuses – the Junior Campus at 27 Omaha Road, Epsom, and the Senior Campus at 2 Erin Street, Epsom, and from a 'Rural Campus' located at Mangatawhiri.
3. Dilworth owns an extensive property portfolio comprising commercial and residential land proximate to its school campuses. The revenue generated from the properties is used to fund the operation of the Dilworth School and the provision of education to boys through scholarships.
4. Accordingly, Dilworth has a vested interest in planning regulation, both with regards to how it affects the operation of the Dilworth School, and how it affects Dilworth's commercial interests which financially support the operation of the Dilworth School.

Scope of submission

5. Dilworth’s submission on Plan Change 71 relates to the following proposed provisions:
 - (a) Standard E27.6.1A Travel demand;
 - (b) Matters of discretion in E27.8.1(4A);
 - (c) Assessment criteria in E27.8.2(3A); and
 - (d) Special information requirements in E27.9(2)(b).

6. Specifically, Dilworth’s submission on Plan Change 71 relates to the introduction of a threshold of activity which triggers a requirement to obtain a resource consent (for a restricted discretionary activity), which is required to address/demonstrate that:
 - (a) the travel demands of the activity are provided for, including the adequacy of travel choices by all modes as an alternative to private vehicle travel and proposed measures to reduce demand for travel by private vehicle;
 - (b) the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement; and
 - (c) the extent to which a travel plan (to be prepared to accompany an application) addresses the matters above.

7. Dilworth is concerned with the unnecessary process, time, cost and efficiency implications of the future use and development of their existing and future school operations and other landholdings being captured by the changes proposed by Plan Change 71, and necessitating resource consents being required for the development of activities.

Educational Facilities

8. Plan Change 71 seeks to introduce new thresholds for activities, for which an activity will require a resource consent related to travel management matters in proposed Standard E27.6.1A. Such activities will require a resource consent where the proposed thresholds are exceeded, based on the premise that there needs to be a process in place ‘to adequately address any adverse effects on the transport network after minimum car parking requirements are removed from the plan’¹, and based on the premise that such activities ‘tend to generate travel demand.’²

9. While all other activities listed in Table E27.6.1A.1 have a quantified threshold (e.g. based on Gross Floor Area or the number of people an activity is designed to accommodate), for primary, secondary and tertiary education facilities, the proposed development threshold is simply “all educational facilities”.

¹ Auckland Council; Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan Section 32 Evaluation Report, page 17

² Ibid, page 21

10. The drafting of the development threshold for educational facilities will require any and all activities and development within an educational facility to obtain a resource consent under Standard E27.6.1A, whether or not the proposed activity will actually generate any new travel demand or change the travel demand characteristics of the activity. There is no discussion or justification for educational facilities being captured by the proposed rule in the Section 32 Evaluation Report for Plan Change 71.
11. The inclusion of educational facilities imposes a significant burden on Dilworth (and all education facility operators) to commit time and money on iterative resource consent applications. There is no justification for imposing such a burden on education facility operators.
12. The definition of “education facilities” in the Auckland Unitary Plan is broad and encompasses a wide range of accessory activities including accommodation. In many circumstances, the requirements proposed by Plan Change 71 will introduce an entirely new element to be considered, or in some situations will require a resource consent to be applied for where one would not otherwise be required. Table 1 below sets out a range of recent activities which have occurred within the Dilworth School Campuses, and the implications of Plan Change 71.

Table 1.

Activity	Regulatory Process	Implications of Plan Change 71
New gymnasium, all-weather field and maintenance shed at Junior Campus. No change to student roll or the capacity of the school.	A resource consent was obtained relating to building design and appearance, and construction traffic from an arterial road.	Additional resource consent requirement to assess travel management related to an activity which did not change traffic characteristics.
Extension of boarding houses at Junior Campus. No change to the capacity of the boarding house or student roll.	Permitted activity, no resource consent required.	Resource consent would be required to assess travel management related to an activity which did not change traffic characteristics.
Staff accommodation house. Relocating an existing accommodation activity for one family from Market Road to Junior Campus.	Permitted activity. Certificate of Compliance obtained.	Resource consent would be required to assess travel management related to an activity which accommodated one staff family. The activity resulted in a reduction of travel demand by accommodating staff on

		the site (rather than staff arriving from off site).
New fence at sports fields at Junior Campus	The activity triggered a technical resource consent as the fence classified as a 'building' within a yard.	The resource consent application would have also needed to address travel management related to an activity which did not change traffic characteristics.
New staff houses at Junior Campus. No change to the student roll or staff numbers on site.	Resource consent obtained relating to building design and appearance.	The resource consent would have also needed to address travel management. The activity resulted in a reduction of travel demand by accommodating staff on the site (rather than staff arriving from off site).
Extension of gymnasium at Senior Campus.	Permitted activity. Certificate of Compliance obtained.	Resource consent would be required to assess travel management related to an activity which did not change travel characteristics.

13. All public schools are designated in the Auckland Unitary Plan, with the effect being that no designated school is subject to the proposed rules under Plan Change 71. The conditions for all school designations held by the Ministry of Education require a minimum parking rate, or for a parking demand assessment to be prepared to justify an alternative parking rate. However, the broad 'travel management' matters that Plan Change 71 seeks to introduce are not required to be assessed or considered for development within designated schools. Given that designated schools comprise the largest proportion of all educational facilities in Auckland, Plan Change 71 will introduce an inequitable burden on non-designated schools.
14. Having regard to the types of activities that would engage the proposed Standard E27.6.1A, the proposed Plan Change 71 is unjustified, inappropriate, will constrain the use and development of educational facilities, and will not enable the efficient use of resources.

Community facilities

15. As with other educational facilities, Dilworth provide for the community use of their facilities, with such an activity being permitted in the Special Purpose – School zone.

16. The inclusion of ‘community facilities’, with a threshold of 50 or more people as requiring a resource consent under the provisions proposed to be introduced by Plan Change 71 may be considered/interpreted to capture the community use of education and tertiary education facilities.
17. There would be no basis or rationale for introducing such a consent requirement, which would be unjustified, inappropriate, will constrain the use and development of educational facilities, and will not enable the efficient use of resources.

Other Activities

18. Dilworth owns a large portfolio of properties within the Business and Residential zones. The income generated by these landholdings contributes to the operation of the Dilworth School, and the provision of full scholarships to boys for a high quality education. For example, Dilworth owns a wide range of properties in the Business – Mixed Use Zone, which are attractive to a range of activities and development opportunities, which Dilworth actively pursues to optimise the income potential of the land assets.
19. The purpose of Plan Change 71 is purportedly to require the consideration of travel management effects in response to the deletion of minimum parking standards. However, the range of matters that are required to be assessed are broader than those that were required to be assessed for activities which did not comply with minimum parking standards (before they were deleted). In addition, in zones such as the Business – Mixed Use zone where there were no (or very few) minimum parking standards to begin with, Plan Change 71 introduces an entirely new element to be assessed. This is inconsistent with the purpose of Plan Change 71.
20. The proposal to introduce development thresholds and a resource consent process (together with the requirement to produce a travel management plan for the activity) is inappropriate and will not enable the efficient use of resources. The resource consent process and the related matters for assessment will impose additional cost on landowners such as Dilworth. This cost has not been adequately considered in the Section 32 Evaluation.

Submission

21. Dilworth opposes Plan Change 71.
22. Dilworth could not gain an advantage in trade competition through this submission.
23. Dilworth is directly affected by an effect of the subject matter that –
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition.
24. The nature of the proposed provisions will place an unreasonable and unnecessary time, cost, and process imposition on Dilworth.

25. Dilworth consider the proposed provisions are:
- (a) Contrary to the sustainable management of natural and physical resources and be inconsistent with the purpose and principles of the Resource Management Act 1991 (RMA);
 - (b) Not consistent with, or achieve, the purpose and principles of the RMA, including meeting the reasonably foreseeable needs of future generations and enabling people and communities to provide for their social, economic, and cultural well-being and for their health and safety;
 - (c) Not consistent with the National Policy Statement on Urban Development 2020, by increasing the complexity, uncertainty, time and cost of enabling and providing educational facilities and infrastructure that are required to support urban intensification and well-functioning urban environments that enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
 - (d) Not consistent with any other relevant objectives and policies of the Auckland Unitary Plan.

Decision Sought

26. Dilworth seeks that Plan Change 71 is declined.
27. Dilworth wishes to be heard in support of this submission.
28. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Signature

Dilworth Trust Board

by its planning and resource management consultants
Bentley & Co. Ltd.



Date: 24 March 2022

Anthony Blomfield

Address for Service:

Bentley & Co. Ltd
PO Box 4492
Shortland Street
Auckland 1141
Attention: Anthony Blomfield

Telephone: (09) 309 5367

Mobile: 0211 339 309

Email: ablomfield@bentley.co.nz

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Tina Kalmar
Date: Thursday, 24 March 2022 2:16:20 pm
Attachments: [pc71-form5-notification.pdf](#)
[24 March 2022 PC71 Submission AUT Final.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Tina Kalmar

Organisation name: Auckland University of Technology (AUT)

Agent's full name: Tina Kalmar

Email address: tina.kalmar@wsp.com

Contact phone number: 0272732396

Postal address:
WSP
Lvl 3
The Westhaven
100 Beaumont St
Auckland Central
Auckland 1010

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Policy E27.3(6), E27.4.1(A3a); E27.9(2)(b); E27.8.1(4A), E27.8.2(3A), E27.9(2), I549.8.2(3), Chapter J

Property address: As detailed in the submission text, attached.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
As detailed in the submission text, attached.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: As detailed in the submission text, attached. This includes amendments to

proposed policy; removal of new standard and matters of discretion/assessment criteria/special information requirement; retain precinct text and amend proposed definition.

Submission date: 24 March 2022

Supporting documents

pc71-form5-notification.pdf

24 March 2022 PC71 Submission_ AUT Final.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Mrs Tina Kalmar on behalf of Auckland University of Technology

Organisation Name (if submission is made on behalf of Organisation)

WSP

Address for service of Submitter

Level 3, The Westhaven, 100 Beaumont St, Auckland 1010

Telephone: Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

Plan Change/Variation Name

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or
Property Address

Or
Map

Or
Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

As outlined in the submission text attached.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

As outlined in the submission text attached.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter
(or person authorised to sign on behalf of submitter)

03/24/2022
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

24 March 2022

Attention: Planning technician

Auckland Council

Level 24, 135 Albert St

Private Bag 92300

Auckland 1142

From: Tina Kalmar, on behalf of Auckland University of Technology

WSP,

Lvl 3, The Westhaven,

100 Beaumont St,

Auckland, 1010

Dear Sir or Madam,

SUBMISSION OF AUCKLAND UNIVERSITY OF TECHNOLOGY (AUT)

PLAN CHANGE 71: NPS-UD REMOVAL OF CAR PARKING MINIMUMS – CONSEQUENTIAL TECHNICAL AMENDMENTS TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART) AND AUCKLAND COUNCIL DISTRICT PLAN

To: Auckland Council

Name of Submitter: Auckland University of Technology

1. This is a submission on the following proposed plan change/variation to an existing plan (the proposal):

PC 71 - NPS-UD Removal Of Car Parking Minimums – Consequential Technical Amendments.

The scope of the plan change is to address the issue of consequential technical amendments to the Auckland Unitary Plan (AUP) and the HGI Plan that are necessary to give effect to Policy 11 of the NPS-UD but fall outside the scope of non-Schedule 1 changes as described in clause 3.38 of the NPS-UD.

2. Auckland University of Technology could not gain an advantage in trade competition through this submission.

3. The specific provisions of the proposal that AUT's submission relates to are:

- Rule E27.4.1(A3a) which provides for any activity or subdivision which meets or exceeds the new travel demand thresholds in Standard E27.6.1A as a restricted discretionary activity;
- The travel plan requirement as part of an assessment of environmental effects for any activity meeting or exceeding the development thresholds in Table E27.6.1A. . This requirement has been included as a new special information requirement (E27.9(2)(b));

- New matters of discretion (E27.8.1(4A)) and related assessment criteria (E27.8.2(3A));
- Precinct text changes (I549.8.2(3))
- Chapter J Definitions

While supportive of the intent of plan change 71, AUT is concerned with the broad scope of the development thresholds, and travel plan requirements as proposed.

4. Background

AUT is a key stakeholder in the Auckland Region and a major contributor to tertiary education for the community. AUT has significant landholdings concentrated in three main sites:

- North Campus, 72 Akoranga Drive, Northcote (Business - Mixed Use zone). Designation 6101 and AUP Precinct I549 Akoranga Precinct apply to the campus
- City Campus (CBD), 37-69 Wellesley Street (Business - City Centre zone). Designation 6100 and AUP I207 Precinct apply to the campus.
- South Campus (Manukau City Centre), 640 Great South Road (Business- General Business Zone). Designation 6102 and AUP Precinct I424 Manukau 2 apply to the campus.

AUT currently has over 4,000 equivalent fulltime staff and more than 29,000 students.

5. AUT’s submission is:

- **Oppose** Rule E27.4.1(A3a) which applies restricted activity status for all tertiary facilities which meet or exceed the travel demand threshold, and triggers the need for a travel plan;
- **Oppose** the new special information requirement under E27.9(2)(b));
- **Oppose** the new matters of discretion (E27.8.1(4A)) and related assessment criteria (E27.8.2(3A));
- **Oppose** the I549 Precinct text change
- **Oppose** the Chapter J definition for ‘travel plans’

62.1

6. AUT plan provision amendments requested

AUT submits that the plan change provisions should be removed or amended to address AUT’s concerns, as summarised in Table 1.

Table 1. Summary of amendments requested

Chapter	Provision	Amendment
E27 Transport	Policy E27.3(6); Table E27.4.1 Activity table; Standard E27.6.1A and Table E27.6.1A.1; E27.8.1 (4A). Matters of discretion; E27.8.2 (3A) Assessment Criteria;	<ul style="list-style-type: none"> • Amend Policy 6, including separate policies for education facilities and hospitals. • Amend RD activity status to apply only when travel demand threshold is exceeded AND amend rule with more specific travel demand threshold (not ‘any activity’).

62.2
62.3
62.4
62.5
62.6

	Special information requirement E27.9(2)	<ul style="list-style-type: none"> Clarify application of Standard E27.6.1A against Policy 6 in instances where an education facility is not within specified zone listed in policy 6. Clarify subject to the new requirements. Remove requirement for a travel plan for all tertiary facilities- delete rule or include additional exceptions to Rule E27.4.1(A3a) 	62.7
I549 Akoranga Precinct amendments	Assessment Criteria I549.8.2(3) – see Table 2 and PC Attachment E pp.787	<ul style="list-style-type: none"> Retain the text 'car parking' to avoid the need to re-insert at later point in time (future plan changes). Retain wording with suggested insertion of "appropriate" or "permitted" or other such wording. The use of "permitted" would align with Chapter J definition changes. 	62.8
J – Definitions amendments	Travel Plan	<ul style="list-style-type: none"> Amend the definition to clarify/limit scope (currently broad) 	62.9

Table 2. Attachment B provisions affected by PPC71/PM14 with amendment and issue category

I549 Akoranga Precinct	Assessment criteria I549.8.2(3)(b)	Plan change	Issue 3
------------------------	------------------------------------	-------------	---------

Note: Issue 3 relates to 'Implied minimums'

7. Reasons

AUT considers the non-specific development threshold proposed for education facilities is too blunt an instrument. Its application could entail additional onerous site-specific assessments requiring response to a wide range of transport issues and effects associated with a development, however, small. AUT also submits that the relationship between the new Rule E27.4.1(A3a) and existing Rule E27.4.1(A3) could be clearer.

A key focus in the development of PPC71/PM14 has been amendments to the AUP to enable the assessment of travel demand effects on the transport network in areas where there previously were car parking minimums. The plan change does not recognise differences between education facilities and applies a 'catch-all' approach.

Further the new rule requirements suggests that the only way for the AUP to continue to function as intended (albeit with the removal of the parking minimums) is to have a travel plan to enable an adequate assessment of travel demand on the safety and efficiency of the road network (referring s32 report section 8.5 Consultation with Technical Specialists). Other methods or travel initiatives already being implemented or proposed for education facilities should be considered before requiring additional, more complex technical travel plans.

The amended definition for Travel Plans is broad in scope. Preparation of an appropriate plan could require specialised needs assessment and monitoring, and ongoing plan

updates may be required. Further, future physical infrastructure requirements may not be known at the time an assessment is carried out.

8. AUT seeks the following decision from Auckland Council:

AUT opposes the plan change provisions as currently proposed, and seeks the following decisions, summarised in Table 3 below.

Table 3. relief sought summary

Chapter	Provision	Support /Oppose /Amend	Relief sought
E27 Transport	As per Table 1	Oppose/ Amend	Amend policy, Remove new standard 27.6.1.A, and matters of discretion and assessment criteria and special information requirement
I549 Akoranga Precinct amendments	Assessment Criteria I549.8.2(3)	Oppose	No deletion of reference to car parking and retain assessment criteria
J – Definitions amendments	Travel Plan	Oppose/ Amend	Amend definition

Overall, AUT seeks the following relief from Auckland Council (or any other relief or other relevant amendment as are considered appropriate or necessary to address the concerns set out in this submission), be granted:

1. Amend Policy E27.3(6);
2. Remove Table E27.4.1 Activity table; Standard E27.6.1A and Table E27.6.1A.1; E27.8.1 (4A). Matters of discretion; E27.8.2 (3A) Assessment Criteria; Special information requirement E27.9(2)
3. Amend the proposed 'travel plan' definition and subsequent information requirements

9. AUT does wish to be heard in support of our submission.

On behalf of Auckland University of Technology,



Tina Kalmar

Intermediate Planner, WSP

Address for Service: WSP, Lvl 3, The Westhaven, 100 Beaumont St, Auckland, 1010

Phone: 027-273-2396

Email: tina.kalmar@wsp.com

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Melinda Kay McMillan
Date: Thursday, 24 March 2022 2:31:02 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Melinda Kay McMillan

Organisation name:

Agent's full name:

Email address: mcmillanm72@gmail.com

Contact phone number:

Postal address:
2 Vista Crescent
Glendowie
Auckland 1071

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
PC 71: NPS-UD Removal of Car Parking Minimums

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Allowing high density housing without the need for car park space in Glendowie is wrong for a number of reasons.

Firstly, most people living in Auckland own at least one and often two cars. Removing the need for at least one car space will cause major congestion on our roads, many of which aren't wide enough to allow cars to park on both sides of the road.

Secondly, Glendowie is not near a train station or bus station or any public transport hub and many of the bus routes have been cut in recent years so assuming that people will have to use public transport is ludicrous as let's face it - Auckland isn't exactly 'public transport friendly'.

Allowing high density housing which doesn't even stipulate a car park is in no way keeping to the current Glendowie neighbourhood which is predominantly single homes on a section and until recently up to three stand alone homes on a section.

As well as little room for lots of cars on our streets, doing so will encourage even more crime in our

neighbourhood as cars are much more likely to be broken into if left on a crowded street. Safety is another issue. We have both young families in our neighbourhood and an older population who will become endangered if having to negotiate traffic and cars whereby streets are crammed with cars, thus minimising visibility. Please rethink this motion, it will be detrimental both to Glendowie and to Auckland in years to come, is extremely short cited as it adds no value whatsoever to a property and is poorly thought out.

I or we seek the following decision by council: Decline the plan change

63.1

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Janice Anne Bryant
Date: Thursday, 24 March 2022 2:31:25 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Janice Anne Bryant

Organisation name:

Agent's full name:

Email address: jannebryant@mac.com

Contact phone number: 021878575

Postal address:

1/34 West Tamaki Road

St Heliers

Auckland 1072

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Car parking minimums for new housing developments.

Property address: 1/34 West Tamaki Road - proposed development at 32 West Tamaki Road.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The street is extremely busy now and the proposed development of 11 units (or more) will only result in unsafe visibility for motorists, pedestrians and cyclists with more on street parking. As the street has a significant curve on a downhill section resulting in increased speeds in the vicinity. It is already dangerous when exiting driveways with limited visibility.

This a major cycling route and as we are encouraging a greater cycling presence as daily transport the worst thing would be to have more parked cars on the cycleways and the danger that car doors opening presents to all cyclists.

It is also ironic that as we encourage the use of E vehicles, this development would deny its residents the opportunity to charge their vehicle apart from on the road. Most unlikely.

This street has a long history of cars being vandalized and/or stolen and this proposal would provide more opportunity for this to happen.

There will be reduced accessibility for service vehicles - eg waste management, couriers, Uber eats

etc. that residents rely on, on a daily basis.

While not providing on-site parking (garaging) this impacts on necessary storage space for sports equipment, garden tools, bikes, scooters etc. which in turn negatively impacts on the quality of residential living.

I or we seek the following decision by council: Decline the plan change

64.1

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)



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Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Kasey Zhai

Organisation Name (if submission is made on behalf of Organisation)

Goodman Property Trust

Address for service of Submitter

PO Box 1986, Shortland Street, Auckland 1140

Telephone:

273058458

Fax/Email:

kaseyz@barker.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 71

Plan Change/Variation Name

NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Please refer to the attached submission

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

Please refer to the attached submission

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

[Handwritten Signature]

Signature of Submitter
(or person authorised to sign on behalf of submitter)

03/24/2022

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

24 March 2022

Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1010
Submission via email: unitaryplan@aucklandcouncil.govt.nz

Submission on Proposed Plan Change 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan on behalf of Goodman Property Trust

Introduction

Goodman Property Trust (“Goodman”) is one of New Zealand’s largest property groups, owning, managing, and developing high-quality urban logistics spaces, including logistics and industrial facilities, warehouses, and business parks.

Goodman’s Auckland portfolio contains over one million square metres of floorspace, including estates located in the suburbs of East Tāmaki, Māngere, Manukau, Mt Roskill, Mt Wellington, Ōtāhuhu, Panmure, and Penrose.

Scope of Submission

The specific aspects of Proposed Plan Change 71 to the Auckland Unitary Plan (Operative in Part) that this submission relates to are detailed in the table at Appendix 1.

The Submission

Goodman generally supports the consequential technical amendments to ensure that the Auckland Unitary Plan (“AUP”) removes all minimum carparking requirements to give effect to the National Policy Statement: Urban Development (“NPS-UD”).

Goodman opposes the aspects of the Proposed Plan Change that seek to introduce requirements to prepare and assess a travel plan for development through a resource consent process. These requirements are contrary to the NPS-UD for the reasons set out in the submission below.

The table at **Appendix 1** provides further details and sets out:

- The provisions that Goodman supports, opposes or seeks to amend;
- Goodman’s reasons for their stated position;
- The decision sought from Council.

Intent of the NPS-UD

The NPS-UD sets out a significant shift in how cities plan for and manage carparking; from one regulated broadly by Councils through District Plans, to a more flexible market-led approach, where those developing land generally decide the amount of parking that is necessary to meet demand. This is intended to achieve more efficient land use, provide more space for housing, and ensure parking is more responsive to demand, acknowledging that minimum parking regulations have historically resulted in an oversupply of parking. This relates to the wider objectives of the NPS-UD to achieve a well-functioning urban environment that supports a reduction in greenhouse gas emissions. The Section 32 report for the NPS-UD explains this approach in more detail¹.

The NPS-UD does not suggest that carparking is irrelevant to urban planning decisions. Rather, it encourages Councils to use non-regulatory methods to manage effects, particularly by preparing and implementing comprehensive parking management plans (Policy 11). The other non-regulatory methods available include Council investment in improvements to public transport and walking and cycling infrastructure where it is needed to meet increased demand. Goodman encourages the Council to take steps to implement these methods.

The proposal to require a travel plan to be prepared and assessed through a resource consent process is not consistent with the NPS-UD, given that in many cases it may have the effect of requiring carparking through assessment criteria. This is contrary to Policy 11 and to clause 3.38(1), which requires Councils to remove any assessment criteria that have the effect of requiring a minimum number of carparks. While the criteria themselves do not set a minimum as a metric, the Council would have discretion to require carparking, with the assessment involving a significantly greater level of uncertainty than the operative provisions.

Goodman is concerned that the proposed provisions for travel plans incorrectly emphasise the need to reduce the demand for private vehicle use and car parking. While the NPS-UD seeks good accessibility outcomes in urban environments by way of public or active transport, it was not the intent to discourage private vehicle use within individual developments. Where travel demand within a development is well managed and does not affect the surrounding transport network, the mode of travel choice should be determined by those developing the land.

For the reasons given above, Goodman considers that the travel plan provisions of the Proposed Plan Change do not give effect to the NPS-UD as required by s75(3) of the Resource Management Act 1991 ("RMA").

Efficiency and Effectiveness of Travel Plans

In addition to the policy issues outlined above, the way in which travel plans are proposed to be applied in the Plan Change is not an efficient or effective method for achieving the transport objectives of the AUP.

Travel plans are documents typically prepared for employment and educational activities with the aim of optimising the use of the transport system, often by encouraging use of a range of modes. They typically involve detailing the operational measures that can be put in place to support this, including management of parking areas, provision for active transport facilities, communications and promotion for public transport and provision for shared transport programmes, amongst others². Given the operational nature of these

¹ See [NPS-UD Section 32 report](#)

² See [Waka Kotahi guidelines](#) and [Auckland Transport guidelines](#)

measures, they require on-going monitoring by businesses and authorities to ensure they are operating as intended.

Plan Change 71 proposes to require travel plans for a wide range of residential and commercial activities outside of centres and other identified zones as set out in Table E27.6.1A.1. In Goodman's view this is unnecessary, inefficient and ineffective for the following reasons:

- Significant time and cost inefficiencies would be involved, including those associated with additional consenting requirements as well as on-going monitoring (for established developments and the Council) and any associated entities or processes that would need to be established. In some cases, the need for a restricted discretionary activity consent for a travel plan will be the only reason for consent (e.g., if the application was for a new warehouse on industrial zoned land). This would add further delays to enabling development to occur, which is not the intent of the NPSUD.
- The activity thresholds set out in Table E27.6.1A.1 are poorly correlated with the potential effects on the transport network. For example, industrial activities of up to 2000m² are likely to accommodate low staff numbers and generate low demand on the transport network. Similarly, retirement villages (integrated residential development) typically have lower levels of demand on the transport network.
- There are existing provisions of the AUP which address the effects of travel demand management where it may be appropriate for larger scale developments. This includes the existing provisions (E27.6.1) requiring the preparation of an Integrated Transport Assessment ("ITA").
- Given the wide range of matters that a travel plan needs to assess and the broad nature of the assessment criteria proposed in E27.8.2(3A), the Plan Change provides little or no certainty to applicants on the specific outcomes to be achieved by a travel plan. The Plan Change has the potential to be more onerous and involve more costs than the operative provisions in E27 – Transport. For example, the assessment criteria includes matters external to the proposed development (the availability of public and active modes), or duplicates matters that are otherwise managed under the AUP (minimum levels of cycle parking). There is also a presumption that developments exceeding the proposed thresholds will create parking overspill to the transport network, with no acknowledgement that developers may choose to provide parking on site. Other concerns regarding the assessment criteria are included at Appendix 2.

Relief Sought

Goodman supports with amendments those aspects of Proposed Plan Change 71 that are consequential technical amendments to the AUP that support the removal of car parking minimums.

Goodman requests further amendments to Policy E27.3(3) and E27.3(9) to give effect to the objectives of Plan Change, and opposes other amendments as set out in Appendix 1. Goodman would consider other consequential amendments as appropriate or necessary to address the concerns set out in this submission.

Goodman wishes to be heard in support of its submission.

If other parties make a similar submission, Goodman would consider presenting a joint case with them at any hearing.

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Appendix 1: Summary of relief sought and reasons

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
B8 Coastal Environment amendments				
1. Amend B8.6 Explanation and principal reasons for adoption	Support	Retain	The reference to required car parking is not consistent with the NPS-UD.	That the B8.6 Explanation and principal reasons for adoption be amended as notified.
E27 Transport amendments				
2. Amend E27.1 Background	Support in Part	Amend	The management of parking demand through a district plan is not consistent with the intent of the NPS-UD. Clarifying the approach to managing maximum parking limits is outside the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPS-UD and adverse effects after the removal of minimum car parking requirements.	That the proposed insertions in reference to parking demand and maximum parking limits are deleted.
3. Additional requested amendment to Policy E27.3(3)	N/A	Amend Policy E27.3(3)	The reference to managing the number, location, and type of parking is not consistent with the NPS-UD. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (3) Manage the number, location and type of parking and loading spaces, including and bicycle parking and associated end-of-trip facilities to support all of the following:

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Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
4. Additional requested amendment to Policy E27.3(9)	N/A	Amend Policy E27.3(9)	The reference to providing for flexible approaches to parking is not necessary. The amendment sought is within scope of Issue 2 of Proposed Plan Change 71.	That the policy be amended as: (9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.
5. Amend Policy E27.3(6)	Support in Part	Amend	Amending the policy framework for managing maximum parking limits is outside of the scope of Proposed Plan Change 71 to address consequential technical amendments to give effect to Policy 11 of the NPS-UD and adverse effects after the removal of minimum car parking requirements.	That the policy be amended as: 6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by: (a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals. (b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail

65.5

65.6

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
				and motor vehicle sales) and commercial service activities.
6. Delete Policy E27.3(6A)	Support	Retain	The reference to where parking may be reduced is not necessary.	That the policy be amended as notified.
7. Delete Policy E27.3(7)	Support	Retain	The reference to where minimum car parking requirements do not apply is not necessary.	That the policy be deleted as notified.
8. Add a new activity rule to Table E27.4.1	Oppose	Delete	Managing the efficient use of car parking and the effects of car parking provision on the transport network through an activity rule is not consistent with the intent of the NPS-UD. A travel plan is not an efficient or effective planning method for managing the potential effects of the specified activities on the transport network.	That E27.4.1(A3a) be deleted.
9. Add a new Standard E27.6.1A	Oppose	Delete	Please refer to commentary in the main submission.	That E27.6.1A be deleted.
10. Amend Standard E27.6.2(5)	Support	Retain	The reference to required minimum car parking in the Business – Neighbourhood Centre Zone is not consistent with the NPS-UD.	That the standard be amended as notified.
11. Amend Standard E27.6.3.1(1)(c)	Support	Retain	The management of the use of any parking spaces that are provided is not necessary.	That the standard be amended as notified.
12. Add a new E27.8.1 Matter of discretion	Oppose	Delete	Please refer to commentary in the main submission.	That E27.8.1(4a) be deleted.

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Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
13. Add a new E27.8.2 Assessment criteria	Oppose	Delete	Please refer to commentary in the main submission and Appendix 2	That E27.8.2(3A) be deleted.	65.14
14. Amend Special Information Requirement E27.9(2)	Oppose in Part	For E27.9(2)(a): Retain	For E27.9(2)(a): Requiring a travel plan where less than the minimum number of parking spaces are provided is not necessary.	That Special Information Requirement E27.9(2) be amended as notified.	65.15
		For E27.9(2)(b): Delete	For E27.9(2)(b): Please refer to commentary in the main submission.	That Special Information Requirement E27.8(2)(b) be deleted.	65.16
15. Amend Special Information Requirement E27.9(3)	Support	Retain	The reference to parking requirements and required parking is not consistent with the NPS-UD.	That the special information requirement is amended as notified.	65.17
Subdivision – Urban amendments					
16. Amend Standard E38.9.1.2(1)	Support	Retain	The reference to required parking spaces is not consistent with the NPS-UD.	That the standard be amended as notified	65.18
Temporary activities amendments					
17. Amend Policy E40.3(5)	Support	Retain	Requiring certain temporary activities provide sufficient parking is not consistent with the NPS-UD.	That the policy is amended as notified.	65.19
18. Amend Assessment criteria E40.8.2(2)	Support	Retain	Assessing the extent that adequate parking will address relevant adverse effects is not consistent with the NPS-UD.	That the assessment criteria is amended as notified.	65.20
F2 Coastal - General Coastal Marine Zone amendments					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
19. Amend Policy F2.17.3(3)	Support	Retain	Requiring adequate car parking be provided is not consistent with the NPS-UD.	That the policy is amended as notified.	65.21
F3 Coastal - Marina Zone amendments					
20. Amend Matter of discretion F3.8.1(3)	Support	Retain	Assessing the effects from any parking requirements is not consistent with the NPS-UD	That the matters of discretion are amended as notified.	65.22
21. Amend Matter of discretion F3.8.1(4)					65.23
22. Amend Assessment criteria F3.8.2(3)	Support	Retain	Assessing whether adequate car parking has been provided and the need for car parking is not consistent with the NPS-UD.	That the assessment criteria are amended as notified.	65.24
23. Amend Assessment criteria F3.8.2(4)					65.25
F5 Coastal – Minor Port Zone amendments					
24. Amend Assessment Criteria F5.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent the NPS-UD.	That the assessment criteria are amended as notified.	65.26
25. Amend Assessment Criteria F5.8.2(3)					65.27
F6 Coastal – Ferry Terminal Zone amendments					
26. Amend Policy F6.3(1)	Support	Retain	Requiring that sufficient car parking be provided is not consistent with the NPS-UD.	That the policies are amended as notified.	65.28
27. Amend Policy F6.3(8)					65.29
H1 Residential – Large Lot Zone amendments, H2 Residential – Rural and Coast Settlement Zone amendments, H3 Residential – Single House Zone amendments, H4 Residential – Mixed Housing Suburban Zone amendments, H5 Residential – Mixed Housing Urban Zone amendments, H6 Residential – Terrace Housing and Apartment Buildings Zone amendments, H20 Rural – Waitakere Foothills Zone amendments, H21 Rural – Waitakere Ranges Zone amendments					

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought	
28. Amend Assessment Criteria H1.8.2(1)	Support	Retain	Assessing whether adequate car parking has been provided is not consistent with the NPS-UD.	That the assessment criteria are amended as notified.	65.30
29. Amend Assessment Criteria H2.8.2(1)					65.31
30. Amend Assessment Criteria H3.8.2(1)					65.32
31. Amend Assessment Criteria H4.8.2(1)					65.33
32. Amend Assessment Criteria H5.8.2(1)					65.34
33. Amend Assessment Criteria H6.8.2(1)					65.35
34. Amend Assessment Criteria H20.8.2(1)					65.36
35. Amend Assessment Criteria H21.8.2(1)					65.37
J – Definitions amendments					
36. Amend the definitions as follows:					
Accessory activities Non-accessory parking Off-site parking	Support	Retain	The reference to required car parking is not consistent with the intent of the NPS-UD.	That the definitions are amended as notified.	65.38

Plan Provision or Proposed amendment in Plan Change 71	Support/Support in Part/Oppose	Decision request (retain, amend, delete)	Reasons for Submission	Relief Sought
Travel Plan	Oppose	Delete	Please refer to commentary in the main submission.	That the amendments to the definition are deleted.

65.39

Appendix 2: Commentary on proposed assessment criteria (E27.8.2(3A))

Proposed Assessment Criteria	Comment
E27.8.2(3A)(a): The extent to which the travel demands of the activity are provided for, including but not limited to: (i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:	Please refer to commentary below.
the accessibility and frequency of public transport services	Public transport accessibility and frequency is directly controlled by Auckland Transport. Goodman is concerned that should the existing accessibility and frequency of public transport services not be acceptable, then provisions of public transport services may fall upon developers to fund (or partially fund), or development may be delayed until appropriate funded services be available. This is not the intent of the NPS-UD.
the standard of active modes infrastructure for all users	Goodman provides appropriate active mode infrastructure within their sites as a matter of course, however Goodman is concerned that this criterion may require infrastructure to be provided beyond the site boundaries to provide an appropriate standard of infrastructure. This goes well beyond the intent of the NPS-UD.
the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments	Goodman is concerned this criterion will require additional assessment within urban areas that have been zoned in recognition that an acceptable level of connectivity to a range of locations is available. In cases where land is already zoned for commercial and industrial activities, proposals should be assessed in accordance with existing AUP assessment processes, and not require the additional burden of proving why urban zoned land is acceptable for the proposed activity.
(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking	Goodman is concerned this criterion is poorly linked to effects on the transport network and will require developers to actively reduce the

Proposed Assessment Criteria	Comment
	demand for private vehicle travel and car parking. While the NPS-UD seeks good accessibility outcomes in urban environments by way of public or active transport, it was not the intent to discourage private vehicle use within individual developments.
E27.8.2(3A)(b): the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.	Goodman is concerned this criterion will result in the default provision of on site car parking to manage the effects of potential parking overspill on the adjacent road network. This is not consistent with the intent of the NPS-UD and potentially disincentivises parking management through non-regulatory methods such as preparing and implementing comprehensive parking management plans and Council investment in improvements to public transport and walking and cycling infrastructure.
E27.8.2(3A)(c): the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).	Please refer to commentary above.

**SUBMISSION ON PLAN CHANGE 71 TO THE AUCKLAND UNITARY PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE
MANAGEMENT ACT 1991**

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Introduction

1. This is a submission on behalf of AMP Capital Investors (New Zealand) Limited (**AMP Capital**) and PSPIB/CPPIB Waiheke Incorporated (**Fund**) on proposed Plan Change 71 (**PC 71**) to the Auckland Unitary Plan (**Unitary Plan**). PC 71 was notified by Auckland Council (**Council**) on 24 February 2022.
2. PC 71 proposes changes to the Unitary Plan in response to the removal of minimum car parking requirements from the Unitary Plan on 11 February 2022, as required by Policy 11 of the National Policy Statement of Urban Development 2020 (**NPS-UD**). The changes include consequential amendments to ensure internal consistency within the Unitary Plan, removal of policies, as well as a new activity rule, standard, matters of discretion, assessment criteria, and special information requirement.
3. AMP Capital and the Fund oppose PC 71 in part and support PC 71 in part.

Scope of submission

4. This submission relates to the following proposals in PC 71:
 - (a) Consequential amendments to the Unitary Plan to ensure internal consistency; and
 - (b) The following amendments to the Transport chapter of the Unitary Plan:
 - (i) Amendment to Policy E27.3(6);
 - (ii) New activity rule at E27.4.1(A3a);
 - (iii) New Standard E27.6.1A and Table E27.6.1A.1;
 - (iv) New matter of discretion E27.8.1(4A);
 - (v) New assessment criteria E27.8.2(3A); and
 - (vi) Amendment to the special information requirement E27.9(2)(b).

Background to AMP Capital and the Fund

5. The Fund is a significant investor in New Zealand commercial real estate worth over a billion dollars and is an indirect supporter of thousands of local jobs across our retailers, property management functions, professional consultants and construction industries. In Auckland, the Fund's assets include the Botany Town Centre (**BTC**), the Manukau Supa Centa (**Supa Centa**), and the office towers in the CBD at 45 Queen St and 51 Shortland St. AMP Capital manages these assets on behalf of the Fund. AMP Group, the ultimate parent entity of AMP Capital, has a long and significant property investment and operating history in the New Zealand market.
6. BTC and the Supa Centa are located within the Business - Metropolitan Centre Zone under the Unitary Plan. This recognises that these centres are a hub for commercial and community activities within the Auckland region, and that further development and intensification on these sites are critical to achieving a quality compact urban form. The provision of sufficient carparking is critical to the success of these centres.
 - 6.1 BTC and the Supa Centa play an important role in the access of goods, services, community facilities and employment opportunities.

Trade competition

7. AMP Capital and the Fund could not gain an advantage in trade competition through this submission.

Submission in opposition

8. AMP Capital and the Fund oppose the following proposals relating to the Transport chapter of the Unitary Plan.
- (a) The amendment to Policy E27.3(6);
 - (b) The new activity rule E27.4.1(A3a);
 - (c) The new Standard E27.6.1A and Table E27.6.1A.1;
 - (d) The new matter of discretion E27.8.1(4A);
 - (e) The new assessment criteria E27.8.2(3A); and
 - (f) The amendment to the special information requirement E27.9(2)(b).

