



**THE NEW ZEALAND
AUTOMOBILE
ASSOCIATION
INCORPORATED.**

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Auckland Transport
Private Bag 92250
AUCKLAND 1142
parkingstrategy@at.govt.nz

Level 16
99 Albert Street
Auckland 1010
PO Box 5
Auckland 1140
New Zealand

T. +21 757 238
E. mglynn@aa.co.nz
W. aa.co.nz

Submission on Parking in Auckland – Starting the conversation: how should Auckland manage its future parking needs?

1. The NZ Automobile Association (AA) appreciates the opportunity to comment on Auckland Transport's (AT) *Parking in Auckland – Starting the conversation: how should Auckland manage its future parking needs* discussion document (document).

Introduction

2. The AA agrees that parking is a key component of the transport system. Parking is and will remain an indispensable element to accessing essential social and economic activities and is critical to Auckland's goal of better connecting people, goods and services.
3. We appreciate that as Auckland continues to grow, there is an increasing need to ensure we are making optimal use of all our road space, including parking. The AA supports the need to update Auckland's Parking Strategy to provide a clear basis for future parking supply and management decisions. Where supported by evidence, this includes:
 - reallocating parking space where this will move more people and/ or reduce emissions within a reasonable transport planning horizon and
 - increasing parking restrictions and prices where there is insufficient supply to meet demand.

Parking's role in achieving the vision and direction for Auckland's transport system

4. The AA agrees that Auckland's future growth needs to be planned and delivered in a more sustainable and efficient way that provides better and safer travel choices for more people. The table below sets out our views on when removing on street parking can contribute to the government's and council's strategic objectives for Auckland's transport system.

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The case for removing on street parking under Auckland’s transport objectives

 <p>Improve the resilience and sustainability of the transport system and significantly reduce the greenhouse gas emissions it generates.</p>	<p>To provide for people movement where there is existing congestion and evidence reallocation to one or more modes will maximise the number of extra people moved and do so more sustainably.</p>
 <p>Accelerate better travel choices for Aucklanders.</p>	<p>Supported by strong evidence that removing parking to provide space for other modes will more effectively serve trip demand, including providing for destinations with reasonably competitive trip times, frequency, and reliability.</p>
 <p>Better connect people, places, goods, and services.</p>	<p>Supported by clear evidence that removing parking won’t undermine town centres by displacing local trips for longer journeys to places where parking is available (e.g., large malls, big box retail).</p>
 <p>Making the transport system safe by eliminating harm to people.</p>	<p>Wherever supported by safety statistics or where there is clear evidence of an ongoing safety risk and parking removal is the best or only way to address it.</p>
 <p>Enable and support growth</p>	<p>In dense locations, where supported by a strong case to reallocate space to the mode(s) that will demonstrably move the most additional people.</p>

Principles

- The AA has commented only on the principles where we consider changes are needed to meet key goals or where there are important matters of interpretation for AT to consider in formulating its Parking Strategy.

Priority for private motor vehicles (Principle [ii])

- We agree that to help achieve shift to more sustainable modes there is a need to move away from parking that prioritises private vehicle use on a number of Auckland’s roads and streets. To be effective, this needs to be in the right locations, particularly in the densest areas where other modes can best meet most people’s transport needs. However, as noted in our comment on the Better Connect objective above, we are concerned that extending this to a number of town centres and parts of the Strategic transport Network (STN) implied by AT’s maps risks unintended consequences. We recommend bullet point 2 of Principle ii be amended to:

prioritises trips by private motor vehicles only where projected demand cannot realistically be met by other modes, parking remains essential to meeting the local community’s needs and/or the viability of the town centre, or removal risks displacing demand for local trips for longer car journeys.

Priority order for kerbside space (Principle [iii](3))

- The AA agrees with the general priority order for reallocating kerbside space where this is needed to support more people movement. However, we are concerned with how the Parking Strategy will apply the modal priorities to support movement of people in accordance with the STN under sub-point 3 of Principle iii.
- The AA supports allocating road space in a mode-neutral manner based on which mode(s) will move the most people. Where parking needs to be removed to move more people, this means the space should be reallocated based on clear evidence of which mode(s) will most effectively achieve this objective.

