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AT Parking Discussion Document

NZAA submission

The New Zealand Automobile Association Incorporated

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Dear Scott,

DRAFT PARKING DISCUSSION DOCUMENT – SUBMISSION

The New Zealand Automobile Association (AA) appreciates the opportunity to comment on Auckland Transport's (AT) Draft Parking Discussion Document (the Document).

The AA is an incorporated society with 1.4 million members, including approximately 285,000 Auckland members. Originally founded in 1903 as an automobile users' advocacy group, today it represents the interests of road users who collectively pay over \$2 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST.

The AA's advocacy role in Auckland is focused on articulating the voice of the reasonable motorist on key transport infrastructure issues, and ensuring that the decisions over which projects to build and how to pay are shaped by value-for-money and principles of equity. Our goal is a safe, sustainable, and strategically aligned transport network that provides greater mobility options for our members and for all Aucklanders.

Overview

The AA supports a number of elements of the Document, but we question whether it will have the desired effect on consumer behaviour, and in general would caution against any attempt to bring about modal shift by focusing predominantly on increasing charges to motorists.

We welcome AT's desire to bring greater clarity and consistency to the parking regime across Auckland. Given the city's projected growth, there is a need to think more strategically about how parking is managed, and to begin a debate with the Auckland public about parking, however combusive it may prove at times.

Many of the objectives that underpin the Document – congestion relief, CBD growth and vitality, and the improvement of the public transport (PT) network in particular – are ones we share strongly and

that resonate with our Members. We support greater investigation of the role parking management can play in advancing those objectives.

In addition, we agree with the majority of the parking management tools that AT is proposing, and we are encouraged to see an increasing preparedness on AT's part to approach parking issues in an innovative and holistic way.

While we support aspects of the Document's aspirational and operational focus, we have a number of concerns about the strategic framework. The Document lacks clarity in relation to its objectives, and there are questions about the robustness of AT's evidence base, especially when it comes to understanding the preferences of its customers. Our own research highlights the fact that many Aucklanders do not pay for parking, are very reluctant to pay more for parking, and still do not see PT as a viable alternative to the private car. These factors speak not only to the level of emotion around parking issues, but also to the difficulty AT may well face in achieving its goals.

Further, we consider AT's approach to entail too much stick and not enough carrot. In general, AT needs to do more to demonstrate that any increased parking charges will be offset by increased convenience for motorists, particularly through technology improvements and the future development of the PT network. Otherwise, AT risks falling at the public acceptability hurdle, with the Document being interpreted first and foremost as an exercise in penalising motorists and revenue grabbing.

Throughout this submission, we recommend a number of initiatives that will assist AT to address these issues. We would be happy to discuss these further with AT at any point.

Auckland parking survey

The AA takes an evidence-based approach to all advocacy work, and to inform our response to the Document, and to provide insights into user behaviour, we completed a survey of the experience and attitudes of Auckland AA Members in relation to parking issues. The survey consisted of an on-line questionnaire emailed to 20,000 randomly selected Auckland AA Members. In all, 1,130 complete responses were received.

The complete survey is attached as a separate document. We would be delighted to meet with AT to review it in more detail, if that would be useful.

Section 2: Objectives for managing parking

In outlining its objectives, AT has provided a list of aspirational statements, but little sense of what each of them means in practical or quantifiable terms, how they are to be prioritised, and how the inevitable trade-offs that result from attempting to pursue them at the same time will be handled. It is therefore unclear what AT is in fact aiming to achieve. Further, because of this lack of clarity, it is impossible to assess the benefits of the initiatives that are proposed in the second half of the Document, or to compare the benefits with those of any alternative approaches.

Section 4: Issues and trends

4.1 City centre

Public transport

According to AT, “the only way to support the expected growth in travel demand is through more public transport.” While we do not necessarily challenge this statement, it is important that such fundamental assumptions are supported by economic data. We presume that AT has carried out economic modelling around the costs of traffic congestion in the Auckland CBD versus the costs of migrating drivers out of cars and onto an expanded PT network. If so, that modelling should be made available.