66.1

Reasons for submission in opposition

9. The reasons for AMP Capital and the Fund's opposition include the following.
10. In general, the proposed changes to the Transport Chapter in paragraph 8 above:
- (a) do not give effect to the objectives and policies of the NPS-UD;
 - (b) would not contribute to well-functioning urban environments;
 - (c) are inconsistent with the sustainable management of physical resources and are otherwise consistent with the purpose and principles of the Resource Management Act 1991 (**RMA**);
 - (d) do not meet the requirements to satisfy the criteria of section 32 of the RMA;
 - (e) will not meet the reasonably foreseeable needs of future generations; and

- (f) are not consistent with sound resource management practice.
11. Without derogating from the generality above, the proposed changes to the Transport Chapter described in paragraph 8 above do not give effect to Policy 11 of the NPS-UD and do not achieve the objective of PC 71.
12. We expand below.

The amendment to Policy E27.3(6) is unnecessary and does not give effect to Policy 11 of the NPS-UD

13. Policy E27.3(6) currently provides for flexibility in on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone. As noted above, BTC is located in the Business – Metropolitan Centre Zone.
14. Amending Policy E27.3(6) as proposed does not give effect to Policy 11 of the NPS-UD. Policy 11 relates to removing minimum car parking standards and managing the effects associated with the supply and demand of car parking. The purpose of Policy 11 of the NPS-UD is to remove minimum car parking requirements so that developers can determine the amount of car parking necessary and choose whether to provide car parks for new developments.¹
15. The objective of PC 71 is to give effect to Policy 11 of the NPS-UD.² The proposed amendment to Policy E27.3(6) goes beyond the purpose of PC 71 to address consequential technical amendments to the Unitary Plan and changes the effect of the policy entirely. This is also inconsistent with the shift toward enabling a market-based approach to the supply of carparking.
16. Amending Policy E27.3(6) would remove a clear policy that recognises the flexibility for car parking in these zones, which in turn reduces the ability for developers to choose how many car parks to provide. Policy E27.3(6)(a) recognises that flexibility is important, and this flexibility should be retained.
17. AMP Capital and the Fund seek for the original wording of Policy E27.3(6) to be retained and only for Policy E37.3(6)(a) and (b) to be deleted and replaced

¹ Ministry for the Environment and Ministry of Housing and Urban Development [Regulatory Impact Statement: National Policy Statement on Urban Development](#) (22 May 2020) at 24; Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1 and 2.

² Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 4.

by the proposed new wording (with amendments) as a new policy 6A as follows (or words to like effect):

(6) Provide for flexible on-site parking in the Business – Metropolitan Centre zone, Business – Town Centre zone, Business – Local Centre zone and Business – Mixed Use zone (with the exception of specified non urban town and local centres and the Mixed use zone adjacent to those specified centres).

(6A) Provide maximum parking limits for education facilities and hospitals in the Business – Metropolitan Centre zone, Business – Town Centre zone, Business – Local Centre zone and Business – Mixed Use zone (with the exception of specified non-urban town and local centres and the Mixed Use zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.

18. We note that the Council has recognised that E27.3(6)(a) is consistent with the NPS-UD.³

The new activity rule, standard, matter of discretion, assessment criteria, and special information requirement are inappropriate and do not achieve the objective of PC 71

19. PC 71 proposes to introduce a new activity rule and standard that will require restricted discretionary resource consent for specified developments, which would materially increase the number of developments requiring resource consent. To summarise, the proposed new matter of discretion, assessment criteria, and special information requirement require an application for resource consent under the new standard to include a travel plan that sets out travel information relating to the proposed development, including alternatives to private vehicle travel, proposals to reduce private vehicle travel and demand for car parking, and the effects of increased demand for private vehicle travel and carparking on the safe and efficient operation of the transport network.
20. The requirements for resource consent and a travel plan do not give effect to Policy 11 of the NPS-UD. As noted above, Policy 11 is limited in scope.

³ Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 12.

21. The removal of minimum carparking requirements was intended to prevent the oversupply of car parks by shifting to a market-based approach for providing car parks.⁴ The requirement for restricted discretionary resource consent, a travel plan, and the ability for the Council to consider the effects on the transport network (E27.8.1(4A)(b)), for a low threshold of new development would give the Council control over on-site car parking rather than allowing a market-based approach.
22. These proposed requirements are unlikely to contribute to well-functioning urban environments as required under Policy 1 of the NPS-UD, because they would provide a level of regulation that is onerous, unnecessary, may have unintended consequences and unduly constrain development.
23. The removal of minimum carparking requirements was also intended to remove unnecessary constraints and costs associated with developments to improve the responsiveness of land markets.⁵ The requirement for restricted discretionary resource consent and a travel plan would only increase the constraints, time and costs associated with development. In particular, this requirement would increase the administrative burden for many developments which will not have significant effects on the transport network while increasing the delay, uncertainty and costs for developers.
24. We appreciate that the Council intends to manage effects of private vehicle travel on the transport network.⁶ However, the Council does not need to introduce the proposed new activity rule and standard to achieve this. The Council already manages effects on the transport network through Integrated Transport Assessments and travel plans where trip generation thresholds are exceeded, or where maximum carparking rates for specified activities are exceeded⁷. These existing provisions are giving effect to NPS-UD Policy 11(b) and it is not necessary or appropriate to add a further control.
25. The development thresholds in the new standard E27.6.1A and table E27.6.1A.1 are very low. For example, the development threshold for offices

⁴ Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1.

⁵ Ministry for the Environment and Ministry of Housing and Urban Development [Regulatory Impact Statement: National Policy Statement on Urban Development](#) (22 May 2020) at 16; Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1.

⁶ Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 15 and 16.

⁷ See E27.8.1(4) and (5), and the special information requirements at E27.9 of the Unitary Plan.

to require a travel plan is 500m² GFA. A development of this size would generally have a minor impact on the transport network and the requirement for resource consent and a travel plan would be disproportionate and unnecessarily onerous. Similarly, the development thresholds for industrial activities are also relatively low at 2000 m² GFA for warehousing and storage, and for entertainment facilities at facilities accommodating 50 people or more.

26. AMP Capital and the Fund seek for the proposed new activity rule at E27.4.1(A3a), the new Standard at E27.6.1A and Table E27.6.1A.1, the new matter of discretion E27.8.1(4A), the new assessment criteria E27.8.2(3A), and the amendment to the special information requirement E27.9(2)(b) to be deleted.

Submission in support

27. AMP Capital and the Fund generally support the remaining proposed consequential amendments to the Unitary Plan to ensure internal consistency.

Decision sought

28. The decision sought by AMP Capital and the Fund is:

- (a) That Policy E27.3(6) is retained, and a new Policy E27.3(6A) inserted as addressed in paragraph 17 above. | 66.2
| 66.3
- (b) That the following proposed amendments are deleted:
- (i) New activity rule E27.4.1(A3a); | 66.4
- (ii) New standard E27.6.1A and Table E27.6.1A.1; | 66.5 | 66.6
- (iii) New matter of discretion E27.8.1(4A); | 66.7
- (iv) New assessment criteria E27.8.2(3A); and | 66.8
- (v) Amendment to special information requirement E27.9(2)(b). | 66.9
- (c) That the proposed consequential amendments to the Unitary Plan that ensure internal consistency are allowed.

- (d) Such other alternative or consequential relief and/or amendments to PC 71 as may be necessary to address AMP Capital and the Fund's concerns, as outlined above.
29. AMP Capital and the Fund wish to be heard in support of its submission.
30. If others make a similar submission, AMP Capital and the Fund will consider presenting a joint case with them at a hearing.

DATED this 24th day of March 2022

**AMP Capital Investors (New Zealand)
Limited and PSPIB/CPPIB Waiheke
Incorporated** by their solicitors and duly
authorised agents MinterEllisonRuddWatts



B J Tree

Address for service of submitter

AMP Capital Investors (New Zealand) Limited and PSPIB/CPPIB Waiheke
Incorporated
c/- MinterEllisonRuddWatts
P O Box 105249
AUCKLAND 1143
Attention: Bianca Tree

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**SUBMISSION ON PLAN CHANGE 71 TO THE AUCKLAND UNITARY PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE
MANAGEMENT ACT 1991**

To: Auckland Council
Attn: Planning Technician
Unitary Plan Private Bag 92300
AUCKLAND 1142

unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: Argosy Property No. 1 Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
AUCKLAND 1143
Attention: Bianca Tree

bianca.tree@minterellison.co.nz

Introduction

1. This is a submission on behalf of Argosy Property No. 1 Limited (**Argosy**) on proposed Plan Change 71 (**PC 71**) to the Auckland Unitary Plan (**Unitary Plan**). PC 71 was notified by Auckland Council (**Council**) on 24 February 2022.
2. PC 71 proposes changes to the Unitary Plan in response to the removal of minimum car parking requirements from the Unitary Plan on 11 February 2022, as required by Policy 11 of the National Policy Statement of Urban Development 2020 (**NPS-UD**). The changes include consequential amendments to ensure internal consistency within the Unitary Plan, removal of policies, as well as a new activity rule, standard, matters of discretion, assessment criteria, and special information requirement.
3. Argosy opposes PC 71 in part and supports PC 71 in part.

Scope of submission

4. This submission relates to the following proposals in PC 71:
 - (a) Consequential amendments to the Unitary Plan to ensure internal consistency; and
 - (b) The following amendments to the Transport chapter of the Unitary Plan:
 - (i) Amendment to Policy E27.3(6);
 - (ii) New activity rule at E27.4.1(A3a);
 - (iii) New Standard E27.6.1A and Table E27.6.1A.1;
 - (iv) New matter of discretion E27.8.1(4A);
 - (v) New assessment criteria E27.8.2(3A); and
 - (vi) Amendment to the special information requirement E27.9(2)(b).

Background to Argosy

5. Argosy is a listed commercial property company that owns and manages a portfolio of industrial, office, and retail properties predominately in Auckland and Wellington.
6. Argosy's investment strategy is to maintain a diversified portfolio of quality properties. Argosy is listed on the NZX and the value of its property portfolio across New Zealand is approximately \$2.12 billion.
7. Argosy owns over 40 properties in Auckland. Properties in the Argosy portfolio include value add properties which will be re-positioned or developed in the near to medium term with a view to moving them into Argosy's core category of properties. Value add properties make up approximately 17 percent of Argosy's portfolio. As Argosy continues to reinvest in its portfolio it wishes to ensure that the Unitary Plan applies appropriate controls and triggers for resource consent.
8. Some of Argosy's key properties in Auckland are commercial offices at 82 Wyndham Street, 23 Customs Street East, 107 Carlton Gore Road, Newmarket, and 8 Nugent Street, Grafton, industrial properties at Highgate

Parkway, Silverdale (occupied by Mighty Ape) and 240 Puhinui Road, Manukau (occupied by Cardinal Logistics), large format retail properties such as Mitre 10 MEGA Albany, and brownfields developments at 224 Neilson Street, Onehunga and 8-14 Mount Richmond Drive, Mount Wellington.

9. These properties are located within various zones including the Business - City Centre zone, Business - Metropolitan Centre zone, Business - Mixed Use zone, Business - Light Industry zone, and Business - Heavy Industry zone.

Trade competition

10. Argosy could not gain an advantage in trade competition through this submission.

Submission in opposition

11. Argosy opposes the following proposals relating to the Transport chapter of the Unitary Plan.
- (a) The amendment to Policy E27.3(6);
 - (b) The new activity rule E27.4.1(A3a);
 - (c) The new Standard E27.6.1A and Table E27.6.1A.1;
 - (d) The new matter of discretion E27.8.1(4A);
 - (e) The new assessment criteria E27.8.2(3A); and
 - (f) The amendment to the special information requirement E27.9(2)(b).

67.1

Reasons for submission in opposition

12. The reasons for Argosy's opposition include the following.
13. In general, the proposed changes to the Transport Chapter in paragraph 11 above:
- (a) do not give effect to the objectives and policies of the NPS-UD;
 - (b) would not contribute to well-functioning urban environments;

- (c) are inconsistent with the sustainable management of physical resources and are otherwise consistent with the purpose and principles of the Resource Management Act 1991 (**RMA**);
 - (d) do not meet the requirements to satisfy the criteria of section 32 of the RMA;
 - (e) will not meet the reasonably foreseeable needs of future generations; and
 - (f) are not consistent with sound resource management practice.
14. Without derogating from the generality above, the proposed changes to the Transport Chapter described in paragraph 11 above do not give effect to Policy 11 of the NPS-UD and do not achieve the objective of PC 71.
15. We expand below.

The amendment to Policy E27.3(6) is unnecessary and does not give effect to Policy 11 of the NPS-UD

16. Policy E27.3(6) currently provides for flexibility in on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone.
17. Amending Policy E27.3(6) as proposed does not give effect to Policy 11 of the NPS-UD. Policy 11 relates to removing minimum car parking standards and managing the effects associated with the supply and demand of car parking. The purpose of Policy 11 of the NPS-UD is to remove minimum car parking requirements so that developers can determine the amount of car parking necessary and choose whether to provide car parks for new developments.¹
18. The objective of PC 71 is to give effect to Policy 11 of the NPS-UD.² The proposed amendment to Policy E27.3(6) goes beyond the purpose of PC 71 to address consequential technical amendments to the Unitary Plan and changes

¹ Ministry for the Environment and Ministry of Housing and Urban Development [Regulatory Impact Statement: National Policy Statement on Urban Development](#) (22 May 2020) at 24; Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1 and 2.

² Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 4.

the effect of the policy entirely. This is also inconsistent with the shift toward enabling a market-based approach to the supply of carparking.

19. Amending Policy E27.3(6) would remove a clear policy that recognises the flexibility for car parking in these zones, which in turn reduces the ability for developers to choose whether to provide car parks. Policy E27.3(6) recognises that flexibility is important, and this flexibility should be retained.
20. Argosy seeks for the original wording of Policy E27.3(6) to be retained and only for Policy E37.3(6)(a) and (b) to be deleted and replaced by the proposed new wording (with amendments) as a new policy 6A as follows (or words to like effect):

(6) Provide for flexible on-site parking in the Business – Metropolitan Centre zone, Business – Town Centre zone, Business – Local Centre zone and Business – Mixed Use zone (with the exception of specified non urban town and local centres and the Mixed use zone adjacent to those specified centres).

(6A) Provide maximum parking limits for education facilities and hospitals in the Business – Metropolitan Centre zone, Business – Town Centre zone, Business – Local Centre zone and Business – Mixed Use zone (with the exception of specified non-urban town and local centres and the Mixed Use zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.

21. We note that the Council has recognised that E27.3(6)(a) is consistent with the NPS-UD.³

The new activity rule, standard, matter of discretion, assessment criteria, and special information requirement are inappropriate and do not achieve the objective of PC 71

22. PC 71 proposes to introduce a new activity rule and standard that will require restricted discretionary resource consent for specified developments, which would materially increase the number of developments requiring resource consent. To summarise, the proposed new matter of discretion, assessment

³ Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 12.

criteria, and special information requirement require an application for resource consent under the new standard to include a travel plan that sets out travel information relating to the proposed development, including alternatives to private vehicle travel, proposals to reduce private vehicle travel and demand for car parking, and the effects of increased demand for private vehicle travel and carparking on the safe and efficient operation of the transport network.

23. The requirements for resource consent and a travel plan do not give effect to Policy 11 of the NPS-UD. As noted above, Policy 11 is limited in scope.
24. The removal of minimum carparking requirements was intended to prevent the oversupply of car parks by shifting to a market-based approach for providing car parks.⁴ The requirement for restricted discretionary resource consent, a travel plan, and the ability for the Council to consider the effects on the transport network (E27.8.1(4A)(b)), for a low threshold of new development would give the Council control over on-site car parking rather than allowing a market-based approach.
25. These proposed requirements are unlikely to contribute to well-functioning urban environments as required under Policy 1 of the NPS-UD, because they would provide a level of regulation that is onerous, unnecessary, may have unintended consequences and unduly constrain development.
26. The removal of minimum carparking requirements was also intended to remove unnecessary constraints and costs associated with developments to improve the responsiveness of land markets.⁵ The requirement for restricted discretionary resource consent and a travel plan would only increase the constraints, time and costs associated with development. In particular, this requirement would increase the administrative burden for many developments which will not have significant effects on the transport network while increasing the delay, uncertainty and costs for developers.
27. We appreciate that the Council intends to manage effects of private vehicle travel on the transport network.⁶ However, the Council does not need to

⁴ Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1.

⁵ Ministry for the Environment and Ministry of Housing and Urban Development [Regulatory Impact Statement: National Policy Statement on Urban Development](#) (22 May 2020) at 16; Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1.

⁶ Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 15 and 16.

introduce the proposed new activity rule and standard to achieve this. The Council already manages effects on the transport network through Integrated Transport Assessments and travel plans where trip generation thresholds are exceeded, or where maximum carparking rates proposed for specified activities are exceeded.⁷ These existing provisions are giving effect to NPS-UD Policy 11(b) and it is not necessary or appropriate to add a further control.

28. The development thresholds in the new standard E27.6.1A and table E27.6.1A.1 are very low. For example, the development threshold for offices to require a travel plan is 500m² GFA. A development of this size would generally have a minor impact on the transport network and the requirement for resource consent and a travel plan would be disproportionate and unnecessarily onerous. Similarly, the development thresholds for industrial activities are also relatively low at 2,000m² GFA for warehousing and storage or 2,000m² GFA for other industrial activities.

29. Argosy seeks for the proposed new activity rule at E27.4.1(A3a), the new Standard at E27.6.1A and Table E27.6.1A.1, the new matter of discretion E27.8.1(4A), the new assessment criteria E27.8.2(3A), and the amendment to the special information requirement E27.9(2)(b) be deleted.

Submission in support

30. Argosy generally supports the remaining proposed consequential amendments to the Unitary Plan to ensure internal consistency.

Decision sought

31. The decision sought by Argosy is:

- (a) That Policy E27.3(6) is retained, and a new Policy E27.3(6A) inserted as addressed in para 20 above. 67.2
67.3
- (b) That the following proposed amendments are deleted:
 - (i) New activity rule E27.4.1(A3a); 67.4
 - (ii) New standard E27.6.1A and Table E27.6.1A.1; 67.5 67.6

⁷ See E27.8.1(4) and (5), and the special information requirements at E27.9 of the Unitary Plan.

- (iii) New matter of discretion E27.8.1(4A); | 67.7
 - (iv) New assessment criteria E27.8.2(3A); and | 67.8
 - (v) Amendment to special information requirement E27.9(2)(b). | 67.9
- (c) That the proposed consequential amendments to the Unitary Plan that ensure internal consistency are allowed.
- (d) Such other alternative or consequential relief and/or amendments to PC 71 as may be necessary to address Argosy's concerns, as outlined above.
32. Argosy wishes to be heard in support of its submission.
33. If others make a similar submission, Argosy will consider presenting a joint case with them at a hearing.

DATED this 24th day of March 2022

Argosy Property No. 1 Limited by its
solicitors and duly authorised agents
MinterEllisonRuddWatts



B J Tree

Address for service of submitter

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SUBMISSION ON PROPOSED PLAN CHANGE 71

SUBMISSION BY AUCKLAND MARINA USERS ASSOCIATION INC

To: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1142

Name and address of person making submission:

Auckland Marina Users Association Inc
Commercial Unit 7, Shed 24
Princes Wharf
143 Quay Street
Auckland 1010
AUCKLAND

Attention: Richard Steel, Committee Member AMUA

1. About the Submitter

The Auckland Marina Users Association Inc is an incorporated society, formed in June 2018 to facilitate the collaboration and representation of marina users and berth holder associations from Westhaven, Gulf Harbour Westpark/Hobsonville, Bayswater and Pine Harbour marinas.

These five marinas comprise some 4000+ berths of the approximately 6000 marina berths in the marinas located throughout the Auckland region.

While the membership of AMUA is made up of marina berth holders a key purpose of the association is:-

- c. **Ensure marina amenity values within the Auckland region are maintained and any development that affects a marina within the Auckland region is consistent with the original marina development amenities and the Objectives and Policies of the Auckland Unitary Plan Coastal Marina Zone.**



The members of AMUA recognise that marinas are scarce and unique items of social infrastructure that provide access to the sea and which need to be utilised to their full potential for that purpose.

This submission represents the views of AMUA. It does not seek to represent the individual views of the five member associations (Westhaven, Gulf Harbour, Bayswater, Hobsonville and Pine Harbour) or individual berth holders at any of the five marinas, who may have made their own submissions; which should be considered separately.

2. Introduction

The NPS-UD requires the council to remove provisions (that have the effect of requiring that development provide a minimum number of car parks) from the AUP and the HGI Plan.

As a result of removing parking minimums, Council has identified a number of consequential changes required to the Unitary Plan. These changes fall outside the scope of the non-Schedule 1 changes and must be the subject of a plan change. Council has identified 7 issues to be addressed as follows:

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

AMUA is concerned that the relevant parts of the proposed plan change do not fully recognise the unique accessibility and travel demands and related parking and parking management needs at the regions marinas and within the marina zone.

AMUA is also concerned that the wording of some of the changes proposed under PC71 appear to have the unintended consequence of removing any requirement to provide for car parking and/or consider related parking and transport effects; rather than just removing minimum requirements or existing provisions that have the effect of requiring minimums.

Given the removal of minimums AMUA believes that any significant development within the marina zone should trigger an assessment of the existing and potential future travel demand and parking supply and demand in order to assess the effects of any such development. AMUA is concerned that in their present form the proposed amendments do not or may not trigger such assessments.

In this regard AMUA notes that Policy 11 (b) of the NPS-UD states "tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans."



In addition the MoE Fact Sheet for Car Parking provisions of the NPS-UD notes that the requirement to remove minimum car parking requirement is primarily directed at high density areas where people do not need to own or use a car to access jobs, services or amenities.

3. Characteristics of Travel Demand and Parking Supply and Demand at Marinas

AMUA believes there are a broad range of reasons why any significant development at marinas in general should trigger assessment of the existing and potential future travel demand and parking supply and demand and parking management. Examples include:-

1. Marinas function as transport destinations for primary activities at marinas and transport interchanges for ferry operations.
2. Parking at marinas is an accessory activity which is incidental to, and serves a supportive function to access the primary activities that occur at marinas. In this regard parking at marinas performs a similar function to accessory activities at Auckland's regional parks and event venues.
3. The physical requirements and pattern of participation in the primary activities dictates the predominate use of private vehicles for access rather than public transport. For example:-
 - a. Vehicle and trailer access and parking is incidental to boat ramps and necessary to launch and retrieve small power boats, trailer sailers, dinghies and jet skis; and in addition sufficient space is required to rig and derig some craft.
 - b. Group activities such as waka ama, sail training, dinghy racing and rowing regattas and the like can place additional demands on parking and other marina amenities.
 - c. A weekend trip/holiday starting from and returning to a vessel moored in the marina requires the same sort of provisioning and loading of personal belongings etc as a holiday home.
 - d. Access to utilise small power boats, stand-up paddle boards, canoes etc that may be stored at a marina also still requires the transport of personal equipment and provisions.
 - e. The pattern of participation in primary activities is not regular and has significant peaks and is heavily influenced by a number of factors including weather and tides, weekends and holidays.
4. Ferry operations at marinas are typically accessed by a number of means including public transport, park and ride and kiss and ride. The pattern of these ferry related activities and related public transport (bus) services is dictated by ferry operations and bears no relation to the pattern of use associated with other primary activities.
5. The differing patterns of use between ferry and other marina activities may present the opportunity for efficiencies through the sharing of car parking spaces.
6. Marinas are "finite resources" as envisaged by s7(g) of the RMA because of the difficulties in consenting new marina developments and in terms of the limited



number of locations around the Auckland coastal fringe that can provide the space and amenities needed to support access to the sea.

In keeping with the need to take a long term view of transport activities and the utilisation of finite resources AMUA believes there is a need for assessments at marinas to explicitly consider effects related to latent and future demand associated with any planned or potential development of facilities and services – such as haul out facilities and onshore storage.

4. Proposed Amendments to PC 71

Overall, the AMUA is neutral with regards to other aspects of PC71, but opposes the parts of the Plan Change related to marinas unless it can assured that any significant development at a marina will trigger an assessment of existing and potential future travel demand and parking supply and demand and parking management.

The following suggested amendments to the proposed Plan Change are intended to trigger such assessments and to remove what appears to be the unintended consequence of removing any requirement to provide for car parking and/or consider related parking and transport effects; rather than just removing minimum requirements or existing provisions that have the effect of requiring minimums. AMUA would welcome the opportunity to discuss its concerns and understanding of the proposed plan change and its effect.

E27.6.1A Travel Demand

It is suggested that marinas and boat ramps need to be added to bottom of Table E27.6.1A.1 to accommodate travel demand for these uses. The categories under the table as proposed under PC71 do not cover marinas or publicly accessible boat ramps.

While travel choices are encouraged, the particular characteristics of these marine gateway locations as discussed above need to be recognised.

Proposed additions to Table E27.6.1A.1

<u>(T14B)</u>	<u>Entertainment facilities</u>		<u>Accommodating 50 or more people</u>
<u>(T15B)</u>	<u>Marinas</u>		<u>Accommodating 20 berths or additional to existing</u>
<u>(T16B)</u>	<u>Marine and port activities</u>		<u>New boat launching facilities or changes to existing boat launching facilities or</u>

68.1



			<u>other</u> <u>accessory</u> <u>facilities</u>
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F2 Coastal – General Coastal Marine Zone amendments

Reword Policy F2.17.3(3) as follows:

(3) Require **accessory** adequate land-based facilities for **car parking, access**, rubbish disposal, and wastewater pump-out to be provided when existing local water transport facilities increase their capacity or when local water transport services increase their scale of operations at those facilities.

68.2

F3 Coastal - Marina Zone amendments

Amend the matter for discretion to F3.8.1(1) as follows:

(e) The effects on existing uses and activities, **including access and parking**.

68.3

Delete the existing assessment criteria F3.8.2.(3)(c) and replace with the following:

(c) ~~whether the provision of parking is adequate for the site and the proposal, having considered any alternative parking available in the area and access to public transport~~ **whether access to parking accommodates the long term operational needs (or meets the functional needs?) of the marina and its related services, facilities and amenities.**

68.4

Further amend Assessment criteria F3.8.2(4) so that the meaning better reflects the intended changes and the transport requirements for marine industry. As worded, the meaning could be interpreted to reflect that marinas do not need parking or transport facilities. As marinas have a functional need for vehicle access, any proposal should be assessed against this.

F3.8.2(4)(f).

(f) the extent to which ~~the need for~~ **the proposed** parking or transport facilities conflicts with the main marina use and should be integrated with public transport.

68.5

F5 Coastal – Minor Port Zone amendments

Delete the existing assessment criteria F5.8.2.(1)(c) and replace with the following:

(c) ~~whether parking is adequate for the site~~ **whether access to parking accommodates the operational needs (or meets the functional needs?) of the minor port facility.**

68.6

Precinct Plan Amendments

At this time AMUA has not been able to complete an assessment of the impact of the proposed PC71 changes on all marina Precinct Plans. However AMUA has discussed the following suggestions put forward by the Bayswater Marina Berth Holders Association



(BBHA) which are specific to the Bayswater Marina Precinct Plan. AMUA supports the comments and amendments proposed by BBHA and suggests that other marina precinct plans are carefully reviewed to ensure consistency.

68.7

While possibly “out of scope” AMUA suggests that there may be merit in considering whether transport and parking requirements contained within marina Precinct Plans might be better located under Chapter F3 – to provide consistency across the marina zone and avoid conflicts of interpretation between Chapter F3 and precinct plans.

68.12

Bayswater Precinct Plan

Policy I504.3(7)

It is nonsensical to have a policy that only addresses boat trailer parking spaces when parking spaces for the marina are also essential to its functional operation. Accordingly, it is proposed that the following further amendment is made:

... (7) Require the retention of appropriate facilities for boating, such as public boat ramps and **boat trailer parking spaces and marina parking spaces commensurate with the transport demand** for associated with the marina and boat ramp.

68.8

Policy I504.3(12)

Similarly, the functional need for marina parking still needs to be considered in this policy. Changing the wording as proposed assumes that no marina parking is needed when this is not the case. Some allowance for parking demand still needs to be provided. The proposed addition still allows effects of parking to still be assessed. It is therefore proposed to amend Policy I504.3(12) as follows:

(12) Require that, residential, or other non-marine related activities such as restaurants and cafes are provided for only where sufficient space remains available as required for marina, ferry service, and public access, recreation, public transport and boating activities, including associated **boat trailer and any marina parking**.

68.9

Assessment Criteria I504.8.2(4)

While food and beverage activities within the ferry terminal, maritime passenger facilities and park and ride facilities are the only RD activities in the precinct, the assessment criteria needs to consider the functional transport needs of the marina and boat ramp. It is proposed to amend the assessment criteria as follows:

(b) the extent to which the provision of parking **does not impact on the operational needs of the marina and boat ramp, and** ~~ensures the amount of parking is adequate for the site and the proposal,~~ and considers effects on alternative parking available in the area and access to the public transport network.

68.10

Amend Special Information Requirement I504.9(1)(b)(ii)

The proposed changes require further amendment to ensure that an assessment of parking is provided and not be optional.



(ii) an assessment of parking, ~~confirming the amount of parking is adequate for the application area and the proposal where provided,~~ including consideration of effects on alternative parking available in the area and access to the public transport network.

68.11

5. Procedural Matters

AMUA wishes to be heard in support of this submission.

AMUA would consider presenting a joint case with any other party seeking similar relief.

AMUA agrees to participate in mediation or other alternative dispute resolution and would be pleased to discuss the content of this submission with Council staff as part of their reporting considerations.

24 March 2022

A handwritten signature in black ink, appearing to read 'R. Steel', is written over a light blue circular stamp.

Richard Steel, On Behalf of Auckland marina Users Association Inc

Address for Service:

Attention: Richard Steel
Telephone: 021 537 349
Email: richard.alecia.steel@gmail.com



SUBMISSION ON PROPOSED PLAN CHANGE 71

SUBMISSION BY AUCKLAND MARINA USERS ASSOCIATION INC

To: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1142

Name and address of person making submission:

Auckland Marina Users Association Inc
Commercial Unit 7, Shed 24
Princes Wharf
143 Quay Street
Auckland 1010
AUCKLAND

Attention: Richard Steel, Committee Member AMUA

1. About the Submitter

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These five marinas comprise some 4000+ berths of the approximately 6000 marina berths in the marinas located throughout the Auckland region.

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AMUA is concerned that the relevant parts of the proposed plan change do not fully recognise the unique accessibility and travel demands and related parking and parking management needs at the regions marinas and within the marina zone.

AMUA is also concerned that the wording of some of the changes proposed under PC71 appear to have the unintended consequence of removing any requirement to provide for car parking and/or consider related parking and transport effects; rather than just removing minimum requirements or existing provisions that have the effect of requiring minimums.

Given the removal of minimums AMUA believes that any significant development within the marina zone should trigger an assessment of the existing and potential future travel demand and parking supply and demand in order to assess the effects of any such development. AMUA is concerned that in their present form the proposed amendments do not or may not trigger such assessments.

In this regard AMUA notes that Policy 11 (b) of the NPS-UD states "tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans."



In addition the MoE Fact Sheet for Car Parking provisions of the NPS-UD notes that the requirement to remove minimum car parking requirement is primarily directed at high density areas where people do not need to own or use a car to access jobs, services or amenities.

3. Characteristics of Travel Demand and Parking Supply and Demand at Marinas

AMUA believes there are a broad range of reasons why any significant development at marinas in general should trigger assessment of the existing and potential future travel demand and parking supply and demand and parking management. Examples include:-

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2. Parking at marinas is an accessory activity which is incidental to, and serves a supportive function to access the primary activities that occur at marinas. In this regard parking at marinas performs a similar function to accessory activities at Auckland's regional parks and event venues.
3. The physical requirements and pattern of participation in the primary activities dictates the predominate use of private vehicles for access rather than public transport. For example:-
 - a. Vehicle and trailer access and parking is incidental to boat ramps and necessary to launch and retrieve small power boats, trailer sailers, dinghies and jet skis; and in addition sufficient space is required to rig and derig some craft.
 - b. Group activities such as waka ama, sail training, dinghy racing and rowing regattas and the like can place additional demands on parking and other marina amenities.
 - c. A weekend trip/holiday starting from and returning to a vessel moored in the marina requires the same sort of provisioning and loading of personal belongings etc as a holiday home.
 - d. Access to utilise small power boats, stand-up paddle boards, canoes etc that may be stored at a marina also still requires the transport of personal equipment and provisions.
 - e. The pattern of participation in primary activities is not regular and has significant peaks and is heavily influenced by a number of factors including weather and tides, weekends and holidays.
4. Ferry operations at marinas are typically accessed by a number of means including public transport, park and ride and kiss and ride. The pattern of these ferry related activities and related public transport (bus) services is dictated by ferry operations and bears no relation to the pattern of use associated with other primary activities.
5. The differing patterns of use between ferry and other marina activities may present the opportunity for efficiencies through the sharing of car parking spaces.
6. Marinas are "finite resources" as envisaged by s7(g) of the RMA because of the difficulties in consenting new marina developments and in terms of the limited



number of locations around the Auckland coastal fringe that can provide the space and amenities needed to support access to the sea.

In keeping with the need to take a long term view of transport activities and the utilisation of finite resources AMUA believes there is a need for assessments at marinas to explicitly consider effects related to latent and future demand associated with any planned or potential development of facilities and services – such as haul out facilities and onshore storage.

4. Proposed Amendments to PC 71

Overall, the AMUA is neutral with regards to other aspects of PC71, but opposes the parts of the Plan Change related to marinas unless it can assured that any significant development at a marina will trigger an assessment of existing and potential future travel demand and parking supply and demand and parking management.

The following suggested amendments to the proposed Plan Change are intended to trigger such assessments and to remove what appears to be the unintended consequence of removing any requirement to provide for car parking and/or consider related parking and transport effects; rather than just removing minimum requirements or existing provisions that have the effect of requiring minimums. AMUA would welcome the opportunity to discuss its concerns and understanding of the proposed plan change and its effect.

E27.6.1A Travel Demand

It is suggested that marinas and boat ramps need to be added to bottom of Table E27.6.1A.1 to accommodate travel demand for these uses. The categories under the table as proposed under PC71 do not cover marinas or publicly accessible boat ramps.

While travel choices are encouraged, the particular characteristics of these marine gateway locations as discussed above need to be recognised.

Proposed additions to Table E27.6.1A.1

<u>(T14B)</u>	<u>Entertainment facilities</u>		<u>Accommodating 50 or more people</u>
<u>(T15B)</u>	<u>Marinas</u>		<u>Accommodating 20 berths or additional to existing</u>
<u>(T16B)</u>	<u>Marine and port activities</u>		<u>New boat launching facilities or changes to existing boat launching facilities or</u>



			<u>other</u> <u>accessory</u> <u>facilities</u>
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F2 Coastal – General Coastal Marine Zone amendments

Reword Policy F2.17.3(3) as follows:

(3) Require **accessory** adequate land-based facilities for **car parking, access**, rubbish disposal, and wastewater pump-out to be provided when existing local water transport facilities increase their capacity or when local water transport services increase their scale of operations at those facilities.

F3 Coastal - Marina Zone amendments

Amend the matter for discretion to F3.8.1(1) as follows:

(e) The effects on existing uses and activities, **including access and parking**.

Delete the existing assessment criteria F3.8.2.(3)(c) and replace with the following:

(c) ~~whether the provision of parking is adequate for the site and the proposal, having considered any alternative parking available in the area and access to public transport~~ **whether access to parking accommodates the long term operational needs (or meets the functional needs?) of the marina and its related services, facilities and amenities.**

Further amend Assessment criteria F3.8.2(4) so that the meaning better reflects the intended changes and the transport requirements for marine industry. As worded, the meaning could be interpreted to reflect that marinas do not need parking or transport facilities. As marinas have a functional need for vehicle access, any proposal should be assessed against this.

F3.8.2(4)(f).

(f) the extent to which ~~the need for~~ **the proposed** parking or transport facilities conflicts with the main marina use and should be integrated with public transport.

F5 Coastal – Minor Port Zone amendments

Delete the existing assessment criteria F5.8.2.(1)(c) and replace with the following:

(c) ~~whether parking is adequate for the site~~ **whether access to parking accommodates the operational needs (or meets the functional needs?) of the minor port facility.**

Precinct Plan Amendments

At this time AMUA has not been able to complete an assessment of the impact of the proposed PC71 changes on all marina Precinct Plans. However AMUA has discussed the following suggestions put forward by the Bayswater Marina Berth Holders Association



(BBHA) which are specific to the Bayswater Marina Precinct Plan. AMUA supports the comments and amendments proposed by BBHA and suggests that other marina precinct plans are carefully reviewed to ensure consistency.

While possibly “out of scope” AMUA suggests that there may be merit in considering whether transport and parking requirements contained within marina Precinct Plans might be better located under Chapter F3 – to provide consistency across the marina zone and avoid conflicts of interpretation between Chapter F3 and precinct plans.

Bayswater Precinct Plan

Policy I504.3(7)

It is nonsensical to have a policy that only addresses boat trailer parking spaces when parking spaces for the marina are also essential to its functional operation. Accordingly, it is proposed that the following further amendment is made:

... (7) Require the retention of appropriate facilities for boating, such as public boat ramps and **boat trailer parking spaces and marina parking spaces commensurate with the transport demand** for associated with the marina and boat ramp.

Policy I504.3(12)

Similarly, the functional need for marina parking still needs to be considered in this policy. Changing the wording as proposed assumes that no marina parking is needed when this is not the case. Some allowance for parking demand still needs to be provided. The proposed addition still allows effects of parking to still be assessed. It is therefore proposed to amend Policy I504.3(12) as follows:

(12) Require that, residential, or other non-marine related activities such as restaurants and cafes are provided for only where sufficient space remains available as required for marina, ferry service, and public access, recreation, public transport and boating activities, including associated **boat trailer and any marina parking**.

Assessment Criteria I504.8.2(4)

While food and beverage activities within the ferry terminal, maritime passenger facilities and park and ride facilities are the only RD activities in the precinct, the assessment criteria needs to consider the functional transport needs of the marina and boat ramp. It is proposed to amend the assessment criteria as follows:

(b) the extent to which the provision of parking **does not impact on the operational needs of the marina and boat ramp, and** ~~ensures the amount of parking is adequate for the site and the proposal, and~~ considers effects on alternative parking available in the area and access to the public transport network.

Amend Special Information Requirement I504.9(1)(b)(ii)

The proposed changes require further amendment to ensure that an assessment of parking is provided and not be optional.



(ii) an assessment of parking, ~~confirming the amount of parking is adequate for the application area and the proposal where provided,~~ including consideration of effects on alternative parking available in the area and access to the public transport network.

5. Procedural Matters

AMUA wishes to be heard in support of this submission.

AMUA would consider presenting a joint case with any other party seeking similar relief.

AMUA agrees to participate in mediation or other alternative dispute resolution and would be pleased to discuss the content of this submission with Council staff as part of their reporting considerations.

24 March 2022

A handwritten signature in black ink, appearing to read 'R. Steel', is written over a light blue circular stamp.

