

CHRISTCHURCH CENTRAL CITY PLAN



NEW ZEALAND AUTOMOBILE ASSOCIATION INCORPORATED

COMMENTARY and SUBMISSION

PRESENTATION: Warren Masters (Chairman) Brian Palliser (Vice Chairman)

INTRODUCTION

The AA's position is simply, as quoted in the Draft Plan (pp84), 'We need to ensure a vital city where people can move freely and safely by whatever mode of transfer they wish to use, including the motor car'

The New Zealand Automobile Association (AA) has a large membership of over 1.3 million with some 81,240 members in Christchurch City.

The AA works cooperatively with the Government, Local government, ECAN, the NZ Transport Association, the NZ Police, the road transport industry, Public Transport, other sector groups, and media to represent the interests of its Members.

AA advocacy and policy work focuses mainly on protecting the freedom of choice and rights of motorists, enhanced road safety and extends well beyond 'cars and roads' to include public transport, cycling and walking.

The AA's Canterbury/West Coast District has many diverse functions and is an active business in the City Centre. We are concerned to see the earliest possible recovery of the City Centre and the Association wishes to re-establish a presence in the City Centre. The AA has been well represented at the City Council's workshops and we maintain a friendly and valued relationship with other organisations, as well as with City Councillors and Council officers.

Future plans for the City Centre must be soundly based in fact, with valid assumptions and forecasts.

The AA refers here to the results of a recent survey of its members; the sample including 4767 households.

The AA supports in general the 'visions' of the Draft Plan and especially the objective of seeking that the 'Central City will be easier to get to and get around' (pp 1, pp7, pp85) this must include convenience for **all modes**, including motor vehicles. The AA acknowledges the Draft Plan's statement where it cautions that the 'traffic, public transport and parking demand modeling and analysis' (pp 14) has yet to be undertaken and reported. We therefore see the road network proposed in the Draft Plan as an initial and tentative one only.

The AA does not wish to comment on other more detailed land use issues or rules set out in Volume 2 at this stage but would simply point out that there is a desperate need for land use and roading matters to be well coordinated.

The AA considers that there are some fundamental concerns that must be resolved satisfactorily, through more technical analysis and planning assessment, before the Plan can be confirmed.

We discuss these under the following headings:

1. Some Basic Issues
2. Central City Travel Mode Choice
3. Central Street Networks
4. One Way Streets
5. Possible Network Compromises
6. Parking Provisions and Management
7. Public Transport
8. AA Suggestions on Next Steps

1. SOME BASIC ISSUES

The AA's recent survey of its members shows that 75% have families and 66% will definitely wish to remain in Christchurch. However 22% were unsure about their future. At present 41% are in the same work premises they occupied pre earthquake and 25% are in new/temporary locations.

The AA sees the Draft Plan as an extension of past plans. We are aware of and have been involved with the earlier plans including the Regional Plans and City Plans of the 1970s 1980s and 1990s.

The objectives and policies now proposed in the Draft Plan are very similar to the higher level objectives of the 2005 City Plan which have been through full consultation, submission and approval processes under the RMA.

The AA supports the opportunities for open spaces, increased landscape amenities, pedestrian convenience and the creation of boulevards and slower traffic streets now envisaged. We are all pedestrians and we will all enjoy these benefits when they eventuate. However these adjustments to the streets and public spaces should not occur by limiting the accessibility for all modes, including travel by vehicles, for people on business and as visitors to the Central City / CBD.

The AA endorses the retention of the CBD/Central City Precinct with all its infrastructure at the present historic location. It also recognises the extent of work which has been undertaken on architectural and urban design aspects in the past three months while preparing this Draft Plan.

The population figures in the technical appendices appear to us to be a little optimistic. We consider the central city employment will be unlikely to rise above 30,000 again, as compared with the pre earthquake 50,000. The central city residential population may lift from 7000 pre-quake to as much as say 15 000. At these 'census' levels there is still the prospect of support for a new, exciting and pleasant Central City /CBD.