More information is also required on AT’s forecasts for travel demand to the city centre. Are these based on current trends, or on predicted responses to capacity constraints? Do they assume implementation of AT’s parking measures?

In this section, and throughout the Document, a more compelling vision of the future of alternative transport modes needs to be communicated to the commuters whose travel habits AT hopes to change. Our survey results highlight that, even though our Auckland Members are relatively frequent PT users by Auckland standards (around 13% use PT to get to work; 38% of those who work in the CBD travel by PT), they remain sceptical about PT as a viable transport alternative.

The fact is that our Members rely heavily on their cars to get to and perform their jobs. Their work destinations are spread all over Auckland – 12% work in the CBD, the rest in tiny concentrations in all quarters of the city. Most Auckland Members (55%) regularly drive during the day to perform their work duties (the figure is 45% for Members that work in the CBD) and the cars they use are typically their own. For nearly 72% of these Members, PT would be a “totally impractical” alternative; for a further 17%, it would be too slow to be realistic.

Consequently, a little over two-thirds of Auckland Members are opposed to restrictions on parking or increased parking charges in order to encourage greater PT use. Interestingly, if parking prices were to rise, PT would be the least favoured alternative (more would use active modes or negotiate with their employer about a work-provided parking space or even a change in jobs).

Auckland Members will therefore take a lot of convincing, and positive reasons to change behaviour must be provided, not just price hikes. Developing incentives will require investment in market research and communications, but also closer integration of AT’s parking and PT strategies.

Pricing of parking

AT states that it “can influence a shift [in] commuter demand away from the morning peak by reducing the amount of long stay parking, increasing prices to achieve parity with commercial operators,

changing the conditions for early bird parking and moving toward more short stay parking.” However, earlier in this section, the point is made that AT controls only 16% of the off-street parking market (we understand that less than half of AT’s market share consists of early bird parking), with the rest controlled by the private sector. Beyond on-street parking, any influence on AT’s part will therefore be limited.

Further, in public as well as private car parks, about half of long-stay parking spaces are leased, with many provided by employers for their staff. Our research shows that 27% of Auckland Members who work in the CBD park in employer-provided car parks (slightly less than the number who park in early bird). While more industry data would be required to understand the extent of the issue, it is clear that price increases would in many cases be carried by the lease-holder rather than the end user, meaning price increases for this group would have little impact on commuter numbers.

Given their potential impact, these issues should be thoroughly reviewed by AT, if they have not been already. Within this process, we strongly recommend that AT strengthen its research into its long-stay customers – both early bird and leased – to better understand price breaks, and to determine what factors other than price (such as quality of alternatives and timing and convenience) might be required to increase PT uptake. This could inform efforts to incentivise greater PT use to all long-stay customers, both in public and private parking facilities.

Parking levies

We note that the notion of a central city parking levy was raised during the Consensus Building Group process last year, but was one of a number of alternative funding mechanisms to be rejected. In this respect, the Document would appear to be misaligned with Auckland Council policy.

Technology

Notably absent from this section, and from the Document in general, is consideration of the opportunities to improve convenience and customer experience that are provided by technology. There are a number of devices and mechanisms that are already being used elsewhere in New Zealand and overseas, and that should be front and centre of any plans by AT to develop parking. Some priority examples include:

- Smart meters, which are purchased by the user and effectively bring the parking meter into the car (ideal for regular short-stay users or tradespeople): <http://www.smartpark.co.nz/>
- Apps that allow users to pay, top up, and identify vacant parking spaces via the smart phone, to avoid circling for spaces or wasted travel: <http://www.phone2park.co.nz/>; <http://wellington.govt.nz/services/parking-and-roads/parking/on-street-parking/txt-a-park>
- In-road sensors, which support variable pricing: <https://frogparking.com/>
- Automatic number plate recognition

Such initiatives would help to give effect to AT’s objective of providing “an outstanding customer experience” at its parking facilities.

CBD vitality

Also missing is a substantive discussion about the potential impact on CBD vitality as a result of increased parking charges. The decline of retail on 'the High Street' remains a highly sensitive issue in Australia and the UK, and should not be underestimated if AT considers raising on-street prices in the CBD, or in town centres. As our survey indicates, parking prices have an important bearing on AA Members' choice of retail destinations: on average, Auckland Members would drive for an extra 11 minutes to shop at a destination with free parking, versus current CBD prices.

