



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

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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.⁶

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.

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:

- 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.

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.

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, flowing style.

Kim Watts
Executive Engagement Manager