While supporting generally most of the higher level objectives set out in the Draft Plan, August 2011 Volume 1 (pp 1, pp 7), the AA has serious reservations relating to the "Transportation Choices" statement (pp 88 - 100). In particular the repeated emphasis on improved solutions for the minor modes, representing 20% only of all person trips to the CBD and an apparent disregard for the needs of the 60 % of car driver trips and 20% car passengers we forecast will need to arrive in a successful Central City in the future.

The AA warns against the Council adopting the transportation part of the Draft Plan in its present form at this time. The Draft Plan lacks any technical transportation appendices. In our view a lot more technical analysis and modeling must be done on the transportation networks, the parking, and public transport before the Council should contemplate adopting the street network and the public transport system proposed by your urban designers. If this does not take place we believe the Council may be guilty of throwing the '(transportation) baby out with the bath water' purely because of unduly hasty political expediency.

2. Central City Travel Mode Choice

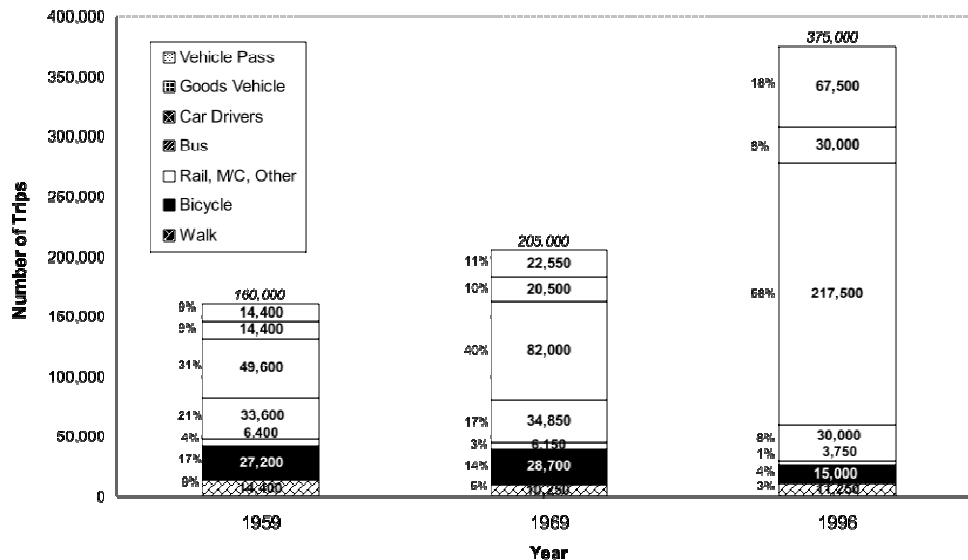
The AA surveys show the 'modal split' for different purposes across all suburbs and the city centre are as follows (Percentages Shown):

ALL TRIPS	TO SUPERMARKET	TO WORK	TO LOCAL SHOPS	TO REC / CULTURE
Pvte Car	77	68	55	74
Bus	2	10	3	10
Cycle	5	14	9	5
Walk	15	7	33	11

CENTRAL CITY	TO SHOP	TO WORK	TO REC / CULTURE
Pvte Car	68	63	67
Bus	18	18	16
Cycle	6	12	7
Walk	8	7	10

(Pre Quake)

In addition to the AA's survey there is a considerable amount of information available on 'modal split' of travel to the CBD. The City Council's report of October 2000 showed the situation in 1959, 1969 and 1996 as shown in the chart and these trends continue



TRAVEL MODE TO CHRISTCHURCH CITY CENTRE 1959-1996

The issues of modal split to the CBD has not been described and apparently these have not yet been analyzed, forecast or assessed as part of the option testing for the Draft Plan at this stage. Given past trends and information, it is possible to make assumptions on future modal split and employment 10, 20 and 30 years out to give confidence in future forecasts for planning the CBD, the roading hierarchy and make assessments of the balance in planning the transport system.