9. In some cases, a bus lane will be most effective where there is sufficient transport demand to justify frequent, well-patronised buses. In the city centre, some of the metropolitan centres and perhaps some of Auckland's largest town centres, the space might in some cases be most optimally used for active modes.
10. In other cases, where there is insufficient demand for these modes, there may be a strong case for reallocating the space to general traffic, including for T2 or T3 lanes, to reduce congestion and emissions. (We note this is presented as an example of the benefits of parking management on page 12 of the document). Such a decision could be revisited as further intensification, shorter trips and concentration in trip destinations occurs over time, and this demand can be better served by other modes.
11. Our concern is that the general focus of the document implies a rigid focus on reallocating parking space based on irrelevant considerations such as theoretical modal capacity rather than actual projected demand and clear sustainability outcomes. The wrong solutions in places with ongoing traffic growth simply risks worse congestion and emissions. We urge AT to provide a pragmatic mode-neutral approach to kerbside parking allocation in the Parking Strategy that is clearly focused on achieving Auckland's transport objectives. This needs to include the full toolkit of interventions, including relocating parking spaces to provide for additional traffic movement where this is the most effective solution for moving more people in specific locations.

Overflow Parking from post-2013 Developments (Principle [iii] 8)

12. The AA is unclear why Principle iii(8) proposes overflow parking from developments constructed prior to the Unitary Plan be treated differently from overflow parking for developments constructed since the changed parking requirements were signalled in the draft Unitary Plan.
13. . The proposed distinction implies that a resident who recently moved into an older dwelling (which may even have some off-street parking), will be given greater priority to park on street than someone who has lived for several years in the same street in a dwelling constructed since the Unitary Plan was developed. We also note that elsewhere on the network, AT is proposing to treat all residents the same (e.g. if parking needs to be removed on the STN there is no distinction between when the housing was developed).
14. In the absence of information to justify the distinction, the AA's preliminary view is that all residences should be treated the same. However, if sub-point iii(8) is to specify a date, we believe it would make more sense for that date to be when the Unitary Plan's parking requirements became operative.
15. Consistent with Principle iii, kerbside space occupied by "overflow parking" should only be reallocated where there is a demonstrable need to use the space to support higher priorities. This should also include consideration of whether the priorities can and should change at different times of day (e.g. it may be that road space is required for people movement during the day, but could be used for residential parking, without impinging on people movement, at night).

Removal of Parking without consultation (Principles iv and xiii)

16. The AA notes that the document states that removal of parking on the STN without public consultation is one of the biggest changes proposed to guide the 2022 Parking Strategy and will be a key enabler of change across Auckland's transport system. However, no explanation is

given for why such a fundamental power is needed. In the absence of this, the AA cannot support this proposal.

17. Removal of parking will in some cases have a major impact on particular people and businesses and the AA considers the public have a genuine right to be consulted.
18. Moreover, we note that because it provides for all modes, the STN is particularly extensive and includes some roads which currently have very limited transport demand from any mode. We think AT needs to be accountable to local communities about any significant changes it is planning to make to the local road network. This means being upfront about what it intends to do, what this will achieve and why it needs to take parking to achieve it. It should also mean genuinely seeking to understand the implications the proposals will have on individuals and businesses, along with any scope for mitigating the impacts before a final decision is made.
19. We note AT still intends to still consult on the proposed projects which be constructed on reallocated parking space. If there is a compelling case for a project, it should be straightforward to consult on the required parking removal at the same time. This is perhaps more of a case of AT needing to find a way to streamline its consultation process so that it can continue to progress necessary works at pace rather than arbitrarily taking away the public's right to have a say.

Parking approaches tailored to local transport and land use patterns (Principle vi)

20. The AA strongly supports this principle and agrees that a prerequisite for any change must be designing an approach that effectively meets the transport demands and community needs of each location.

Areas with the highest readiness for change (Principle vii)

21. The AA considers this Principle should be re-worded to focus on "the highest need for change" rather than "readiness". This balances the essential social and economic functions parking performs in all communities with the importance of making parking changes in areas of high transport demand. It also avoids subjective judgments of what constitutes "readiness for change" (see Tier 2 section below).

Proposed broad approach

Strategic Transport Network

22. The AA has commented on the proposed approach to the STN under the Principles section above. While we don't support the removal of parking for projects on the STN without the opportunity for public feedback, we do support the proposed approach that parking "will be removed where necessary...to move more people". We note the document states this is most likely to occur where the STN passes through Tier 3 and 2 locations. It will be important that the Parking Strategy clearly defines "necessary", and the evidence required to demonstrate that an intervention will "move more people".