Also, a strong PT network depends heavily on high employment density in the CBD, and there is a risk that high parking charges could eventually encourage employers to relocate to more accessible parts of the city.

Section 5: Suggested approaches

5.1a Managing demand for parking in the city centre, metropolitan and town centres

We generally support the expansion of the City Centre Parking Zone (CCPZ) model, and recognise the benefits that demand-responsive pricing can have when it comes to guaranteeing the availability of parking spaces and easing congestion. We note that the CCPZ appears to have been well received by city-centre retailers, though there are concerns in some quarters that the removal of time restrictions has discouraged turnover.

Auckland Members recognise the value of guaranteed parking access, and on average would be prepared to pay \$3.60 per hour to obtain an immediate park (among those that work in the CBD, the figure is \$7.90). But there is far less willingness to pay more (or pay at all) when there is no obvious benefit, and it is clear that a large proportion of Aucklanders – particularly those who work outside the CBD – do not expect to have to pay for parking. When faced with a \$4 parking charge, 80% of Auckland Members would spend around ten minutes looking for a cheaper (or free) parking option, in sunny weather. This could potentially cause significant congestion.

Separately, there may be an opportunity for AT to collaborate with the private sector to mitigate the impacts on shoppers of parking charges. One scheme introduced in the UK involves 'High Street' retailers subsidising the parking costs of people who shop in their stores, and may be worth investigating in the Auckland context.

5.1b Consistent approach to managing parking in centres

The AA supports proposals to develop Comprehensive Parking Management Plans. Within these plans, there should be a strong focus on consistent application of enforcement rules and clarity about the purpose of enforcement (for instance, to improve compliance or encourage turnover). Such plans should have the goal of improving compliance over time (and therefore reducing enforcement), and should clearly identify the means by which this will be achieved, such as via the adoption of technology like top-up by txt or online prepayment.

5.2 Balancing competing demands for parking in residential streets

We recognise the need to manage the tension between different users of residential parking space, and therefore agree in principle with an extension of the St Marys Bay trial scheme, where occupancy rates are high enough to warrant it. However, we would insist on the outcomes being closely monitored, to ensure that parking assets are best utilised and that the benefits accrue to as many user groups as possible. If the scheme resulted in low occupancy rates, for instance, consideration should be given to some form of coupon parking (ideally in the form of smart parking meters), which could be made available to local employees and commuters in appropriate numbers. Some innovative approaches have been used overseas to make residential off-street parking available to non-resident commuters during the day ('rent-a-driveway'), and may be worth investigating further.

In addition, we would like to see a degree of flexibility when it comes to the allocation of parking permits to existing residents, to ensure they are not unfairly disadvantaged by decisions they made well before the rules were changed. This may require a distinction being drawn in the application of the rules between people who already live in a suburb, and people who move in subsequent to any parking changes. Rather than a wholesale restriction in residential parking, more stringent restrictions would apply to new residents.

5.3 Managing off-street parking facilities in the city centre

Notwithstanding the comments made in relation to section 4.2, the AA strongly supports the concept of a "congestion buster" product, and would also encourage AT (and private providers) to examine opportunities to free up some leased parking spaces to casual parking in evenings and weekends.

5.4 Investing in off-street parking facilities

The AA is generally comfortable with the approach AT has suggested to investment in off-street facilities. We would strongly support any examination by AT of revenue-generating initiatives that can improve the customer experience, and we would encourage AT to look beyond car wash and valet services to services like dry-cleaning and food and beverage.

As with on-street parking, we would like to see greater emphasis on opportunities to improve user convenience through technology. It will also be necessary to equip off-street facilities with charging stations as the size of Auckland's electric vehicle fleet increases, and to give priority parking to electric vehicles and plug-in hybrids.

5.5 Prioritising access to on-street parking

In principle, the AA sees some merit providing priority for certain classes when it comes to on-street parking. However, in this case, no rationale is given for the prioritisation model, nor is there any sense of what prioritised access will mean in practical terms (e.g., how many spaces would be allocated to the different classes), or what the actual demand for priority parking is.