3. Central City Street Networks

For those answering the AA Surveys their frequency of visits (pre earthquake) to the City Centre were:

Daily	16.8%
5-6 Days/Week	13.6%
3-4 Days/Week	8.6%
1-2 Days/Week	<u>21.0%</u>
<u>Total</u>	<u>60.0%</u>
Less often	40.0%

To the question 'What do you think about reducing speed limits to 30kph in the city centre 47.7% AA members supported the suggestion and 27.7% opposed the suggestion?

The AA accepts the general objectives and the discussion on CBD future functions, activities, building plot ratios, height controls and city plan provisions. **However we ask that the road network and transport issues must be subject to more rigorous technical analysis.**

Since the 1960s the Christchurch City Council has had a positive view on providing for the City Centre's accessibility and the spectrum of different streets and pedestrian areas each in their correct places and style. In the past these types of improvements have been achieved by a process of incremental adaption over time. Now necessity dictates a redevelopment programme over the whole CBD in a short time frame.

The AA observes two cultural changes that appear to have taken place over the past year.

Firstly a stronger desire to encourage more foot traffic who can 'linger and ponder' in the centre city.

Secondly an apparent willingness to spend much more money on extending landscaping in public areas.

The AA supports making the central streets operate at slower 30kph and 40kph speed limits. It also supports an ambitious programme of rebuilding the streets in a new manner with their different cross sections and landscape treatments. **However this must be with due regard to maintaining the network's capacity suited to each part and the balance of modes on each link.**

The AA is not satisfied that the selection and definition of the street types has been undertaken with all the relevant factors in mind.

The key to the Central City Road Hierarchy is the map at the back of Volume 2. This sets out the urban designers' preferences and has also introduced three main classes of street: 'distributors', 'ways' and 'typical streets'. The map must surely be the first option only. The AA believes there are other options, including not altering the present

classification, which must also be explored; for example to rely on Deans, Bealey and Fitzgerald Avenues to assist in serving as distributors to the inner City Centre area, in the absence of the inner one-ways, is not logical. This has obviously not been analyzed thoroughly and relies on a 'hobby horse' group of opinions. They are already loaded to their practical capacity with their cross-town inter-suburban ring function while at the same time providing significant access and distribution for longer trips to and from the City Centre.

The basic assumptions about two-way streets being adequate and the 'Four Avenues' providing alternative access and relief for traffic from the centre city has obviously not been tested rigorously and if it is it will fail again.

The draft CBD Roading Hierarchy map reflects one tentative option which presumably supports the Planning Team's rules, zones, bus routes and landscaping visions for the proposed Draft Plan. This and other options should all be subject to comprehensive modeling, testing and planning assessment before the Road Hierarchy network is confirmed for inclusion in the Draft Plan. This is surely a pre-requisite to these changes before they can be approved under the CERA or the RMA.

4. One-Way Streets

The AA survey indicates that 56.8 % of the members surveyed, favor the one way streets. There were only 16.7% opposed, while 24.5% are neither for nor against them.

The AA's view is simply that the one-way streets are a proven success and should be accepted as the essential inner distributor for all vehicle modes of travel in the new City Plan.

Since they were introduced 38 years ago, the public has accepted and appreciated the quality of travel, the traffic management and safety advantages of the one-way streets with their area wide control surrounding the CBD. They help the environment, reduce accidents and free up the inner core 'ways' and 'streets' from needless and extraneous vehicle movements. This in turn enables the latter to better serve their pedestrian and community functions.

The Draft Plan states explicitly (pp 87, 98 and 125) that one of the first changes will be to revert the one-way streets back to two-way 'to provide simple and direct access to the central city'. There is no factual analysis or justification given for altering the one-way streets. Some urban designers are known to oppose them because they deem them to be in conflict with retail and footpath activities. However the 'one-ways' traverse streets outside the central core and they have never been proposed to be placed along the more intimate CBD retail locations.

The AA believes the environmental impacts of one-way streets are, relative to two-way streets, quite benign. They provide a ring of inner roads that enable vehicles to approach the edge of the CBD from all points of the compass and reach a variety of destinations on the near or the far side of the core without cluttering up city centre streets and ways.