Tier 3 Locations

23. The AA is for the most part comfortable with the proposed approach to Tier 3 locations. We note that the emphasis is on retaining parking, albeit with increased charges and time restrictions, but that some parking space appropriation is likely (e.g. for loading zones, micromobility parking, footpaths, public space and cycleways). The Strategy will need to set out transparent criteria for reallocating parking spaces for these different purposes to ensure there is a demonstrable net benefit from any proposed changes.

24. We note the focus is on walkable distance to rapid transit so suggest the Strategy define the area for parking interventions as within 500 metres of a rapid transit station consistent with AT's Frequent Transport Network (FTN) accessibility measure. Parking will continue to be needed to support people with limited time, including people who would otherwise need to make two or three connecting public transport trips with impractical journey times. Parking will also contribute to the overall attractiveness and vibrancy of our major centres, particularly outside of peak public transport times. For these reasons, we also expect the Strategy will set out a clear basis for adjusting proposed charges and time-restricted parking to reflect demand at different times of the day and night.

Tier 2 locations

25. The AA has three main concerns with the Tier 2 locations: the very large number of locations currently included within this definition, the vaguely specified land use criterion and the inadequate transport criterion which are proposed to be used to assess "readiness for change".
26. The AA acknowledges and has signalled our strong support for Principle vi that Parking approaches will be tailored to local transport and land use patterns. However, we are concerned about how this Principle can be reasonably applied in Tier 2 locations if the transport criterion for intervention is a simple input measure focused on the number of frequent bus routes.
27. Even where there are three or more FTN routes close to a Tier 2 location, public transport will realistically only be able to meet a small proportion of trip demand. In a number of locations, this also includes commuters with unrealistic options requiring lengthy commutes to connect to the FTN and their final (Tier 2) destinations. Public transport choices are also much more limited outside of weekdays when town centres are often busiest.
28. As for other locations, we think the focus should be confined to Tier 2 locations where there is clear evidence that there is a need for change or that change will be needed soon.
29. The AA is largely comfortable with the proposed approach to parking management and supply for these locations, provided the focus is on Tier 2 locations where change is needed. In general, this should mean parking charges and time-restricted parking should only be introduced or increased in places and at times where there is a genuine shortage of parking available and/or clear evidence that most commuters' travel needs (i.e. origins and destinations) can be realistically met by other modes.
30. The document states that some parking space appropriation is possible at Tier 2 locations for the same list of functions set out in the proposed approach for Tier 3 locations. The AA reiterates our comment in respect of Tier 3 locations – it will be important that the Strategy sets out transparent criteria for reallocating this space for these different purposes to ensure there is a demonstrable net benefit from any proposed changes.

Tier 1 locations

31. The AA notes that Tier 1 locations cover all roads and streets in Auckland which do not fall within the three categories above. We agree these areas should be a low priority for intervention and presume "low access to public transport" means all locations that are not very close to multiple high frequency public transport routes (under Tier 2 locations).

32. The AA also supports the need to apply responsive parking management where either demand pressures or safety issues arise or are emerging. The removal of minimum parking requirements under the Government's National Policy Statement on Urban Development combined with ongoing increases in housing density will inevitably increase demand for on street parking. The AA is pleased to see AT is thinking about how this problem can best be addressed before it emerges.
33. Finally, the AA notes that in some Tier 1 locations where parking restrictions may be needed there will also be a need to consider some parking provisions for businesses and other workplaces as well as local residents.

Conclusion

34. The AA supports the need to update Auckland's Parking Strategy to provide a clear basis for on-street parking supply and management decisions that will support this city's growth in a sustainable way.
35. To achieve this, it is important that the Strategy is strongly focused on achieving the outcomes it seeks but is also grounded in the realities of Auckland's urban form and public transport system. Slowly increasing density and ongoing public transport improvements are starting to improve travel choices for many Aucklanders. However, the extent of change signalled in the discussion document appears out of step with Auckland's land use and trip patterns, the ability of our current public transport system to effectively meet these needs, and a realistic role for active modes. Auckland Transport's (AT) research¹ indicates most people are and will remain reliant on private vehicles (and parking) for most of their trips in the foreseeable future. It was therefore disappointing to note the document attributes parking removal as freeing up the roads for "freight, tradespeople and emergency services"².
36. The AA is concerned at the potential breadth of changes the document implies across the STN and Tier 2 locations and the risk of unintended consequences this creates. In the wrong place, where transport demand growth cannot be met by public transport and active modes, such interventions could increase congestion and emissions and encourage longer car trips to places where free parking is available, such as shopping malls. In the long term, there is a risk that reduced parking, increased restrictions and higher prices could undermine the viability of town centres.
37. Pragmatic decisions will be needed to attract community buy-in, or at least acceptance. This needs to include consulting on any proposal to remove parking. There is a very real risk that if the Parking Strategy is seen as a "big stick" to get people to change their behaviour it will backfire. This could set back more critical objectives, such as making changes to get our main arterials flowing better for everyone.
38. To achieve the necessary social licence for change, we propose a shift away from arbitrary and subjective measures like "readiness for change". We recommend the Strategy instead focus on locations where change is needed or will be soon, and on the evidence that will be required to