5.6 Managing parking on arterial roads

As our survey demonstrates, the removal of parking on arterial routes is a highly polarised issue: 39% support it; 40% oppose it; and the rest remain uncertain. We agree that the issue needs to be given further consideration, given the potential to improve traffic flows and improve road safety. However, we would urge AT to maintain a gradual, case-by-case approach, with a high level of attention to the sentiment of local residents and retailers, and a strong emphasis on communicating the benefits to all stakeholders. Within the discussion, the AA would also like to see more emphasis on the benefits to throughput for general traffic that could come from removing parking from arterials, in addition to the emphasis on benefits to PT and bicycles.

5.7 On-street parking restrictions and events

The AA supports AT's intent to work with event organisers to develop traffic management plans. We frequently receive complaints from motorists about inadequate and inconsistent management of temporary events and associated parking restrictions, often from those that are not local residents. In particular, we submit that, if AT is to enforce any parking restrictions associated with temporary events, in the interests of consistency it should also be responsible for all aspects of traffic management and notification to road users and residents. This would include installing signage and coning off areas where parking is to be restricted, well in advance (up to 24 hours) of the restriction taking effect.

If AT does not assume this responsibility, it should impose minimum standards on event organisers covering signage (over and above the regulatory requirements), use of cones (in advance of the restriction applying) and letterbox drops, and decline to enforce parking restrictions if these standards are not met. This practice is observed by RCAs elsewhere.

For the absence of doubt, the AA would welcome the opportunity to work with AT to develop a template for parking enforcement guidelines as part of a temporary event traffic management plan. Any requests for road closures for temporary events should go through a standard application process with clear guidelines on the respective responsibilities of event organisers and AT, and the purpose of those guidelines.

5.8 Allocation of parking permits

In general, the AA agrees with the approach to the allocation of parking permits that has been proposed by AT, including the suggestion of a daily coupon, for greater convenience.

5.9a Investment in park and ride facilities

Park and ride has proven a highly effective means of encouraging PT patronage, locally, nationally and internationally. We therefore strongly support AT's intention to expand park and ride facilities through the Auckland network. At this point, our preference would be to avoid capping the expansion in terms

of numbers of parking spaces, and to instead follow demand in the years ahead and adjust targets accordingly.

We are similarly supportive of AT's suggestion of collaboration with parking providers adjacent to park and ride stations (e.g., shopping centres) who might have under-utilised spaces during the day.

We would be interested to know whether any research has been carried out into the possibility of establishing park and ride facilities on the city fringe at some point in the future. This could involve relocating existing CBD parking spaces and could dovetail with plans for increased densification and pedestrianisation of the CBD.

5.9b Pricing of park and ride spaces

The AA is opposed to any moves to charge for park and ride spaces at this time. Park and ride is arguably delivering exactly the type of transformational shift towards PT sought by AT, and introducing charges would therefore appear self-defeating. As our research indicates, the introduction of any such charges seems likely to result in many users reverting to private vehicles: around one-third of current park and ride users would choose instead to use their cars for the entire journey if faced with a charge of \$3 or more; at least half would change to a 'hide and ride' approach (though the park and ride subgroup was small).

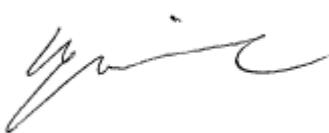
Where charging of park and ride facilities has been introduced overseas, the local PT system has been significantly more mature than it currently is in Auckland, and we would not be prepared to consider any moves towards charging until levels of PT service and patronage have increased significantly, both on the key routes and the feeder services. Even at that point, we would insist on the following conditions within any proposed scheme:

- A small quantum (e.g., \$1-\$2)
- An proportion of parking spaces remaining free, as is common overseas
- Convenient payment solutions (for example, integration with the Hop card, as the Discussion Document suggests in 5.9a)
- Demonstrable gains in security and amenity at stations

Conclusion

As mentioned above, we would be happy to discuss the content of this submission or our Member survey with AT. Please advise me if that would be useful.

Yours sincerely,



Barney Irvine
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