These inner one-way streets are not there to provide fast through vehicle traffic routes between suburbs or short cuts across town. On-street surveys confirm that 80% of the vehicles on the inner one-way streets have origins or destinations within the centre city. Over all four pairs of one-way streets the 'through' or 'by-passable' traffic varies from 15% to 25% in different parts of the one-ways. This is no problem and, if the one-way streets were slowed to say 40kph the percentage could be expected to drop still further.

The one-ways also serve the peripheral commercial, institutional and residential precincts. Most importantly they provide direct access to the 'fringe' blocks for off street parking areas for both short and long term parkers.

5. Possible Network Compromises

The AA believes there is a need for a meeting of minds between all the interested agencies to agree a Central City Roading Hierarchy that matches the reasonable intentions of the urban designers while being equal to the traffic capacity, type of road and place, and the landscape treatments proposed.

While being resolute on the need of the inner one-way street square the AA recognises that some compromises can be made to assist the emerging vision of the present discussion Draft Plan:-

1. It may be desirable to slow down these inner one-way streets to 30~40kph. They would still serve their same functions at the slower speeds;
2. The opportunity on the one-way streets to modify footpath crossing positions, reduce pedestrian crossing widths and undertake additional street planting all exist as part of the redeveloped city centre upgrade. For cyclists the edges of one way streets have also proven to be popular;
3. If a decision is made to close Oxford Terrace and Lichfield Street or use it as a bus route only then the continuity of the inner one-way street 'box' can be preserved by switching to Tuam St. Even greater cycle safety and convenience may be achieved by slightly raised cycle kerbing as seen overseas;
4. The situation on Durham St and Cambridge Terrace is less flexible. Making the Bridge of Remembrance into a 'green' pedestrian concourse in 1957 was enabled by the construction of the new Durham St bridge. The

continuity of the one way pair of both Montreal Street and Durham Street is essential to vehicle distribution on the west of the CBD for both vehicles and public transport;

5. To rely on Deans, Bealey and Fitzgerald Avenues to assist the City Centre has been tested and failed.
6. They are too remote from the location of intense pre-earthquake Central City land uses. They are already loaded with their existing cross town inter suburban ring function. Finally these divided arterial Avenues are significant landscape features, in their own right;
7. There are two or three other locations where some adjustment to the Roading Hierarchy classifications would appear to be appropriate and these include adjustments to parts of Park Terrace (North), Armagh St (West) and Lichfield Street; however these refinements would best follow the analysis and modeling tests.

6. Parking Provision and Management

The AA sees the development of the whole City Centre Parking Plan as a pre-requisite to businesses being prepared to return to the centre city. The Draft Plan's absence of information and analysis is a major defect.

The AA Survey results for removing on street parking to allow for buses and cycle lanes was 45.2% support and 36.5 % opposed.

The question of reducing maximum parking to 3 hours max was supported by 50% with 21.5 % opposed.

The AA considers that now is the time to be selecting parking sites outside the core and in the fringe and establishing the Council's policy plans for the whole Centre City. Assuming that the parking demand is forecast at about the 1990 parking level of 30000 (i.e. 80% of the 2006 level) the parking supply would be as follows: Street kerb-side spaces reduced to 5000; future off-street short term parking totaling about 10,000. The future of off-street commuter and long-term parking might be about 15,000 off-street spaces. This demonstrates the need to plan for these off-street parking needs as a whole from the outset.

There are obviously detailed studies, forecasts and policy decisions to be made on the City Council's future involvement in parking. This needs to be worked through the planning and policies after the transitional period of vacant land - open lot parking and the free parking fees ends in 2 or 3 years time.

The AA is of the view that forecasting future parking, planning for future off-street parking, for both short and long term, and then establishing suitable policies for managing the parking facilities, are all key matters to be resolved as a whole package at this early stage so as to give confidence in the transportation objectives. This is essential to the integrated planning of the City Centre as part of the Draft Plan.