Richard Steel, On Behalf of Auckland marina Users Association Inc

Address for Service:

Attention: Richard Steel
Telephone: 021 537 349
Email: richard.alecia.steel@gmail.com

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Imogen Trupinic
Date: Thursday, 24 March 2022 3:16:06 pm
Attachments: [PC 71 Submission - I Trupinic.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Imogen Trupinic
Organisation name:
Agent's full name:
Email address: imogen.trupinic@gmail.com
Contact phone number:
Postal address:
52 Gallony Ave
Massey
Auckland 0614

Submission details

This is a submission to:

Plan change number: Plan Change 71
Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
• The travel demand threshold rule at E27.4.1(A3a)
• Standard E27.6.1A
• Matters for discretion at E27.8.1(4A)
• Assessment criteria at E27.8.2(3A)
• Special information requirement at E27.9(2)(b)

Property address:

Map or maps:

Other provisions:
Definition of Travel Management Plan at Chapter J1

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
Numerous - please refer to attachment.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

Supporting documents
PC 71 Submission - I Trupinic.pdf

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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Submission on a notified proposal for plan change

Clause 6 of Schedule 1, Resource Management Act 1991 (“RMA”)

[Form 5](#)

To Auckland Council

Time and Date of Submission – 3pm

24/03/2022

Submitter details

Name of submitter:

Email address:

Telephone:

Postal address:

Contact person:

Scope of submission

This is a submission on a change proposed to the following plan (the proposal):

Auckland Unitary Plan Operative in part (“AUP OP”)

[PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments](#)

I could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that my submission relates to are:

- The travel demand threshold rule at E27.4.1(A3a)
- Standard E27.6.1A
- Matters for discretion at E27.8.1(4A)
- Assessment criteria at E27.8.2(3A)
- Special information requirement at E27.9(2)(b)
- Definition of Travel Management Plan at Chapter J1

My submission is:

- I oppose the specific provisions identified above.
- The reasons for my opposition are:
 - The plan change is described as being ‘consequential technical amendments’ required as a result of the NPS-UD removal of car parking minimums. The introduction of a travel demand threshold rule is not a technical amendment, and the proposed rule should be declined on that basis. The rule would be more appropriately subject to a standalone plan change with a title that is clear to the community as to what is included within it.
 - The volume of resource consent applications processed by Auckland Council is significant and increasing. The proposed rule is unlikely to satisfy the local authority’s requirement under [section 18A](#) of the RMA for all persons acting under it to use timely, efficient, consistent and cost-effective processes that are proportionate to its functions or powers. In particular, this plan change will result in a higher demand of resourcing for traffic specialists as well as referrals to Auckland Transport for comment therefore slowing down progress on all resource consent applications. The National Policy Statement for Urban Development 2020 (“**NPS-UD**”) encourages local authorities to use comprehensive parking management plans, though this is for the local authority to pursue.
 - The [NPS-UD Fact Sheet on car parking](#) states at page 2 that district plans may contain ‘*a policy stating that... travel demand management... are [an] appropriate means of managing the demand and supply effects of car parking*’. While this fact sheet is only the view of the Government and is neither law nor binding, this suggests that the Government through the NPS-UD was not envisaging an outcome where travel demand management rules would be introduced and mandated; merely that a policy may be included in plans that would acknowledge travel demand management as one way of managing such effects. Further, our reading of this part of the fact sheet is that these plans would be something for the local authority to pursue, and not for individual applicants.
 - The residential thresholds at (T1B) through (T3B) will not apply in the major residential zones. In the Residential – Mixed Housing Suburban Zone and Residential – Mixed Housing Urban Zone, there are already matters for discretion that allow for an assessment of traffic effects at these thresholds. The proposed exclusion at E27.6.1A(2)(d) then means that the travel demand standard does not apply. The same applies for the community uses listed at (T11B) through (T13B). It is therefore unclear where it is expected that these activities will be located at these thresholds that would necessitate a travel demand assessment. The main possibilities would be the Business – Mixed Use Zone and Business – Local Centre Zone, which are not listed at E27.6.1A(2)(a) as excluded zones. It seems unusual that a travel demand assessment is required where the listed activities are to be located in these zones (which usually have good access to active and public transport modes), but not the above residential zones.
 - It appears that the list of exclusions where the proposed standard does not apply at E27.6.1A(2) have been copied verbatim from Standard E27.6.1 Trip Generation. It appears that this has been done without any analysis or consideration of suitability in association with the proposed rule.

- Plan provisions should be worded clearly to enable the plan user to judge meaning and effect at face value without having to resort to using explanations or seeking advice from those who wrote it. There are parts of rule E27.4.1(A3a) and standard E27.6.1A that are potentially confusing for the following reasons:
 - Rule E27.4.1(A3a) refers to exceeding ‘the travel demand thresholds’ set out in Standard E27.6.1A. There are no travel demand thresholds set out in the standard, there are only development thresholds.
 - It is unclear whether rule E27.4.1(A3a) applies only to new development at the specified threshold, or whether it applies to development that could increase an existing development above the threshold. For example, if an existing integrated residential development complex had 49 units, and 5 more were proposed, does this trigger the stated development threshold? The proposed special information requirement at E27.9(2)(b) refers to ‘new development’, but this is the only location in the provision set where the word ‘new’ is used.
 - Rule E27.4.1(A3a) states that it applies to subdivision. It appears that this has been copied verbatim from rule E27.4.1(A3) for trip generation assessment, which does apply to subdivision per standard E27.6.1(c). However, there is no mention of subdivision in the proposed standard E27.6.1A, and so the reference to subdivision in the rule is superfluous.
 - The activity status and resource consent requirement is restated at standard E27.6.1A(1), which is superfluous when this is already referred to in proposed rule E27.4.1(A3a). It is not best practice to include references to activity status within standards.
 - The standard is drafted poorly in that it doesn’t actually state a requirement of any kind. The requirement behind the standard for a travel demand management plan will be ‘buried’ in the Special Information Requirements section at the end of Chapter E27. There is no cross-reference in the standard to the Special Information Requirements, which means a layperson reading the standard has no idea what is required of them. Rather than improving on the poor setting out of the trip generation standard at E27.6.1, it appears that the layout and structure has just been replicated. Further complicating the process is that the definition of ‘travel management plan’ in Chapter J1 of the AUP states that Auckland Transport are able to provide guidance on how to prepare a travel plan. There is no readily available webpage from Auckland Transport with information about how to prepare a travel plan meaning anyone wanting their guidance will have to contact them directly which is both time-consuming and does not guarantee consistent advice from Auckland Transport will be given to each applicant.
 - The exclusion clause at standard E27.6.1A(2)(b) will require consent history research, which is not an infallible process for either an applicant or the consent authority. It is unclear what “provisions approved on the basis of an Integrated Transport Assessment” would mean. There is no AUP OP definition for “Integrated Transport Assessment”. Determining whether “effects are the same or similar in character, intensity and scale to those identified in the previous assessment” has the potential to be subjective and discretionary.

- The exclusion clause at standard E27.6.1A(2)(d) could lead to confusion where, for example, there is a requirement in a zone to consider effects of parking. Is this considered a 'transport effect' for this exclusion? Furthermore, the text which was already included in the AUP stating "A travel plan will not be required where the infringement of the parking standards is minor in relation to the scale of the activity." needs to be changed to be more specific. Lack of clarity here could result in debate between applicants and the consent authority as to what zone, precinct provisions or what is considered "minor" are captured by this exclusion. Debate as a result of poorly written plan provisions is inefficient, and wastes time and money.
- The section 32 analysis acknowledges that the proposed threshold rule will be unpopular, and would add time and cost. Auckland is already by far the most expensive location in New Zealand to obtain a resource consent and develop land. **Requiring a travel plan for every development that exceeds the stated thresholds (regardless of how much or how little parking is provided) has the potential to add thousands of dollars to the cost of every resource consent. The rule will simply have the outcome of being a proxy for the local authority to require on-site car parking. The quandary is that if parking is provided that would have complied with the now-removed minimums, a travel demand assessment will still be required, which is a greater requirement than before.**
- The proposed rule has the potential to undermine the 'market led' approach to parking that the NPS-UD seeks to offer, and will add cost, complexity and time to the resource consent process for little environmental gain. The proposed rule also has the potential to undermine development capacity, with some developers choosing to supply less units or floor area in order to save time and cost as part of the consent process.
- Other local authorities in New Zealand (for example, Queenstown Lakes District Council) that have removed parking minimums as directed by Policy 11 in the NPS-UD have not as far as we are aware sought to introduce additional development threshold rules to their plans. The urban areas within the limits of these local authorities have significantly less access to public transport and active modes than Auckland. As such, it is unclear why under the RMA there is a Part 2 resource management need for this proposed rule package in Auckland, and not in other parts of the country.
- There appears to be little evidence base in the section 32 evaluation to support the development thresholds that are proposed for the specific activities listed. There are residential activities like boarding houses and supported residential care that apparently have no requirement for travel demand management. These uses could equally have similar demand effects.
- It is unclear what expert evidence the local authority has relied upon outside of any input provided by Auckland Transport. There is no internal or independent expert report included with the section 37 evaluation. Such a report would usually be present for any private plan change that could affect the transport network, so it seems unusual that one has not been prepared for a transport-based plan change that affects all of Auckland. We expect that there will be a significant volume of expert evidence presented at the hearing on this plan change by suitably qualified and experienced transport planners, who will present a strong case in opposition to this proposed rule.

- It is accepted that on-street parking is a public asset that does require suitable cost mechanisms in play to manage its use and demand. However, this is the responsibility of Auckland Transport to manage as appropriate. While there may in-part be political opposition to further limiting or charging for on-street parking, this does not mean that it is appropriate to defer cost and responsibility to private developers given the clear market-led direction of NPS-UD Policy 11.

I seek the following decision from the local authority:

- Decline the proposed plan change as it relates to the submission and the provisions above.

Hearing

I wish to be heard in support of my submission.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Signature



Mrs. Imogen Trupinic

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Sonya McCall
Date: Thursday, 24 March 2022 3:16:07 pm
Attachments: [PC 71 Form 5 Waka Kotahi final.pdf](#)
[PC71 submission table 1 final.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sonya McCall

Organisation name: Waka Kotahi New Zealand Transport Agency

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Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Definition section
Standard E27.6.1A Travel Demand

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Supports the general consequential amendments with the exception of:

The proposed amendments to the travel plan definition which is being amended to include the efficient use of limited resources such as car parking.

The development thresholds which trigger the need for a travel plan.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: See attached Table 1

Submission date: 24 March 2022

Supporting documents

PC 71 Form 5 Waka Kotahi final.pdf

PC71 submission table 1 final.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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FORM 5

Submission on a notified proposal for Plan Change 71 – NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments under Clause 6 of Schedule 1 Resource Management Act 1991

24 March 2022

Auckland Council
Plans and Places
Private Bag 92300
Auckland 1142
Attn: Planning technician

Email: unitaryplan@aucklandcouncil.govt.nz

Name of submitter: Waka Kotahi New Zealand Transport Agency

This is a submission on Plan Change 71 – NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments (**Plan Change**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).

The Waka Kotahi New Zealand Transport Agency (**Waka Kotahi**) could not gain an advantage in trade competition through this submission.

Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (**LTMA**). Waka Kotahi's objective is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi's roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

The Plan Change relates to managing regulatory requirements for transport on land. The Plan Change introduces one additional new standard being the preparation of travel plans for various developments where the travel demand threshold is triggered.

Waka Kotahi is making a submission as it relates to:

- The proposed amendments to the travel plan definition, which is being amended to include, as part of the purpose of these plans, the efficient use of limited resources such as car parking.
- The development thresholds (as specified in table E27.6.1A.) which sets out the triggers for a travel plan.

Waka Kotahi's interest in this proposed Plan Change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.
- The manager of the State Highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

Government Policy Statement on Land Transport

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on the transport system and outcomes such as mode shift, emissions and safety. Land use and development form affects the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. Likewise, changes in transport can affect land use.

Waka Kotahi gives effect to the GPS through a number of strategic plans including:

- Arataki – our ten-year view of the step changes and actions needed to deliver on the government's current priorities and long-term outcomes for the land transport system;
- Toitu Te Taiao – our sustainability action plan. This notes two big challenges around reducing greenhouse gases and improving public health;
- Keeping Cities Moving – our national mode shift plan based around shaping urban form, making shared and active modes more attractive and influencing travel demand and transport choices.

Plan Change

In making this submission, Waka Kotahi is cognisant of the context of the Plan Change and ongoing planning processes. These include:

- The standard will potentially result in parking being provided unnecessarily resulting in increased emissions and the inefficient use of land.

- Parking requirements exacerbate climate change. The level of parking provided has been frequently shown to be strongly associated with the level of car ownership and VKT of residents/users of that development.
- The travel demand thresholds add a regulatory barrier and disincentive to development (particularly housing). This is both through the need to prepare a travel plan and the risk of notification and public opposition.
- The plan change does not recognise the importance of supply in shaping demand and instead continues the outdated view of parking demand as something that must lead supply.

Decision sought

Waka Kotahi supports the plan change but seeks amendments to ensure that perverse outcomes such as increased parking provision are avoided.

Waka Kotahi does not support in the definition of travel plans the inclusion of the efficient use of limited resources such as parking as part of the purpose of travel plans. Waka Kotahi seeks amendments to the travel plan definition. Waka Kotahi seek the deletion of Standard E27.6.1A Travel Demand and related tables, matters of discretion and assessment criteria.

Decisions that Waka Kotahi seeks on the Plan Change are set out in its submissions contained in **Table 1**. Waka Kotahi also seeks any consequential changes to the Plan Change required to give effect to the relief described in **Table 1**.

Hearings

Waka Kotahi wishes to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Submitter:

Sonya McCall

Team Lead, Environmental Planning Waka Kotahi

Address for Service of person making submission:

Waka Kotahi NZ Transport Agency

Contact Person: Sonya McCall

Email: sonya.mccall@nzta.govt.nz

Table 1: Waka Kotahi Submission on Plan Change 71 – NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments under Clause 6 of Schedule 1 Resource Management Act 1991

Sub #	Provision Number	Reason for Submission	Relief Sought Base text is PC71 as notified New text <u>underline</u> Deleted text strikethrough
1	Whole of plan change	<p>Waka Kotahi seeks to ensure that transport effects across the land transport system are appropriately managed through regulatory requirements for transport on land.</p> <p>Waka Kotahi generally supports the proposed plan change 71 which seeks to address consequential technical amendments to the Auckland Unitary Plan (Operative in part) that are necessary to give effect to Policy 11 of the National Policy Statement on Urban Development (NPS-UD).</p>	<p>Supports the general consequential amendments with the exception of:</p> <ul style="list-style-type: none"> • The proposed amendments to the travel plan definition which is being amended to include the efficient use of limited resources such as car parking. • The development thresholds which trigger the need for a travel plan.
2	Definition section	<p>The inclusion of managing “the efficient use of limited resources such as parking” as part of the purpose of travel plans in the definition of the Auckland Unitary Plan (Operative in part) risks changing the purpose of a travel plan (or travel demand management plan). The purpose of a travel plan should be to assess travel demand and manage that demand, the inclusion of parking management as part of the purpose risks undermining this primary purpose.</p> <p>It is noted that this matter is already covered as something a travel plan includes. The inclusion of this management</p>	<p>Oppose.</p> <p>Relief sought:</p> <p>Remove manage the efficient use of limited resources such as car parking and loading areas from the travel plan definition.</p> <p>Travel Plan A plan which sets out how travel demand is to be managed for a particular site or proposal to:</p>

70.1

70.2

		<p>approach as a tool to deliver the purpose of managing travel demand is the appropriate approach and is not opposed.</p> <p>The best practice guidance referred to in the definition should also be provided by Auckland Transport on their website so that it is publicly and easily available.</p>	<ul style="list-style-type: none"> • maximise the efficient use of transport networks and systems; and • promote and enable the use of more sustainable and active modes of transport such as public transport, walking and cycling, and carpooling, <u>car sharing</u> and micro mobility as alternatives to sole occupancy private cars. And • manage the efficient use of limited resources such as car parking and loading areas. <p>A travel plan includes:</p> <ul style="list-style-type: none"> • a description of the site and the proposal; • details of the physical infrastructure that is or will be established on the site to support the use of walking and cycling, public transport, carpooling, car sharing and micro mobility; • details of the ongoing activities and processes that will be used to support the use of walking and cycling, public transport, carpooling, car sharing and micro mobility; • details of how the travel plan is to be communicated, promoted, implemented, and monitored and reviewed; • information about the amount and nature of any onsite parking and loading (whether onsite or on the street) and how this is to be managed to support efficient use and promote alternatives travel modes; and • expected outcomes from its implementation. <p>Note Best practice guidance on the preparation of a travel plan can be provided by Auckland Transport. A travel plan is also sometimes referred to as a travel demand management plan.</p>
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<p>3</p>	<p>Standard E27.6.1A Travel Demand</p>	<p><u>Rule in general</u></p> <ul style="list-style-type: none"> Rules that result in parking being required will increase use of private vehicles and exacerbate climate change. The level of parking provided has been frequently shown to be strongly associated with the level of car ownership and VKT of residents/users of that development. The development thresholds do not recognise the importance of supply in shaping demand and instead continues the outdated view of parking demand as something that must lead supply. The rule adds a regulatory barrier and disincentive to develop both through the additional consenting reason and the need to prepare a travel plan but also the risk of notification and public opposition. Alternative non-RMA methods exist to manage any impacts of increased demand for on-street parking and the effects of this on the safe and efficient operation of the transport network. Auckland Transport has a range of management and enforcement options available to them. <p><u>Alignment with objectives and policies</u></p> <ul style="list-style-type: none"> The introduction of development thresholds does not support many objectives and policies of the AUP which include mode shift, climate change, efficient use of land and urban design. <p><u>Assessment criteria</u></p> <ul style="list-style-type: none"> It is very difficult to accurately estimate the level of travel demand of a development, both as a whole and by different modes, given the many variables involved. This will become even more so 	<p>Oppose.</p> <p>Relief sought:</p> <p>Remove Standard E27.6.1A Travel Demand and all related tables, matters of discretion and assessment criteria.</p>
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70.3

		<p>the case as Auckland undergoes the transformational shift Auckland Council seeks to meet its emissions reduction targets. Requiring parking now, risks incentivising private vehicle trips and locking in inefficient use of land.</p> <ul style="list-style-type: none">• Other than providing more on-site car or cycle parking, there are limited interventions a developer of the relatively small scale development picked up by this rule (i.e. 10 dwellings or 501m2 of office) can provide.• Following on from the above point, the AUP already has standards for bicycle parking and end of trip facilities which apply in most of the circumstances the travel demand threshold would apply. Amendment of the cycle provisions to cover a similar level of development (i.e. changing 20 dwellings to 10 dwellings) would be a more appropriate alternative approach to ensure sufficient cycle facilities.• Notwithstanding the above points, should these matters be retained they should be amended to also include planned PT service levels and active transport infrastructure. With this concept already in the NPS-UD it should be incorporated here – projects in the RLTP or future bus service frequencies in the RPTP should be taken into account as part of this assessment.	
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**SUBMISSION ON PLAN CHANGE 71 TO THE AUCKLAND UNITARY PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE
MANAGEMENT ACT 1991**

To: Auckland Council
Attn: Planning Technician
Unitary Plan Private Bag 92300
AUCKLAND 1142

unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: Oyster Management Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
AUCKLAND 1143
Attention: Bianca Tree

bianca.tree@minterellison.co.nz

Introduction

1. This is a submission on behalf of Oyster Management Limited (**Oyster**) on proposed Plan Change 71 (**PC 71**) to the Auckland Unitary Plan (**Unitary Plan**). PC 71 was notified by Auckland Council (**Council**) on 24 February 2022.
2. PC 71 proposes changes to the Unitary Plan in response to the removal of minimum car parking requirements from the Unitary Plan on 11 February 2022, as required by Policy 11 of the National Policy Statement of Urban Development 2020 (**NPS-UD**). The changes include consequential amendments to ensure internal consistency within the Unitary Plan, removal of policies, as well as a new activity rule, standard, matters of discretion, assessment criteria, and special information requirement.
3. Oyster opposes PC 71 in part and supports PC 71 in part.

Scope of submission

4. This submission relates to the following proposals in PC 71:
 - (a) Consequential amendments to the Unitary Plan to ensure internal consistency; and
 - (b) The following amendments to the Transport chapter of the Unitary Plan:
 - (i) Removal of Policy E27.3(6);
 - (ii) New activity rule at E27.4.1(A3a);
 - (iii) New Standard E27.6.1A and Table E27.6.1A.1;
 - (iv) New matter of discretion E27.8.1(4A);
 - (v) New assessment criteria E27.8.2(3A); and
 - (vi) Amendment to the special information requirement E27.9(2)(b).

Background to Oyster

5. Oyster is a commercial property and fund manager that manages a portfolio of office, retail, large format retail, and industrial properties throughout New Zealand. Oyster manages approximately \$2.1 billion in assets.
6. Oyster's office assets comprise of commercial business parks and suburban and CBD fringe offices. Its retail assets include regional shopping centres, outlet centres, suburban convenience centres, large format retail, and supermarkets, and its industrial assets comprise of logistic, manufacturing, and warehouse facilities in established industrial areas.
7. In Auckland, Oyster's portfolio includes the Millennium Centre and Central Park business parks on Great South Road, Cider Building in Ponsonby, Dress-Smart Onehunga, Albany Lifestyle Centre, Mitre 10 MEGA in Henderson, Countdown Lincoln Road, a trade retail property at 107 Harris Road, East Tamaki, and the building occupied by Cardinal Logistics at 71 and 77 Westney Road, Mangere.
8. These properties are located in various different zones including the Business – Business Park zone, Business – Mixed Use zone, Business – Town Centre

zone, Business – Metropolitan Centre zone, Business – General Business zone, Business – Light Industry zone, and Business - Heavy Industry zone.

Trade competition

9. Oyster could not gain an advantage in trade competition through this submission.

Submission in opposition

10. Oyster opposes the following proposals relating to the Transport chapter of the Unitary Plan.
- (a) The amendment to Policy E27.3(6);
 - (b) The new activity rule E27.4.1(A3a);
 - (c) The new Standard E27.6.1A and Table E27.6.1A.1;
 - (d) The new matter of discretion E27.8.1(4A);
 - (e) The new assessment criteria E27.8.2(3A); and
 - (f) The amendment to the special information requirement E27.9(2)(b).

71.1

Reasons for submission in opposition

11. The reasons for Oyster's opposition include the following.
12. In general, the proposed changes to the Transport Chapter in paragraph 10 above:
- (a) do not give effect to the objectives and policies of the NPS-UD;
 - (b) would not contribute to well-functioning urban environments;
 - (c) are inconsistent with the sustainable management of physical resources and are otherwise consistent with the purpose and principles of the Resource Management Act 1991 (**RMA**);
 - (d) do not meet the requirements to satisfy the criteria of section 32 of the RMA;

- (e) will not meet the reasonably foreseeable needs of future generations;
and
 - (f) are not consistent with sound resource management practice.
13. Without derogating from the generality above, the proposed changes to the Transport Chapter described in paragraph 10 above do not give effect to Policy 11 of the NPS-UD and do not achieve the objective of PC 71.
14. We expand below.

The amendment to Policy E27.3(6) is unnecessary and does not give effect to Policy 11 of the NPS-UD

15. Policy E27.3(6) currently provides for flexibility in on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone.
16. Amending Policy E27.3(6) as proposed does not give effect to Policy 11 of the NPS-UD. Policy 11 relates to removing minimum car parking standards and managing the effects associated with the supply and demand of car parking. The purpose of Policy 11 of the NPS-UD is to remove minimum car parking requirements so that developers can determine the amount of car parking necessary and choose whether to provide car parks for new developments.¹
17. The objective of PC 71 is to give effect to Policy 11 of the NPS-UD.² The proposed amendment to Policy E27.3(6) goes beyond the purpose of PC 71 to address consequential technical amendments to the Unitary Plan and changes the effect of the policy entirely. This is also inconsistent with the shift toward enabling a market-based approach to the supply of carparking.
18. Amending Policy E27.3(6) would remove a clear policy that recognises the flexibility for car parking in these zones, which in turn reduces the ability for developers to choose whether to provide car parks. Policy E27.3(6)(a) recognises that flexibility is important, and this flexibility should be retained.

¹ Ministry for the Environment and Ministry of Housing and Urban Development [Regulatory Impact Statement: National Policy Statement on Urban Development](#) (22 May 2020) at 24; Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1 and 2.

² Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 4.

19. Oyster seeks for the original wording of Policy E27.3(6) to be retained and only for Policy E37.3(6)(a) and (b) to be deleted and replaced by the proposed new wording (with amendments) as a new policy 6A as follows (or words to like effect):

(6) Provide for flexible on-site parking in the Business – Metropolitan Centre zone, Business – Town Centre zone, Business – Local Centre zone and Business – Mixed Use zone (with the exception of specified non urban town and local centres and the Mixed use zone adjacent to those specified centres).

(6A) Provide maximum parking limits for education facilities and hospitals in the Business – Metropolitan Centre zone, Business – Town Centre zone, Business – Local Centre zone and Business – Mixed Use zone (with the exception of specified non-urban town and local centres and the Mixed Use zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.

20. We note that the Council has recognised that E27.3(6)(a) is consistent with the NPS-UD.³

The new activity rule, standard, matter of discretion, assessment criteria, and special information requirement are inappropriate and do not achieve the objective of PC 71

21. PC 71 proposes to introduce a new activity rule and standard that will require restricted discretionary resource consent for specified developments, which would materially increase the number of developments requiring resource consent. To summarise, the proposed new matter of discretion, assessment criteria, and special information requirement require an application for resource consent under the new standard to include a travel plan that sets out travel information relating to the proposed development, including alternatives to private vehicle travel, proposals to reduce private vehicle travel and demand for car parking, and the effects of increased demand for private vehicle travel and carparking on the safe and efficient operation of the transport network.

³ Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 12.

22. The requirements for resource consent and a travel plan do not give effect to Policy 11 of the NPS-UD. As noted above, Policy 11 is limited in scope.
23. The removal of minimum carparking requirements was intended to prevent the oversupply of car parks by shifting to a market-based approach for providing car parks.⁴ The requirement for restricted discretionary resource consent, a travel plan, and the ability for the Council to consider the effects on the transport network (E27.8.1(4A)(b)), for a low threshold of new development would give the Council control over on-site car parking rather than allowing a market-based approach.
24. These proposed requirements are unlikely to contribute to well-functioning urban environments as required under Policy 1 of the NPS-UD, because they would provide a level of regulation that is onerous, unnecessary, may have unintended consequences and unduly constrain development.
25. The removal of minimum carparking requirements was also intended to remove unnecessary constraints and costs associated with developments to improve the responsiveness of land markets.⁵ The requirement for restricted discretionary resource consent and a travel plan would only increase the constraints, time and costs associated with development. In particular, this requirement would increase the administrative burden for many developments which will not have significant effects on the transport network while increasing the delay, uncertainty and costs for developers.
26. We appreciate that the Council intends to manage effects of private vehicle travel on the transport network.⁶ However, the Council does not need to introduce the proposed new activity rule and standard to achieve this. The Council already manages effects on the transport network through Integrated Transport Assessments and travel plans where trip generation thresholds are exceeded, or where maximum carparking rates proposed for specified

⁴ Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1.

⁵ Ministry for the Environment and Ministry of Housing and Urban Development [Regulatory Impact Statement: National Policy Statement on Urban Development](#) (22 May 2020) at 16; Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1.

⁶ Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 15 and 16.

activities are exceeded.⁷ These existing provisions are giving effect to NPS-UD Policy 11(b) and it is not necessary or appropriate to add a further control.

- 27. The development thresholds in the new standard E27.6.1A and table E27.6.1A.1 are very low. For example, the development threshold for offices to require a travel plan is 500m² GFA. A development of this size would generally have a minor impact on the transport network and the requirement for resource consent and a travel plan would be disproportionate and unnecessarily onerous. Similarly, the development thresholds for industrial activities are also relatively low at 2000 m² GFA for warehousing and storage or 2000m² GFA for other industrial activities.
- 28. Oyster seeks for the proposed new activity rule at E27.4.1(A3a), the new Standard at E27.6.1A and Table E27.6.1A.1, the new matter of discretion E27.8.1(4A), the new assessment criteria E27.8.2(3A), and the amendment to the special information requirement E27.9(2)(b) to be deleted.

Submission in support

- 29. Oyster generally supports the remaining proposed consequential amendments to the Unitary Plan to ensure internal consistency.

Decision sought

- 30. The decision sought by Oyster is:
 - (a) That Policy E27.3(6) is retained, and a new Policy E27.3(6A) inserted as addressed in para 18 above. 71.2
71.3
 - (b) That the following proposed amendments are deleted:
 - (i) New activity rule E27.4.1(A3a); 71.4
 - (ii) New standard E27.6.1A and Table E27.6.1A.1; 71.5 71.6
 - (iii) New matter of discretion E27.8.1(4A); 71.7
 - (iv) New assessment criteria E27.8.2(3A); and 71.8

⁷ See E27.8.1(4) and (5), and the special information requirements at E27.9 of the Unitary Plan.

- (v) Amendment to special information requirement E27.9(2)(b).
 - (c) That the proposed consequential amendments to the Unitary Plan that ensure internal consistency are allowed.
 - (d) Such other alternative or consequential relief and/or amendments to PC 71 as may be necessary to address Oysters concerns, as outlined above.
31. Oyster wishes to be heard in support of its submission.
32. If others make a similar submission, Oyster will consider presenting a joint case with them at a hearing.

DATED this 24th day of March 2022

Oyster Management Limited by its
solicitors and duly authorised agents
MinterEllisonRuddWatts



B J Tree

Address for service of submitter

Oyster Management Limited c/- MinterEllisonRuddWatts
P O Box 105249
AUCKLAND 1143
Attention: Bianca Tree

Telephone No: (09) 353 9700
Fax No. (09) 353 9701
Email: bianca.tree@minterellison.co.nz

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Celia Davison, Manager Central South, Plans and Places, Auckland Council

Organisation Name (if submission is made on behalf of Organisation)

Auckland Council

Address for service of Submitter

Auckland Council, Private Bag 92300, Victoria Street West, Auckland 1142

Telephone:

93010101

Fax/Email:

Celia.Davison@AucklandCouncil.govt.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 71

Plan Change/Variation Name

NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

E27.6.1A Travel Demand standard, Table E27.6.1A.1 Development Thresholds with a travel plan requirement, & tE27.8.2 Assessment Criteria

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

see attached reasons

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

see attached decision sought

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

03/24/2022

Date

(or person authorised to sign on behalf of submitter)

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

I wish to have the following provisions amended:

1. E27.6.1A Travel Demand

Relief Sought: Delete standard (2)(d) which states:

~~(d) there are requirements to assess transport, traffic or trip generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities.~~

72.1

The reasons for my views are:

- The requirement to assess transport, traffic or trip generation in the applicable zone rules or precinct rules are not comprehensive enough to adequately assess travel demand and associated effects
- The proposed assessment criteria in E27.8.2 are more appropriate and comprehensive and enable an appropriate assessment of the travel demands of an activity

2. Table E27.6.1A Development thresholds with a travel plan requirement

72.2

Relief Sought: Amend the development threshold for education facilities in the table to read:

All Education facilities accommodating an additional 50 or more people

The reasons for my views are:

- The proposed term “education facilities” is very broad and captures many activities that will not result in an increase in people using/visiting an education facility site
- The focus of the development threshold should be on additional development that results in an increase in people using such sites and associated effects
- The 50 or more people threshold would be consistent with other activities identified in the proposed activity table

3. E27.8.2 Assessment Criteria

Relief Sought: Amend (3A)(a)(i) first bullet point to read:

- the accessibility and frequency of public transport services for all users

72.3

The reasons for my views are:

- the criteria relating to the accessibility of public transport also needs to take into account people with disabilities and this is captured by the term “for all users”
- people with disabilities may have lesser ability to access public transport given factors such as travel distances, topography, the type and condition of surfaces such as footpaths and this needs to be taken into consideration when assessing the accessibility of public transport services

**SUBMISSION ON PLAN CHANGE 71 TO THE AUCKLAND UNITARY PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE
MANAGEMENT ACT 1991**

To: Auckland Council
Attn: Planning Technician
Unitary Plan Private Bag 92300
AUCKLAND 1142

unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: Southern Cross Healthcare Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
AUCKLAND 1143
Attention: Bianca Tree

bianca.tree@minterellison.co.nz

Introduction

1. This is a submission on behalf of Southern Cross Healthcare Limited (**Southern Cross**) on proposed Plan Change 71 (**PC 71**) to the Auckland Unitary Plan (**Unitary Plan**). PC 71 was notified by Auckland Council (**Council**) on 24 February 2022.
2. PC 71 proposes changes to the Unitary Plan in response to the removal of minimum car parking requirements from the Unitary Plan on 11 February 2022, as required by Policy 11 of the National Policy Statement of Urban Development 2020 (**NPS-UD**). The changes include consequential amendments to ensure internal consistency within the Unitary Plan, removal of policies, as well as a new activity rule, standard, matters of discretion, assessment criteria, and special information requirement.
3. Southern Cross opposes PC 71 in part and supports PC 71 in part.

Scope of submission

4. This submission relates to the following proposals in PC 71:
 - (a) Consequential amendments to the Unitary Plan to ensure internal consistency; and
 - (b) The following amendments to the Transport chapter of the Unitary Plan:
 - (i) Amendment to Policy E27.3(6);
 - (ii) New activity rule at E27.4.1(A3a);
 - (iii) New Standard E27.6.1A and Table E27.6.1A.1;
 - (iv) New matter of discretion E27.8.1(4A);
 - (v) New assessment criteria E27.8.2(3A); and
 - (vi) Amendment to the special information requirement E27.9(2)(b).

Background to Southern Cross

5. Southern Cross has the largest network of private surgical hospitals and procedure centres in New Zealand, with ten wholly owned hospitals as well as six hospitals operated as joint ventures in partnership with leading healthcare providers. Southern Cross also has a shareholding in a number of other related organisations involved in providing orthopaedic, diagnostic and interventional treatments for endoscopic and cardiology services, and radiotherapy for cancer treatment.
6. Southern Cross is a not-for-profit business which means all profit is reinvested to provide increased access to, and improved, healthcare services.
7. A list of Southern Cross' wholly-owned Auckland hospitals and their zoning is included as **Appendix A**. These properties are located in the Mixed Use zone, Light Industry zone, Mixed Housing – Urban zone, Mixed Housing – Suburban zone and the Single House zone.
8. Where possible, Southern Cross co-locates its health services so that it can provide an effective and efficient patient experience. Co-location means bringing together in one Southern Cross site surgical, recovery, endoscopy,

consulting and imaging services. By doing this, Southern Cross is able to significantly reduce delays in patients receiving treatment and reduce the need for patients to travel to various locations within a city or town to access these services, which are often an integral part of a patient's treatment. This makes a significant difference in patient care.

9. Southern Cross' hospitals are typically located immediately adjacent to or within residential areas of towns and cities in New Zealand. They are also often located in proximity to public hospitals and other healthcare providers, which also provides time and efficiency benefits for specialists who work in this sector.
10. There are functional reasons why a certain level of on-site carparking will always be required for hospitals and in some instances public transport, walking and cycling trips are not realistic. In a typical day, surgeons and anaesthetists commute between public hospitals, private hospitals and their consulting rooms. Equally, a patient will need to travel between a surgeon's consulting rooms, our hospital and other supporting healthcare providers. Further, hospital staff generally perform shift work and (depending on the shift time) rely on private vehicles for transport. Patients also need to be brought to the hospital and taken home in the comfort of a private vehicle. These functional concerns have already been considered and are addressed in the Unitary Plan, and there is no need for the further more onerous controls as proposed in PC 71.
11. Southern Cross considers that PC71 will add another layer of regulation, cost, delay and uncertainty for development projects, with no material benefits.

Trade competition

12. Southern Cross could not gain an advantage in trade competition through this submission.

Submission in opposition

13. Southern Cross opposes the following proposals relating to the Transport chapter of the Unitary Plan:
 - (a) The amendment to Policy E27.3(6);

- (b) The new activity rule E27.4.1(A3a);
- (c) The new Standard E27.6.1A and Table E27.6.1A.1;
- (d) The new matter of discretion E27.8.1(4A);
- (e) The new assessment criteria E27.8.2(3A); and
- (f) The amendment to the special information requirement E27.9(2)(b).

Reasons for submission in opposition

14. The reasons for Southern Cross' opposition include the following.
15. In general, the proposed changes to the Transport Chapter in paragraph 11 above:
 - (a) do not give effect to the objectives and policies of the NPS-UD;
 - (b) would not contribute to well-functioning urban environments;
 - (c) are inconsistent with the sustainable management of physical resources and are otherwise consistent with the purpose and principles of the Resource Management Act 1991 (**RMA**);
 - (d) do not meet the requirements to satisfy the criteria of section 32 of the RMA;
 - (e) will not meet the reasonably foreseeable needs of future generations; and
 - (f) are not consistent with sound resource management practice.
16. Without derogating from the generality above, the proposed changes to the Transport Chapter described in paragraph 11 above do not give effect to Policy 11 of the NPS-UD and do not achieve the objective of PC 71.
17. We expand below.

The amendment to Policy E27.3(6) is unnecessary and does not give effect to Policy 11 of the NPS-UD

18. Policy E27.3(6) currently provides for flexibility in on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone.
19. Amending Policy E27.3(6) as proposed does not give effect to Policy 11 of the NPS-UD. Policy 11 relates to removing minimum car parking standards and managing the effects associated with the supply and demand of car parking. The purpose of Policy 11 of the NPS-UD is to remove minimum car parking requirements so that developers can determine the amount of car parking necessary and choose whether to provide car parks for new developments.¹
20. The objective of PC 71 is to give effect to Policy 11 of the NPS-UD.² The proposed amendment to Policy E27.3(6) goes beyond the purpose of PC 71 to address consequential technical amendments to the Unitary Plan and changes the effect of the policy entirely. This is also inconsistent with the shift toward enabling a market-based approach to the supply of carparking.
21. Amending Policy E27.3(6) would remove a clear policy that recognises the flexibility for car parking in these zones, which in turn reduces the ability for developers to choose whether to provide car parks. This is inappropriate because for some developments in these zones providing for on-site parking may be necessary or provide for better urban design outcomes. Policy E27.3(6) recognises that flexibility is important, and this flexibility should be retained.
22. The Unitary Plan provides for maximum carparking limits for education facilities and hospitals in these zones, and the policy should recognise these controls while retaining flexibility for other uses.
23. Southern Cross seeks for the original wording of Policy E27.3(6) to be retained and only for Policy E37.3(6)(a) and (b) to be deleted and replaced by the

¹ Ministry for the Environment and Ministry of Housing and Urban Development [Regulatory Impact Statement: National Policy Statement on Urban Development](#) (22 May 2020) at 24; Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1 and 2.

² Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 4.

proposed new wording (with amendments) as a new policy 6A as follows (or words to like effect):

(6) Provide for flexible on-site parking in the Business – Metropolitan Centre zone, Business – Town Centre zone, Business – Local Centre zone and Business – Mixed Use zone (with the exception of specified non urban town and local centres and the Mixed use zone adjacent to those specified centres).

(6A) Provide maximum parking limits for education facilities and hospitals in the Business – Metropolitan Centre zone, Business – Town Centre zone, Business – Local Centre zone and Business – Mixed Use zone (with the exception of specified non-urban town and local centres and the Mixed Use zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.

24. We note that the Council has recognised that E27.3(6)(a) is consistent with the NPS-UD.³

The new activity rule, standard, matter of discretion, assessment criteria, and special information requirement are inappropriate and do not achieve the objective of PC 71

25. PC 71 proposes to introduce a new activity rule and standard that will require restricted discretionary resource consent for specified developments, which would materially increase the number of developments requiring resource consent. To summarise, the proposed new matter of discretion, assessment criteria, and special information requirement require an application for resource consent under the new standard to include a travel plan that sets out travel information relating to the proposed development, including alternatives to private vehicle travel, proposals to reduce private vehicle travel and demand for car parking, and the effects of increased demand for private vehicle travel and carparking on the safe and efficient operation of the transport network.
26. The requirements for resource consent and a travel plan do not give effect to Policy 11 of the NPS-UD. As noted above, Policy 11 is limited in scope.

³ Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 12.

27. The removal of minimum carparking requirements was intended to prevent the oversupply of car parks by shifting to a market-based approach for providing car parks.⁴ The requirement for restricted discretionary resource consent, a travel plan, and the ability for the Council to consider the effects on the transport network (E27.8.1(4A)(b)), for a low threshold of new development would give the Council control over on-site car parking rather than allowing a market-based approach.
28. These proposed requirements are unlikely to contribute to well-functioning urban environments as required under Policy 1 of the NPS-UD, because they would provide a level of regulation that is onerous, unnecessary, may have unintended consequences and unduly constrain development.
29. The removal of minimum carparking requirements was also intended to remove unnecessary constraints and costs associated with developments to improve the responsiveness of land markets.⁵ The requirement for restricted discretionary resource consent and a travel plan would only increase the constraints, time and costs associated with development. In particular, this requirement would increase the administrative burden for many developments which will not have significant effects on the transport network while increasing the delay, uncertainty and costs for consent applicants.
30. We appreciate that the Council intends to manage effects of private vehicle travel on the transport network.⁶ However, the Council does not need to introduce the proposed new activity rule and standard to achieve this. The Council already manages effects on the transport network through Integrated Transport Assessments and travel plans where trip generation thresholds are exceeded, or where maximum carparking rates proposed for specified activities are exceeded.⁷ These existing provisions are giving effect to NPS-UD Policy 11(b) and it is not necessary or appropriate to add a further control.
31. The development thresholds in the new standard E27.6.1A and table E27.6.1A.1 are very low. For example, the development threshold for

⁴ Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1.