¹ <https://at.govt.nz/media/1985124/census-report-analysis-of-the-2018-census-results.pdf>
<https://at.govt.nz/media/1986141/final-regional-land-transport-plan-2021-2031-web-version.pdf> (see p78)

ensure the changes will achieve the desired results.

39. If parking is to make an effective contribution to the Auckland Transport system's objectives, the Strategy will need to set out a clear basis for how and on what basis decisions will be made about the allocation and management of parking space. For proposals to:
- *reallocate parking space for more people movement* – this means specifying what information is needed to demonstrate that the optimal modal mix for moving the greatest amount of extra people in a specific location has been identified.
 - *reallocate parking spaces for the wide range of other purposes* proposed for Tier 3 and potentially some Tier 2 locations – it means providing transparent criteria to ensure any proposed changes will result in a demonstrable net benefit.
 - *increase parking restrictions or prices* – it means a clear and transparent methodology for identifying areas where demand is exceeding or close to exceeding supply, the extent to which this varies at different times of the day and how the proposed changes will achieve the optimal balance between supply and demand

Recommendations

The AA recommends the Parking Strategy address the following points:

1. The second bullet point of Principle 2 be amended to: *“only prioritises trips by private motor vehicles where projected demand cannot realistically be met by other modes, parking remains essential to meeting the local community's needs and/or the viability of the town centre, or removal risks displacing demand for local trips for longer car journeys”*
2. Where there is a clear need to remove on street parking to move more people, the kerbside space priority order set out in Principle [iii] (3) be reallocated in a mode-neutral manner (including for bus lanes, active modes, general traffic, T2 and T3 lanes) based on:
 - i. clear evidence which mode(s) will move the most people and
 - ii. best contribute to achieving Auckland transport objectives
3. In the absence of information to justify the different treatment of overflow parking from dwellings constructed at different times, overflow parking from all residences should be treated the same when decisions are being made on kerb space allocation. Alternatively, if sub-point iii of Principle 8 is to specify a date, this should be when the Unitary Plan's parking requirements became operative
4. Principle iv and xiii be amended to provide that where space is required for increased movement of people and goods on the Strategic Transport Network (STN), streamlined consultation on plans to remove on street parking is included alongside consultation on the proposed project
5. Principle vii be reworded to focus on locations with the highest need for change to balance parking's essential social and economic functions with the importance of making parking changes in areas of high transport demand, and to avoid subjective judgments of what constitutes “readiness for change”
6. Clearly define the meaning of the word “necessary” in the phrase “parking will be removed where necessary... to move more people” on the STN and the evidence required to demonstrate that an intervention will “move more people”

7. Set out transparent criteria for reallocating parking spaces for the range of purposes proposed for Tier 3, and potentially some Tier 2 locations, to ensure any proposed changes will result in a demonstrable net benefit
8. Make clear that new parking restrictions in Tier 3 locations will only apply within reasonable walking distance of rapid transit stations and set out a clear basis for adjusting proposed charges and time-restricted parking to reflect varying demand at different times of the day and night.
9. Propose a wide range of measures for determining transport access for Tier 2 locations with a strong emphasis on understanding the trip demands at individual locations and provide that:
 - i. intervention be confined to locations where there is clear evidence that there is a need for change or that change will be needed soon
 - ii. additional parking charges and time-restricted parking will only be introduced or increased in locations and at times when there is a genuine shortage of parking spaces available and/or clear evidence that most commuters' travel needs (i.e. origins and destinations) can be realistically met by other modes.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Glynn', with a large, sweeping flourish at the bottom.

Martin Glynn
Principal Advisor – Advocacy
The New Zealand Automobile Association