7. Public Transport

AA members surveyed showed above average use of the bus system public as shown by the following:

ALL TRIPS	TO SUPERMARKET	TO WORK	TO LOCAL SHOPS	TO REC-CULTURE
	2%	10%	3%	10%
CENTRAL CITY TRIP	TO SHOP	TO WORK		TO REC-CULTURE
	18%	18%		16 %

The Bus trips by Secondary School students were 27.7% before and 24.1% after the quake while Primary School pupils were 8.0% before and 6.2% after the quake.

The provision of more suburban public transport is the most common view as to one means of reducing car use. However being realistic the majority of individual trips to and from the Central City will continue to be by car and only 15% by bus transport.

This is the well established mix for Christchurch with its circular shape, its existing twenty suburban centres and the scattered nature of its employment. Unfortunately the recent earthquakes have scattered the residential and employment functions still further afield away from the old CBD.

The AA considers that even with great effort and greater subsidies to passengers and to the bus system the present share of trips by the different modes of travel is unlikely to change significantly during the post earthquake re-development over the next 20 or even 30 years. While other options can be tested from time to time it is certain that the new Christchurch CBD must be designed to meet its first obligation; this is to accommodate the existing urban travel patterns including a workable network for vehicle travel and buses.

The AA believes there is unlikely be an economic suburban public transport solution using fixed rail or supporting a light rail system in Christchurch in the next 30 years.

For good social and community reasons we must retain the best public-private bus system we can afford especially along the selected public transport routes. In the City and even in suburbs more sophisticated electric rubber-tyred

buses/trolleys would be better value, more flexible and affordable. Modern bus variants, including diesel electric, trolleys and taxis, both fixed route and de-routed, would be the most productive policy for Christchurch's size. With web and IT information systems now available the combination of taxis and mini bus direct dial services all show promise. These could provide the outer collection to more heavily trafficked scheduled bus services between the suburban nodes and the city centre.

Regarding the Central City Bus Exchange and street exchanges we have some concern because, yet again, the sketches shown so far do not seem to have been fully modeled or proven. We believe the number of smaller street stations will be less attractive for PT users, i.e. reduced level of service, less legibility, safety, cross town transfers and it will also lead to more obscure routing.

The AA believes that a major multi-function Central Exchange is to be preferred. However the split routes using Manchester and Durham Streets as proposed might not fit with a single exchange system. We agree that the exchange, and/or street stations should be as close to the City's Heart/core as possible. This is another example of a work in progress and will need to be the subject to rigorous modeling, testing options and planning assessment.

One element of public transport which has been much neglected is the inter city linking of Canterbury towns with a fast diesel multiple unit (DMU) rail service along the existing heavy rail lines between Timaru, Ashburton, Christchurch, Rangiora and Amberley. This could be used as a further incentive for a regional urban development policy supporting this lineal constellation of towns along the under-utilised main railway.

As has been found in other cities it is necessary to plan public transport routes, of all sorts, well ahead and establish the location of any new corridors many years ahead of installation. In Christchurch we have the Kiwi Rail lines and that existing rail right of way should be Stage 1 and the start for any rail infrastructure.

We could lease Railcars as part of the testing of the viability of such a facility but must be very careful that the cost is not yet another heavy impost on the general rate/tax-payer to subsidise inadequate recovery from users by way of appropriate fares.

The suggested light rail route - with no apparent real benefits - to the University should not be considered further.

8. AA Suggestions for Process and Options

The AA believes that we must take a step back and consider the transportation options more thoroughly. Everyone agrees we must not get it wrong now. If we 'get it wrong' we will leave an impossible legacy for the future.

The AA supports the City Council in principle on the definition of CBD precincts. The open spaces identified, which are shown in the Draft Plan, should be confirmed. This includes the Avon corridor, except for the proposed closure of Cambridge Terrace and the Durham Street Bridge to vehicle traffic.

We also accept that, subject to more detailed land use planning (which we understand is in hand) many aspects of the Central City Draft Plan could be signed off and allowed to proceed.