⁵ Ministry for the Environment and Ministry of Housing and Urban Development [Regulatory Impact Statement: National Policy Statement on Urban Development](#) (22 May 2020) at 16; Ministry for the Environment [National Policy Statement on Urban Development 2020 – car parking fact sheet](#) (July 2020) at 1.

⁶ Auckland Council [Section 32 Evaluation Report](#) (24 February 2022) at 15 and 16.

⁷ See E27.8.1(4) and (5), and the special information requirements at E27.9 of the Unitary Plan.

healthcare facilities to require a travel plan is 200m² GFA. A development of this size would generally have a minor impact on the transport network and the requirement for resource consent and a travel plan would be disproportionate and unnecessarily onerous.

- 32. Southern Cross seeks for the proposed new activity rule at E27.4.1(A3a), the new Standard at E27.6.1A and Table E27.6.1A.1, the new matter of discretion E27.8.1(4A), the new assessment criteria E27.8.2(3A), and the amendment to the special information requirement E27.9(2)(b) to be deleted.

Submission in support

- 33. Southern Cross generally supports the remaining proposed consequential amendments to the Unitary Plan to ensure internal consistency.

Decision sought

- 34. The decision sought by Southern Cross is:
 - (a) That Policy E27.3(6) is retained, and a new Policy E27.3(6A) inserted as addressed in paragraph 21 above. 73.2
73.3
 - (b) That the following proposed amendments are deleted:
 - (i) New activity rule E27.4.1(A3a); 73.4
 - (ii) New standard E27.6.1A and Table E27.6.1A.1; 73.5 73.6
 - (iii) New matter of discretion E27.8.1(4A); 73.7
 - (iv) New assessment criteria E27.8.2(3A); and 73.8
 - (v) Amendment to special information requirement E27.9(2)(b). 73.9
 - (c) That the proposed consequential amendments to the Unitary Plan that ensure internal consistency are allowed.
 - (d) Such other alternative or consequential relief and/or amendments to PC 71 as may be necessary to address Southern Cross concerns, as outlined above.
- 35. Southern Cross wishes to be heard in support of its submission.

36. If others make a similar submission, Southern Cross will consider presenting a joint case with them at a hearing.

DATED this 24th day of March 2022

Southern Cross Hospitals Limited by its
solicitors and duly authorised agents
MinterEllisonRuddWatts



B J Tree

Address for service of submitter

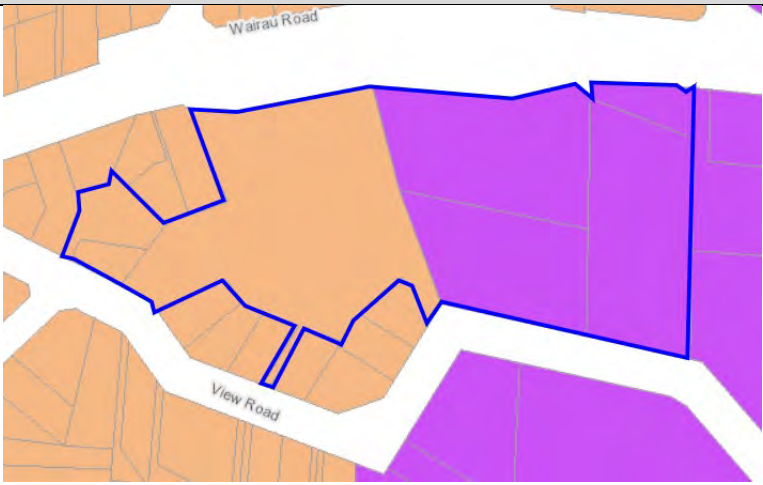
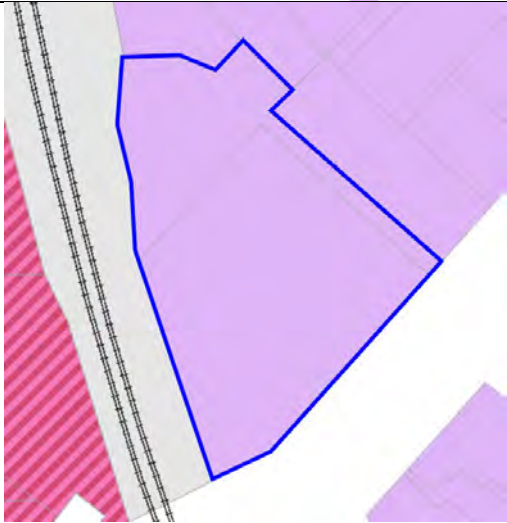
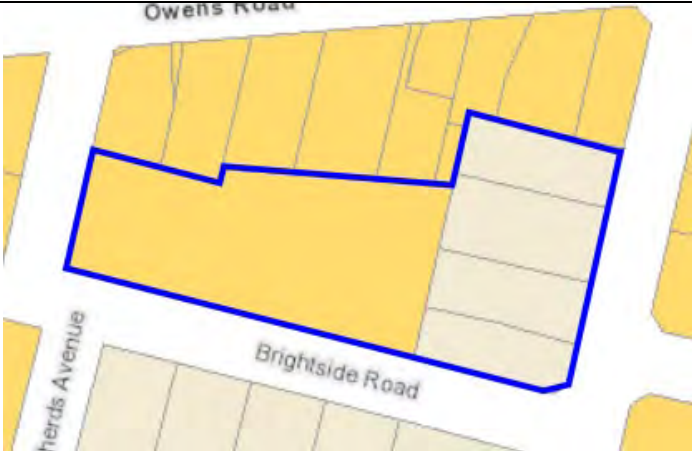
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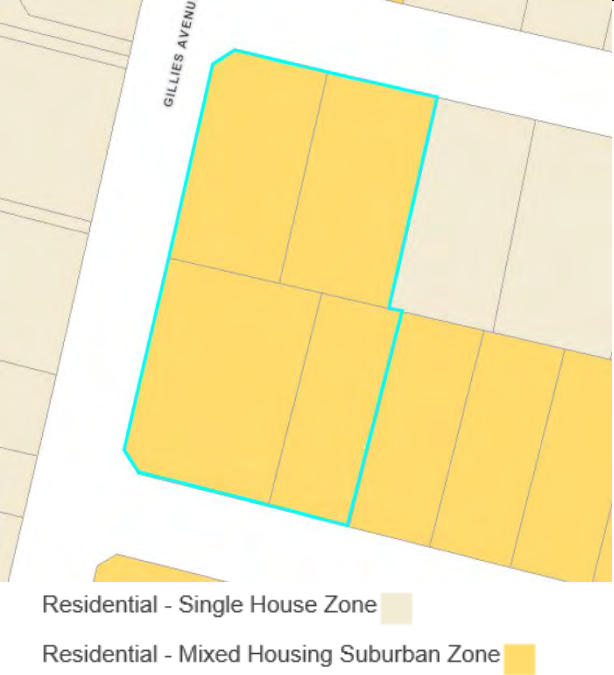
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Appendix A – List of Southern Cross’ Auckland sites

Site	Zoning
<p>North Harbour Hospital 223 Wairau Road, Wairau Valley</p>	 <p>Residential - Mixed Housing Urban Zone ■ Business - Light Industry Zone ■</p>
<p>Auckland Surgical Centre 7 and 7A St Marks Road, Remuera</p>	 <p>Business - Mixed Use Zone ■</p>
<p>Brightside Hospital 3 Brightside Road and 149-153 Gillies Avenue, Epsom</p>	 <p>Residential - Single House Zone ■ Residential - Mixed Housing Suburban Zone ■</p>

Site	Zoning
<p>Gillies Hospital 156-160 Gillies Avenue, Epsom</p>	 <p>The map shows a street labeled 'GILLIES AVENUE' running vertically. A large area of land is highlighted in yellow, representing the 'Residential - Mixed Housing Suburban Zone'. This area is divided into several rectangular lots. To the left of this yellow area, there are several rectangular lots colored in a light tan or beige, representing the 'Residential - Single House Zone'. The Gillies Hospital site is located within the yellow-highlighted area.</p> <p>Residential - Single House Zone </p> <p>Residential - Mixed Housing Suburban Zone </p>



Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY
STATEMENT OR PLAN, CHANGE OR VARIATION**
Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council

Name of submitter: Ryman Healthcare Limited (*Ryman*)

Introduction

- 1 This is a submission on Auckland Council's (*Council*) Proposed Plan Change 71 (*PC71*) to the Auckland Unitary Plan (Operative in Part) (*AUP*) on behalf of Ryman.
- 2 Ryman could not gain an advantage in trade competition through this submission.
- 3 Ryman supports in full the Retirement Villages Association of New Zealand Incorporated (*RVA*) submission on *PC71*. This submission provides additional context to Ryman's villages and its interest in the proposal.
- 4 The submission covers:
 - 4.1 An introduction to Ryman, its villages and its residents; and
 - 4.2 Ryman's position on *PC71*.

Ryman's approach

- 5 Ryman is considered to be a pioneer in many aspects of the healthcare industry – including retirement village design, standards of care, and staff education. It believes that a quality site, living environment, amenities and the best care maximises the quality of life for its residents. Ryman is passionately committed to providing the best environment and care for our residents. Ryman is not a developer. It is a resident-focused operator of retirement villages. Ryman has a long term interest in its villages and its residents.

The ageing demographic

- 6 Auckland's growing ageing population and the increasing demand for retirement villages is addressed in the *RVA*'s submission on *PC71*, and that is adopted by Ryman.
- 7 Ryman's own research confirms that good quality housing and sophisticated care for the older population is significantly undersupplied in many parts of the country,

including Auckland. Auckland's ageing population is facing a significant shortage in appropriate accommodation and care options, which allow them to "age in place" as their health and lifestyle requirements change over time. This is because appropriate sites in good locations are incredibly scarce.

Ryman's scale in Auckland's retirement market

- 8 Ryman is the largest provider of retirement village accommodation in New Zealand. Ryman currently has 38 operational retirement villages throughout New Zealand providing homes for more than 11,000 elderly residents. It has 13 retirement villages currently operating or at some stage of design or construction in Auckland. Ryman is also in the process of obtaining consents for a further village in Auckland, as well as the extension of an existing village.
- 9 Ryman constructs a significant number of the new dwellings in Auckland each year. In the last 6 years, it has obtained resource consents to build and operate 7 large villages at Howick, Birkenhead, Greenlane, Pukekohe, Hillsborough, Narrowneck and Kohimarama, which are now either completed or under construction.
- 10 Collectively, these villages comprise around 1,300 new retirement units and 1200 new aged care units. Each village will house in the order of 400-600 residents. Ryman's contribution to Auckland's growth in a 6 year period is accommodation for in the order of 2,900 people. Ryman has a further similarly-scaled site in the pipeline for consenting.
- 11 In that sense, Ryman builds a substantial portion of all new retirement village units. We expect to continue to increase our proportion of Auckland's new build retirement village over time.

Ryman's residents

- 12 All of Ryman's residents – both retirement unit and aged care room residents – are much less active and mobile than the 65+ population generally as well as the wider population. Ryman's retirement unit residents are early 80s on move-in and its aged care residents are mid-late 80s on move-in. Across all of Ryman's villages, the average age of retirement unit residents is 82.1 years and the average age of aged care residents is 86.7 years.

Ryman villages have a lower and different traffic demand profile

- 13 Retirement villages' lower and different traffic demand profile is addressed in the RVA's submission on PC71, and that is adopted by Ryman.
- 14 Due to the frailty and mobility limitations of some residents, Ryman provides extensive on-site community amenities, including entertainment activities, recreational facilities, small shops, bar and restaurant facilities, communal sitting areas, and large, attractively landscaped areas. Ryman provides these on-site indoor and outdoor purpose built amenities, as well as its activities programmes, to meet the very specific needs of its residents.
- 15 Because of the demographic, frailty and health characteristics of Ryman's residents, as well as the on-site amenities provided by its retirement villages, Ryman's experience is that its villages generate a lower level of traffic than standard residential developments. Residents generally stay on-site as they do not travel to work and choose to engage in activities within the village. There is often so much to do within the village that there is very little time for other activities. Further,

Ryman's villages have measures in place to reduce transportation effects, including providing sufficient on-site parking for residents and staff, using vans to transport residents to shared activities and organising staff shift changes outside peak commuting periods.

Ryman's position on PC71

- 16 Ryman adopts the RVA's submission on PC71. In addition, Ryman wishes to emphasise that PC71 will have a significant impact on the provision of housing and care for Auckland's growing ageing population. There is a real risk that the proposed changes will delay necessary retirement and aged care accommodation in the region.

74.1

Relief sought

- 17 Ryman seeks the relief sought by the RVA in its submission on PC71.
- 18 Ryman wishes to be heard in support of this submission.
- 19 If others make a similar submission, Ryman will consider presenting a joint case with them at a hearing.

Matthew Brown

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Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT
OR PLAN, CHANGE OR VARIATION

Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council

Name of submitter: Retirement Villages Association of New Zealand Incorporated (RVA)

1 This is a submission on **Auckland Council's (Council)** Proposed Plan Change 71 (PC71) to the Auckland Unitary Plan (Operative in Part) (AUP) on behalf of the RVA.

2 The RVA could not gain an advantage in trade competition through this submission.

Summary

3 The RVA and its members have a significant interest in how PC71 will alter the provision and regulation of retirement villages in Auckland. Car-parking and traffic management are key components of retirement villages, given the number of residents, staff and guests involved.

4 The RVA is concerned about, and opposes, PC71. The proposed amendments would introduce unjustifiable and overly restrictive barriers to necessary development. In particular, they would make retirement village proposals that meet or exceed the threshold of 50 units a restricted discretionary activity, and require a "travel plan" to be prepared and considered. The new requirements would exacerbate the consenting challenges already experienced by retirement village proposals, resulting in increased costs and delays.

5 The RVA opposes PC71 as a whole. In particular, the RVA is concerned with the **Council's** proposed provisions **to address "Issue 7: Assessment of travel demand in the AUP"**.

6 Travel plans are usually prepared for employment and educational activities with the aim of reducing car dependency, especially in peak commuting periods. The RVA is concerned that the PC71 provisions, as currently drafted, fail to recognise the unique features of retirement villages. The provisions do not acknowledge that retirement villages have a different demand profile to other activities. Retirement villages do not generate large volumes of traffic and traffic movements generally occur outside peak commuting periods. Introducing a requirement for retirement village operators to produce travel plans is unnecessary.

7 **Although the Council's** stated intention is to give effect to Policy 11 of the National Policy Statement on Urban Development 2020 (NPSUD), PC71 goes well beyond what is required and proposes to add unnecessary barriers to development. By doing so, PC71 does not give effect to the NPSUD. PC71 will unduly increase the

consenting complexity of retirement village proposals by introducing additional requirements that are contrary to the enabling nature of the NPSUD.

- 8 The RVA seeks that PC71 **be rejected, in particular the Council’s proposed amendments to address “Issue 7” (as set out in Attachment D of the Council’s section 32 assessment).**

BACKGROUND

Retirement Villages Association

- 9 The RVA is a voluntary industry organisation that represents the interests of the owners, developers and managers of registered retirement villages throughout New Zealand. Today, the RVA has 401 member villages throughout New Zealand, with approximately 34,200 units that are home to around 47,000 older New Zealanders. This figure is 96% of the registered retirement village units in New Zealand.

- 10 **The RVA’s** members include all five publicly-listed companies (Ryman Healthcare, Summerset Group, Arvida Group, Oceania Healthcare, and Radius Residential Care Ltd), other corporate groups such as Metlifecare, Bupa Healthcare, Arena Living, independent operators, and not-for profit operators such as community trusts, religious and welfare organisations.

- 11 **Within the Auckland region, the RVA’s members currently operate** a total of 79 retirement villages, including 26 expanding or new villages to come (based on 2021 data). The total capacity of the villages will be 12,836 units, providing a home to 17.8% of the 75+ age group population. The RVA’s members provide 98% of all retirement village units in the Auckland Council area.

- 12 The important role of retirement villages in addressing the housing crisis New Zealand, and in particular Auckland, is facing a retirement living and aged care crisis. There is a severe lack of appropriate housing and care for our growing ageing population. This problem is immediate, and projected to worsen in the coming decades.

- 13 Last year, the Government recognised the ageing population as one of the key housing and urban development challenges facing New Zealand in its overarching direction for housing and urban development – the Government Policy on Housing and Urban Development (*GPS-HUD*).¹ The GPS-HUD records that ***“[s]ecure, functional housing choices for older people will be increasingly fundamental to wellbeing”***.²

- 14 A key connecting government strategy, *Better later life – He Oranga Kaumatua 2019 to 2034*, outlines what is required to have the right policies in place for our ageing population, including creating diverse housing choices and options.³ The strategy notes that ***“[m]any people want to age in the communities they already live in, while others wish to move closer to family and whānau, or to move to retirement villages or locations that offer the lifestyle and security they want.”***⁴

¹ The GPS-HUD was issued in September 2021 ([available online](#)).

² GPS-HUD at page 10.

³ *Better Later Life – He Oranga Kaumatua 2019 to 2034* ([available online](#)).

⁴ Ibid, at page 32.

- 15 Retirement villages already play a significant part in housing and caring for older people in New Zealand. Currently, 14.3% of the 75+ age group population live in retirement villages, a penetration rate that has risen from around 9.0% of the 75+ age population at the end of 2012.⁵ The Auckland region has one of the highest penetration rates (17.8%).⁶
- 16 Retirement villages also help to ease demand on the residential housing market, assisting with the broader housing crisis in New Zealand. That is because growth in retirement village units is faster than growth of general housing stock, and the retirement village sector allows older New Zealanders to release back their homes into the housing market.
- Increasing demand for retirement villages
- 17 Demand for retirement villages is increasing exponentially in New Zealand, and particularly in the Auckland region. Auckland is the largest contributor to New Zealand's estimated 75+ population growth. The +75 demographic in Auckland will more than double between 2020 and 2048, from under 100,000 last year to almost 250,000.⁷
- 18 Demand for retirement village accommodation is outstripping supply. The ageing population and longer life expectancy, coupled with a trend towards people wishing to live in retirement villages that provide purpose-built accommodation, means that demand is continuing to grow. The COVID-19 pandemic has also contributed to a strong demand to access retirement villages and limited stock available.⁸
- 19 That demand is reflected in the development pipeline. Auckland has the largest share of the retirement development pipeline with 32% (6,779 units).⁹
- 20 Deliverability of this pipeline is contingent on a number of factors, including property market conditions, construction, building materials, labour costs, timing of resource consent approvals, as well as the feasibility of projects. Regulatory barriers such as complex consenting processes are a major impediment to delivering necessary housing.

Consenting challenges for the retirement sector

- 21 There are a number of unique challenges in planning and constructing new retirement villages. Cumbersome, rigid and uncertain resource management processes and practices have contributed considerably to New Zealand's, and Auckland's, retirement living and care crisis. In particular, resource consent processes take too long, are unnecessarily complex, and often do not provide for retirement living options properly because the relevant plans are not fit for purpose. Key challenges include:

21.1 The lack of suitable sites for retirement villages to enable people to 'age in place';

⁵ Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, June 2021, page 15.

⁶ Ibid, page 17.

⁷ Ibid, page 8.

⁸ Ibid, pages 5 and 25.

⁹ Ibid, page 17.

21.2 **The 'intensification debate'** – that is, the disconnect between expectations of maintaining status quo amenity versus the need for communities to change to provide retirement housing intensification, that promotes affordability, diverse and choice; and

21.3 Related to that is:

- (a) The inconsistent and sometimes highly complex consenting rules for retirement villages; and
- (b) The barriers and constraints in resource consent processes, particularly uncertainties in the further information and notification stages. Over time, the amount of information that is required to support consent applications has substantially increased – these requests add cost and delay. The requests of further information also distract from the key issues as it is often not relevant to the assessment of the effects of a proposal.

22 As addressed in detail below, the RVA considers that PC71, and in particular the Council's **proposed amendments to address "Issue 7"**, would exacerbate the consenting complexities already experienced by the retirement village sector. The RVA therefore also considers that PC71 does not give effect to the NPSUD, as outlined in the following section.

NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020

23 **As set out in the Council's section 32 assessment, the rationale for PC71 stems from the NPSUD.** In particular, PC71 intends to give effect to Policy 11 of the NPSUD and make consequential technical amendments to the AUP that the Council considers are necessary to give effect to Policy 11.

24 National policy statements sit at the top of the planning hierarchy setting out matters of national significance that give substance to Part 2 of the Resource Management Act 1991 (*RMA*).¹⁰ **PC71 must "give effect" to the NPSUD.**¹¹ The Supreme Court has established that the **requirement to "give effect to"** means to **"implement"**; **"it is a strong directive, creating a firm obligation on the part of those subject to it"**.¹²

25 The NPSUD replaced the National Policy Statement on Urban Development Capacity 2016 (*NPSUDC*), but it is intended to be more enabling of development than its predecessor. It, **"builds on many of the existing requirements for greater development capacity ...has a wider focus and adds significant new and directive content"**.¹³

26 A key feature of the NPSUD is its enabling nature. The NPSUD is designed to improve the responsiveness and competitiveness of land and development markets. In particular, it requires local authorities to open up more development capacity, so

¹⁰ *Environmental Defence Society Inc v New Zealand King Salmon Company Limited* [2014] NZSC 38.

¹¹ *Colonial Vineyard Limited v Marlborough District Council* [2014] NZEnvC 55 at [17]; and RMA, section 75(3)(a).

¹² *Environmental Defence Society Inc v The New Zealand King Salmon Company Ltd* at [77].

¹³ **MfE and HUD, "Recommendations and decisions report on the National Policy Statement on Urban Development" (Wellington, 2020), page 16.**

more homes can be built in response to demand. The NPS provides direction to make sure capacity is provided in accessible places, helping New Zealanders build homes in the places they want, close to jobs, community services, public transport and other amenities.¹⁴

- 27 The enabling nature of the NPSUD is set out by the Ministry for the Environment (MfE) and the Ministry of Housing and Urban Development (HUD) in their final decisions report on the NPSUD.¹⁵ In their report, MfE and HUD state that:¹⁶

The NPS-UD will enable growth by requiring councils to provide development capacity to meet the diverse demands of communities, address overly restrictive rules and encourage well-functioning urban environments.

- 28 The final decisions report also provides **that the NPSUD “is intended to help improve housing affordability by removing unnecessary restrictions to development and improving responsiveness to growth in the planning system” (emphasis added).**¹⁷

- 29 The enabling policy intent of the NPSUD is further supported by the recently passed Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 – **a clear demonstration of the government’s view of the NPSUD as a tool that “addresses restrictive land use regulations”.**¹⁸

- 30 In summary, it is clear that the NPSUD is intended to be an enabling tool. The **NPSUD seeks to remove unnecessary “restrictions”, “constraints” and “barriers”** in the planning system to enable the growth of well-functioning urban environments.

SUBMISSION ON PC71

- 31 The RVA is particularly concerned with PC71, and in particular the Council’s **proposed amendments to address “Issue 7”.** In essence, the Council is proposing to include a new rule that provides for any activity or subdivision which meets or exceeds the proposed new travel demand threshold as a restricted discretionary activity. Any activity that meets or exceeds **the threshold would require a “travel plan”** as part of the assessment of environmental effects (as set out in the proposed new special information requirement).

- 32 The specific provisions of PC71 that the RVA is particularly concerned with include:

32.1 New Rule E27.4.1(A3a) in Activity Table E27.4.1;

32.2 New Standard E27.6.1A;

32.3 New Matter of discretion E27.8.1(4A);

¹⁴ Introductory guide to the National Policy Statement 2020, Ministry for the Environment, July 2020, page 6.

¹⁵ **The report includes the Ministers’ final decisions on the NPSUD, and was published** in accordance with s 52(3)(b) of the RMA.

¹⁶ MfE and HUD, “*Recommendations and decisions report on the National Policy Statement on Urban Development*” (Wellington, 2020), page 17.

¹⁷ Ibid, page 85.

¹⁸ Housing Bill, Explanatory note, page 1.

- 32.4 New Assessment criteria E27.8.2(3A);
- 32.5 Amendments to E27.9 Special information requirements; and
- 32.6 **Amendments to the definition of “travel plan”** in Chapter J.
- 33 **The RVA opposes the Council’s proposal as it would add unnecessary and overly restrictive barriers to development without appropriate justification. The RVA considers overall (and in particular in respect to the provisions above), that PC71:**
- 33.1 Will not promote the sustainable management of natural and physical resources;
- 33.2 Will not promote the efficient use and development of natural and physical resources;
- 33.3 Is contrary to good resource management practice;
- 33.4 Does not comply with the requirements of section 32 of the RMA, particularly in that the provisions are not the most appropriate means of achieving the relevant plan objectives having regard to their efficiency and effectiveness and taking into account benefits, costs and risks;
- 33.5 Fails to give effect, and is contrary, to the NPSUD; and
- 33.6 Is otherwise inconsistent with the relevant provisions of the RMA, including the purposes and principles under Part 2 of the RMA, as well as the procedural principles set out in section 18A of the Act.
- 34 Without limiting the generality of the above, other more specific reasons for the **RVA’s opposition have been provided throughout this submission.**
- 35 Retirement villages have a lower and different traffic demand profile. The list of activities listed in proposed Table E27.6.1A.1 is wide-reaching, and includes integrated residential developments that meet or exceed the threshold of 50 units.
- 36 **Under the AUP, retirement villages are assessed as “integrated residential developments”, and therefore many retirement village proposals will be impacted by the Council’s proposed new requirements.**
- 37 PC71 implicitly assumes that older residents living in retirement villages generate the same traffic and transportation effects as other activities. That assumption is clearly inconsistent with the evidence.
- 38 Although many retirement villages are located on large sites, they generate significantly lower **“per person”** traffic volumes compared to standard residential activities, commercial activities (offices), educational facilities, and large-scale healthcare facilities for example. The lower impact on traffic movements and the transport network is due to a number of reasons, including the:
- 38.1 Low occupancy levels (1.3 residents per retirement unit, compared to 2.6 residents per standard dwelling);
- 38.2 Reduced activity levels of the residents due to their age and frailty. Residents are less mobile and are not travelling to work; and

38.3 Specialist on-site amenities to cater for **residents'** specific needs. Retirement villages are largely self-sufficient. The provision of on-site amenities reduces **residents' need to travel to access care, services or entertainment.**

Travel plans are not appropriate

39 Travel plans are typically prepared for employment and educational activities with the aim of reducing car dependency, particularly in peak commuting periods. Travel plans usually include the operational measures that can be put in place to support such a reduction in car dependency. The plans can include matters concerning the management of parking areas, the provision for active transport facilities, the promotion for public transport, and the provision for shared transport programmes.

40 Accordingly, travel plans are unnecessary for retirement villages because:

40.1 Traffic movements at retirement villages generally occur outside peak commuting periods;

40.2 As opposed to other type of activities, retirement villages do not generally require managing a workforce with common travel patterns. They also do not have the required workforce scale to offer alternative transport services (eg, compared to large construction sites, school bus services, hospital and university campus connection shuttles, etc.);

40.3 Retirement village operators already have operational measures in place that reduce transportation effects. For example, using vans to transport residents to shared activities and organising staff shift hours to be outside peak commuting periods;

40.4 Retirement villages will continue to provide car parking required to meet their residents need, despite removal of minimum car parking rates; and

40.5 Larger retirement village developments are already required to provide an Integrated Transport Assessment (*ITA*), which should already cover travel demand management. In its section 32 assessment the Council notes that the activity categories listed in the new standard (E27.6.1A) is based on the list of activities in the existing trip generation standard (Standard E27.6.1).¹⁹ However, the Council is proposing to significantly lower the thresholds for integrated residential developments from 500 to 50 **units. The Council's** justification for the significant differences on the thresholds is unclear. Moreover, the existing trip generation standard already requires integrated residential developments that exceed the threshold of 500 units to seek consent for a restricted discretionary activity, allowing the Council to require applicants to produce more detailed assessment of transport effects. PC71 proposes to lower the threshold to 50 units, requiring applicants to produce a **comprehensive "travel plan"** (albeit not an *ITA*) – yet in both situations applicants are required through the matter of discretion to undertake an assessment of effects on the transport network.

41 **In addition, the proposed requirement to produce "travel plans"** would introduce a subjective requirement open to interpretation by Council officers. In comparison, the minimum car parking requirements provided clear (objective) direction to applicants

¹⁹ Section 32 Report, paragraph 46.

as to what was required. The lack of clarity will prolong consent processes and create substantial uncertainty for project proponents.

- 42 Further, the subjective nature of the proposed **"travel plans"** requirements (for example, to **'maximise' the efficient** use of transport networks and **'promote'** alternative modes of transport) will create monitoring and enforcement uncertainty, particularly related to the expected outcomes from the implementation of the plan.
- 43 Taking into account the above, the RVA is concerned that PC71 is not the most appropriate means of achieving the purpose of the RMA as well as the relevant plan objectives, and would simply impose planning burden for no real benefit. The proposed changes would not promote the efficient use and development of resources by exacerbating consenting processes and challenges already experienced by retirement village operators, resulting in increased costs and delays. In this regard, the RVA considers that PC71 is contrary to section 18A of the RMA, which requires every person exercising powers and performing functions under the RMA to take all **practicable steps to "use timely, efficient, consistent, and cost-effective processes that are proportionate to the functions or powers being performed or exercised"**.²⁰

Proposed assessment criteria are not efficient or effective

- 44 The RVA considers the proposed new assessment criteria E27.8.2(3A) are not efficient or effective generally or for retirement villages especially. In particular, the RVA is concerned with the following criteria:

- 44.1 **"adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel"**. The RVA is concerned that this criterion fails to recognise that alternatives to private vehicle travel are not always appropriate for all demographics, and in particular older residents. As previously noted, older residents are less mobile and active modes of transport are often not suited to address **older people's needs**.
- 44.2 **"the accessibility and frequency of public transport services"**. The accessibility and frequency of public transport services is directly controlled by Auckland Transport, not by developers. The RVA is therefore concerned this criterion may be used to require retirement village operators, as well as other developers, to fund (or partially fund) public transport services and/or development may be delayed until appropriate Auckland Transport funded services become available.
- 44.3 **"the standard of active modes infrastructure for all users"**. The RVA is concerned this criterion may require retirement village operators (as well as other developers) to provide active transport infrastructure beyond their site boundaries. This infrastructure is the responsibility of Auckland Transport and not a direct effect of development.
- 44.4 **"the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments"**. The RVA is concerned that this criterion may require retirement village operators to provide an assessment of matters beyond their control. In cases where land is zoned for residential activity, proposals should be assessed in accordance with that zoning, and

²⁰ RMA, section 18A(a).

should not be faced with the additional burden of proving why currently zoned residential land is acceptable to use for that purpose. This criterion also does not recognise that connectivity to employment and educational facilities may not be a necessary priority for some land uses.

- 44.5 ***"the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement"***. The RVA considers the proposed criterion overlaps with the matters of discretion already set out in specific zone chapters, such as the Mixed Housing Suburban Zone and Mixed Housing Urban Zone chapters – these already require the **Council's assessment to focus on the proposal's** traffic safety effects. In any event, due to the specific operational features of retirement villages and their **residents' needs**, retirement village operators will continue to provide **car parking required to meet the residents' needs**, despite the removal of minimum car parking requirements.
- 45 PC71 does not give effect to the NPSUD
PC71 introduces unnecessary restrictions to development and is therefore contrary to the intent of the NPSUD as discussed above. Instead of addressing restrictive land use regulations to enable the provision of more housing and business development, **the Council's proposal would add further complexity** to consenting processes, i.e. acting as a barrier to enabling the growth of well-functioning urban environments.
- 46 Further, Policy 11 of the NPSUD specifically encourages councils to manage effects that might otherwise have been managed through minimum car parking rates through "comprehensive parking management plans". Such plans are limited in scope to managing remaining public parking (using methods such as limiting what space is available for parking, restricting how long a vehicle can be parked for, allocating specific space for types of parking (e.g. mobility parking and loading zones), or requiring payments for parking). As previously addressed, travel plans are more wide ranging documents with the aim of reducing car dependency, especially in peak commuting periods. PC71, therefore, goes well beyond what is encouraged by the NPSUD without appropriate justification.
- 47 For the above reasons, the RVA considers that PC71 does not give effect to, and is contrary to, the NPSUD.
- Relief sought
- 48 The RVA seeks that PC71 be rejected, and in particular **the Council's proposed amendments to address "Issue 7: Assessment of travel demand in the AUP" (as set out in Attachment D of the Council's section 32 assessment)**.
- 49 The RVA wishes to be heard in support of this submission.
- 50 If others make a similar submission, the RVA will consider presenting a joint case with them at a hearing.

John Collins
Executive Director
24 March 2022

Address for service of submitter:
Retirement Villages Association of New Zealand Incorporated
c/- Nicola de Wit

75.1

Chapman Tripp
Level 34
15 Customs Street West
PO Box 2206
Auckland 1140

Email address: luke.hinchey@chapmantripp.com / nicola.dewit@chapmantripp.com

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - North Eastern Investments Limited
Date: Thursday, 24 March 2022 4:16:40 pm
Attachments: [Submission by NEIL on AC PC71 FINAL.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: North Eastern Investments Limited

Organisation name: Proarch Consultants Limited

Agent's full name: johnnyfarquhar@gmail.com

Email address: amanda@proarch.co.nz

Contact phone number: 021517955

Postal address:
PO Box 1105
Central City
Palmerston North 4440

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
refer to attached

Property address: 56 Fairview Avenue and 129 Oteha Valley Road

Map or maps: see attached

Other provisions:
see attached

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
see attached

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: see attached

Submission date: 24 March 2022

Supporting documents
[Submission by NEIL on AC PC71 FINAL.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)



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BEFORE THE AUCKLAND COUNCIL

Under the Resource Management Act 1991 ('the Act')

In the matter of Auckland Councils **PC 71: NPS-UD**
Removal of Car Parking Minimums – Consequential Technical Amendments

North Eastern Investments Limited
("NEIL")
The Submitter

Submission on Auckland Council's PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

Dated 24 March 2022

Submission on application concerning Auckland Councils proposed plan change, **PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments**, that is subject to public notification by the consent authority pursuant to *Schedule 1 of the Resource Management Act 1991*

To: **Auckland Council (AC)**
Private Bag 92300, Auckland

Name of Submitter: **North Eastern Investments Limited in relation to the land at 56 Fairview Avenue & 129 Oteha Valley Road, Fairview Heights, Albany.**

The Councils notified **PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments**, on the Auckland Council website, the submissions opened on the 24th of February 2022 and close on the 24 March 2022.

“The National Policy Statement on Urban Development (NPS-UD) required the Council to remove car parking minimums from the Auckland Unitary Plan (Operative in Part) and Auckland Council District Plan – Hauraki Gulf Islands Section without going through a plan change (Non-Schedule 1) process. The removal of minimums occurred on 11 February 2022.

The proposal aims to make several consequential amendments to the Auckland Unitary Plan and Hauraki Gulf Islands District Plan which lie outside the scope of the Non-Schedule 1 changes. The proposed changes are necessary to ensure that both plans continue to function as intended following the removal of car parking minimums.”

1. The Council’s notified documents on the Auckland Council’s website are:

- [1] Public Notice of Notification - Proposed Plan Change 71 to the Auckland Unitary Plan (Operative in Part) and proposed Plan Modification 14 to the Auckland Council District Plan – Hauraki Gulf Islands Section.
- [2] Proposed Amendments to the Plan text - Auckland Unitary Plan (Operative in Part) and Auckland Council District Plan – Hauraki Gulf Islands Section PROPOSED PLAN CHANGE 71 PROPOSED PLAN MODIFICATION 14 NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments Plan Change (dated 24 February 2022).
 - a. This document includes the following statements:
 - i. *“This is a council-initiated plan change.*
 - ii. ***Explanatory note – not part of proposed plan change***
 - iii. *The proposed plan change seeks to address consequential technical amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan – Hauraki Gulf Islands Section that are necessary to give effect*

to Policy 11 of the National Policy Statement on Urban Development (NPS-UD) but fall outside the scope of non-Schedule 1 changes as described in clause 3.38 of the NPS-UD.”

- [3] Proposed amendments to the Hauraki Gulf Island district plan text: PM14: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments Auckland Council District Plan – Hauraki Gulf Islands Section PM14 and non-Schedule 1 mark-ups
 - a. February 2022

- [4] Proposed amendments to the Auckland Unitary Plan (Operative in Part) for Precincts (part 1 save). PPC71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments Auckland Unitary Plan (Operative in Part) PPC71 and non-Schedule 1 mark-ups February 2022

- [5] Proposed amendments to the Auckland Unitary Plan (Operative in Part) for Affected Unitary Plan Chapters both regional matters and all zones, and inclusive of Precincts and definitions (part 2 save): PPC71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments Auckland Unitary Plan (Operative in Part) PPC71 and non-Schedule 1 mark-ups February 2022

- [6] Proposed Plan Change 71 (PPC 17) and Plan Modification 14 (PM 14): NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments to the Auckland Unitary Plan (Operative in part) and Auckland Council District Plan **SECTION 32 EVALUATION REPORT** 24 February 2022

- [7] Attachment A: Section 32 of the RMA

- [8] Attachment B: List of AUP provisions affected by PPC71/PM14

- [9] Attachment C: List of HGI Plan provisions affected by PPC71/PM14

- [10] Attachment D: Attachment D: Proposed amendments to the AUP to address Issue 7: Assessment of travel demand in the AUP

2. Background to the submitter and Land Context:

The submitter North Eastern Investments Limited (“**NEIL**”) is the consent holder of multiple unimplemented regional and land use consents reliant on plan changes granted in favour of NEIL by the Environment Court between 2011 and 2016 in relation to the land at 56 Fairview Avenue and 129 Oteha Valley Road, Fairview Heights, Albany (“**Land**”).

At the date of this submission 24 March 2022, NEIL awaits a rehearing of its February 2014 submission on the PAUP before the Independent Hearings Panel for the PAUP as directed by the

Court of Appeal in 2018¹ to resolve the submitters request for a Precinct with extra height and mixed-use zoning. Between November 2016 (when the AUP became Operative in Part) and the 24 March 2022 AC has made extensive changes to the AUP (Operative in Part) that NEIL submitted on in February 2014.

The notified version of the PAUP that NEIL submitted on was designed to give effect to the Auckland Plan 2012, a high-level strategic plan that Auckland Council replaced with the Auckland Plan 2050 (adopted in 2018) because:

1.1 The Auckland Plan

The first Auckland Plan was adopted in 2012, less than 18 months after Auckland Council was established. It was a landmark document for Auckland, covering every aspect of Auckland life and economy. One of its provisions was for review after six years.

Over the past five years, the plan has provided direction in some significant areas. For example, it set the growth model for Auckland. The Unitary Plan took its direction from this and enabled the model through its zoning. It also built the strategic case and the momentum for the City Rail Link. Inclusion of this in the plan was not simply about agreeing to a project but about creating the framework for Auckland’s future transport strategy. While these are significant achievements, the 2012 plan had shortcomings which became evident through implementation (see Table 1). This meant that, the current plan could not adequately continue to provide the support for decision-making that legislation intends.