It is fundamental to these discussions that the City Council, as advocate for change including the proposed conversion of the one-way streets to two-way, the re-classifying of the streets, changes to the public transport system, the light rail proposal, all require much more rigorous technical assessments.

These matters affect everyone and cannot be resolved without a lot more analysis, assessment and consultation over the alternatives. Without that work none of these proposals can 'fly' with any confidence. Some will of course fail at this early stage.

The AA is of the view that the following matters have not been developed sufficiently to be confirmed for forwarding to CERA and Government at this time:

- The centre city roading hierarchy;
- The abandonment of the one-way streets;
- The public transport bus central city system and exchange;
- The light rail proposal;
- The plan for future central city car parking.

To be realistic the technical work required to justify the changes, together with the next round of open consultation on most matters would require and indeed must take at least twelve months.

Without such studies the public, all the agencies involved and the business community cannot be expected to have sufficient confidence to agree on the street networks, the public transport plans and the parking provisions for the City Centre, to be included in the proposed Draft Plan.

The advisers should consult far more widely than they have and learn from the ideas of the likes of Otto Wagner (Vienna) and not be afraid to look beyond the few examples so far visited. One City worth looking at is Tianjin's Ninghe for example.

We have an opportunity to work together to recreate our once beautiful City but in doing so we must 'let go' of much of the past and look to a future to provide for the very real needs of the majority of the Citizens and not be diverted from that course by political puffery, ill-considered strategies, professional and inflexible egos, economic wastage and unacceptable present and future burdens on the rate payers.

We need a relevant, vital, aesthetically pleasing, accessible and fun Central City precinct

Signed on behalf of the New Zealand Automobile Association Inc., - (Canterbury West Coast District Council)



Warren Masters
(District Chairman)

Date: 15th September, 2011

Also Referred to :

1. 'Christchurch's One Way Pairs and Area Wide Linked Traffic Signal System' A brief article by Bill Williams -former City Planner (April 2011)
2. 'Christchurch's Central Area Traffic Plan 1960-1986' (1987) Bill Williams, City Planner
3. A City Council Report 'Christchurch City Centre- 40 Years of Change, Traffic, Planning 1959-1999 October (2000) by John Dryden. Compiled by Malcolm Douglass - (October 2000)
4. Christchurch City Council-Central City Parking Plan Development , Summary Report Stages 1 & 2 (October 2008)
5. 'Christchurch City Centre Draft Plan - Commentary on Planning, Transportation and Network Issues' - Malcolm Douglass (September 2011).

COMMENTS ON PROJECTS and CHAPTERS

A. The Projects which the Automobile Association disagree in part or whole include:-

Green City

Te Otakaro Park - While agreeing the importance of the landscaping we disagree with the need to prohibit vehicle traffic in part of Cambridge Tce the 'green' Durham St bridge, and possibly Oxford Terrace (saving say \$2m).

Transport Choice

City to University Light Rail - While there are many other transportation studies and projects the AA support we are totally opposed to commencing light rail studies for operations in particular the University to CBD proposal which we do not believe would assist transportation movement or CBD accessibility significantly. (Saving say \$ 408m).

Enhancing the Avenues - The Avenues are already serving their basic functions well and are fully utilised doing their intra-city and inter-suburban functions now. Beyond normal maintenance and continuing median landscape planting no further actions are required. (Saving say \$60m).

One-Way to Two -Way - As explained the Automobile Association is opposed to the reversion of the one way streets to two way operation. The continued improvement, cycle laning and landscaping on these distributors can be justified but this would be at little cost. (Saving say \$70 m).

(Total Savings on these projects say \$ 480 m.)

B. The Automobile Association has made a comprehensive sub mission on the Draft Plan and in summary has the following views on the chapters in the plan:-

- a) The first four chapters describe the environment and situation well. These introductory chapters give little regard to the record of extensive work which has been undertaken by the City Council to upgrade the central city environment in the 1960 - 2010 period or the record of information and planning in the past 40 years. Some information on the resources provided by the CCC to manage the city centre on a year by year basis over the past years would provide some useful perspective.