Table 1 Issues with existing Auckland Plan

Issues	Description
Out of date data	<ul style="list-style-type: none"> Majority is based on 2006 census data Does not reflect strategic work carried out since the plan was adopted
Hard copy document	<ul style="list-style-type: none"> Unable to update document to reflect significant changes
Integration/Development Strategy	<ul style="list-style-type: none"> Development Strategy sits separately from other strategic directions
Complex structure	<ul style="list-style-type: none"> Contains too many layers and components People find it hard to work with, which affects implementation Limited integration between different components
Mixed content	<ul style="list-style-type: none"> Includes range of strategic and operational content Detailed content better addressed in other plans and processes
No prioritisation	<ul style="list-style-type: none"> Does not prioritise across the large number of strategic directions in the plan
Targets	<ul style="list-style-type: none"> Too many targets and many unmeasurable Unclear ownership of targets Difficult to track progress as a result

To illustrate the issue on the out-of-date data, Auckland’s rate of population growth has exceeded the growth projections of the 2012 plan. This could have created significant implications for Auckland if these out-of-date projections continued to be used into the future. The estimated population figures were revised after the 2013 Census. The Auckland Plan 2050 Evidence report, Demographic trends for Auckland: Data sources and findings, provides further detail around Auckland’s continued anticipated population increase. The Auckland Plan 2050 will help to build a better understanding of how to plan for and fund this level of growth.²

¹ [2018] NZCA 629 NEIL v AC & HNZ

² Auckland Council (2018). Auckland Plan 2050: Developing the Auckland Plan 2050 ISBN 978-1-98-856441-8 (PDF)

NEIL intends to amend (under s127 of the RMA) and implement its granted land use consents and apply for a new land use consent for the balance of the land at 56 Fairview Avenue to the south of Medallion Drive (LHS of Image 1 below) but awaits a decision on its PAUP submissions.



Image 1: [2016] EnvC 139 NEIL consented development at 56 FA & 129 OVR.

The NEIL land is within a walkable distance of the edge of the metropolitan zone and the Albany Park and Ride (see Image 2) under the National Policy Statement Urban Development 2020.

NEIL’s 2016 consented development (see Image 1) was designed to provide walking and cycling paths throughout the development and between Oteha Valley Road (and a new bus stop on that frontage supported by Auckland Transport) and Fairview Avenue, these connections were generally at a gradient of 1 in 20 or 1 in 12 because the at grade pathway connections are benched into the topography. Throughout the six (6) year Environment Court process to achieve land use consent NEIL demonstrated that contoured land can be developed in an integrated manner to promote walking and cycling environment near rapid and frequent public transport routes and within walking distance of rapid transit stops, i.e., the Albany Park and Ride.

The NPS-UD 2020 mandates that: Tier 1 local authorities to enable development of at least six storeys within walkable distances of rapid transit stops, and the edge of city centre and metropolitan zones. NEIL is informed by the Ministry for the Environment (“MfE”) NPS-UD that for locations like the 56 Fairview Avenue Land, six storeys are not a target, but rather a minimum for what must be enabled in plans.

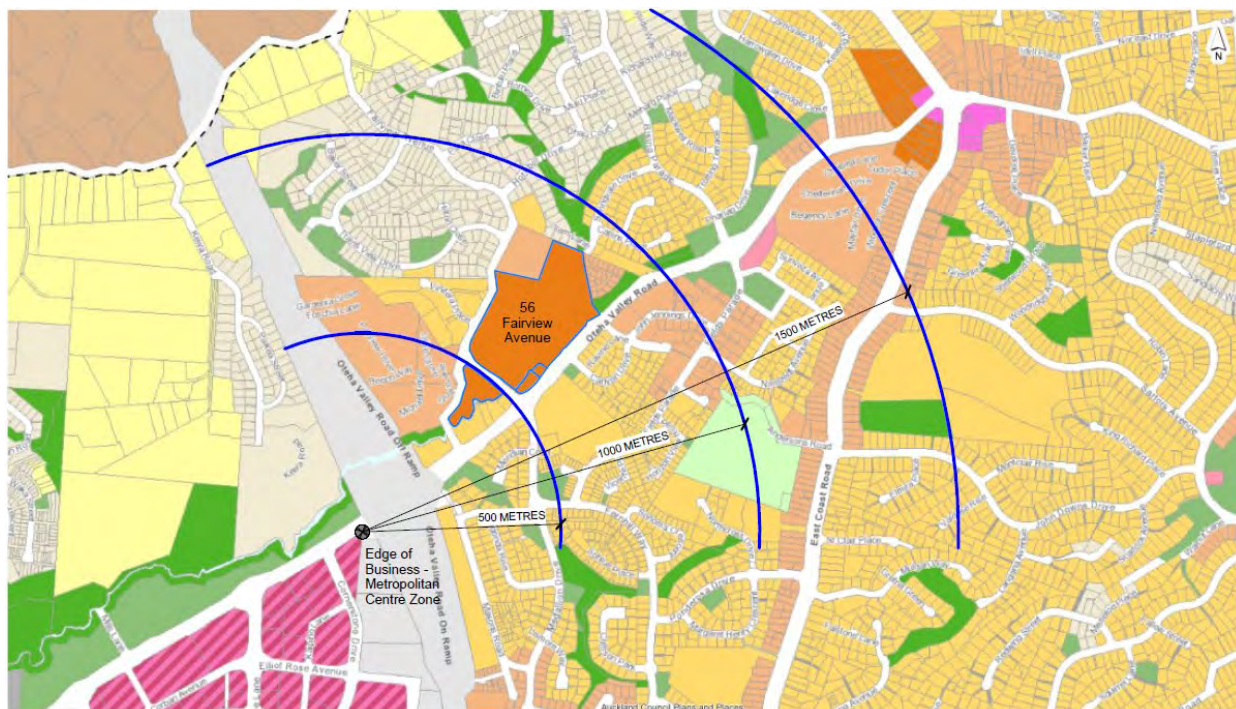


Image 2: NPS-UD2020 applied to the AUP (Operative in Part) Zoning of 56 Fairview Avenue and 129 Oteha Valley Road

With reference to Image 2 above, the edge of the Business -Metropolitan Centre Zone is also the approximate location of the pedestrian access to the Albany Bus Station from Oteha Valley Road.



Image 3: 2018 Auckland Transport photograph

The Albany Busway Station resides in the Whaka Kotahi (NZTA) designation in the AUP. Whaka Kotahi, Auckland Council and Auckland Transport have recently completed the Northern Corridor Improvement (NCI) project. The EPA decision for the NCI included footpaths and cycleways to improve the connectivity of this project with Oteha Valley Road. A stated benefit of the project

is to ***“Create new reliable, safe services for bus users, walkers, and cyclists”***³ refer to Image 4 for an overview of the area with the NCI under construction in 2021. The NEIL land is located to the top right-hand side of this photograph just out of view (see Image 1&2 for proximity and location of the land).



Image 4 - October 2021 Waka Kotahi photograph⁴ of progress at the Albany Busway Station and associated walkways and cycleway progress linking to eastern side Oteha Valley Road

3. NEIL Submission:

- [1] NEIL **accepts** that the Auckland Council-initiated plan change is a consequence of the mandatory requirement for Auckland Council to give effect to the National Policy Statement on Urban Development (NPS-UD) under which AC is required to remove the minimum carpark requirements from the AUP (Operative in Part).
- [2] NEIL **supports** the inclusion of updates to the AUP (Operative in Part) as mandated under the NPS-UD but **opposes** the wording of the amendments by AC in their current form and considers the s 32 analysis to be inadequate. The s 32 excludes an assessment of the effects of PPC71 on the unheard submitters to the PAUP process. In section 6.2, paragraph 80, page 25 of the s32 states that there are no other relevant Acts or legislation for this plan change, however, NEIL considers the Council’s early adoption of the mandatory definitions from the National Planning Standards (2019) are relevant to the interpretation of the NPS-UD in the AUP (Operative in part) and PPC71.

³ <https://www.nzta.govt.nz/projects/the-western-ring-route/auckland-northern-corridor/>

⁴ <https://www.nzta.govt.nz/projects/the-western-ring-route/auckland-northern-corridor/gallery>

[3] The purpose of the National Planning standards (the planning standards) is to improve the efficiency and effectiveness of the planning system. This Schedule 1 process and the further NPS-UD process to follow in August 2022 requires the Council to revisit multiple sections of the combined Unitary Plan, there is perceived efficiency in the Council adopting and correcting the text of all definitions so that they are consistent with the planning standards rather than revisiting each section repetitively and incrementally later. NEIL **submits** that the inclusion of all National Planning Standard definitions in the AUP (operative in part) follow the mandatory direction set by the Ministry for the Environment and promote clarity to the planning systems of AC.

76.2

[4] NEIL **opposes** the amended definition of “*Travel Plan*” and “*Off-site parking*” as worded.

[5] NEIL **opposes** any constraint on the supply of parking as part of an integrated development inclusive of where there are multiple underlying zones and/or designations.

[6] NEIL seeks the primary relief that PPC71 be declined based on the proposed text amendments.

76.1

[7] NEIL wishes to be heard in support of its submission.



Amanda M. Coats, Proarch Consultants Limited, with delegated authority to sign this submission on behalf of the submitter **North Eastern Investments Limited (NEIL)**

Date: 24 March 2022

Electronic address for service of submitter:

North Eastern Investments Limited
c/-Proarch Consultants Limited
PO Box 1105, PALMERSTON NORTH
Telephone: **021517955**

Contact person: **Amanda Coats**

Email: amanda@proarch.co.nz; and jointly provide all correspondence to NEIL's consultant Johnny Farquhar: johnnyfarquhar@gmail.com at the same time.

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Mark James Todd

Organisation Name (if submission is made on behalf of Organisation)

Ockham Group Limited

Address for service of Submitter

246 Khyber Pass Road Grafton, Auckland

Telephone:

272275019

Fax/Email:

mark@ockham.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 71

Plan Change/Variation Name

NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

(a) Rule E 27.4.1 (A3a) in Activity Table E 27.4.1 (b) Standard E 27.6.1A (c) Matters of discretion E 27.8(4A) (d) Assessment criteria E 27.8.2(3A) (e) Specific information requirement E 27.9(2)(b) and (f) definition of Travel plan

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

As outlined in the attached document

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

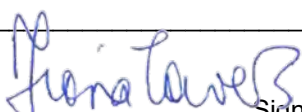
Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing


Signature of Submitter
(or person authorised to sign on behalf of submitter)

03/24/2022
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

SUBMISSION ON PLAN CHANGE 71 (PC71)

BY OCKHAM GROUP LIMITED

INTRODUCTION

1. This submission is lodged on behalf of Ockham Group Limited (**Ockham**) in relation to plan change 71, NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments (**PC71**).
2. Ockham is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991 (**RMA**).
3. Ockham opposes Issue 7 of PC71 and the proposed amendments to the AUP that are intended to address the effects of travel demand on the transport network after the car parking minimums are removed from the Auckland Unitary Plan (**AUP**). The specific provisions of PC71 that are opposed by Ockham include:
 - (a) Rule E27.4.1(A3a) in Activity Table E27.4.1;
 - (b) Standard E27.6.1A;
 - (c) Matters of discretion E27.8.1(4A);
 - (d) Assessment criteria E27.8.2(3A);
 - (e) Special information requirement E27.9(2)(b); and
 - (f) Definition of 'travel plan'.

(the **travel demand provisions**)

REASONS FOR OPPOSITION

General Reasons

4. Ockham submits that the travel demand provisions:

- (a) Do not promote the sustainable management of natural and physical resources under section 5 RMA;
 - (b) Do not have adequate regard to the efficient use and development of natural and physical resources under section 7(b) RMA;
 - (c) Represents a failure to fulfil the functions of regional councils under section 30 RMA and local authorities under section 31 RMA;
 - (d) Do not give effect to the National Policy Statement on Urban Development 2020 (**NPSUD**) under section 75(3)(a) RMA; and
 - (e) Do not provide for policies which are the most appropriate way to achieve the AUP's objectives in terms of their efficiency and effectiveness and therefore are not appropriate in terms of s32 RMA.
5. The travel plan provisions go beyond 'consequential technical amendments' and require a plan change process of their own that is separate from Issues 1 to 6 of PC71.

Specific Reasons

6. Ockham submits that the travel demand provisions are in direct conflict with the intent of the NPSUD:
- (a) The NPSUD is intended to provide adequate opportunity for land development for business and housing to meet community needs, as well as provide direction to make sure capacity is provided in accessible areas, helping New Zealanders build homes in the places they want. Local authorities are required to open up more development capacity, so more homes can be built in response to demand.¹
 - (b) However, new Rule E27.4.1(A3a) and Standard E27.6.1A limit urban development by applying a restricted discretionary activity (**RDA**) status with a travel plan requirement to an activity or subdivision which exceeds the development thresholds set out in proposed Table E27.6.1A.1. This includes residential activities involving 10 or more dwellings (T1B), integrated residential

¹ Ministry for the Environment and Ministry of Housing and Urban Development, *National Policy Statement on Urban Development 2020 – Introductory Guide* (2020), at page 6 – Intent of the National Policy Statement on Urban Development.

development involving 50 or more units (T2B), and visitor accommodation involving 10 or more units (T3B).

- (c) In effect, the travel demand provisions will impose the same or similar limitations and restrictions on urban development and growth as the minimum car parking requirements did, which is inconsistent with the strategic direction of the NPSUD.
7. The proposed travel demand provisions are unsupported and more restrictive than the existing AUP provisions:
- (a) The s32 Report states at paragraph 46 that, “[t]he activity categories listed in the new Standard E27.6.1A is based on the list of activities in the existing trip generation standard (Standard E27.6.1), and include care centres, community facilities, healthcare facilities and entertainment facilities as they are activities that tend to generate travel demand”.²
 - (b) An assessment of the trip generation provisions of the AUP demonstrates that resource consent is required for an activity or subdivision which exceeds the trip generation standards set out in E27.6.1.1. This includes residential activities involving 100 or more dwellings (T1), integrated residential development involving 500 or more units (T2), and visitor accommodation involving 100 or more units (T3).
 - (c) The trip generation standards under the AUP are substantially higher than, and inconsistent with, the proposed standards for travel demand under PC71. The travel demand development thresholds are therefore unsubstantiated and there is inadequate information in the s32 Report to justify the limits which have been set.
8. Proposed assessment criterion E27.8.2(3A)(a)(i) imposes an unreasonably high threshold on applicants to manage the effects of travel demand. It is not the role of an applicant for resource consent to ensure that there are accessible and frequent public services and infrastructure available for public use. Any lack of such services is an issue for the Council and other public service providers, such as Auckland Transport, to address.


² Auckland Council, Section 32 Evaluation Report (24 February 2022), at [46].

9. Without any specified minimum car parking requirements in the AUP, the references to “demand for car parking” in proposed assessment criteria E27.8.2(3A)(a)(ii) and E27.8.2(3A)(b) are unsubstantiated.
10. The requirement to prepare a travel plan as part of an assessment of environmental effects under E27.9(2)(b) for every development that exceeds the development thresholds (which are excessively low) will result in significant costs for a resource consent applicant. The effect of this requirement is essentially the same as imposing minimum car parking requirements as the availability of a sufficient supply of car parks becomes a relevant factor in the assessment of whether the travel plan requirements can be met.

RELIEF SOUGHT

11. Ockham seeks that Auckland Council declines PC71 as it relates to the travel demand provisions listed at paragraph 3 above. | 77.1
12. Should Auckland Council approve PC71, then Ockham seeks that residential activities (T1B), (T2B), and (T3B) be deleted from the development thresholds with a travel plan requirement listed in proposed Table E27.6.1A.1. | 77.2
13. Ockham wishes to be heard in support of this submission. If others make a similar submission, then Ockham will consider presenting a joint case with them at a hearing.

Dated: 24 March 2022



Mark Todd
Ockham Group Limited

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Lance William Hessel
Date: Thursday, 24 March 2022 4:31:15 pm
Attachments: [Civix Submission on PC 71.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lance William Hessel

Organisation name: Civix Ltd

Agent's full name:

Email address: lance@civix.co.nz

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Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Rule E27.4.1(A3a) and related Standard E27.6.1A

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
See the attached submission.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Refer to the attached Submission.

Submission date: 24 March 2022

Supporting documents
Civix Submission on PC 71.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)



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24 March 2022

Auckland Council
Private Bag 92300,
Victoria Street West
Auckland
New Zealand, 1142

RE: Submission on Proposed Plan Change 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments on behalf of Civix Limited

1.0 Introduction

We write in relation to proposed Plan Change 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments (referred to herein as “PC71”) which has been prepared by Auckland Council and was notified on 24/02/22. Council’s Section 32 Evaluation Report (the “s32 Report”), has set out rationale for the Plan Change as follows:

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

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

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

This Planning Memorandum seeks to provide a Submission on parts of the plan change. We are supportive of the plan change where it relates to clarifications regarding the removal of car parking minimums, however, we oppose amendments that seek to require resource consent for provision of a “Travel Plan” where certain development thresholds are proposed under proposed Standard E27.6.1A.

2.0 Summary of Matters

PC71 seeks to require resource consent for certain development thresholds in order to require these activities to provide a “Travel Plan” for assessment of the traffic effects of these developments.

We consider that Travel Plans are better suited as a tool for Auckland Transport and Auckland Council to determine the adequacy of road and pedestrian networks for existing or planned urban areas, or to assess the adequacy of traffic networks in areas where intensification is likely under the new Medium Density Residential Standards to be introduced in August 2022. Requiring the private sector to undertake such assessments provides an avenue for responsibility for upgrades of the public transportation network to be shifted to the private sector.

Further, the development thresholds triggering this requirement are too low - for example just 10 new residential units, and the resulting planning complexities, delays, and outcomes from providing Travel Plans and the Council assessing these are not aligned with the direction sought under the National Policy Statement for Urban Development (NPSUD).

Overall, the requirement for resource consent requiring compliance with this Travel Plan standard adds significant inefficiencies for lower-level developments, noting that the current planning framework already has provisions for assessment of significant trip generating activities or larger developments requiring provision of traffic assessments as part of a resource consent application. The requirement for this additional consent is placed in the Activity Table E27.4.1 as E27.4.1(A3a) directly underneath E27.4.1(A3) – “Any activity or subdivision which exceeds the trip generation standards set out in Standard E27.6.1”. This leaves no room for lower order developments likely with minimal traffic effects to be assessed in context with the scale and effect of the proposal, and instead exposes these to an onerous process that could potentially preclude perfectly reasonable high quality developments from being implemented.

3.0 Submission

Our Submission raises the following concerns with the requirement for resource consent requiring provision of a Travel Plan. For context of our comments below, we have inserted the definition of “Travel Plan” from PC71 (highlights added):

Travel Plan

A plan which sets out how travel demand is to be managed for a particular site or proposal to:

- maximise the efficient use of transport networks and systems; and
- promote and enable the use of more sustainable and active modes of transport such as public transport, walking and cycling, and carpooling, car sharing and micro mobility as alternatives to sole occupancy private cars; and
- manage the efficient use of limited resources such as car parking and loading areas.

A travel plan includes:

- a description of the site and the proposal;
- details of the physical infrastructure that is or will be established on the site to support the use of walking and cycling, public transport, carpooling, car sharing and micro mobility;
- details of the ongoing activities and processes that will be used to support the use of walking and cycling, public transport, carpooling, car sharing and micro mobility;
- details of how the travel plan is to be communicated, promoted, implemented, and monitored and reviewed;
- information about the amount and nature of any onsite parking and loading (whether onsite or on the street) and how this is to be managed to support efficient use and promote alternatives travel modes; and
- expected outcomes from its implementation.

Note

Best practice guidance on the preparation of a travel plan can be provided by Auckland Transport.

A travel plan is also sometimes referred to as a travel demand management plan.

- The threshold for requiring travel plans is way too low and for developments that justify these there are already criteria requiring integrated traffic assessments or traffic impact assessments.¹
- Travel Plans should be a tool used by Auckland Transport and Auckland Council as part of integrated traffic and planning assessments when preparing plan changes or plan reviews. It should not be the role of developers of as few as 10 dwellings to prescribe how the public travel and to provide such things as ‘micro transportation’ options on public road networks. Further, this provides potential for smaller scale private developers to be expected to fund upgrades on the public transportation network should a Travel Plan be interpreted by Auckland Council or Auckland Transport to require such upgrades. This places a further substantial financial burden on developers that should not be additional to development contributions already levied for public works.
- There are vagaries around what a travel plan actually is and should address, partly evidenced by the suggestion to seek clarification from Auckland Transport if unsure of what to include. Also, Auckland Transport is already under resourced and would likely take considerable time to provide this guidance. A further vagary example is the expectation for a site to provide physical infrastructure to support the use of public transport. It is unclear how this is possible for smaller developments to achieve within their sites (see the Definition above).
- The interpretations of what a travel plan should include are likely to be wide and varied between different experts in the Council and Auckland Transport adding complexity and uncertainty to the application process with associated delays and costs.
- The process for provision of a Travel Plan adds another complex layer of assessment for already under resourced planning and traffic agencies to have to grapple with.
- If the interpretations by council planners of what is required are too onerous then perfectly acceptable and anticipated developments may be subject to unnecessary public notification or simply recommended for decline outright.
- If developers are forced to provide car parks due to Council interpretations assessments that a Travel Plan is insufficient or leads them to believe car parking is needed, this undermines the NPSUD and the rationales for removing car park provision in the first place.
- Some of the requirements to be considered in a travel plan are not realistic to address such as options for car pooling (refer to the Definition above).
- The market would play a substantial role in whether car parks are provided by developers, noting that many would likely opt for at least one car park anyway.
- This Travel Plan requirement may force developers to work around this requirement by staging developments with no more than 9 dwellings in each application, or worse - these provisions may discourage developers from proceeding at all. This is not supportive of central Government’s direction for increasing housing supply, and again conflicts with the outcomes intended under the NPSUD.

¹ PC71 Item 7 identifying the standard.

4.0 Relief Sought

Civix request that the wording of specific provisions in PC71 are revised by Auckland Council, as set out above – essentially to remove the requirement for resource consent for the activities prescribed in Activity Table Rule E27.6.4.1(3a) and the required consequential edits.

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Civix welcomes the opportunity to speak to this submission further at a Hearing.

Kind Regards



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Form 5

Submission on the Proposed Plan Change 71 to the Auckland Unitary Plan

To: Auckland Council

Name of Submitter: CivilPlan Consultants Ltd

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Auckland 2241

Attn: Aaron Grey

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This is a submission on Proposed Plan Change 71 to the Auckland Unitary Plan – NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments (“PC71”).

The submitter is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (‘RMA’).

1. Specific provisions of the proposal that this submission relates to

This provisions specifically relates to the amendments to the AUP under PC71 that have been proposed to address Issue 7 (Assessment of travel demand in the AUP), being those provisions outlined in Attachment D of the plan change material.

2. Submission

We are neutral to the changes proposed by PC71 in relation to Themes 1 to 6.

However, we oppose all changes proposed by PC71 in relation to Theme 7, being those provisions outlined in Attachment D of the plan change material.

The reasons for this opposition are set out as follows.

2.1 Scope of PC71

Paragraph 52 of the section 32 report specifies the scope of PC71 as being:

The scope of PPC71/PM14 is limited to addressing consequential technical amendments in the AUP and HGI Plan and ensuring that the effects of travel demand can be adequately addressed in the AUP following the removal of car parking minimums to give effect to Policy 11 of the NPS-UD.

The amendments related to Issue 7 are covered by the latter part of this scope.

We consider that the section 32 analysis has not first provided sufficient consideration to the extent to which the effects of travel demand are already addressed in the AUP, the adequacy of the existing provisions in addressing these effects, and identification of the specific circumstances where the existing provisions are considered to be inadequate. Therefore, there is considered to be insufficient justification for the additional rules proposed under Theme 7 to be within the stated scope of PC71.

In particular, the assessment of the “do nothing” option for Issue 7 (option 7.1 in Table 18) only gives consideration to the appropriateness of Standard E27.6.1 and gives no regard to other provisions in the AUP, such as:

- Activities with discretionary and non-complying activity statuses, which provide Council scope to consider all effects of the activity and consistency with all objectives and policies, including those in E27; and
- Activities with a restricted discretionary activity status with matters of discretion that include consideration of effects of travel demand (or consideration of effects on the environment as a result of development intensity).

2.2 Consistency with the NPS-UD

NPS-UD relies on a market-driven response to provide a sufficient number of parking spaces. Theme 7 of PC71 goes against this.

Whilst the NPS-UD anticipates that higher development densities will locate in areas well served by public transport, it is expected that some development will occur in areas less well served by public transport that may not provide parking, or provide it at low levels, due to the removal of minimum parking standards. The thrust of Theme 7 is that Council is concerned that this could result in adverse effects associated with the under-supply of parking in locations not well served by public transport or other alternative travel modes, particularly for residential development. However, it is considered that concern is somewhat unfounded.

The market provides housing product that will meet the demands of house buyers. A developer is not likely to develop a product that they are not confident of selling at a price point that will ensure a profit. It is expected that for the foreseeable future, whilst public transport accessibility is improved and Auckland’s car-oriented culture adjusts, many buyers will seek to purchase properties with a carpark. Therefore, it is likely that most developments will continue to provide on-site parking at some level (at least meeting the minimum requirements that were previously within the AUP). However, the removal of minimum parking requirements will enable the development of some housing product that does not

have on-site parking, which will be desirable for purchasers without a car seeking a more affordable dwelling.

Similarly, businesses are unlikely to establish in premises where there is insufficient parking for their staff or visitors, as it will adversely affect the operation and profitability of their business. Therefore, it is suggested that enabling the market to influence the level of parking provided on sites, rather than requiring a travel plan via a resource consent process, will ensure that an adequate level of parking is provided on sites to meet likely demand, and that where parking isn't provided, there are viable alternative transport modes.

NPS-UD strongly encourages comprehensive parking management plans, not travel plans. There is no evidence in PC71 of whether consideration has been given to Council/Auckland Transport implementing parking management plans to manage effects associated with the provision and management of parking at a neighbourhood, town, city or regional scale, rather than relying on site specific travel plans that do not take into account broader parking management issues.

We are not aware of any other councils requiring travel plans in response to the NPS-UD. Therefore, it is unclear why Auckland Council considers this necessary.

2.3 Residential and Rural Zone Implications

It appears that the additional provisions related to Issue 7 as currently drafted would have no effect for developments within the residential zones.

Firstly, Standard E27.6.1A will not apply to activities in the THAB zone in accordance with Standard E27.6.1A(2)(a)).

Secondly, for non-complying and discretionary activities, Council has scope to consider all effects of the activity and consistency with all objectives and policies, including those in E27, without the need for an additional rule.

Thirdly, Standard E27.6.1A(2)(d) specifies that Standard E27.6.1A does not apply where *“there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities”* [emphasis added]. Therefore, it should be determined that Standard E27.6.1A does not apply to the restricted discretionary activities in residential and rural zones subject to a matters of discretion requiring traffic effects to be considered.

From our review, each activity type listed in Table E27.6.1A.1 falls within one of the above categories within each of the residential and rural zones (when excluding THAB):

- A non-complying activity, including those activities not provided for.
- A discretionary activity.
- A restricted discretionary activity, subject to a matter of discretion addressing *“transport, traffic or trip-generation effects for the activity”* [emphasis added] and thus excluded under E27.6.1A(d). For example, more than four dwellings; integrated residential development; boarding houses, visitor accommodation, care centres and supported residential care for more than 10 people per site; dairies, community facilities and healthcare facilities up to 200 m² in the Mixed Housing zones.

- A restricted discretionary activity, subject to a matter of discretion addressing “*effects of traffic volume on the safety of and convenience of other road users*” [emphasis added] and thus excluded under E27.6.1A(d). For example, rural industries and care centres for more than 10 people in the rural zones.

Subsequently, Standard E27.6.1A does not have any impact on any of the activities listed in Table E27.6.1A.1 within residential and rural zones. Therefore, it would be more efficient for all residential and rural zones to be listed in Standard E27.6.1A(2)(a) (which specifies the zones that Standard E27.6.1A does not apply in), or for all of the proposed provisions in relation to Theme 7 to be deleted.

2.3.1 Residential Activities in Residential Zones

Notwithstanding that residential activities in the residential zones that are listed in Table E27.6.1A.1 would be excluded from requiring assessment under these proposed provisions (which is not abundantly clear and is open to interpretation), the practicality of requiring a travel plan for residential developments does not appear to have been thought through.

A large proportion of residential development is for multiple detached or terraced dwellings that are then subdivided into fee simple lots. In such circumstances there is no management body or structure that could be responsible for ongoing implementation of a travel management plan. It is considered to be impracticable and inefficient to impose conditions of consent for such development that would require monitoring and review of a travel plan (as specified in the definition of ‘travel plan’) once each dwelling is in separate ownership – and it would certainly be inappropriate to prevent subdivision of 10 or more dwellings in order to avoid such issues arising.

In recognition of these issues, assessment should be limited to consideration of the level of parking provided for anticipated parking demand, accessibility to alternative transport modes and providing for cycle parking/storage (i.e. matters that can be addressed through design). In such circumstances, simply requiring an assessment of effects of travel demand on the surrounding environment should suffice rather than mandating a travel plan (under existing zone matters of discretions). It therefore would be more appropriate for a travel management plan to be one of the tools that could be used to address the effects of a development, rather than it being mandatory if not warranted.

2.4 Business Zone Implications

After excluding the City Centre, Metropolitan Centre, Town Centre and Mixed Use zones (Standard E27.6.1A will not apply to activities in these zones in accordance with Standard E27.6.1A(2)(a)), any prohibited activities (for which resource consent cannot be obtained) and any non-complying or discretionary activities (for which Council has scope to consider all effects of the activity and consistency with all objectives and policies, including those in E27, without the need for an additional rule), Standard E27.6.1A is considered to only impact the following activities listed in Table E27.6.1A.1:

- Within the Local Centre zone:
 - 10 or more dwellings – restricted discretionary activity under rule H11.4.1(A3) (for converting an existing building) or H11.4.1(A44) (for a new building);
 - Integrated residential development with 50 or more units – restricted discretionary activity under rule H11.4.1(A3) (for converting an existing building) or H11.4.1(A44) (for a new building);

- Visitor accommodation with 10 or more units – restricted discretionary activity under rule H11.4.1(A3) (for converting an existing building) or H11.4.1(A44) (for a new building);
- Primary or secondary education facilities – permitted activity under rule H11.4.1(A29);
- Tertiary education facilities – restricted discretionary activity under rule H11.4.1(A35), although these may be exempt due to matter of discretion H11.8.1(3) referring to *“effects of intensity and scale of the development arising from the numbers of people and/or vehicles using the site”*;
- Office over 500 m² GFA – restricted discretionary activity under rule H11.4.1(A19) , although these may be exempt due to matter of discretion H11.8.1(1)(a) referring to *“effects of intensity and scale of the development arising from the numbers of people and/or vehicles using the site”*;;
- Warehousing and storage over 2,000 m² GFA – permitted activity under rule H11.4.1(A42);
- Industrial laboratories over 1,000 m² GFA – permitted activity under rule H11.4.1(A37);
- Light manufacturing and servicing over 1,000 m² GFA – permitted activity under rule H11.4.1(A37);
- Repair and maintenance services over 1,000 m² GFA – permitted activity under rule H11.4.1(A37);
- Care centres accommodating 50 or more people – permitted activity under rule H11.4.1(A27);
- Community facilities accommodating 50 or more people – permitted activity under rule H11.4.1(A28); and
- Healthcare facilities over 200 m² GFA – permitted activity under rule H11.4.1(A28).
- Within the Neighbourhood Centre zone:
 - 10 or more dwellings – restricted discretionary activity under rule H124.1(A3) (for converting an existing building) or H12.4.1(A47) (for a new building);
 - Integrated residential development with 50 or more units – restricted discretionary activity under rule H124.1(A3) (for converting an existing building) or H12.4.1(A47) (for a new building);
 - Visitor accommodation with 10 or more units – restricted discretionary activity under rule H124.1(A3) (for converting an existing building) or H12.4.1(A47) (for a new building);

- Care centres accommodating 50 or more people – permitted activity under rule H12.4.1(A27); and
- Healthcare facilities over 200 m² GFA – permitted activity under rule H12.4.1(A28).
- Within the General Business zone:
 - Warehousing and storage over 2,000 m² GFA – permitted activity under rule H14.4.1(A39); and
 - Other industrial activities (excluding waste management facilities) over 1,000 m² GFA – permitted activity under rule H14.4.1(A39).
- Within the Business Park zone:
 - Office over 500 m² GFA – restricted discretionary activity under rule H15.4.1(A16);
 - Warehousing and storage over 2,000 m² GFA – permitted activity under rule H15.4.1(A37);
 - Industrial laboratories over 1,000 m² GFA – permitted activity under rule H15.4.1(A32);
 - Light manufacturing and servicing over 1,000 m² GFA – permitted activity under rule H15.4.1(A33);
 - Repair and maintenance services over 1,000 m² GFA – permitted activity under rule H15.4.1(A34);
 - Care centres accommodating 50 or more people – permitted activity under rule H15.4.1(A22); and
 - Healthcare facilities over 200 m² GFA – permitted activity under rule H15.4.1(A26).
- Within the Heavy Industry zone:
 - Tertiary education facilities that are accessory to an industrial activity on the site – permitted activity under rule H16.4.1(A28);
 - Office over 500 m² GFA that are accessory to the primary activity on the site – restricted discretionary activity under rule H16.4.1(A14);
 - Warehousing and storage over 2,000 m² GFA – permitted activity under rule H16.4.1(A30);
 - Other industrial activities (excluding storage and lock-up facilities and wholesalers) over 1,000 m² GFA – permitted activity under rule H16.4.1(A30).

- Within the Light Industry zone:
 - Tertiary education facilities that are accessory to an industrial activity on the site – permitted activity under rule H17.4.1(A31);
 - Office over 500 m² GFA that are accessory to the primary activity on the site – restricted discretionary activity under rule H17.4.1(A18);
 - Warehousing and storage over 2,000 m² GFA – permitted activity under rule H17.4.1(A33);
 - Other industrial activities over 1,000 m² GFA – permitted activity under rule H17.4.1(A33), H17.4.1(A34) or H17.4.1(A35).

Standard E27.6.1A will primarily impact activities in the Local Centre zone. The necessity for this additional rule for activities in this zone is unclear, given that areas subject to the Local Centre zone are generally well served by public and active transport networks (reducing vehicle trips for all activities) and the residential activities within these areas are less likely to generate vehicle movements due to the wide variety of commercial and community facilities provided for in the immediate vicinity. Council has appeared to give little, if any, consideration to the need for Standard E27.6.1A to apply to activities within the Local Centre zone, instead relying simply only on the fact that Standard E27.6.1 applies in this zone. We consider the application of Standard E27.6.1A to be unnecessary in this zone.

Otherwise, the number of activities that Standard E27.6.1A will impact in other business zones is relatively low. If Council considers that the effects of travel demand for these activities needs to be managed (after assessing each individually), then it is considered to be more efficient for this to be stated in the zone provisions, rather than inserting a new standard in E27 that is subject wide ranging and confusing exemptions. This can be achieved by:

- Inserting additional matters of discretion related to effects of travel demand for each of the restricted discretionary activities listed above; and
- Making each of the permitted activities listed above restricted discretionary activities instead, subject to a matter of discretion related to effects of travel demand.

These suggested changes are not set out in the relief sought below. It is considered that such significant changes would require Theme 7 of PC71 to be withdrawn and the alternative amendments to the zone provisions to be re-notified, subject to comprehensive section 32 analysis.

2.5 Integrated Transport Assessment Exemption

Standard E27.6.1A(2)(b) specifies that Standard E27.6.1A does not apply where “development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment”.

We consider there to be many issues with the measurability and efficiency of this provision (in order to determine whether there is a need for resource consent under rule E27.4.1(A3A)), including:

- If development is in accordance with a consent, then there is no need for the development to consider compliance with AUP rules;
- The AUP does not clearly identify “provisions approved on the basis of an Integrated Transport Assessment” and ‘Integrated Transport Assessment’ is not defined by the AUP; and
- Whether the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment is a judgement and open to interpretation by different parties.

It is considered more appropriate for consideration of consistency with an Integrated Transport Assessment to form part of Council’s assessment of an application for resource consent, not determining whether resource consent is required under a rule. For that reason, it is considered more appropriate that reference to any Integrated Transport Assessment be made in assessment criteria instead.

It is acknowledged that this exemption is the same as that specified in E27.6.1(2)(b). We consider that provision to be flawed for the same reasoning.

2.6 Costs of Theme 7 Changes

The changes proposed by Theme 7 will result in additional consent requirements for activities that would have complied with the minimum parking standards that were previously within the AUP.

The decisions on the AUP determined that activities that met those minimum parking requirements achieved the relevant objectives and policies of the AUP that PC71 seeks to ensure are still being achieved. PC71 does not appear to be considering activities that complied with the previous minimum parking requirements were not achieving these objectives and policies.

The introduction of an additional consent requirement is also considered to be inconsistent with Objective 2 of the NPS-UD (“Planning decisions improve housing affordability by supporting competitive land and development markets”), as the additional consenting requirements, including the requirement for a travel plan to be prepared, implemented, monitored and approved, will result in additional costs on developers that can impact housing affordability.

2.7 Section 18A Procedural Principles

Section 18A of the RMA outlines requirements that every person exercising powers and performing functions under this Act must take all practicable steps to achieve.

The approval of Theme 7 of Plan Change 71 is considered to result in Auckland Council being inconsistent with the requirements under this section as (for the reasons outlined above):

- The processes created by the new provisions are neither timely, efficient, consistent and cost-effective, proportionate to its functions or powers; and
- The provisions are not worded in a way that is clear and concise.

3. Relief Sought

The primary relief sought is to delete all amendments to the AUP that have been proposed to address Issue 7 (Assessment of travel demand in the AUP), being those provisions outlined in Attachment D of the plan change material.

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In the alternative, the following amendments are sought (insertions in double underline and deletions in double strike through):

...

E27.6.1A Travel demand

(1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required.

(2) Standard E27.6.1A does not apply where:

(a) a proposal is located in:

(i) the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone or Business – Mixed Use Zone, or

(ii) a residential zone; or

(iii) a rural zone

~~Residential – Terrace Housing and Apartment Building Zone or Centre Fringe Office Control as shown on the planning maps;~~

~~(b) development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;~~

(c) the activity is permitted in the H7 Open space zones; ~~or~~

(d) there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities; ~~or~~

(e) the activity is a discretionary or non-complying activity in the applicable zone rules or precinct rules.

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Table E27.6.1A.1 Development thresholds with a travel plan requirement

<u>Activity</u>		<u>Development threshold</u>	
<u>(T1B)</u>	<u>Residential</u>	<u>Dwellings</u>	<u>10 dwellings</u>
<u>(T2B)</u>		<u>Integrated residential development</u>	<u>50 units</u>
<u>(T3B)</u>		<u>Visitor accommodation</u>	<u>10 units</u>
<u>(T4B)</u>	<u>Education facilities</u>	<u>Primary</u>	<u>All educational facilities</u>

(T5B)		Secondary	
(T6B)		Tertiary	
(T7B)	Office		500 m ² GFA
(T8B)	Industrial activities	Warehousing and storage	2,000 m ² GFA
(T9B)		Other industrial activities	1,000 m ² GFA
(T11B)	Community	Care centres	Accommodating 50 or more children or other people, other than employees
(T12B)		Community facilities	Accommodating 50 or more people
(T13B)		Healthcare facilities	200 m ² GFA
(T14B)	Entertainment facilities		Accommodating 50 or more people

...

E27.8.1. Matters of discretion

...

(4A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:

- (a) adequacy of the any travel plan required under E27.9(2)(b)
- (b) effects on the transport network.

79.4

...

E27.8.2. Assessment criteria

...

(3A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:

- (a) the extent to which the travel demands of the activity are provided for, including but not limited to:
 - (i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:
 - the accessibility and frequency of public transport services
 - the standard of active modes infrastructure for all users
 - the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments
 - (ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking

(b) the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.

(c) the extent to which ~~the any travel plan required under E27.9(2)(b)~~ addresses the matters in E27.8.2(3A)(a) and (b).

(b) the extent to which the development is being undertaken on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;

79.5

...

E27.9 Special information requirements

...

(2) Travel plan:

(a) a travel plan may be required as part of an assessment of environmental effects where a proposal exceeds the trip generation threshold, exceeds a new development threshold in Standard E27.6.1A, or provides more parking than the maximums specified ~~or fewer than the minimums specified~~. A travel plan will not be required where the infringement of the parking standards is minor in relation to the scale of the activity and associated parking proposed.

79.6

~~(b) a travel plan is required as part of an assessment of environmental effects where a proposal meets or exceeds a new development threshold in Standard E27.6.1A~~

We do not wish to be heard in support of our submission.

Signature:

EMMA BAYLY PLANNING TEAM LEADER
on behalf of CivilPlan Consultants Ltd

AARON GREY – SENOR PLANNER

Date: 24 March 2022

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Mark James Todd
Date: Thursday, 24 March 2022 5:01:22 pm
Attachments: [Ockham - Submission on PC71 \(002\).pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Mark James Todd
Organisation name: Ockham Group Limited
Agent's full name: Mark Todd
Email address: mark@ockham.co.nz
Contact phone number: +64272275019
Postal address:
246 Khyber Pass Road
Grafton
Auckland 1023

Submission details

This is a submission to:

Plan change number: Plan Change 71
Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
E27.4.1(A3a), E27.6.1A, E27.8.1(4A), E27.8.2(3A), E27.9(2)(B), Definition of 'travel plan'

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
As outlined in the attached submission

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

Supporting documents
Ockham - Submission on PC71 (002).pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)



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SUBMISSION ON PLAN CHANGE 71 (PC71)

BY OCKHAM GROUP LIMITED

INTRODUCTION

1. This submission is lodged on behalf of Ockham Group Limited (**Ockham**) in relation to plan change 71, NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments (**PC71**).
2. Ockham is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991 (**RMA**).
3. Ockham opposes Issue 7 of PC71 and the proposed amendments to the AUP that are intended to address the effects of travel demand on the transport network after the car parking minimums are removed from the Auckland Unitary Plan (**AUP**). The specific provisions of PC71 that are opposed by Ockham include:
 - (a) Rule E27.4.1(A3a) in Activity Table E27.4.1;
 - (b) Standard E27.6.1A;
 - (c) Matters of discretion E27.8.1(4A);
 - (d) Assessment criteria E27.8.2(3A);
 - (e) Special information requirement E27.9(2)(b); and
 - (f) Definition of 'travel plan'.

(the **travel demand provisions**)

80.1

REASONS FOR OPPOSITION

General Reasons

4. Ockham submits that the travel demand provisions:

- (a) Do not promote the sustainable management of natural and physical resources under section 5 RMA;
 - (b) Do not have adequate regard to the efficient use and development of natural and physical resources under section 7(b) RMA;
 - (c) Represents a failure to fulfil the functions of regional councils under section 30 RMA and local authorities under section 31 RMA;
 - (d) Do not give effect to the National Policy Statement on Urban Development 2020 (**NPSUD**) under section 75(3)(a) RMA; and
 - (e) Do not provide for policies which are the most appropriate way to achieve the AUP's objectives in terms of their efficiency and effectiveness and therefore are not appropriate in terms of s32 RMA.
5. The travel plan provisions go beyond 'consequential technical amendments' and require a plan change process of their own that is separate from Issues 1 to 6 of PC71.

Specific Reasons

6. Ockham submits that the travel demand provisions are in direct conflict with the intent of the NPSUD:
- (a) The NPSUD is intended to provide adequate opportunity for land development for business and housing to meet community needs, as well as provide direction to make sure capacity is provided in accessible areas, helping New Zealanders build homes in the places they want. Local authorities are required to open up more development capacity, so more homes can be built in response to demand.¹
 - (b) However, new Rule E27.4.1(A3a) and Standard E27.6.1A limit urban development by applying a restricted discretionary activity (**RDA**) status with a travel plan requirement to an activity or subdivision which exceeds the development thresholds set out in proposed Table E27.6.1A.1. This includes residential activities involving 10 or more dwellings (T1B), integrated residential

¹ Ministry for the Environment and Ministry of Housing and Urban Development, *National Policy Statement on Urban Development 2020 – Introductory Guide* (2020), at page 6 – Intent of the National Policy Statement on Urban Development.

development involving 50 or more units (T2B), and visitor accommodation involving 10 or more units (T3B).

- (c) In effect, the travel demand provisions will impose the same or similar limitations and restrictions on urban development and growth as the minimum car parking requirements did, which is inconsistent with the strategic direction of the NPSUD.
7. The proposed travel demand provisions are unsupported and more restrictive than the existing AUP provisions:
- (a) The s32 Report states at paragraph 46 that, “[t]he activity categories listed in the new Standard E27.6.1A is based on the list of activities in the existing trip generation standard (Standard E27.6.1), and include care centres, community facilities, healthcare facilities and entertainment facilities as they are activities that tend to generate travel demand”.²
 - (b) An assessment of the trip generation provisions of the AUP demonstrates that resource consent is required for an activity or subdivision which exceeds the trip generation standards set out in E27.6.1.1. This includes residential activities involving 100 or more dwellings (T1), integrated residential development involving 500 or more units (T2), and visitor accommodation involving 100 or more units (T3).
 - (c) The trip generation standards under the AUP are substantially higher than, and inconsistent with, the proposed standards for travel demand under PC71. The travel demand development thresholds are therefore unsubstantiated and there is inadequate information in the s32 Report to justify the limits which have been set.
8. Proposed assessment criterion E27.8.2(3A)(a)(i) imposes an unreasonably high threshold on applicants to manage the effects of travel demand. It is not the role of an applicant for resource consent to ensure that there are accessible and frequent public services and infrastructure available for public use. Any lack of such services is an issue for the Council and other public service providers, such as Auckland Transport, to address.

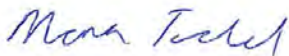
² Auckland Council, Section 32 Evaluation Report (24 February 2022), at [46].

9. Without any specified minimum car parking requirements in the AUP, the references to “demand for car parking” in proposed assessment criteria E27.8.2(3A)(a)(ii) and E27.8.2(3A)(b) are unsubstantiated.
10. The requirement to prepare a travel plan as part of an assessment of environmental effects under E27.9(2)(b) for every development that exceeds the development thresholds (which are excessively low) will result in significant costs for a resource consent applicant. The effect of this requirement is essentially the same as imposing minimum car parking requirements as the availability of a sufficient supply of car parks becomes a relevant factor in the assessment of whether the travel plan requirements can be met.

RELIEF SOUGHT

11. Ockham seeks that Auckland Council declines PC71 as it relates to the travel demand provisions listed at paragraph 3 above.
12. Should Auckland Council approve PC71, then Ockham seeks that residential activities (T1B), (T2B), and (T3B) be deleted from the development thresholds with a travel plan requirement listed in proposed Table E27.6.1A.1.
13. Ockham wishes to be heard in support of this submission. If others make a similar submission, then Ockham will consider presenting a joint case with them at a hearing.

Dated: 24 March 2022



Mark Todd
Ockham Group Limited

24 March 2022

Attn: Manager, Plans and Places

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Submission sent via email: unitaryplan@aucklandcouncil.govt.nz

SUBMISSION ON PROPOSED PLAN CHANGE 71: NPS-UD REMOVAL OF CARPARKING MINIMUMS – CONSEQUENTIAL TECHNICAL AMENDMENTS FROM KĀINGA ORA – HOMES AND COMMUNITIES

Introduction

Kāinga Ora – Homes and Communities (“Kāinga Ora”) at the address for service set out below makes the following submission on the Proposed Plan Change 71 and Plan Modification 14 (“PC71 & PM 14”) to the Auckland Unitary Plan Operative in Part (“AUP-OP” or “the Plan”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

This submission provides an overview of the matters of interest to Kāinga Ora with Attachment 1 providing the substantive detail of submission matters.

Background to Kāinga Ora and its Submission

1. Kāinga Ora Homes and Communities was established in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019 (“**KOHC Act**”). Kāinga Ora consolidates Housing New Zealand Corporation (“Housing NZ”), HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown entity and is required to give effect to Government policies.
2. Kāinga Ora is now the Government’s delivery entity for housing and urban development. Kāinga Ora will therefore work across the entire housing spectrum to build complete, diverse communities. As a result, Kāinga Ora has two core roles: a) Being a world class public housing landlord; and b) Leading and co-ordinating urban development projects.

3. Kāinga Ora's statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that: a) provide people with good quality, affordable housing choices that meet diverse needs; and b) support good access to jobs, amenities and services; and c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
4. Kāinga Ora tenants are people who face barriers (for a number of reasons) to housing in the wider rental and housing market. In general terms, housing supply issues have made housing less affordable around New Zealand and as such there is an increased demand for public housing. As a result of the COVID-19 pandemic this waiting list has increased further. In Auckland Tāmaki Makaurau, this pressure on housing has been felt most poignantly
5. In the Auckland Tāmaki Makaurau context, the housing portfolio managed by Kāinga Ora comprises approximately 30,000 dwellings (as at 30 June 2021). The Auckland Housing Program is Kāinga Ora's key program to reconfigure and grow its housing stock to provide warm and dry homes and sufficient stocks for public housing.
6. Kāinga Ora also play a role in urban development throughout New Zealand. The legislative functions of Kāinga Ora, as outlined in section 13 of the KOHC Act, illustrate this broad mandate and outline two key roles of Kāinga Ora in that regard:
 - a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
 - b) providing a leadership or coordination role to urban development more generally.
7. Notably, Kāinga Ora statutory functions in relation to urban development now extend beyond the development of housing in relation to the development and renewal of urban environments. It now also includes enabling or providing related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works within its development areas. Therefore, in reviewing policy documents around the country, Kāinga Ora also has an interest in how local authorities are encouraging integrated urban growth.
8. Section 26 of the KOHC Act also directs that Kāinga Ora must give effect to the Government Policy Statement on Housing and Urban Development (GPS-HUD) when performing its functions. The 2021 GPS-HUD identifies four key outcomes, two of these outcomes are of particular relevance to this submission being '*Thriving and resilient communities*' and '*An adaptive and responsive system*'. The prior identifies urban places in Aotearoa should help reduce emissions and to be centred around public transport and active transport networks. The latter envisions Aotearoa's housing system as integrated and self-adjusting with regulatory and institutional settings that enable increased housing supply and urban change (densification and expansion, mixed land use, accessibility, connectivity).

9. One of the objectives of the National Policy Statement on Urban Development ('NPS UD') 2020 seeks to improve housing affordability by supporting competitive land and development markets and to create environments that support reductions in greenhouse gas emissions via removing the subsidy on car parking which increases demand for emission generating car use. In accordance with Policy 11 of the NPS UD, parking minimums were removed from the AUP-OP recently (11 February 2022) utilising the RMA non-schedule 1 process.
10. The NPS-UD Recommendations and Decisions Report¹, comment that the intent of Policy 11 is to *"create more efficient land use, provide more space for housing and reduce development costs"* and *"car parking is over supplied as a result of parking regulations in district plans"*² (page 63). Accordingly, the NPS-UD has the intent of transitioning car-parking supply in Aotearoa to a market-based approach. PC71/PM14 are therefore required to reflect these intentions.

Scope of Submission

11. Kāinga Ora seeks the withdrawal of PC 71 and PM 14 in entirety. The NPS UD provides for the consequential changes to text to remove reference to requirement of minimum parking without a schedule 1 process to the RMA to give effect to policy 11(a). Kāinga Ora notes that PC71 introduces new provisions and rules which go beyond a 'consequential change' and is opposed to these rules being introduced to the Auckland Unitary Plan ('AUP').
12. If PC71 and PM14 are not withdrawn, Kāinga Ora's position on PC71 and PM14 is oppose in part to remove the travel plan provisions to ensure the AUP remain consistent with the purpose and outcomes sought in the NPS UD. See attachment A for details of its submission on the PC 71 and PM 14.
13. The key submission is that Kāinga Ora's consider the new **Rule E27.6.1A Travel Demand** and its related requirement and assessment could see small scale urban developments with reduced or no carparking not supported by the Council based on short-term, site-specific considerations and thereby a means to require additional parking or decline applications. These new provisions are opposed for the reasons set out below and in the attachment.

81.1

The submission is:

14. If the plan change is not withdrawn, Kāinga Ora, opposes PC71 in part, for the reasons set out below and in the attachment.
15. Provided that the relief sought above and attached is granted:

¹ Ministry for the Environment and Ministry of Housing and Urban Development. 2020. Recommendations and decisions report on the National Policy Statement on Urban Development dated July 2020

² P63 of the NPS UD Recommendations and Decisions Report dated July 2020

- a) The PC71 and PM 14 will be in accordance with the purpose and principles of the Resource Management Act 1991 ("the Act") and will be appropriate in terms of section 32 of the Act; and
- b) The potential adverse effects that might arise from activities provided for by PC71 will have been addressed appropriately.

16. In the absence of the relief sought, the opposed sections of PC71 and PM14:

- c) are contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;
- d) will not meet statutory obligations under the NPS-UD;
- e) will in those circumstances impact significantly and adversely on the ability of people and communities to provide for their social, economic and cultural wellbeing; and
- f) does not provide a framework to enable the delivery of sustainable, inclusive, and thriving communities.

17. In particular, but without limiting the generality of the above:

Details of the submission are:

The proposed travel demand plan is a new tool and is not a consequential amendment to the removal of the carparking minima

18. The purpose of PC71 states "*The proposed changes are necessary to ensure that both plans continue to function as intended following the removal of car parking minimums*". One of the objectives of PC71 is "*Ensure that the AUP and the HGI Plan continue to adequately address any adverse effects on the transport network after minimum car parking requirements are removed from the plans*".
19. The NPS UD (section 3.38) specifically provided for Councils to make amendments to objectives, policies, rules, or assessment criteria without using a schedule 1 process. The majority of the PC71 and PM14 changes can be made without the Plan Change. Kāinga Ora therefore consider that the entire Plan Change should be withdrawn and that process be used instead where it relates to removing reference to minimum and required parking throughout the plans' objectives, policies and assessment matters.
20. With respect to the introduction of new rule, standards and assessment relating to Travel Plans³, (being Activity E27.4.1(A3a), Standard E27.6.1A, Table E27.6.1A.1 Development thresholds with a travel plan requirement, matter of discretion E27.8.1 (4A), assessment criteria E27.8.2(3A Special information requirement E27.9(2)(b)) insufficient cost and benefits assessment has been provided to support the travel

³ Sections 6, 7, 10, 11 and 12 of PC71

management plan requirement and the proposed thresholds for urban development that will be subject to that requirement. The supporting s32 does not provide details of how this tool was considered appropriate and also to be considered as a consequential change to the car parking minimum removal.

21. If it is considered, however, that a Schedule 1 process is necessary, the amendments that remove reference to parking minimums are supported generally and the introduction of a Travel Plan⁴ requirement is opposed for the reasons set out below.
22. The proposed tool will add time, cost and delay to urban development
23. The proposed Travel Plan standard contradicts the NPS UD intent being the removal of parking minimums to support urban intensification by way of travel mode shifts to public transport, and other active modes. The new rule merely introduces an administrative hurdle⁵ (involving the applicant's preparation of the Travel Plan and the Council's assessment, monitoring and enforcement) and significantly increase the processing time, and cost of resource consent applications. Kāinga Ora considers that majority of these smaller scale urban development will not benefit from the requirement for a travel plan.
24. The new rule appears to be driven by a concern that parking will occur off site and thus having residents parking on streets. The Recommendations and Decisions report for the NPS UD⁶ makes it clear that by focussing on parking management plans for a wider area rather than looking at parking on an individual site/development/ consent basis, Council can provide the required strategic overview of parking needs and alternative transport options especially public transport over the medium and long term. Kāinga Ora encourages Auckland Council or Auckland Transport to provide these region wide initiatives or strategies as soon as practicable. We note that Auckland Transport will be releasing a consultation document in April on an Auckland Wide Parking Strategy. This parking strategy (along with publicly available information on public transport accessibility zones and upgrade projects Auckland wide) could be factored into the developers' market decisions about the provision of onsite parking for their development.
25. Kainga Ora considers that the development thresholds in Table E27.6.1A.1 for urban activities to provide a travel plan will now capture small urban developments that would not previously be required to provide a transport assessment or would have already needed to provide one subject to existing AUP zone provisions. The s32 analysis did not clarify or justify how these thresholds were reached. The existing AUP Trip Generation rule already require large urban scale development to assess its transport

⁴ Under new Restricted Discretionary Activity E27.4.1(A3a)

⁵ Restricted Discretionary activity status introduced for activities that exceed Development Thresholds (rule E27.4.1(A3a))

⁶ Section 13, page 65 of the Ministry for the Environment and Ministry of Housing and Urban Development. 2020. Recommendations and decisions report on the National Policy Statement on Urban Development dated July 2020

effects. This trip generation rule already meets and is better aligned with NPS UD's intention. Kainga Ora considers it is unnecessary to introduce a new rule at the small scale of activities identified in the Travel Plan rule.

26. The exemption to the Travel Plan rule provided through E27.6.1A (2)(d) is unclear and will create confusion with applicants and council reviews of applications. This will again delay and increase cost to the already complicated consenting process. It is noted that assessment of 'traffic effects' is still required for 'Four or more dwellings' in the Mixed Housing Suburban and Mixed Housing Urban zones and therefore this exemption indicates that the Travel Plan rule would not apply.
27. The Travel Plan assessment includes matters that extend beyond the control of applicants and generally what is not required from individual small scale urban development. The assessment criteria for the provisions of the Travel Plan rule that are of particular concern are below (emphasis added):
- i. *the **adequacy** of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:*
 - *the **accessibility and frequency** of public transport services*
 - *the **standard of active modes infrastructure** for all users*
 - *the **connectivity of the site** by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments*
28. This assessment involves a review of public transport availability, cycle lanes, footpath upgrades and other transport initiatives for each site. This information is generally not publicly available. As such, Auckland Transport would need to provide this information to all applicants and to Council to satisfy this review. Providing assessment on these matters are beyond the control of the applicant and is an unreasonable request as well as adding time, cost and delays. This will also create a significant burden on Auckland Council, and Auckland Transport to provide information and assist with informed assessment.
29. In terms of meeting the assessment matter of **adequacy** of the Travel Plan⁷, is providing all of the content as outlined in the rule for the travel plan considered as adequate? Or does the rule enable a review of the **findings** of the Travel Plan adequacy?
30. In terms of who makes the assessments and in order to retain control over the market led response, is Auckland Transport going to be involved in all applications that exceed the development threshold or is this going to rely on Council planners and Transport Engineers making their own judgement calls on the merits of the Travel Plan? If Auckland Transport is involved, then this will lead to further delays to the assessment of

⁷ Matter of discretion E27.8.1(4A)(a)

applications and put additional resourcing requirements on Auckland Transport (where there is already capacity issues). If Auckland Transport is not involved, then these assessments will be made without the guidance on parking and public transport strategies for the location and will be based on the individuals' views on the transport options put forward. There is potential therefore for the merits of the removal of minimum parking and the NPS UD intents to be revisited on each application and that an unwritten parking requirement is applied in every case (i.e. based on an assumption that at least 50% of occupants/users will drive).

31. In order to make a comprehensive assessment of the Travel Plan, applicants and Council reviewers would need to consider the short-, medium- and long-term transport options for a site. This could involve a number of documents such as the Auckland Plan, the Draft Regional Land Transport Plan 2021-2031, the Auckland Transport Alignment Project (ATAP)⁸, Auckland Transport Brownfield programme of actions for each location and other ongoing and future transport initiatives. Kāinga Ora does not consider this is an appropriate or suitable requirement for individual small scale urban development rather than neighbourhood wide approach.

Issues with implementation, monitoring and compliance of Travel Plans

32. In order to add value and achieve its intention i.e. changing the travel modes of future residents and the communities, the Travel Plan rule would need to be implemented and enforced on the ground. For small-scale urban development, particularly residential development which is then sold to individual owners, who will be responsible for ongoing implementation of the travel plan across the development. The monitoring and compliance issue relating to the travel plan is questionable and it will not add value and achieve its original intent.
33. It is considered unlikely that Auckland Council will have the ability or resourcing to monitor the effectiveness and enforce the Travel Plan especially where this requires ongoing reviews given the changes to transport modes over time.

Conclusion

34. Kāinga Ora considers that PC71 & PM14 do not sufficiently give effect to the direction of the NPS-UD, specifically Policy 1(d)(e) and (f), Policy 6 and Policy 11.
35. Kāinga Ora is concerned that the Council has not fully understood the intent of Policy 11(a), and that the proposed changes could be used to require on-site car-parking and thus not promoting the use of public transport, and active travel modes. That would be an inappropriate outcome as the NPS UD is promoting intensification around rapid

⁸ ATAP which in partnership with KO is investigating the public transport and walking and cycling infrastructure to encourage sustainable transport behaviour

transit, frequent public transport routes and promoting active transport modes such as walking and cycling.

Relief Sought

36. Kāinga Ora seeks the following decision from Auckland Council on PC71 and PM 14:

Either:

a) withdraw PC71 and PM14 in its entirety and use non-schedule 1 process to make amendments to objectives, policies, standards and assessment criteria that relate to the removal of minimum parking requirements.

OR, if PC71 and PM14 are not withdrawn;

a) that the proposed provisions of PC71 and PM 14 be deleted or amended (see attached table), to address the matters raised in this submission and its attachment so as to provide for the sustainable management of the City's natural and physical resources and thereby achieve the purpose of the RM Act; and

b) Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.

37. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.

38. Kāinga Ora wishes to be heard in support of this submission.

39. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at a hearing.

Dated this 24th day of March 2022

PP Stuart Bracey
.....

Brendon Liggett

Manager Development Planning

National Planning, Urban Design and Planning Group

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities,

PO Box 74598, Greenlane,

Central Auckland 1546

Email: developmentplanning@kaingaora.govt.nz

Section/Subsection/Provision	Support/ Support in part/Oppose	Reason(s) for submission	<p>Relief sought / decision requested</p> <p>Text proposed as part of the Plan Change is shown as <u>underlined</u> and strikethrough.</p> <p>Text proposed by Kāinga Ora is shown as <u>underlined</u> and strikethrough Consequential amendments may be required to give effect to the relief sought.</p>
E27 Transport			
E27.1.Background	Support in part	<p>Kāinga Ora supports changes to the text of E27.1.Background that reflect the removal of minimum parking requirements directed by the NPS-UD.</p> <p>However, Kāinga Ora considers that the reasoning behind the removal of car-parking requirements needs to be included to support and encourage future developments with low or no parking.</p> <p>Furthermore, the background section should be amended to retain and include text that reflects the need to and benefits of reducing onsite car-parking as identified in the Recommendations and Decisions Report of the NPS-UD.</p>	<p>.....</p> <p>The current predominance of private vehicle travel and the accompanying demand requirements for parking is recognised in terms of both the positive and adverse effects associated with accommodating these parking requirements.</p> <p>Parking is an essential component of Auckland's transport network and the management of parking can have major implications for the convenience, economic viability, design and layout of an area and the function of the transport network. It is important that parking is managed and provided in a manner that supports urban amenity, efficient use of land and the functional requirements of activities. The requirements demand for parking can reflect the trip characteristics of a range of activities at different locations that occur at different times. 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 when supported by the provision of other transport modes achieves a more sustainable transport network.</p>

			<p>The management of parking supply includes a region-wide approach to regulating the amount of parking to support different activities (accessory parking) regulation in areas to limit parking (maximums) and requiring resource consent for non-accessory parking. This regulation generally occurs by requiring parking (minimums) or limiting parking (maximums) or a combination of these approaches. Any controls on parking should reflect the needs of land use and the wider transport system.</p> <p><u>A maximum limit has been set on the amount of parking that can be provided on a site in the Business – City Centre Zone and in the Centre Fringe Office Control as shown on the planning maps for office activities. Car parking is also limited for office activities in all zones, and for education facilities and hospitals in some zones.</u> The overall purpose of limiting parking through maximums is to manage potential parking oversupply and in turn reduce traffic congestion and provide opportunities to improve amenity in areas earmarked for intensification. Maximum parking rates have been set at a level which appropriately provides for the management on-site parking demands.</p> <p>Requiring on-site parking through minimums has generally been used to manage the effects of parking (e.g. spill-over effects) associated with development. Accommodating growth in areas where land is scarce and a highly valued resource requires reconsideration of the use, and benefits and costs of requiring parking. The planning framework to facilitate this growth includes managing parking minimums and recognising situations where removing the requirement to provide parking will have direct land use benefits in regard to reducing development costs, improving housing affordability, optimising investment in parking facilities</p>
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			<p>and supporting the use of public transport. The approach to parking provided with an activity or development is outlined below:</p> <ul style="list-style-type: none"> • there is no requirement for activities or development to provide parking in the following zones and locations: <ul style="list-style-type: none"> o the Business — City Centre Zone; and o Centre Fringe Office Control as shown on the planning maps for office activities. <p>instead, a maximum limit has been set on the amount of parking that can be provided on a site in the Business — City Centre Zone and in the Centre Fringe Office Control as shown on the planning maps for office activities. these areas;</p> <ul style="list-style-type: none"> • there is generally no requirement or limit for activities or development, excluding office, education facilities, hospitals, retail and commercial services, to provide parking in the following zones and locations: <ul style="list-style-type: none"> o Business — Metropolitan Centre Zone: Business — Town Centre Zone, Business — Local Centre Zone and Business — Mixed Use Zone (with the exception of identified non-urban town and local centres); o Centre Fringe Office Control as shown on the planning maps; o Residential — Terrace Housing and Apartment Buildings Zone; and o Residential — Mixed Housing Urban Zone (for studio and one-bedroom dwellings) <p>this approach supports intensification and public transport and recognises that for most of these areas, access to the public transport network will provide an alternative means of travel to private vehicles;</p>
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			<p>• in all other areas, a minimum level of parking is required to accompany any activity or development. A maximum limit is set on the amount of parking that can be provided for offices.</p> <p>Retain the following amended wording from this section</p> <p><u>Accommodating growth in areas where land is scarce and a highly valued resource requires reconsideration of the use, and benefits and costs of onsite parking. The planning framework to facilitate this growth recognises that removing the requirement to provide parking will have direct land use benefits in regard to reducing development costs, improving housing affordability, optimising investment in parking facilities and supporting the use of public transport</u></p>	81.2
E27.2. Objectives	Oppose	PC71 has not amended the objectives for E27. While this may be considered as part of the future plan change that has been signalled by Council, the amendments to other sections of E27 necessitates amendments to these objectives in order to provide consistency with the NPS-UD.	<p>(3) Parking and loading <u>is managed to supports</u> urban growth and the quality compact urban form.</p> <p>(4) The provision of safe and efficient Pparking, loading and access <u>is safe and efficient and, where parking is provided, it is commensurate with the character, scale and intensity and alternative transport options</u> of the zone location.</p>	81.3
Policy E27.3(6)	Support in part	<p>Kāinga Ora supports the introduction of parking maximums for education and hospital activities in certain locations as an action consistent with both the NPS-UD and the GPS-HUD.</p> <p>The policy wording should be amended as limiting supply of on site parking is not related to the management of effects on the safe and</p>	<p>(6) Provide for flexible on-site parking in the Business— Metropolitan Centre Zone, Business—Town Centre Zone, Business—Local Centre Zone and Business—Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by:</p> <p>(a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals.</p>	81.4

		<p>efficient operation of the transport network. This safe operation of the network is also set out in Policy 3.</p>	<p>(b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.</p> <p><u>Limit the supply of on-site parking for education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.</u></p> <p>Proposed amendment</p> <p><u>Limit the supply of on-site parking for education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips. and manage effects on the safe and efficient operation of the transport network</u></p>
<p>Policy E27.3(6A)</p>	<p>Support in part</p>	<p>Kāinga Ora supports the deletion of policies supporting flexible, low or no parking parking provision where they are no longer relevant due</p>	<p>(6A) [deleted] Enable the reduction of on-site parking for retail and commercial services activities in the Business-Metropolitan Centre Zone, Business-Town Centre Zone, Business-Local Centre Zone and Business-Mixed Use Zone where a suitable public offsite parking solution is available and providing for no or reduced on-site</p>

81.5

		to the removal of on-site car parking requirements. Amendments to the policy wording are required to provide consistency with the NPS-UD	parking will better enable the built form outcomes anticipated in these zones. Proposed Amendment E27.3(6A) Support activities providing no or reduced on-site parking where it will enable better built form outcomes.	81.6
Policy E27.3(7)	Support		Retain as notified (7) [deleted] Provide for flexible on-site parking by not limiting or requiring parking for subdivision, use and development (excluding office) in the Centre Fringe Office Control area, Residential – Terrace Housing and Apartment Buildings Zone and Residential – Mixed Housing Urban Zone (studio and one bedroom dwellings).	81.7
E27.4.1 Activity table – new activity (A3a)	Oppose	Kāinga Ora opposes the introduction of a new Restricted Discretionary activity relating to travel demand thresholds for the reasons set out in the submission.	(A3a) Any activity or subdivision which meets or exceeds the travel demand thresholds set out in Standard E27.6.1A. RD (A3a) Any activity or subdivision which meets or exceeds the travel demand thresholds set out in Standard E27.6.1A. RD	81.8
Standard E27.6.1A Travel Demand	Oppose	As set out in the submission, Kāinga Ora opposes the introduction of travel management thresholds relating to small-scale activities as this is inconsistent with the NPS-UD. Travel demand measures utilised by the AUP-OP over the past 6 years have been in association with commercial, education, port and cultural designations and precincts, as such,	(1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required. (2) Standard E27.6.1A does not apply where: (a) a proposal is located in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, or Residential – Terrace Housing and Apartment Building	

		<p>with large-scale operations overseen by an entity or business. It is therefore fair to associate such measures with activities that generate large numbers of trips which existing Standard E27.6.1. and Table E27.6.1.1 Trip Generation, already does. The thresholds set out in this existing standard are consistent with what Kāinga Ora consider “large-scale” activities as contemplated by the NPS UD.</p> <p>The exemption to this rule provided through E27.6.1A (2)(d) is unclear and will create confusion with applicant’s and council reviews of applications. The assessment of ‘traffic effects’ is still required for ‘Four or more dwellings’ in the Mixed Housing Suburban and Mixed Housing Urban zones and therefore this exemption indicates that the Travel Plan rule would not apply.</p>	<p><u>Zone or Centre Fringe Office Control as shown on the planning maps;</u></p> <p><u>(b) development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;</u></p> <p><u>(c) the activity is permitted in the H7 Open space zones; or</u></p> <p><u>(d) there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities.</u></p> <p>(1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required.</p> <p>(2) Standard E27.6.1A does not apply where:</p> <p>(a) a proposal is located in the Business — City Centre Zone, Business — Metropolitan Centre Zone, Business — Town Centre Zone, or Residential — Terrace Housing and Apartment Building Zone or Centre Fringe Office Control as shown on the planning maps;</p> <p>(b) development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation</p>
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81.9

			<p>and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;</p> <p>(c) the activity is permitted in the H7 Open space zones; or</p> <p>(d) there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities.</p>
<p>Table E27.6.1A.1 Development thresholds with a travel plan requirement</p>	<p>Oppose</p>	<p>Kāinga Ora opposes all development thresholds notified in Table E27.6.1A.1 as these limits have not been justified in the Plan Change or s32 analysis and they relate to the new Rule E27.4.1 (A3A) which is opposed.</p> <p>Standard E27.6.1A. and Table E27.6.1A.1 are considered as an uncessacery and inappropriate duplication and extension of Standard E27.6.1 Trip Generation, which already serves the function of setting a threshold for trip generation that justifies the requirement of a Travel Plan.</p> <p>The 10 dwelling number for Dwelling and Visitor Accomodation and 50 unit number for Integrated residential development activities will frustrate many developers attempting to supply housing across Tāmaki Makaurau including Kāinga Ora, by incurring additional time and cost to the consent process without a proportionate justification for avoiding adverse effects. The</p>	<p>Delete the following table inserted through PC71</p> <p>Table E27.6.1A.1 Development thresholds with a travel plan requirement</p>

81.10

		<p>thresholds for all other activities would capture a large number of applications which previously would have been permitted throughout Auckland (where minimum parking levels were met).</p> <p>As such, Kāinga Ora does not consider these thresholds are consistent with the intentions of the NPS-UD Policy 11(a), which directed the removal of parking minimums and a market-led approach to on-site parking provision as a means to enable development capacity.</p> <p>Kāinga Ora is not convinced that this additional assessment requirement will add value to the development process</p>	<table border="1"> <thead> <tr> <th colspan="2">Activity</th> <th>Development threshold</th> </tr> </thead> <tbody> <tr> <td>(T1B)</td> <td>Residential</td> <td>Dwellings</td> <td>10 dwellings</td> </tr> <tr> <td>(T2B)</td> <td></td> <td>Integrated residential development</td> <td>50 units</td> </tr> <tr> <td>(T3B)</td> <td></td> <td>Visitor accommodation</td> <td>10 units</td> </tr> <tr> <td>(T4B)</td> <td rowspan="3">Education facilities</td> <td>Primary</td> <td rowspan="3">All educational facilities</td> </tr> <tr> <td>(T5B)</td> <td>Secondary</td> </tr> <tr> <td>(T6B)</td> <td>Tertiary</td> </tr> <tr> <td>(T7B)</td> <td>Office</td> <td></td> <td>500 m² GFA</td> </tr> <tr> <td>(T8B)</td> <td rowspan="2">Industrial activities</td> <td>Warehousing and storage</td> <td>2,000 m² GFA</td> </tr> <tr> <td>(T9B)</td> <td>Other industrial activities</td> <td>1,000 m² GFA</td> </tr> <tr> <td>(T11B)</td> <td rowspan="3">Community</td> <td>Care centres</td> <td>Accommodating 50 or more children or other people, other than employees</td> </tr> <tr> <td>(T12B)</td> <td>Community facilities</td> <td>Accommodating 50 or more people</td> </tr> <tr> <td>(T13B)</td> <td>Healthcare facilities</td> <td>200 m² GFA</td> </tr> <tr> <td>(T14B)</td> <td>Entertainment facilities</td> <td></td> <td>Accommodating 50 or more people</td> </tr> </tbody> </table>	Activity		Development threshold	(T1B)	Residential	Dwellings	10 dwellings	(T2B)		Integrated residential development	50 units	(T3B)		Visitor accommodation	10 units	(T4B)	Education facilities	Primary	All educational facilities	(T5B)	Secondary	(T6B)	Tertiary	(T7B)	Office		500 m ² GFA	(T8B)	Industrial activities	Warehousing and storage	2,000 m ² GFA	(T9B)	Other industrial activities	1,000 m ² GFA	(T11B)	Community	Care centres	Accommodating 50 or more children or other people, other than employees	(T12B)	Community facilities	Accommodating 50 or more people	(T13B)	Healthcare facilities	200 m ² GFA	(T14B)	Entertainment facilities		Accommodating 50 or more people
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<p>Standard E27.6.2(5)</p>	<p>Support</p>	<p>Kāinga Ora supports the deletion of text relating to policies that were previously required to support flexible, low or no parking parking provision, in order to create consistency between text and tables.</p>	<p>Retain as notified</p>	<p>81.11</p>																																															
<p>Standard E27.6.3.1(1)(c)</p>			<p>Retain as notified</p>	<p>81.12</p>																																															

<p>Matter of Discretion E27.8.1</p>	<p>Oppose</p>	<p>As set out in the submission, Kāinga Ora views this requirement as creating an additional barrier to development by incurring additional time and cost to the consent process and by creating an alternative mechanism to require car parking.</p> <p>The wording of this matter of discretion is ambiguous and will create confusion to the assessment of consent applications. In particular, the consideration of the adequacy of the Travel Plan which could be said to have been met if all of the content listed in the rule are provided. It is clear that the intention of the rule is a review of the adequacy of the findings of the Travel Plan with this assessment reliant on the opinion and information available to the reviewer.</p> <p>Of note are the factors that the Government considered relevant to removing parking minimums across Aotearoa's Tier 1, 2 and 3 Councils rather than allowing the Council to decide where to apply parking requirements (taken from the Beca NPS UD s32 report March 2020 page 70):</p> <p><i>Setting minimum car parking rates which meets actual demand would be highly complex as it would need to take into consideration potentially hundreds of factors which are constantly changing. It is therefore expected</i></p>	<p>E27.8.1. Matters of discretion The Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application.</p> <p>...</p> <p><u>(4A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:</u> <u>(a) adequacy of the travel plan required under E27.9(2)(b)</u> <u>(b) effects on the transport network.</u></p> <p>Proposed Amendment</p> <p>(4A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A: (a) adequacy of the travel plan required under E27.9(2)(b) (b) effects on the transport network.</p>
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81.13

		<p><i>that car parking rates are out pacing actual demand.</i></p> <p><i>√ The nature of vehicle transport is changing, such as through the uptake of car share (app-based taxis) and could continue to change further as technology changes occur and user habits change, a more responsive approach is required in favour of current minimum parking rates.</i></p> <p><i>√ Car parking rates are generally set at rates independent of location, accessibility and demand, moving to market based approach for parking minimums will result in an approach which is more responsive and dependant on location, accessibility and demand.</i></p> <p>With the proposed insertion Matters of discretion E27.8.1 (4A), the matters of consideration above will now fall to decision makers on individual applications thus based on their opinion of whether the travel demand plan is adequate.</p>	
<p>Assessment criteria E27.8.2</p>	<p>Oppose</p>	<p>Kāinga Ora opposes this assessment criteria which is related to the new rule for Travel Plans for the reasons set out in the submission.</p> <p>In particular, this assessment requires consideration of the availability of public transport, cycle lanes, footpath upgrades and other transport initiatives for each application site where there is currently little information</p>	<p>E27.8.2 Assessment criteria The Council will consider the relevant assessment criteria for restricted discretionary activities from the list below: ...</p> <p><u>(3A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:</u></p> <p><u>(a) the extent to which the travel demands of the activity are provided for, including but not limited to:</u></p>

		<p>publicly available for applicants. Auckland Transport would need to provide this information to all applicants and Council reviewers for each application. This would create a considerable burden on Auckland Transport in order to ensure a consistent and informed assessment. Not to mentioned the time, cost and delays that would be added to the resource consenting process of housing development.</p> <p>The requirement to consider PT, and active modes options would be better served by Auckland Transport providing a city-wide review of public transport accessibility zones and other transport improvements which would indicate current, short-term and long-term strategies and programmed works. Kāinga Ora note that individual developers have little control over the upgrade of existing public transport services or the provision of new public transport services in relation to any development site.</p> <p>This regionwide strategy would provide developers with guidance when making market decisions on transport options and onsite parking provision for their future users.</p>	<p><u>(i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:</u></p> <ul style="list-style-type: none"> • <u>the accessibility and frequency of public transport services</u> • <u>the standard of active modes infrastructure for all users</u> • <u>the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments</u> <p><u>(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking</u></p> <p><u>(b) the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.</u></p> <p><u>(c) the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).</u></p> <p>...</p> <p>(3A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:</p> <p>(a) the extent to which the travel demands of the activity are provided for, including but not limited to:</p> <p>(i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:</p> <ul style="list-style-type: none"> • the accessibility and frequency of public transport services • the standard of active modes infrastructure for all users
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81.14

			<p>• the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments</p> <p>(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking</p> <p>(b) the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.</p> <p>(c) the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).</p> <p>---</p>
<p>Special information requirement E27.9(2)(b)</p>	<p>Oppose</p>	<p>Kāinga Ora opposes the triggering of a special information requirement by meeting or exceeding the notified new development thresholds.</p> <p>It is Kāinga Ora’s view that the addition of standard E27.9(2)(b) is illogical and inappropriate (as it is considered to be double dipping), with the activities requiring travel plans already managed by Rule E27.4.1 (A3) for activities exceeding the Trip Generation Thresholds in Rule E27.6.1.</p>	<p>(2) Travel plan: (a) a travel plan may be required as part of an assessment of environmental effects where a proposal exceeds the trip generation threshold, <u>or</u> provides more parking than the maximums specified or fewer than the minimums specified. A travel plan will not be required where the infringement of the parking standards is minor in relation to the scale of the activity and associated parking proposed. <u>(b) a travel plan is required as part of an assessment of environmental effects where a proposal meets or exceeds a new development threshold in Standard E27.6.1A.</u></p> <p><i>Proposed Deletion</i></p>

		The addition of E27.9(2)(b) which relates to Standard E27.6.1A (Development thresholds), may lead to on-site car-parking being required through the consent process and as such is not consistent with Policy 11(a) of the NPS-UD.	(2) Travel plan: (a) a travel plan may be required as part of an assessment of environmental effects where a proposal exceeds the trip generation threshold, or provides more parking than the maximums specified or fewer than the minimums specified . A travel plan will not be required where the infringement of the parking standards <u>maximums</u> is minor in relation to the scale of the activity and associated parking proposed. (b) a travel plan is required as part of an assessment of environmental effects where a proposal meets or exceeds a new development threshold in Standard E27.6.1A.	81.15
				81.16
E27.9(3) Special information requirement	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP.	Retain as notified	81.17
E38 Urban Subdivision				
Subdivision Standard E38.9.1.2(1)	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP.	Retain as notified	81.18
E40 Temporary activities				
Policy E40.3(5)	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-UD	Retain as notified Support deletion of E40.3(5)(b)	81.19
Assessment Criteria E40.8.2(2)	Support		Retain as notified	81.20