- b) The AA accepts the information and is not in a position to contribute to the vision or policies proposed in the following chapters.
 - I. pp 27 Green City - generally support with some minor omissions.
 - II. pp 45 Distinctive City - support the principle of precincts proposed.
 - III. pp 65 City Life - agree the need to undertake this stock taking of activities in the CBD.
 - IV. pp 101 Market City- these enterprises should be well supported by the Council.
 - V. pp 115 & 119 Transition and Implementation - all very necessary.

- c) pp 83 Transport Choices. While the AA agree with the need and the topics addressed in this chapter, as outlined in the attached submission, while accepting the principle of a compact CBD and a slow (30 kph) core, it has considerable reservations about:
 - i. An over emphasis on open space and pedestrian spaces to the extent shown.
 - ii. A preference for public transport to the possible detriment of vehicle access.

C. The Automobile Association does not wish to comment in detail on the Regulatory Framework proposed in Volume 2

However there are aspects directly affecting transportation matters and we comment accordingly:-

pp86 Insert Appendix 18 Neighbourhood Centres

For reasons of traffic safety and traffic management the AA question the placing of neighborhood centres astride the intersections of Kilmore/Barbadoes Streets, Manchester/Salisbury Streets, and Colombo/Bealey Avenue. We ask this be reviewed and sites found mid block on the axis of the Living Zone proposed Greenway corridors where pedestrians and cyclists would naturally congregate.

pp118 7.9.1 Policy Road Hierarchy for the Central City

Volume 3 Part 8 - Appendix 4B. Map.

Amend the map in the following links

Cambridge Tce and Durham St Bridge from Way to Distributer.

Armagh St Park Tce to Durham ST from Typical St to Distributer

There are other refinements that should be made after suitable assignment testing.

This Rooding Hierarchy network is still, in our view, untested and subject to more technical analysis. It must be subject to such tests before it could be finalised.

pp118 Definition of Distributer Streets omit reference here (and at all other places in the proposed policies) the sentence *'All of the existing one-way streets will eventually be converted to two way operation.'* This characteristic of the Distributer links has not yet been established and would not necessarily apply to all of them.

pp 121 Car parking

While agreeing the generality of these parking policies in the absence of a total balance sheet of proposed parking and what will be provided through development approvals complimented by CCC public owned short and long term parking there is no confidence as to the appropriateness of the locations or the extent of the resource.

pp128 Appendix 3A. Avenues 50/50.

There seems no reason why the four avenues are split 50/50 between the city centre of the draft plan and the rest of the city. They must be designed as one major road. It is suggested the City centre boundary be defined on the nearside of these Avenues around the three sides of the central City. The southern boundary would be best defined by the railway so that the area fronting the south side of Moorhouse Avenue is seen as part of the central city.

pp128 Appendix Map 4c Map of Central City Cycle and Bus Network.

This Bus network, like the Rooding Hierarchy network is still, in our view, untested and subject to more technical analysis. It must be subject to such tests before it could be finalised.

pp131 2.4 .1 Maximum Parking space numbers.

The maximum spaces approach whereby development provides a fixed ration of 1 car per 75 sq.ms or 1 car per 50 sq.ms could be supported but we expect there will be a balance shortfall of parking demand arising from employee parking and visitor parking to be met by a programme of public (off-street) parking especially from the core transferred to the fringe. More information on parking in the fringe to offset the shortages and the location of the proposed parking areas, which are not shown on the present zoning map, is required before the implications of this new policy can be appreciated.

pp 141 2.4.14 Vehicle access to parking Locations

While generally comprehending the desire to avoid congestion on streets through access to parking buildings etc we wonder whether it would be preferable to encourage access to the larger car parks from the Distributer Streets in place B (whether they are one way or two way streets) rather than the Typical Streets as the first preference. This would appear to present the vehicle drivers with an earlier parking location.