			Support deletion of E40.8.2(2)(d)	
B8 Coastal environment & F2, F3, F5, F6 Coastal zones				
B8.6 Explanation and principal reasons for adoption	Support	Kāinga Ora supports all updates in text relating to the Coastal environment and coastal zones, that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-UD.	Retain as notified changes to text to remove terms “car parking” "parking requirements" and phrasing relating to parking requirements and adequacy from policies, matters of discretion and assessment relation to parking, remove assessment criteria regarding parking adequacy.	81.21
Policy F2.17.3(3)				81.22
Matter of discretion F3.8.1(3)(a)				81.23
Matter of discretion F3.8.1(4)(a)				81.24
Assessment criteria F3.8.2(3)(c)				81.25
Assessment criteria F3.8.2(4)(f)				81.26
Assessment criteria F5.8.2(1)(c)				81.27
Assessment criteria F5.8.2(3)(f)				81.28
Policy F6.3(1)(e)				81.29
Policy F6.3(8)(d)				81.30
H1-H6 Residential Zones				
Assessment Criteria H1.8.2(1)(d)(i)	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-	Retain as notified Changes to the Assessment Criteria of all zones as notified below:	81.31

Assessment Criteria H2.8.2(1)(d)(i)		UD, and as such, assessments of the adequacy of parking provision is no longer in scope.	(d) location and design of parking and access:	81.32
Assessment Criteria H3.8.2(1)(c)(i)			(i) whether adequate parking and access is provided or required.	81.33
Assessment Criteria H4.8.2(1)(d)(i)				81.34
Assessment Criteria H5.8.2(1)(d)(i)				81.35
Assessment Criteria H6.8.2(1)(d)(i)				81.36
H20-H21 Rural Zones				
H20.8.2(1)(f) and H21.8.2(1)(f)	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-UD, and as such, assessments of the adequacy of parking provision is no longer in scope.	Retain as notified modifications to Assessment Critiria to delete the term "adequate parking and" to support assessment of "the extent to which the activity provides safe driveway access and sight lines."	81.37
				81.38
J- Definitions				
Accessory activities Non-accessory parking Off-site parking	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-UD.	Retain as notified	81.39

<p>Travel Plan</p>	<p>Oppose/Oppose in part</p>	<p>Kāinga Ora acknowledges the intention of the Travel Plan as a means to assess whether development is contributing the Auckland Region’s long term goals relating to transport, climate change and wellbeing. These Travel Plans are suitable for high trip generating activities as already provided for through the Trip Generation rule. These plans are unnecessary and unreasonable as a requirement for small-scale developments (as set out in the new Development Threshold for a Travel Plan rule).</p> <p>Kāinga Ora opposes the notified Travel Plan definition however, due to its poor applicability to residential and mixed-use developments.</p> <p>The Travel Plan asks proposals to assess matters that would be outside the scope of many 10 unit residential developments and beyond the control of all private developments.</p> <p>Requesting developers of private, freehold housing to describe “details of the ongoing activities and processes...” is not possible when the future residents and their travel habits are unknown and there are no mechanisms to control individuals travel behaviour.</p> <p>This also applies to bullet point 4. Following the delivery of freehold housing, there is no way for</p>	<p>Travel Plan</p> <p>A plan which sets out how travel demand is to be managed for a particular site or proposal to:</p> <ul style="list-style-type: none"> • maximise the efficient use of transport <u>networks</u> and systems; and • promote <u>and</u> enable the use of more sustainable and active modes of transport such as public transport, walking and cycling, and carpooling, <u>car sharing and micro mobility</u> as alternatives to sole occupancy private <u>cars. and</u> • <u>manage the efficient use of limited land resources such as by removing or limiting onsite car parking and loading areas.</u> <p>A travel plan <u>may</u> includes:</p> <ul style="list-style-type: none"> • a description of the site and the proposal; • details of the physical infrastructure that is or will be established on the site to support the use of walking and cycling, public transport, carpooling, <u>car sharing and micro mobility;</u> • <u>details of the ongoing activities and processes that will be used to support the use of walking and cycling, public transport, carpooling, car sharing and micro mobility;</u> • details of how the travel plan is to be communicated, promoted, implemented, and monitored <u>and reviewed;</u> • information about the amount and nature of any <u>onsite parking and loading (whether onsite or on the street)</u> and <u>how this</u> is to be managed to support efficient use and promote alternatives <u>travel modes;</u> and • expected outcomes from <u>its implementation.</u> <p><u>Note</u> Best practice guidance on the preparation of a travel plan can be provided by Auckland Transport. A travel plan is also sometimes referred to as a travel demand management plan.</p>
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81.40

	<p>Kāinga Ora or any other developer to hold future residents to the requirements of a Travel Plan, and as such, monitor and review of these plans.</p> <p>Accordingly, Kāinga Ora believes these forms of development should not be required to provide a Travel Plan.</p> <p>Kāinga Ora also opposes these small scale development having to provide travel plans as a part of their consent process, 1) due the additional time and expertise for such plans being an additional barrier to development and 2) due to the duplication of requirements such as minimum bike parking E27.6.2.5), end of journey facilities (E27.6.2.6) and loading spaces (E27.6.2.7) rates. Furthermore, guidance and supporting information should be provided by Auckland Transport to allow a fair and reasonable assessment. The proposed additional wording at the bottom of the definition refers to this information from AT.</p> <p>It is Kāinga Ora’s view that the requirement for a Travel Plan for small scale developments (as set out in the Development Thresholds is beyond the scope of its discretion in light of Policy 11(a) of the NPS-UD.</p>	<p>Refer to Auckland Transport website which provides information on existing and proposed public transport areas, parking strategies and infrastructure upgrades and their timing across Auckland.</p>
<p>Precincts</p>		

All changes proposed to Precincts identified in PC 71	Support	Kainga Ora supports modifications to policies, matters of discretion and assessment criteria within precinct chapters that achieve Policy 11(a) of the NPS-UD by deleting references to parking sufficiency, adequacy, overspill, required parking and directing assessment to provision of specialised parking facilities and accessways (i.e boat trailers or disabled parking).	Retain as notified	81.41
I - Special Housing Areas				
Birdwood 2 Special Housing Area 4.2(iv)	Support	Kāinga Ora supports the modification of SHA controls and assessment criteria that are consistent with Policy 11(a) of the NPS-UD and replace the term “requires” or “required” with “provides” or “provided” and deletes phrases that direct for car-parking to be assessed according to sufficiency or adequacy.	Retain as notified	81.42
Huapai Triangle Special Housing Area 6.4(19)(b) & 6.4(23)	Support		Retain as notified	
Mangere Gateway Sub-Precinct E Special Housing Area 5.1.1(4) & 5.1.2(5) a	Support		Retain as notified	
Whenuapai 1 Special Housing Area 5.1.1(4) & 5.1.2(5)	Support		Retain as notified	
Auckland Council District Plan – Hauraki Gulf Islands Section				

<p>All changes notified for 5.9(3) 10a.18.8.2(2), 11.3.2(7)(a), 13.2.5, 13.3.4.1(1), 13.3.4.2(4), 13.4.5, 13.4.7, 13.4.8, 13.6.1 , 13.7.1, 13.7.4(1), 13.7.4(4), 13.7.5, Part 14: Definitions</p>	<p>Support</p>	<p>Kāinga Ora supports the updating of the plan's text to give effect to Policy 11(a) of the NPS-UD. Kāinga Ora supports amendments that limit Council's discretion to opportunities to reduce car-parks when proposals involve an excess number of 25 car-parks</p>	<p><i>Retain as notified .</i></p>
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81.43

Attn: Manager, Plans and Places

Auckland Council
Level 24, 135 Albert Street
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Auckland 1142

Submission sent via email: unitaryplan@aucklandcouncil.govt.nz

**SUBMISSION ON PROPOSED PLAN CHANGE 71: NPS-UD REMOVAL OF
CARPARKING MINIMUMS – CONSEQUENTIAL TECHNICAL AMENDMENTS
FROM KĀINGA ORA – HOMES AND COMMUNITIES**

Introduction

Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) at the address for service set out below makes the following submission on the Proposed Plan Change 71 and Plan Modification 14 (“**PC71 & PM 14**”) to the Auckland Unitary Plan Operative in Part (“**AUP-OP**” or “**the Plan**”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

This submission provides an overview of the matters of interest to Kāinga Ora and changes sought with **Attachment 1** providing the substantive detail of submission matters.

Background to Kāinga Ora and its Submission

1. Kāinga Ora Homes and Communities was established in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019 (“**KOHC Act**”) and is required to give effect to Government policies.

2. Kāinga Ora is now the Government's delivery entity for housing and urban development. Kāinga Ora will therefore work across the entire housing spectrum to build complete, diverse communities. As a result, Kāinga Ora has two core roles:
 - a) being a world class public housing landlord; and
 - b) leading and co-ordinating urban development projects.
3. Kāinga Ora's statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) provide people with good quality, affordable housing choices that meet diverse needs;
 - b) support good access to jobs, amenities, and services; and
 - c) otherwise sustain or enhance the overall economic, social, environmental, and cultural well-being of current and future generations.
4. Kāinga Ora customers are people who face barriers (for a number of reasons) to housing in the wider rental and housing market. In general terms, housing supply issues have made housing less affordable around New Zealand and as such there is an increased demand for public housing.
5. In the Auckland Tāmaki Makaurau context, the housing portfolio managed by Kāinga Ora comprises approximately 30,000 dwellings (as of 30 June 2021).¹ The Auckland Housing Programme is Kāinga Ora's key program to reconfigure and grow its housing stock to provide warm and dry homes and sufficient stocks for public housing.
6. Kāinga Ora also play a role in urban development throughout New Zealand. The legislative functions of Kāinga Ora, as outlined in section 13 of the KOHC Act, illustrate this broad mandate and outline two key roles of Kāinga Ora in that regard:

¹ Kāinga Ora Annual Report 2020/2021

- a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
 - b) providing a leadership or coordination role to urban development more generally.
7. Notably, Kāinga Ora statutory functions in relation to urban development now extend beyond the development of housing in relation to the development and renewal of urban environments. It now also includes enabling or providing related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works within its development areas. Therefore, in reviewing policy documents around the country, Kāinga Ora also has an interest in how local authorities are encouraging integrated urban growth.
8. Section 26 of the KOHC Act also directs that Kāinga Ora must give effect to the Government Policy Statement on Housing and Urban Development (GPS-HUD) when performing its functions. The 2021 GPS-HUD identifies four key outcomes, two of these outcomes are of particular relevance to this submission being '*Thriving and resilient communities*' and '*An adaptive and responsive system*'. The prior identifies urban places in Aotearoa should help reduce emissions and to be centred around public transport and active transport networks. The latter envisions Aotearoa's housing system as integrated and self-adjusting with regulatory and institutional settings that enable increased housing supply and urban change (densification and expansion, mixed land use, accessibility, connectivity).
9. One of the objectives of the National Policy Statement on Urban Development ('NPS-UD') 2020 seeks to improve housing affordability by supporting competitive land and development markets and to create environments that support reductions in greenhouse gas emissions via removing the subsidy on car parking which increases demand for emission generating car use. In accordance with Policy 11 of the NPS-UD, parking minimums were removed from the AUP-OP recently (11 February 2022) utilising the RMA non-schedule 1 process.

10. The NPS-UD Recommendations and Decisions Report², comment that the intent of Policy 11 is to “*create more efficient land use, provide more space for housing and reduce development costs*” and “*car parking is over supplied as a result of parking regulations in district plans*”³ (page 63). Accordingly, the NPS-UD has the intent of transitioning car-parking supply in Aotearoa to a market-based approach. PC71/PM14 are therefore required to reflect these intentions.

Scope of Submission

11. Kāinga Ora seeks the withdrawal of PC 71 and PM 14 in entirety. The NPS-UD provides for the consequential changes to text to remove reference to requirement of minimum parking without a schedule 1 process to the RMA to give effect to policy 11(a). Kāinga Ora notes that PC71 introduces new provisions and rules which go beyond a ‘consequential change’ and Kāinga Ora is opposed to these rules being introduced to the AUP-OP through PC71 and PM14.

12. If PC71 and PM14 are not withdrawn, Kāinga Ora’s position on PC71 and PM14 is oppose in part to remove the travel plan provisions to ensure the AUP-OP remain consistent with the purpose and outcomes sought in the NPS-UD. See attachment A for details of its submission on the PC 71 and PM 14.

13. The key submission is that Kāinga Ora’s consider the new **Rule E27.6.1A Travel Demand** and its related requirement and assessment could see small scale urban developments with reduced or no carparking not supported by the Council based on short-term, site-specific considerations and thereby a means to require additional parking or decline applications. These new provisions are opposed for the reasons set out below and in the attachment.

² Ministry for the Environment and Ministry of Housing and Urban Development. 2020. Recommendations and decisions report on the National Policy Statement on Urban Development dated July 2020

³ P63 of the NPSUD Recommendations and Decisions Report dated July 2020

The submission is:

14. If the plan change is not withdrawn, Kāinga Ora, opposes PC71 in part, for the reasons set out below and in the attachment.
15. Provided that the relief sought above and attached is granted:
- a) The PC71 and PM 14 will be in accordance with the purpose and principles of the Resource Management Act 1991 (“the Act”) and will be appropriate in terms of section 32 of the Act; and
 - b) The potential adverse effects that might arise from activities provided for by PC71 will have been addressed appropriately.
16. In the absence of the relief sought, the opposed sections of PC71 and PM14:
- a) are contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;
 - b) will not meet statutory obligations under the NPS-UD;
 - c) will in those circumstances impact significantly and adversely on the ability of people and communities to provide for their social, economic, and cultural wellbeing; and
 - d) does not provide a framework to enable the delivery of sustainable, inclusive, and thriving communities.
17. In particular, but without limiting the generality of the above:

Details of the submission are:

The proposed travel demand plan is a new tool and is not a consequential amendment to the removal of the carparking minima

18. The purpose of PC71 states “*The proposed changes are necessary to ensure that both plans continue to function as intended following the removal of car parking minimums*”. One of the objectives of PC71 is “*Ensure that the AUP*

and the HGI Plan continue to adequately address any adverse effects on the transport network after minimum car parking requirements are removed from the plans”.

19. The NPS-UD (section 3.38) specifically provided for Councils to make amendments to objectives, policies, rules, or assessment criteria without using a schedule 1 process. The majority of the PC71 and PM14 changes can be made without the Plan Change. Kāinga Ora therefore consider that the entire Plan Change should be withdrawn, and that process be used instead where it relates to removing reference to minimum and required parking throughout the plans’ objectives, policies, and assessment matters.
20. With respect to the introduction of new rule, standards and assessment relating to Travel Plans⁴, (being Activity E27.4.1(A3a), Standard E27.6.1A, Table E27.6.1A.1 Development thresholds with a travel plan requirement, matter of discretion E27.8.1 (4A), assessment criteria E27.8.2(3A Special information requirement E27.9(2)(b)) insufficient cost and benefits assessment has been provided to support the travel management plan requirement and the proposed thresholds for urban development that will be subject to that requirement. The supporting s32 does not provide details of how this tool was considered appropriate and also to be considered as a consequential change to the car parking minimum removal.
21. If it is considered, however, that a Schedule 1 process is necessary, the amendments that remove reference to parking minimums are supported generally and the introduction of a Travel Plan⁵ requirement is opposed for the reasons set out below.
22. The proposed tool will add time, cost, and delay to urban development.

⁴ Sections 6, 7, 10, 11 and 12 of PC71

⁵ Under new Restricted Discretionary Activity E27.4.1(A3a)

23. The proposed Travel Plan standard contradicts the NPS-UD intent being the removal of parking minimums to support urban intensification by way of travel mode shifts to public transport, and other active modes. The new rule merely introduces an administrative hurdle⁶ (involving the applicant's preparation of the Travel Plan and the Council's assessment, monitoring and enforcement) and significantly increase the processing time, and cost of resource consent applications. Kāinga Ora considers that majority of these smaller scale urban development will not benefit from the requirement for a travel plan.
24. The new rule appears to be driven by a concern that parking will occur off site and thus having residents parking on streets. The Recommendations and Decisions report for the NPS-UD⁷ makes it clear that by focussing on parking management plans for a wider area rather than looking at parking on an individual site/development/ consent basis, Council can provide the required strategic overview of parking needs and alternative transport options especially public transport over the medium and long term. Kāinga Ora encourages Auckland Council or Auckland Transport to provide these region wide initiatives or strategies as soon as practicable. We note that Auckland Transport will be releasing a consultation document in April on an Auckland Wide Parking Strategy. This parking strategy (along with publicly available information on public transport accessibility zones and upgrade projects Auckland wide) could be factored into the developers' market decisions about the provision of onsite parking for their development.
25. Kainga Ora considers that the development thresholds in Table E27.6.1A.1 for urban activities to provide a travel plan will now capture small urban developments that would not previously be required to provide a transport assessment or would have already needed to provide one subject to existing AUP-OP zone provisions. The s32 analysis did not clarify or justify how these thresholds were reached. The existing AUP-OP Trip Generation rule already

⁶ Restricted Discretionary activity status introduced for activities that exceed Development Thresholds (rule E27.4.1(A3a))

⁷ Section 13, page 65 of the Ministry for the Environment and Ministry of Housing and Urban Development. 2020. Recommendations and decisions report on the National Policy Statement on Urban Development dated July 2020

require large urban scale development to assess its transport effects. This trip generation rule already meets and is better aligned with NPS-UD's intention. Kainga Ora considers it is unnecessary to introduce a new rule at the small scale of activities identified in the Travel Plan rule.

26. The exemption to the Travel Plan rule provided through E27.6.1A (2)(d)) is unclear and will create confusion with applicants and council reviews of applications. This will again delay and increase cost to the already complicated consenting process. It is noted that assessment of 'traffic effects' is still required for 'Four or more dwellings' in the Mixed Housing Suburban and Mixed Housing Urban zones and therefore this exemption indicates that the Travel Plan rule would not apply.

27. The Travel Plan assessment includes matters that extend beyond the control of applicants and generally what is not required from individual small scale urban development. The assessment criteria for the provisions of the Travel Plan rule that are of particular concern are below (emphasis added):

*i. the **adequacy** of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:*

- *the **accessibility and frequency** of public transport services*
- *the **standard of active modes infrastructure** for all users*
- *the **connectivity of the site** by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments*

28. This assessment involves a review of public transport availability, cycle lanes, footpath upgrades and other transport initiatives for each site. This information is generally not publicly available. As such, Auckland Transport would need to provide this information to all applicants and to Council to satisfy this review. Providing assessment on these matters are beyond the control of the applicant and is an unreasonable request as well as adding time, cost, and delays. This

will also create a significant burden on Auckland Council, and Auckland Transport to provide information and assist with informed assessment.

29. In terms of meeting the assessment matter of **adequacy** of the Travel Plan⁸, is providing all of the content as outlined in the rule for the travel plan considered as adequate? Or does the rule enable a review of the **findings** of the Travel Plan adequacy?
30. In terms of who makes the assessments and in order to retain control over the market led response, Kāinga Ora questions if Auckland Transport is going to be involved in all applications that exceed the development threshold or is this going to rely on Council planners and Transport Engineers making their own judgement calls on the merits of the Travel Plan. If Auckland Transport is involved, then this will lead to further delays to the assessment of applications and put additional resourcing requirements on Auckland Transport (where there is already capacity issues). If Auckland Transport is not involved, then these assessments will be made without the guidance on parking and public transport strategies for the location and will be based on the individuals' views on the transport options put forward. There is potential therefore for the merits of the removal of minimum parking and the NPS-UD intents to be revisited on each application and that an unwritten parking requirement is applied in every case (i.e., based on an assumption that at least 50% of occupants/users will drive).
31. In order to make a comprehensive assessment of the Travel Plan, applicants and Council reviewers would need to consider the short-, medium- and long-term transport options for a site. This could involve a number of documents such as the Auckland Plan, the Draft Regional Land Transport Plan 2021-2031, the Auckland Transport Alignment Project (ATAP)⁹, Auckland Transport Brownfield programme of actions for each location and other ongoing and future transport initiatives. Kāinga Ora does not consider this is an appropriate

⁸ Matter of discretion E27.8.1(4A)(a)

⁹ ATAP which in partnership with KO is investigating the public transport and walking and cycling infrastructure to encourage sustainable transport behaviour

or suitable requirement for individual small scale urban development rather than neighbourhood wide approach.

Issues with implementation, monitoring and compliance of Travel Plans

32. In order to add value and achieve its intention i.e., changing the travel modes of future residents and the communities, the Travel Plan rule would need to be implemented and enforced on the ground. For small-scale urban development, particularly residential development, which is then sold to individual owners, who will be responsible for on-going implementation of the travel plan across the development. The monitoring and compliance issue relating to the travel plan is questionable and it will not add value and achieve its original intent.
33. It is considered unlikely that Auckland Council will have the ability or resourcing to monitor the effectiveness and enforce the Travel Plan especially where this requires ongoing reviews given the changes to transport modes over time.

Conclusion

34. Kāinga Ora considers that PC71 & PM14 do not sufficiently give effect to the direction of the NPS-UD, specifically Policy 1(d)(e) and (f), Policy 6 and Policy 11.
35. Kāinga Ora is concerned that the Council has not fully understood the intent of Policy 11(a), and that the proposed changes could be used to require on-site car-parking and thus not promoting the use of public transport, and active travel modes. That would be an inappropriate outcome as the NPS-UD is promoting intensification around rapid transit, frequent public transport routes and promoting active transport modes such as walking and cycling.

Relief Sought

36. Kāinga Ora seeks the following decision from Auckland Council on PC71 and PM 14:

Either:

a) withdraw PC71 and PM14 in its entirety and use non-schedule 1 process to make amendments to objectives, policies, standards, and assessment criteria that relate to the removal of minimum parking requirements.

OR, if PC71 and PM14 are not withdrawn;

a) that the proposed provisions of PC71 and PM 14 be deleted or amended (see attached table), to address the matters raised in this submission and its attachment so as to provide for the sustainable management of the City’s natural and physical resources and thereby achieve the purpose of the RM Act; and

b) Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.

37. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.

38. Kāinga Ora wishes to be heard in support of this submission.

39. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at a hearing.

Dated this 24th day of March 2022



.....

Gurv Singh

Acting Manager Development Planning
National Planning, Urban Design and Planning Group

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland 1546. Email: developmentplanning@kaingaora.govt.nz

Section/Subsection/Provision	Support/ Support in part/Oppose	Reason(s) for submission	Relief sought / decision requested Text proposed as part of the Plan Change is shown as <u>underlined</u> and strikethrough . Text proposed by Kāinga Ora is shown as <u>underlined</u> and strikethrough Consequential amendments may be required to give effect to the relief sought.
E27 Transport			
E27.1.Background	Support in part	<p>Kāinga Ora supports changes to the text of E27.1.Background that reflect the removal of minimum parking requirements directed by the NPS-UD.</p> <p>However, Kāinga Ora considers that the reasoning behind the removal of car-parking requirements needs to be included to support and encourage future developments with low or no parking.</p> <p>Furthermore, the background section should be amended to retain and include text that reflects the need to and benefits of reducing onsite car-parking as identified in the Recommendations and Decisions Report of the NPS-UD.</p>	<p>.....</p> <p>The current predominance of private vehicle travel and the accompanying demand requirements for parking is recognised in terms of both the positive and adverse effects associated with accommodating these parking requirements.</p> <p>Parking is an essential component of Auckland’s transport network and the management of parking can have major implications for the convenience, economic viability, design and layout of an area and the function of the transport network. It is important that parking is managed and provided in a manner that supports urban amenity, efficient use of land and the functional requirements of activities. The requirements demand for parking can reflect the trip characteristics of a range of activities at different locations that occur at different times. 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 when supported by the provision of other</p>

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			<p>transport modes achieves a more sustainable transport network. The management of parking supply includes a region-wide approach to regulating the amount of parking to support different activities (accessory parking) regulation in areas to limit parking (maximums) and requiring resource consent for non-accessory parking. This regulation generally occurs by requiring parking (minimums) or limiting parking (maximums) or a combination of these approaches. Any controls on parking should reflect the needs of land use and the wider transport system.</p> <p><u>A maximum limit has been set on the amount of parking that can be provided on a site in the Business – City Centre Zone and in the Centre Fringe Office Control as shown on the planning maps for office activities. Car parking is also limited for office activities in all zones, and for education facilities and hospitals in some zones.</u> The overall purpose of limiting parking through maximums is to manage potential parking oversupply and in turn reduce traffic congestion and provide opportunities to improve amenity in areas earmarked for intensification. Maximum parking rates have been set at a level which appropriately provides for the management on-site parking demands.</p>

Section/Subsection/Provision	Support/ Support in part/Oppose	Reason(s) for submission	Relief sought / decision requested Text proposed as part of the Plan Change is shown as <u>underlined and strikethrough</u> . Text proposed by Kāinga Ora is shown as <u>underlined and strikethrough</u> Consequential amendments may be required to give effect to the relief sought.
			<p>Requiring on-site parking through minimums has generally been used to manage the effects of parking (e.g. spill-over effects) associated with development. Accommodating growth in areas where land is scarce and a highly valued resource requires reconsideration of the use, and benefits and costs of requiring parking. The planning framework to facilitate this growth includes managing parking minimums and recognising situations where removing the requirement to provide parking will have direct land use benefits in regard to reducing development costs, improving housing affordability, optimising investment in parking facilities and supporting the use of public transport. The approach to parking provided with an activity or development is outlined below:</p> <ul style="list-style-type: none"> • there is no requirement for activities or development to provide parking in the following zones and locations: <ul style="list-style-type: none"> o the Business — City Centre Zone; and o Centre Fringe Office Control as shown on the planning maps for office activities. <p>instead, a maximum limit has been set on the amount of parking</p>

Section/Subsection/Provision	Support/ Support in part/Oppose	Reason(s) for submission	Relief sought / decision requested Text proposed as part of the Plan Change is shown as <u>underlined and strikethrough</u> . Text proposed by Kāinga Ora is shown as <u>underlined and strikethrough</u> Consequential amendments may be required to give effect to the relief sought.
			<p>that can be provided on a site in the Business — City Centre Zone and in the Centre Fringe Office Control as shown on the planning maps for office activities. these areas;</p> <ul style="list-style-type: none"> • there is generally no requirement or limit for activities or development, excluding office, education facilities, hospitals, retail and commercial services, to provide parking in the following zones and locations: o Business — Metropolitan Centre Zone: Business — Town Centre Zone, Business — Local Centre Zone and Business — Mixed Use Zone (with the exception of identified non-urban town and local centres); o Centre Fringe Office Control as shown on the planning maps; o Residential — Terrace Housing and Apartment Buildings Zone; and o Residential — Mixed Housing Urban Zone (for studio and one-bedroom dwellings) <p>this approach supports intensification and public transport and recognises that for most of these areas, access to the public transport network will provide an alternative means of travel to private vehicles;</p>

Section/Subsection/Provision	Support/ Support in part/Oppose	Reason(s) for submission	Relief sought / decision requested Text proposed as part of the Plan Change is shown as <u>underlined</u> and strikethrough . Text proposed by Kāinga Ora is shown as <u>underlined</u> and strikethrough Consequential amendments may be required to give effect to the relief sought.
			<p>• in all other areas, a minimum level of parking is required to accompany any activity or development. A maximum limit is set on the amount of parking that can be provided for offices.</p> <p>Retain the following amended wording from this section</p> <p><u>Accommodating growth in areas where land is scarce and a highly valued resource requires reconsideration of the use, and benefits and costs of onsite parking. The planning framework to facilitate this growth recognises that removing the requirement to provide parking will have direct land use benefits in regard to reducing development costs, improving housing affordability, optimising investment in parking facilities and supporting the use of public transport</u></p>
E27.2. Objectives	Oppose	PC71 has not amended the objectives for E27. While this may be considered as part of the future plan change that has been signalled by Council, the amendments to other sections of E27 necessitates amendments to these objectives in order to provide consistency with the NPS-UD.	<p>(3) Parking and loading <u>is managed to supports</u> urban growth and the quality compact urban form.</p> <p>(4) The provision of safe and efficient Pparking, loading and access <u>is safe and efficient and, where parking is provided, it is commensurate with the character, scale and intensity and alternative transport options</u> of the zone location.</p>

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Policy E27.3(6)	Support in part	<p>Kāinga Ora supports the introduction of parking maximums for education and hospital activities in certain locations as an action consistent with both the NPS-UD and the GPS-HUD.</p> <p>The policy wording should be amended as limiting supply of on site parking is not related to the management of effects on the safe and efficient operation of the transport network. This safe operation of the network is also set out in Policy 3.</p>	<p>(6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) by:</p> <p>(a) not limiting parking for subdivision, use and development other than for office activities, education facilities and hospitals.</p> <p>(b) not requiring parking for subdivision, use and development other than for retail (excluding marine retail and motor vehicle sales) and commercial service activities.</p> <p><u>Limit the supply of on-site parking for education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking</u></p>

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			<p><u>and cycling trips and manage effects on the safe and efficient operation of the transport network.</u></p> <p>Proposed amendment</p> <p><u>Limit the supply of on-site parking for education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips. and manage effects on the safe and efficient operation of the transport network</u></p>
Policy E27.3(6A)	Support in part	Kāinga Ora supports the deletion of policies supporting flexible, low or no parking parking provision where they are no longer relevant due to the removal of on-site car parking requirements.	(6A) [deleted] Enable the reduction of on-site parking for retail and commercial services activities in the Business-Metropolitan Centre Zone, Business-Town Centre Zone, Business-Local Centre Zone and Business-Mixed Use Zone where a suitable public offsite parking solution is available and providing for no or reduced on-site parking will better enable the built form outcomes anticipated in these zones.

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		Amendments to the policy wording are required to provide consistency with the NPS-UD	Proposed Amendment <u>E27.3(6A) Support activities providing no or reduced on-site parking where it will enable better built form outcomes.</u>
Policy E27.3(7)	Support		Retain as notified (7) Provide for flexible on-site parking by not limiting or requiring parking for subdivision, use and development (excluding office) in the Centre Fringe Office Control area, Residential – Terrace Housing and Apartment Buildings Zone and Residential – Mixed Housing Urban Zone (studio and one bedroom dwellings).
E27.4.1 Activity table – new activity (A3a)	Oppose	Kāinga Ora opposes the introduction of a new Restricted Discretionary activity relating to travel demand thresholds for the reasons set out in the submission.	<u>(A3a) Any activity or subdivision which meets or exceeds the travel demand thresholds set out in Standard E27.6.1A. RD</u> (A3a) Any activity or subdivision which meets or exceeds the travel demand thresholds set out in Standard E27.6.1A. RD

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Standard E27.6.1A Travel Demand	Oppose	<p>As set out in the submission, Kāinga Ora opposes the introduction of travel management thresholds relating to small-scale activities as this is inconsistent with the NPS-UD.</p> <p>Travel demand measures utilised by the AUP-OP over the past 6 years have been in association with commercial, education, port and cultural designations and precincts, as such, with large-scale operations overseen by an entity or business. It is therefore fair to associate such measures with activities that generate large numbers of trips which existing Standard E27.6.1. and Table E27.6.1.1 Trip Generation, already does. The thresholds set out in this existing standard are consistent with what Kāinga Ora consider “large-scale” activities as contemplated by the NPS UD.</p> <p>The exemption to this rule provided through E27.6.1A (2)(d) is unclear and will create</p>	<p><u>(1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required.</u></p> <p><u>(2) Standard E27.6.1A does not apply where:</u></p> <p><u>(a) a proposal is located in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, or Residential – Terrace Housing and Apartment Building Zone or Centre Fringe Office Control as shown on the planning maps;</u></p> <p><u>(b) development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;</u></p> <p><u>(c) the activity is permitted in the H7 Open space zones; or</u></p>

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		<p>confusion with applicant's and council reviews of applications. The assessment of 'traffic effects' is still required for 'Four or more dwellings' in the Mixed Housing Suburban and Mixed Housing Urban zones and therefore this exemption indicates that the Travel Plan rule would not apply.</p>	<p>(d) there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities.</p> <p>(1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required.</p> <p>(2) Standard E27.6.1A does not apply where:</p> <p>(a) a proposal is located in the Business—City Centre Zone, Business—Metropolitan Centre Zone, Business—Town Centre Zone, or Residential—Terrace Housing and Apartment Building Zone or Centre Fringe Office Control as shown on the planning maps;</p> <p>(b) development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity</p>

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			<p>and scale to those identified in the previous assessment;</p> <p>(c) the activity is permitted in the H7 Open space zones; or</p> <p>(d) there are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities.</p>
Table E27.6.1A.1 Development thresholds with a travel plan requirement	Oppose	<p>Kāinga Ora opposes all development thresholds notified in Table E27.6.1A.1 as these limits have not been justified in the Plan Change or s32 analysis and they relate to the new Rule E27.4.1 (A3A) which is opposed.</p> <p>Standard E27.6.1A. and Table E27.6.1A.1 are considered as an uncessacery and inappropriate duplication and extension of Standard E27.6.1 Trip Generation, which already serves the function of setting a threshold for trip generation that justifies the requirement of a Travel Plan.</p>	<p>Delete the following table inserted through PC71</p> <p>Table E27.6.1A.1 Development thresholds with a travel plan requirement</p>

		<p>The 10 dwelling number for Dwelling and Visitor Accommodation and 50 unit number for Integrated residential development activities will frustrate many developers attempting to supply housing across Tāmaki Makaurau including Kāinga Ora, by incurring additional time and cost to the consent process without a proportionate justification for avoiding adverse effects. The thresholds for all other activities would capture a large number of applications which previously would have been permitted throughout Auckland (where minimum parking levels were met).</p> <p>As such, Kāinga Ora does not consider these thresholds are consistent with the intentions of the NPS-UD Policy 11(a), which directed the removal of parking minimums and a market-led approach to on-site parking provision as a means to enable development capacity.</p> <p>Kāinga Ora is not convinced that this additional assessment requirement will add value to the development process</p>	<table border="1"> <thead> <tr> <th colspan="2">Activity</th> <th>Development threshold</th> </tr> </thead> <tbody> <tr> <td>(T1B)</td> <td>Residential</td> <td>Dwellings</td> <td>10 dwellings</td> </tr> <tr> <td>(T2B)</td> <td></td> <td>Integrated residential development</td> <td>50 units</td> </tr> <tr> <td>(T3B)</td> <td></td> <td>Visitor accommodation</td> <td>10 units</td> </tr> <tr> <td>(T4B)</td> <td rowspan="3">Education facilities</td> <td>Primary</td> <td rowspan="3">All educational facilities</td> </tr> <tr> <td>(T5B)</td> <td>Secondary</td> </tr> <tr> <td>(T6B)</td> <td>Tertiary</td> </tr> <tr> <td>(T7B)</td> <td>Office</td> <td></td> <td>500 m² GFA</td> </tr> <tr> <td>(T8B)</td> <td rowspan="2">Industrial activities</td> <td>Warehousing and storage</td> <td>2,000 m² GFA</td> </tr> <tr> <td>(T9B)</td> <td>Other industrial activities</td> <td>1,000 m² GFA</td> </tr> <tr> <td>(T11B)</td> <td rowspan="3">Community</td> <td>Care centres</td> <td>Accommodating 50 or more children or other people, other than employees</td> </tr> <tr> <td>(T12B)</td> <td>Community facilities</td> <td>Accommodating 50 or more people</td> </tr> <tr> <td>(T13B)</td> <td>Healthcare facilities</td> <td>200 m² GFA</td> </tr> <tr> <td>(T14B)</td> <td>Entertainment facilities</td> <td></td> <td>Accommodating 50 or more people</td> </tr> </tbody> </table>	Activity		Development threshold	(T1B)	Residential	Dwellings	10 dwellings	(T2B)		Integrated residential development	50 units	(T3B)		Visitor accommodation	10 units	(T4B)	Education facilities	Primary	All educational facilities	(T5B)	Secondary	(T6B)	Tertiary	(T7B)	Office		500 m ² GFA	(T8B)	Industrial activities	Warehousing and storage	2,000 m ² GFA	(T9B)	Other industrial activities	1,000 m ² GFA	(T11B)	Community	Care centres	Accommodating 50 or more children or other people, other than employees	(T12B)	Community facilities	Accommodating 50 or more people	(T13B)	Healthcare facilities	200 m ² GFA	(T14B)	Entertainment facilities		Accommodating 50 or more people
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<p>Standard E27.6.2(5)</p>	<p>Support</p>	<p>Kāinga Ora supports the deletion of text relating to policies that were previously required to support flexible, low or no parking parking provision, in order to create consistency between text and tables.</p>	<p>Retain as notified</p>																																																
<p>Standard E27.6.3.1(1)(c)</p>			<p>Retain as notified</p>																																																

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Matter of Discretion E27.8.1	Oppose	<p>As set out in the submission, Kāinga Ora views this requirement as creating an additional barrier to development by incurring additional time and cost to the consent process and by creating an alternative mechanism to require car parking.</p> <p>The wording of this matter of discretion is ambiguous and will create confusion to the assessment of consent applications. In particular, the consideration of the adequacy of the Travel Plan which could be said to have been met if all of the content listed in the rule are provided. It is clear that the intention of the rule is a review of the adequacy of the findings of the Travel Plan with this assessment reliant on the opinion and information available to the reviewer.</p> <p>Of note are the factors that the Government considered relevant to removing parking minimums across Aotearoa's Tier 1, 2 and 3</p>	<p>E27.8.1. Matters of discretion The Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application. ... <u>(4A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:</u> <u>(a) adequacy of the travel plan required under E27.9(2)(b)</u> <u>(b) effects on the transport network.</u></p> <p>Proposed Amendment</p> <p>(4A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A: (a) adequacy of the travel plan required under E27.9(2)(b) (b) effects on the transport network.</p>

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		<p>Councils rather than allowing the Council to decide where to apply parking requirements (taken from the Beca NPS UD s32 report March 2020 page 70):</p> <p><i>Setting minimum car parking rates which meets actual demand would be highly complex as it would need to take into consideration potentially hundreds of factors which are constantly changing. It is therefore expected that car parking rates are out pacing actual demand.</i></p> <p><i>√ The nature of vehicle transport is changing, such as through the uptake of car share (app-based taxis) and could continue to change further as technology changes occur and user habits change, a more responsive approach is required in favour of current minimum parking rates.</i></p> <p><i>√ Car parking rates are generally set at rates independent of location, accessibility and</i></p>	

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		<p><i>demand, moving to market based approach for parking minimums will result in an approach which is more responsive and dependant on location, accessibility and demand.</i></p> <p>With the proposed insertion Matters of discretion E27.8.1 (4A), the matters of consideration above will now fall to decision makers on individual applications thus based on their opinion of whether the travel demand plan is adequate.</p>	
Assessment criteria E27.8.2	Oppose	<p>Kāinga Ora opposes this assessment criteria which is related to the new rule for Travel Plans for the reasons set out in the submission.</p> <p>In particular, this assessment requires consideration of the availability of public transport, cycle lanes, footpath upgrades and other transport initiatives for each application site where there is currently little information publicly available for applicants. Auckland Transport would need to provide this information</p>	<p>E27.8.2 Assessment criteria The Council will consider the relevant assessment criteria for restricted discretionary activities from the list below: ...</p> <p><u>(3A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:</u></p> <p><u>(a) the extent to which the travel demands of the activity are provided for, including but not limited to:</u></p>

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		<p>to all applicants and Council reviewers for each application. This would create a considerable burden on Auckland Transport in order to ensure a consistent and informed assessment. Not to mentioned the time, cost and delays that would be added to the resource consenting process of housing development.</p> <p>The requirement to consider PT, and active modes options would be better served by Auckland Transport providing a city-wide review of public transport accessibility zones and other transport improvements which would indicate current, short-term and long-term strategies and programmed works. Kāinga Ora note that individual developers have little control over the upgrade of existing public transport services or the provision of new public transport services in relation to any development site.</p> <p>This regionwide strategy would provide developers with guidance when making market</p>	<p><u>(i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:</u></p> <ul style="list-style-type: none"> • <u>the accessibility and frequency of public transport services</u> • <u>the standard of active modes infrastructure for all users</u> • <u>the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments</u> <p><u>(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking</u></p> <p><u>(b) the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.</u></p> <p><u>(c) the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).</u></p> <p>...</p>

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		decisions on transport options and onsite parking provision for their future users.	<p>(3A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:</p> <p>(a) the extent to which the travel demands of the activity are provided for, including but not limited to:</p> <p>(i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:</p> <ul style="list-style-type: none"> • the accessibility and frequency of public transport services • the standard of active modes infrastructure for all users • the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments <p>(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking</p> <p>(b) the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.</p>

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			<p>(c) the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).</p> <p>...</p>
Special information requirement E27.9(2)(b)	Oppose	<p>Kāinga Ora opposes the triggering of a special information requirement by meeting or exceeding the notified new development thresholds.</p> <p>It is Kāinga Ora’s view that the addition of standard E27.9(2)(b) is illogical and inappropriate (as it is considered to be double dipping), with the activities requiring travel plans already managed by Rule E27.4.1 (A3) for activities exceeding the Trip Generation Thresholds in Rule E27.6.1.</p>	<p>(2) Travel plan: (a) a travel plan may be required as part of an assessment of environmental effects where a proposal exceeds the trip generation threshold, <u>or</u> provides more parking than the maximums specified or fewer than the minimums specified. A travel plan will not be required where the infringement of the parking standards is minor in relation to the scale of the activity and associated parking proposed. <u>(b) a travel plan is required as part of an assessment of environmental effects where a proposal meets or exceeds a new development threshold in Standard E27.6.1A.</u></p> <p>Proposed Deletion</p>

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		The addition of E27.9(2)(b) which relates to Standard E27.6.1A (Development thresholds), may lead to on-site car-parking being required through the consent process and as such is not consistent with Policy 11(a) of the NPS-UD.	(2) Travel plan: (a) a travel plan may be required as part of an assessment of environmental effects where a proposal exceeds the trip generation threshold, <u>or</u> provides more parking than the maximums specified or fewer than the minimums specified . A travel plan will not be required where the infringement of the parking <u>standards maximums</u> is minor in relation to the scale of the activity and associated parking proposed. (b) a travel plan is required as part of an assessment of environmental effects where a proposal meets or exceeds a new development threshold in Standard E27.6.1A.
E27.9(3) Special information requirement	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP.	Retain as notified
E38 Urban Subdivision			

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Subdivision Standard E38.9.1.2(1)	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP.	Retain as notified
E40 Temporary activities			
Policy E40.3(5)	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-UD	Retain as notified Support deletion of E40.3(5)(b)
Assessment Criteria E40.8.2(2)	Support		Retain as notified Support deletion of E40.8.2(2)(d)
B8 Coastal environment & F2, F3, F5, F6 Coastal zones			
B8.6 Explanation and principal reasons for adoption Policy F2.17.3(3)	Support	Kāinga Ora supports all updates in text relating to the Coastal environment and coastal zones, that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-UD.	Retain as notified changes to text to remove terms "car parking" "parking requirements" and phrasing relating to parking requirements and adequacy from policies, matters of discretion and assessment relation to parking, remove assessment criteria regarding parking adequacy.

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Matter of discretion F3.8.1(3)(a) Matter of discretion F3.8.1(4)(a) Assessment criteria F3.8.2(3)(c) Assessment criteria F3.8.2(4)(f) Assessment criteria F5.8.2(1)(c) Assessment criteria F5.8.2(3)(f) Policy F6.3(1)(e) Policy F6.3(8)(d)			
H1-H6 Residential Zones			
Assessment Criteria H1.8.2(1)(d)(i)	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-	Retain as notified Changes to the Assessment Criteria of all zones as notified below:

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Assessment Criteria H2.8.2(1)(d)(i) Assessment Criteria H3.8.2(1)(c)(i) Assessment Criteria H4.8.2(1)(d)(i) Assessment Criteria H5.8.2(1)(d)(i) Assessment Criteria H6.8.2(1)(d)(i)		UD, and as such, assessments of the adequacy of parking provision is no longer in scope.	(d) location and design of parking and access: (i) whether adequate parking and access is provided or required.
H20-H21 Rural Zones			
H20.8.2(1)(f) and H21.8.2(1)(f)	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-UD, and as such, assessments of the adequacy of parking provision is no longer in scope.	Retain as notified modifications to Assessment Criteria to delete the term "adequate parking and" to support assessment of "the extent to which the activity provides safe driveway access and sight lines."

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J- Definitions			
Accessory activities Non-accessory parking Off-site parking	Support	Kāinga Ora supports updates in text that reflect that car parking is no longer required under the AUP-OP as required by Policy 11(a) of the NPS-UD.	Retain as notified
Travel Plan	Oppose/Oppose in part	Kāinga Ora acknowledges the intention of the Travel Plan as a means to assess whether development is contributing the Auckland Region’s long term goals relating to transport, climate change and wellbeing. These Travel Plans are suitable for high trip generating activities as already provided for through the Trip Generation rule. These plans are unnecessary and unreasonable as a requirement for small-scale developments (as set out in the new Development Threshold for a Travel Plan rule).	Travel Plan A plan which sets out how travel demand is to be managed for a particular site or proposal to: <ul style="list-style-type: none"> • maximise the efficient use of transport <u>networks</u> and systems; and • promote <u>and</u> enable the use of more sustainable and active modes of transport such as public transport, walking and cycling, and carpooling, <u>car sharing and micro mobility</u> as alternatives to sole occupancy private <u>cars. and</u> • <u>manage the efficient use of limited land resources such as by removing or limiting onsite car parking and loading areas.</u> A travel plan <u>may</u> include: <ul style="list-style-type: none"> • a description of the site and the proposal;

Section/Subsection/Provision	Support/Support in part/Oppose	Reason(s) for submission	Relief sought / decision requested
		<p>Kāinga Ora opposes the notified Travel Plan definition however, due to its poor applicability to residential and mixed-use developments.</p> <p>The Travel Plan asks proposals to assess matters that would be outside the scope of many 10 unit residential developments and beyond the control of all private developments.</p> <p>Requesting developers of private, freehold housing to describe “details of the ongoing activities and processes...” is not possible when the future residents and their travel habits are unknown and there are no mechanisms to control individuals travel behaviour.</p> <p>This also applies to bullet point 4. Following the delivery of freehold housing, there is no way for Kāinga Ora or any other developer to hold future residents to the requirements of a Travel Plan, and as such, monitor and review of these plans.</p>	<p>Text proposed as part of the Plan Change is shown as <u>underlined</u> and strikethrough.</p> <p>Text proposed by Kāinga Ora is shown as <u>underlined</u> and strikethrough Consequential amendments may be required to give effect to the relief sought.</p> <ul style="list-style-type: none"> • details of the physical infrastructure that is or will be established on the site to support the use of walking and cycling, public transport, carpooling, <u>car sharing and micro mobility</u>; • details of the ongoing activities and processes that will be used to support the use of walking and cycling, public transport, carpooling, car sharing and micro mobility; • details of how the travel plan is to be communicated, promoted, implemented, and monitored <u>and reviewed</u>; • information about the amount and nature of any on-site parking <u>and loading (whether onsite or on the street)</u> and <u>how this</u> is to be managed to support efficient use and promote alternatives <u>travel modes</u>; and • expected outcomes from <u>its implementation</u>. <p>Note Best practice guidance on the preparation of a travel plan can be provided by Auckland Transport. A travel plan is also sometimes referred to as a travel demand management plan.</p> <p><u>Refer to Auckland Transport website which provides information on existing and proposed public transport areas, parking strategies and infrastructure upgrades and their timing across Auckland.</u></p>

Section/Subsection/Provision	Support/ Support in part/Oppose	Reason(s) for submission	Relief sought / decision requested Text proposed as part of the Plan Change is shown as <u>underlined</u> and strikethrough . Text proposed by Kāinga Ora is shown as <u>underlined</u> and strikethrough Consequential amendments may be required to give effect to the relief sought.
		<p>Accordingly, Kāinga Ora believes these forms of development should not be required to provide a Travel Plan.</p> <p>Kāinga Ora also opposes these small scale development having to provide travel plans as a part of their consent process, 1) due the additional time and expertise for such plans being an additional barrier to development and 2) due to the duplication of requirements such as minimum bike parking E27.6.2.5), end of journey facilities (E27.6.2.6) and loading spaces (E27.6.2.7) rates. Furthermore, guidance and supporting information should be provided by Auckland Transport to allow a fair and reasonable assessment. The proposed additional wording at the bottom of the definition refers to this information from AT.</p> <p>It is Kāinga Ora's view that the requirement for a Travel Plan for small scale developments (as set</p>	

Section/Subsection/Provision	Support/ Support in part/Oppose	Reason(s) for submission	Relief sought / decision requested Text proposed as part of the Plan Change is shown as <u>underlined</u> and strikethrough . Text proposed by Kāinga Ora is shown as <u>underlined</u> and strikethrough Consequential amendments may be required to give effect to the relief sought.
		out in the Development Thresholds is beyond the scope of its discretion in light of Policy 11(a) of the NPS-UD.	
Precincts			
All changes proposed to Precincts identified in PC 71	Support	Kainga Ora supports modifications to policies, matters of discretion and assessment criteria within precinct chapters that achieve Policy 11(a) of the NPS-UD by deleting references to parking sufficiency, adequacy, overspill, required parking and directing assessment to provision of specialised parking facilities and accessways (i.e boat trailers or disabled parking).	<i>Retain as notified</i>
I - Special Housing Areas			
Birdwood 2 Special Housing Area 4.2(iv)	Support	Kāinga Ora supports the modification of SHA controls and assessment criteria that are consistent with Policy 11(a) of the NPS-UD and	<i>Retain as notified</i>

Section/Subsection/Provision	Support/ Support in part/Oppose	Reason(s) for submission	Relief sought / decision requested Text proposed as part of the Plan Change is shown as <u>underlined and strikethrough</u> . Text proposed by Kāinga Ora is shown as <u>underlined and strikethrough</u> Consequential amendments may be required to give effect to the relief sought.
Huapai Triangle Special Housing Area 6.4(19)(b) & 6.4(23)	Support	replace the term “requires” or “required” with “provides” or “provided” and deletes phrases that direct for car-parking to be assessed according to sufficiency or adequacy.	<i>Retain as notified</i>
Mangere Gateway Sub-Precinct E Special Housing Area 5.1.1(4) & 5.1.2(5) a	Support		<i>Retain as notified</i>
Whenuapai 1 Special Housing Area 5.1.1(4) & 5.1.2(5)	Support		<i>Retain as notified</i>
Auckland Council District Plan – Hauraki Gulf Islands Section			
All changes notified for 5.9(3) 10a.18.8.2(2), 11.3.2(7)(a), 13.2.5, 13.3.4.1(1), 13.3.4.2(4), 13.4.5, 13.4.7, 13.4.8, 13.6.1 , 13.7.1, 13.7.4(1), 13.7.4(4), 13.7.5, Part 14: Definitions	Support	Kāinga Ora supports the updating of the plan’s text to give effect to Policy 11(a) of the NPS-UD. Kāinga Ora supports amendments that limit Council’s discretion to opportunities to reduce carparks when proposals involve an excess number of 25 car-parks	<i>Retain as notified .</i>

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Ministry of Education
Date: Thursday, 24 March 2022 5:16:07 pm
Attachments: [Ministry of Education - Submission on PC71.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Ministry of Education

Organisation name: Ministry of Education

Agent's full name: Adriene Grafia

Email address: adriene.grafia@beca.com

Contact phone number: 093080863

Postal address:

C/- Beca Ltd PO Box 6345

Wellesley

Auckland 1141

Wellesley

Auckland 1141

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Policy E27.3(6), Travel Demand Provisions (E27.6.1A Travel Demand, Table E27.6.1A.1 Development thresholds with a travel plan requirement, E27.8.2 Assessment Criteria). Refer to accompanying Submission for further details.

Property address:

Map or maps:

Other provisions:

Refer to accompanying Submission for further details.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Refer to accompanying Submission for further details.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

Supporting documents
Ministry of Education - Submission on PC71.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Find out more about Auckland Council's Election](#)



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FORM 5

Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991.

To: Auckland Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
PO Box 6345
Wellesley
Auckland 1141

Attention: Adriene Grafia

Phone: 09 308 0863

Email: adriene.grafia@beca.com

This is a submission on the Proposed Plan Change 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments (PPC71)

Background

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Auckland region.

The Ministry of Education's submission is:

Policy 11 of the National Policy Statement – Urban Development (NPS-UD) specifies that in relation to car parking:

(a) The district plans of tier 1, 2 and 3 territorial authorities (i.e., Auckland council) do not set minimum carparking rate requirements, other than for accessible car parks; and

(b) tier 1, 2 and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of carparking through comprehensive parking management plans.

The Ministry acknowledges that Auckland Council have removed minimum carparking requirements from their plans and that Proposed Plan Change 71 ('PPC71') seeks to address technical issues in the Auckland Unitary Plan – Operative in Part (AUP-OP) and Hauraki Gulf Island Plan (HRP), resulting from the NPS-UD direction. This includes maintaining the ability to assess wider travel demand effects from proposals that were previously subject to minimum car parking requirements. Council proposes the inclusion of new travel demand provisions to specifically address this issue. This would result in the following activities requiring resource consent as a Restricted Discretionary activity and a Travel Plan to support the application:



- Education facilities (primary, secondary, and tertiary)
- Care centres (e.g., early childhood learning services) accommodating 50 or more children or other people, other than employees.

The Ministry recognises the importance of managing adverse effects on the transport network. Council through their District Plans “*may contain a policy stating that comprehensive parking management plans, travel demand management and other methods are the appropriate means of managing the demand and supply effects of car parking.*”¹ While the Ministry are neutral on the inclusion of provisions or methods to manage demand and supply effects, it is unclear from Council’s section 32A report why the new travel demand provisions apply to all education facilities and the rationale for the care centre threshold. The Ministry have concerns that the blanket approach compromises the limited opportunities existing in the AUP:OP to establish education facilities or care centres without resource consent as a Permitted activity.

Currently in the AUP:OP Care centres (accommodating greater than 10 people) and education facilities are Permitted activities in the Business – Mixed Use Zone, Business – Local Centre Zone, Special Purpose – Healthcare Facility and Hospital Zone and Special Purpose – School Zone. Care centres (accommodating greater than 10 people) are also Permitted activities in the Business – Local Centre Zone, Business – Neighbourhood Centre Zone and Business – Business Park Zone. Early Childhood Education Services which are nested within the ‘Care Centre’ definition are also Permitted within the Open Space – Community Zone. The new provisions mean that, as a default, all education facilities regardless of scale/nature will require a resource consent. It also means that care centres (even where it is a Permitted activity in the underlying zone to accommodate 50 or more children or other people) will also now need resource consent.

The Ministry notes that education facilities and care centres (greater than 10 people) already require resource consent as either a Discretionary or Non-complying activity in most AUP:OP zones. Council has full discretion to consider the traffic and travel demands effects in such zones. In the few examples where zones provide for education facilities, tertiary education facilities and/or care centres greater than 10 people as a Restricted Discretionary activity (e.g., Business – Local Centre Zone, Residential – Mixed Housing Suburban and Urban Zones), traffic related effects are also within Council’s matters of discretion. While Council recognises this in their Section 32A report, there is also existing Trip Generation provisions (Standard E27.6.1) which contribute towards managing effects from high travel demand activities.

In regard to education facilities and care centres specifically, the existing combination of existing provisions (e.g., trip generation standard, objectives, policies, and underlying zone requirements) enable potential adverse travel demand effects to be managed. It is considered that the inclusion of the proposed travel demand provisions (for education facilities and care centres) is prescriptive and has the potential to increase costs and process for education facility providers / developers and adds little in terms of effectiveness and efficiency. The Ministry is in opposition to these provisions in PP71.

82.1

The respective assessment criteria (in E27.8.2(3A)) in PPC71 for activities exceeding the travel demand thresholds under proposed Standard E27.6.1A requires specific consideration of the extent to which the travel demands of the activity are provided for, including but not limited to:

(i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel having regard to:

- *The accessibility and frequency of public transport services*

¹ As stated in the National Policy Statement on Urban Development 2020 – Car parking Fact Sheet prepared by the Ministry for the Environment, p. 2



- *The standard of active modes infrastructure for all users*
- *the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments*

(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking

The Ministry are supportive of establishing education facilities with viable alternatives to the private vehicle and measures that facilitate effective land use and transport integration. The Ministry however emphasises their need to provide for schools to all communities and where demand requires it. This may be in locations where the existing (or planned) environment does not currently have effective public transport services and active mode infrastructure which depend on other agencies to provide / fund them. The assessment criteria as currently proposed places the onus on education facility providers / developers to address a matter that may be out of their control. The effects of travel demand are also currently left to providers / developers to address and mitigate, whereas there should be additional Council guidance and support to enable the assessment criteria to be met.

Although PPC71 responds to NPS-UD Policy 11a, it is unclear what Council is proposing (whether through the statutory or non-statutory process) to address NPS-UD Policy 11b which encourages Council to also manage effects of carparking supply and demand through comprehensive parking management plans. Implementing Policy 11b is an essential part of giving effect to the objectives of the NPS-UD in terms of carparking provision. There is a risk of poor outcomes and/or resource consent applications not being approved by Council as applicants cannot address off-site effects without Council adopting a comprehensive and integrated approach to carparking supply and demand.

Council's section 32A report identifies that consultation has occurred with some key stakeholders relating to PPC71 and the implications arising from the implementation of NPS-UD Policy 11. The Ministry is a key stakeholder; however, consultation with the Ministry has not been undertaken to date.

The Ministry also notes that while Council have removed minimum car parking requirements from Chapter E27 Transport of the AUP:OP, many of the Ministry's designations (under Chapter K) are still subject to minimum carparking requirements / conditions. The Ministry considers it appropriate for such requirements to also be removed to align with Policy 11 of the NPS-UD. The Ministry seeks that Council consult with the Ministry on this matter and how this is to be addressed.

The Ministry of Education seeks the following decision from the consent authority

Overall, the Ministry opposes PPC71 in its current form and seeks that Council accept the following relief and any consequential amendments required to give effects to the matters raised in this submission:

1. Auckland Council to consult with the Ministry to provide clarity on the rationale for the proposed changes, particularly the Travel Demand provisions. The Ministry wish to better understand why the Travel Demand provisions apply to all education facilities and the basis for the care centre threshold.
2. Auckland Council accept the proposed amendments, additions and retentions as set out in Attachment 1 below. Additions are underlined and deletions are strikeouts.
3. Removal of minimum carparking requirements from all Ministry designations (Chapter K of the AUP:OP) and consultation with the Ministry on how this is to be addressed.

82.5

The Ministry wishes to be heard in support of its submission.



Adriene Grafia

Planner – Beca Ltd

(Consultant to the Ministry of Education)

Date: 24 March 2022



Attachment 1 – Ministry submission on the Proposed Plan Change

Additions are shown as underlined and deletions are shown as strikeouts.

ID	Proposed Provision	Position	Reason for submission	Decision requested
1	<p>Policy E27.3(6) <u>Limit the supply of on-site parking for education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.</u></p>	<p>Support with amendments</p>	<p>The Ministry acknowledges that amendments are required to Policy E27.3(6) to reflect the removal of minimum parking requirements and that there are existing limits on parking in the zones specified in this Policy as per Table E27.6.2.3 (T24) and (T25). The Ministry are supportive of a policy that encourages the use of public transport and active modes.</p> <p>For consistency, the Ministry however proposes a minor amendment to include office activities into this Policy. This is another activity in Table E27.6.2.3 where there are existing maximum rates. Office activities were also included in the existing Policy E27.3(6)(a).</p>	<p>Limit the supply of on-site parking for <u>office activities</u>, education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and the Mixed Use Zone adjacent to those specified centres) to encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network.</p>

82.2

2	<p>Table E27.4.1 Activity Table</p> <table border="1" data-bbox="220 245 825 358"> <tr> <td data-bbox="220 245 338 358">(A3a)</td> <td data-bbox="338 245 730 358">Any activity or subdivision which meets or exceeds the travel demand thresholds set out in Standard E27.6.1A.</td> <td data-bbox="730 245 825 358">RD</td> </tr> </table>	(A3a)	Any activity or subdivision which meets or exceeds the travel demand thresholds set out in Standard E27.6.1A.	RD	Neutral	The Ministry oppose the proposed provisions for managing the effects of travel demand and supply in its current form. The Ministry are concerned that the application of Travel Demand provisions across all education facilities (and care centres at a specific threshold) compromise the minimal opportunities under the AUP:OP to establish education facilities / care centres without resource consent and as a Permitted activity. The provisions will require all education facilities and care centres that may have been Permitted in the underlying zone to now need resource consent as a default. This can add process and potential costs for education facility developers / providers.	N/A																							
(A3a)	Any activity or subdivision which meets or exceeds the travel demand thresholds set out in Standard E27.6.1A.	RD																												
3	<p><u>E27.6.1A Travel demand</u></p> <p><u>(1) Where a proposal meets or exceeds one of the development thresholds in Table E27.6.1A.1, a resource consent for a restricted discretionary activity is required.</u></p> <p><u>(2) Standard E27.6.1A does not apply where:</u></p> <p>(a) <u>a proposal is located in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, or Residential – Terrace Housing and Apartment Building Zone or Centre Fringe Office Control as shown on the planning maps;</u></p> <p>(b) <u>development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment;</u></p> <p>(c) <u>the activity is permitted in the H7 Open space zones; or</u></p> <p>(d) <u>There are requirements to assess transport, traffic or trip-generation effects for the activity in the applicable zone rules or precinct rules for any controlled or restricted discretionary land use activities.</u></p> <p><u>Table E27.6.1A.1 Development thresholds with a travel plan requirement</u></p> <table border="1" data-bbox="220 1357 825 1414"> <tr> <td data-bbox="220 1357 625 1414">Activity</td> <td data-bbox="625 1357 825 1414">Development Threshold</td> </tr> </table>	Activity	Development Threshold	Oppose	<p>The Ministry notes that for education facilities and care centre facilities specifically, there are existing provisions (i.e., Trip Generation standard, objectives, policies, and underlying zone requirements) that will enable Travel Demand effects to be managed as appropriate.</p>	<p>Table E27.6.1A.1 Development thresholds with a travel plan requirement</p> <table border="1" data-bbox="1312 508 1906 875"> <thead> <tr> <th colspan="3">Activity</th> <th>Development Threshold</th> </tr> </thead> <tbody> <tr> <td>...</td> <td>...</td> <td>...</td> <td>...</td> </tr> <tr> <td>(T4B)</td> <td rowspan="3">Education facilities</td> <td>Primary</td> <td rowspan="3">All educational facilities</td> </tr> <tr> <td>(T5B)</td> <td>Secondary</td> </tr> <tr> <td>(T6B)</td> <td>Tertiary</td> </tr> <tr> <td>...</td> <td>...</td> <td>...</td> <td>...</td> </tr> <tr> <td>(T11B)</td> <td>Community</td> <td>Care Centres</td> <td>Accommodating 50 or more children or other people, other than employees</td> </tr> </tbody> </table>	Activity			Development Threshold	(T4B)	Education facilities	Primary	All educational facilities	(T5B)	Secondary	(T6B)	Tertiary	(T11B)	Community	Care Centres	Accommodating 50 or more children or other people, other than employees
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82.3

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...																									
(T4B)	Education	Primary	All educational																									
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4	<p><u>E27.8.2 Assessment criteria</u></p> <p><u>(3A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:</u></p> <p>(a) <u>the extent to which the travel demands of the activity are provided for, including but not limited to:</u></p> <p><u>(i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:</u></p> <ul style="list-style-type: none"> <u>the accessibility and frequency of public transport services</u> <u>the standard of active modes infrastructure for all users</u> <u>the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments</u> <p><u>(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking</u></p> <p>(b) <u>the effects of increased demand for travel by private vehicle and demand for car parking on the function and the safe and efficient operation of the transport network, including pedestrian and cycle movement.</u></p>	Oppose	<p>As above, the Ministry oppose the proposed provisions for managing the effects of travel demand and supply in its current form. The Ministry seeks clarification on the thresholds proposed for education facilities and care centres.</p> <p>The Ministry is overall supportive of education facilities having viable alternatives to the private vehicle. The Ministry however notes that where Travel Demand plans are required for education facilities / care centres, the proposed assessment criteria puts the onus on developers / providers to address matters that may be out of their control (e.g., public transport services and active mode infrastructure). While the</p>	<p><u>E27.8.2 Assessment criteria</u></p> <p><u>(3A) any activity or subdivision which meets or exceeds the travel demand thresholds under Standard E27.6.1A:</u></p> <p>(a) <u>the extent to which the travel demands of the activity are provided for, which may include, including but not limited to:</u></p> <p><u>(i) the adequacy of travel choices, by all modes, to provide a viable alternative to private vehicle travel, having regard to:</u></p> <ul style="list-style-type: none"> <u>the accessibility and frequency of public transport services</u> <u>the standard of active modes infrastructure for all users</u> <u>the connectivity of the site by all modes to and from a range of locations including employment, educational facilities, and where relevant, supporting residential or commercial catchments</u> <p><u>(ii) the adequacy of proposed measures that reduce the demand for travel by private vehicle and reduce the demand for car parking</u></p> <p>...</p>																								

82.4

	(c) <u>the extent to which the travel plan required under E27.9(2)(b) addresses the matters in E27.8.2(3A)(a) and (b).</u>		<p>Ministry acknowledges their relevance, the proposed assessment criteria is prescriptive and does not recognise that there may be limitations in the existing/planned environment. Other options for addressing travel demand effects should be considered equally.</p> <p>The Ministry has a need to provide education facilities / schools to all communities and to respond to demand (even where the existing / planned environment may not provide public transport services or active mode infrastructure yet). This should be reflected in the assessment criteria.</p>	
5	<p>E27.9 Special Information requirements (2) Travel Plan:</p> <p><u>(b) a travel plan is required as part of an assessment of environmental effects where a proposal meets or exceeds a new development threshold in Standard E27.6.1A.</u></p>	Neutral	<p>As above, the Ministry oppose the proposed provisions for managing the effects of travel demand and supply in its current form. The Ministry seeks clarification on the thresholds proposed for education facilities and care centres.</p>	N/A
	<p>J – Definitions</p> <p>Travel Plan A plan which sets out how travel demand is to be managed for a particular site or proposal to:</p> <ul style="list-style-type: none"> • maximise the efficient use of transport <u>networks and systems</u>; and • promote <u>and enable</u> the use of more sustainable and active modes of transport such 	Neutral	<p>The Ministry are overall supportive of encouraging public transport, active modes, and alternatives of travel to the private vehicle.</p>	N/A

	<p>as public transport, walking and cycling, <u>and</u> carpooling, <u>car sharing and micro mobility</u> as alternatives to sole occupancy private cars. and</p> <ul style="list-style-type: none">• <u>manage the efficient use of limited resources such as car parking and loading areas.</u> <p>A travel plan includes:</p> <ul style="list-style-type: none">• a description of the site and the proposal;• details of the physical infrastructure that is or will be established on the site to support the use of walking and cycling, public transport, carpooling, <u>car sharing and micro mobility</u>;• <u>details of the ongoing activities and processes that will be used to support the use of walking</u>;• and cycling, public transport, carpooling, car sharing and micro mobility;• details of how the travel plan is to be communicated, promoted, implemented, and monitored <u>and reviewed</u>;• information about the amount and nature of any onsite parking <u>and loading (whether onsite or on the street)</u> and how <u>this</u> is to be managed to support efficient use and promote alternatives <u>travel modes</u>; and• expected outcomes <u>from its implementation</u>.			
--	---	--	--	--

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Joshua Iain Bradley
Date: Thursday, 24 March 2022 5:45:49 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Joshua Iain Bradley

Organisation name:

Agent's full name:

Email address: Joshua.iain.bradley@gmail.com

Contact phone number: 0211576232

Postal address:
7 Easther Crescent
Kew
Dunedin 9012

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Removal of the requirement for carparking minimums from the Auckland Unitary Plan and Hauraki Gulf Islands Plan.

Property address: 29 Whenuapai Drive, Whenuapai

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The removal of minimum car parking for landowners or developers developing a site in the future, has the potential to result in further congested neighbourhood streets.

The Suburb of Whenuapai already has an emerging issue with off-site/on-road parking and it unfortunately makes the suburb appear very crowded. Developers especially, will see this as an opportunity to decrease LOT sizes so they can build more houses, and although I would love to see a steady supply of good housing stock in Auckland, I feel this is going to hurt future and present owners in the long run.

I see two reasons why it may hurt future and present owners:

Firstly, the Public Transport infrastructure in Whenuapai is not yet there to allow people to travel conveniently around Auckland. They will continue to use cars and struggle for parking on their own

street.

Secondly, now our visually car-cluttered neighbourhood streets has the potential to devalue those brand new, and many neighbouring, houses. I think the public will agree, that becomes an undesirable location to live.

I think adjusting the minimum to at least one car park per house is the logical next step to work towards less cars on our roads. This should still be a requirement from Council.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

83.1

Details of amendments: I think adjusting the minimum to at least one car park per house is the logical next step to work towards less cars on our roads. I understand this is a leading goal for Auckland.

83.2

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Jeremy Song
Date: Thursday, 24 March 2022 7:46:02 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jeremy Song

Organisation name:

Agent's full name:

Email address: jeremyjhsong@gmail.com

Contact phone number:

Postal address:
5 Wallace Road
Hobsonville Point
Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Proposed plan change 72

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I wish to keep and retain the parking in front of our house as this was the main reason we bought the house.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

84.1

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Jing Fung Kee
Date: Thursday, 24 March 2022 8:30:51 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jing Fung Kee

Organisation name:

Agent's full name:

Email address: kazedn@yahoo.com

Contact phone number: 021415173

Postal address:
12a Sierra street
Glendowie
Auckland 1071

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Removal of car parking minimum

Property address: 12a sierra street, Glendowie, Auckland

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

In my view, intensification of central suburbs is inevitable. I am ok with that but there should be a rule that all terrace townhouses are built with minimum of 2 carparks even if they are tandem. It simply means the bottom level of a three story dwelling is used as carpark. I hate to see lax rules that result in developer building five bedroom terraces at expense of carpark. This leads to people parking on berm or parking on both sides of a narrow street, creating blindspots that endanger our children walking to school. Some of the development being considered for resource consent in Glendowie are involving narrow roads like Pembroke crescent and Sierra street. There are too many kindies and schools around and every morning there are people walking to schools. I am already finding it dangerous reversing out from my driveway onto the road with double parked cars. This will only get worse. I have no trust in your so called traffic engineer making the right decision so please don't even start pretending having such an officer will solve the problem.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

85.1

Details of amendments: Permit high density built but only if developer incorporate minimum of two carparks within their own compound

85.2

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - swee huat sim
Date: Thursday, 24 March 2022 9:15:50 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: swee huat sim

Organisation name:

Agent's full name: swee huat sim

Email address: shsimm@hotmail.com

Contact phone number:

Postal address:

13 Zadar Street

Kumeu

Auckland 0810

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

Property address: 13 Zadar Street, Kumeu, Auckland 0810

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Every house need to have a garage or a car porch otherwise the car will be parked everywhere along the road which is already happening in some area in Auckland.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

| 86.1

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - SHU ZHANG
Date: Thursday, 24 March 2022 9:45:48 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: SHU ZHANG

Organisation name:

Agent's full name:

Email address: shu.greenfins@hotmail.com

Contact phone number: 02108117535

Postal address:

16 MOEMOEA AVENUE
KUMEU
AUCKLAND 0810

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:

NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

Property address: 16 MOEMOEA AVENUE, KUMEU

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Reasons to oppose car parking minimum proposal:

1. Will lead to the reduction of accessibility to facilities and independency. Impact to door-to-door delivery services.

2. Will lead to the adversity to emergency service in term of more tripping or slipping hazards at uneven access, more delay of response time for emergency service provider due to lack of accessible off-street parking.

3. Will lead to more cars parked on berms and blocking footpaths.

4. Will lead to more obstruction and difficulty on pedestrian access for these group of users: Wheelchair users, parents with prams, scooters.

Removal of minimum off-street parking restriction to compensate the increasing floor area of the house simply will not solve Auckland house crisis. To solve house crisis, houses must allow to build

higher. More apartments with sufficient parking buildings. Have already seen more and more resident living in one share house, not enough off-street parking already has pushed the up the demand for on-street parking for a long time. Infrastructure growth in terms of frequent train and bus could be greatly anticipated now to catch up the growth of population.

I or we seek the following decision by council: Decline the plan change

| 87.1

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Sentinel Planning Limited
Date: Thursday, 24 March 2022 10:01:04 pm
Attachments: [Submission on PC71 - Sentinel Planning Limited.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sentinel Planning Limited

Organisation name:

Agent's full name: Gerard McCarten

Email address: gerard@sentinelplanning.co.nz

Contact phone number: 021727743

Postal address:
gerard@sentinelplanning.co.nz
Milford
Auckland 0620

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
E27.4.1(A3a), E27.6.1A, E27.8.1(4A), E27.8.2(3A), E27.9(2)(b)

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
See attached.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

Supporting documents
[Submission on PC71 - Sentinel Planning Limited.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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Submission on Proposed Plan Change 71 to the Auckland Unitary Plan (Operative in Part)

Clause 6 of Schedule 1, Resource Management Act 1991

To Auckland Council

Name of Submitter: Sentinel Planning Limited

This is a submission on a change proposed to the following plan (the **proposal**):

Auckland Unitary Plan – Operative in Part (**AUP-OP**)

PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

Sentinel Planning Limited could not gain an advantage in trade competition through this submission.

The specific provisions of PC71 that this submission relates to are:

- a) Rule E27.4.1(A3a)
- b) Standard E27.6.1A
- c) Matters for discretion E27.8.1(4A)
- d) Assessment criteria E27.8.2(3A)
- e) Special information requirement E27.9(2)(b)

Our submission is:

1. We **OPPOSE** the specific provisions set out above.
2. The requirement for travel plans is out of scope of this plan change. Paragraph 31 of the section 32 report explains that the basis for requiring travel demand is because, before they were removed from the AUP-OP, shortfalls in parking required an assessment of matters that included access by public transport, travel plans, effects of overspill, availability of on-street parking, shared parking and physical suite constraints, and that the council's ability to assess these would now be lost. Its solution now appears to treat every development listed in the proposed threshold rule as if it had a parking shortfall. Fundamentally this appears to be an attempt to retain plan provisions by another means. PC71 is couched as a 'technical amendment' as a result of the NPS-UD – but the specific provisions listed above, which relate to travel plans, are not a technical amendment at all

and should decline on that basis alone. These provisions should more properly be proposed as a standalone plan change with a clear evidence base to support the need for such plans, the type of activities that should provide them, and the appropriate development thresholds.

3. In support of the above point, we note that there are no objectives or policies proposed as part of the PC71 and it is unclear which existing provisions the rule seeks to give effect to. With a restricted discretionary activity status there are no specific objectives or policies listed, meaning they cannot factor into a determination of a consent application under section 104C of the RMA.
4. There is inconsistent wording between rule E27.4.1(A3a) which refers to “travel demand thresholds” and standard E27.6.1A which only describes “development thresholds”.
5. Standard E27.6.1A(2)(b) requires a subjective assessment and determination of whether a development accords with a consent, or the provisions of an ITA, and a subjective assessment of character, intensity and scale with regard to land use, trip generation and transport effects. The wording of this rule is imprecise and uncertain and places a large burden of proof on a person undertaking a development – with no certainty the council will agree.
6. There appears to be no justification or evidence base to support any of the development thresholds in Table E27.6.1A.1.
7. It is unclear how a subdivision would ever trigger the thresholds in standard E27.6.1A/table E27.6.1A.1 as all the thresholds relate to activities, dwellings, people and floor area, whereas subdivision involves the creation of lots, units or lease areas.
8. It is unclear how a subdivision could be assessed against the thresholds in standard E27.6.1A/table E27.6.1A.1 or the matters of discretion or assessment criteria or how a travel plan could be applied to the lots created through the subdivision.
9. The above two points reinforce the position that the travel plan aspect of PC71 is not properly considered, is ill-prepared, and lacks any credible evidentiary base.
10. In our experience, travel plans are unworkable and impractical for individual dwellings, small offices, and activities where there is no real control over the bulk of its users and visitors. How would they be enforced or monitored? Travel plans are appropriate as living documents used by larger-scale or centrally-managed activities such as larger employment and industry activities, large-scale apartment buildings or integrated residential developments, schools and care centres.

Sentinel Planning Limited seeks the following decision from Auckland Council:

- A. **Decline** the proposed plan change as it relates to the specific provisions E27.4.1(A3a), E27.6.1A, E27.8.1(4A), E27.8.2(3A), E27.9(2)(b)
- B. Recommend that these provisions should be the subject of a separate plan change with a more robust section 32 analysis.

Sentinel Planning Limited **wishes to be heard** in support of this submission.

If others make a similar submission, Sentinel Planning will consider presenting a joint case with them at a hearing.

Signature of Submitter:

Simon O'Connor, Sentinel Planning Limited

Date: 24 March 2022

Address for service

Sentinel Planning Limited

Attn: Simon O'Connor

PO Box 33995, Takapuna 0740

Email: simon@sentinelplanning.co.nz

From: [Michael and Lynley Webster](#)
To: [Unitary Plan](#)
Subject: Submission on proposed plan change 71
Date: Thursday, 24 March 2022 10:22:48 pm

Tena koe

I wish to make a quick submission to say that I am concerned about the amendment to remove car parking minimums in the Hobsonville Point area.

89.1

Although I am in support of encouraging people to use public transport, it is just not possible to live with a family in our area without a vehicle. Public transport is prohibitive for getting to work on time when multiple changes of services are required. Therefore it is imperative that at least one park is provided per dwelling. Perhaps there can be an exception for apartment buildings, with a reduced number.

Many older people live in our suburb. They tend to have families that visit. With no parking provided for the elderly family member's relatives, there will be chaos on the streets on the weekends.

Hobsonville Point was designed for families. Therefore we have a number of children. The streets are narrow, but at the moment with most current properties in the established streets having one or two parks, cars are not parked on the road. As soon as a car is parked on the road, visibility for children crossing the road becomes impaired, and it becomes very difficult for other vehicles to pass.

Please do not create hazardous road conditions in our new streets, or disadvantage families of young and old. Hobsonville is a considerable distance from the city, and it just isn't feasible to be without cars. The plan will cause hostility amongst neighbours and possible road rage. I urge you to reconsider.

Nga mihi

Lynley Webster
12 Tuatua Road
Hobsonville Point

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Lauren Hawken
Date: Thursday, 24 March 2022 10:45:51 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lauren Hawken

Organisation name:

Agent's full name:

Email address: Lauren@upo.co.nz

Contact phone number:

Postal address:
15 Vista Crescent
Glendowie
Auckland 1071

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
E27.6.1A.1 Dev. Thresholds

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Within the MHS Zone, threshold should be reduced to 4 residential dwellings & above, for travel document requirement. Further a loading bay should be provided. Suburban Zone, is located further away from rapid transport hubs & large shopping complexes. Therefore greater need for car parks & loading bays for deliveries.

90.1

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: As above. Change threshold in MHS Zone to 4 dwellings & above require travel plan document. Loading bay should be provided as a minimum.

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 71 - Joseph Donis
Date: Thursday, 24 March 2022 11:15:48 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Joseph Donis

Organisation name:

Agent's full name: Joseph D

Email address: digitaly.ko@gmail.com

Contact phone number:

Postal address:
3 Mccaw Avenue
Whenuapai
Auckland 0618

Submission details

This is a submission to:

Plan change number: Plan Change 71

Plan change name: PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments

My submission relates to

Rule or rules:
Removal of car parking minimums

Property address: Whenuapai

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Whenuapai will be facing increased car theft issues and there isn't sufficient public transport system.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 March 2022

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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