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

**THE NEW ZEALAND
AUTOMOBILE
ASSOCIATION
INCORPORATED.**

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 Draft Auckland Parking Strategy

Introduction

1. The NZ Automobile Association (AA) appreciates the opportunity to comment on Auckland Transport's (AT) *draft Parking Strategy for Auckland* (draft Parking Strategy).
2. The AA is an incorporated society with over 1.8 million members, including over one million personal Members, approximately 330,000 of which are in Auckland. The AA was founded in 1903 as an automobile users' advocacy group, but today our work reflects the wide range of interests of our large membership, many of whom are cyclists and public transport (PT) users, as well as private motorists.
3. This submission has been informed by over 1,100 Auckland AA Members responses to a survey on matters covered in the discussion document and draft Parking Strategy.
4. Parking is an essential component of Auckland's transport system – the vast majority of trips are – and will continue to be – taken by private vehicle, and every trip by vehicle starts and ends in a parking space (whether it be on-street, off-street, private or public). Parking is and will remain an indispensable element to accessing work, education, recreation, and social opportunities, and therefore makes a critical contribution to Auckland's goal of better connecting people, goods and services.
5. The AA appreciates that as Auckland continues to grow, there is an increasing need to ensure we are making optimal use of all our road space, including space allocated to parking. The AA supports:
 - allocating road space in a mode-neutral manner based on strong evidence of which mode(s) will move the most people more sustainably
 - reallocating parking space when doing so will achieve a net benefit to society (taking into account safety, congestion, emissions, access, economic productivity, etc)
 - increased parking restrictions and prices where there is insufficient supply to meet demand and increasing supply is impractical or inappropriate (with the right intervention dependent on the location)
6. This submission sets out the changes the AA considers needs to be made to the draft Strategy to ensure it achieves the most critical objectives of improving access and moving more people, more sustainably.

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New Zealand Automobile Association



Key points

7. The AA supports the need to update Auckland's Parking Strategy to better support the city's growth in a more sustainable fashion. We strongly support reallocating parking space on Auckland's busiest roads to move more people, more sustainably – provided that decisions are based on robust location-specific assessments of the potential for different modes to meet current and forecast demand.
8. Our key concern with much of what the draft Strategy proposes for other locations is that it appears significantly out-of-step with the pace of change in Auckland's urban form and the reach, coverage, and frequency of the PT system.
9. Many of the changes signalled indicate a view that PT or active travel could easily replace most trips currently made by private vehicle. For instance, the draft Strategy continues to emphasise parking changes will free "up the roads for the likes of freight, tradespeople and emergency services". This statement is at odds with AT's key statutory planning document which shows that if the region's targets for increasing PT and active mode share¹ by 2031 are reached, 7 out of 10 trips will continue to be made by car.
10. The same document forecasts that by 2031 Aucklanders will be able to access 158,000 more job opportunities within 30 minutes by car as they will within 45 minutes by PT². These numbers underline the need for strong evidence to identify the optimal interventions to support more people movement, access and improved sustainability outcomes in different parts of Auckland.
11. The AA is particularly concerned that the wrong changes in the wrong places may result in perverse consequences for access, congestion, and emissions – for instance through poor road space reallocation on the STN or parking restrictions that encourage people to drive further to locations where free parking is available.
12. The starting point needs to recognise the essential access private motor vehicles provide to the majority of Aucklanders, and that the removal of parking, parking restrictions or priced parking outside their homes and their local shops generally means reduced access.
13. The final Parking Strategy needs to adopt a more pragmatic mode-neutral approach in line with similar cities, be tightly focused on enabling more Aucklanders to get where they need to go and achieve improved sustainability outcomes. This includes setting out a clear basis for identifying what constitutes reasonable PT access for trips currently not made by PT.
14. A pragmatic mode-neutral approach means focusing on the actual and potential limitations of all modes to better provide for short to medium term transport demand in different locations. Consistent with the draft Strategy's dynamic approach, this means decisions can be revisited as further intensification, greater numbers of shorter trips, increased concentration in trip destinations that can be better served by other modes, and improved PT, occurs over time.
15. The final Strategy also needs to clarify how the trade-offs between increasing people movement, improving sustainability, and providing more travel choices will be reconciled. Without this, there is a significant risk that implementation of the Strategy will not be a success.

¹ [Auckland 2021-2031 Regional Land Transport Plan](#) p78

² [Auckland 2021-2031 Regional Land Transport Plan](#) p82

16. Considering the pervasive scope of change signalled by the draft Strategy, the AA recommends the final Strategy provide for an early, limited review in approximately three years, consistent with the region's other key strategic, planning and funding documents. The purpose would be to assess the success of the early interventions and identify whether changes need to be made to the Strategy to better enable the achievement of the city's transport objectives.

Proposed Parking Principles

17. Consistent with our feedback on AT's discussion document *Parking in Auckland – Starting the conversation: how should Auckland manage its future parking needs?*, we continue to have concerns with the proposed Parking Strategy principles.
18. Our key concern is that by failing to apply a mode neutral approach the proposed Principles will not achieve the best outcomes for Auckland. For example:
 - Principle II, bullet point 2 reads: *...we need to ensure that the way we manage parking: prioritises trips by modes other than private motor vehicles.* We strongly believe that AT should be seeking to prioritise trips by the right mode(s) in the right place, recognising that across much of Auckland, private vehicles are – and will continue to be – the mode which best meets the needs of most people.
 - Principle II, bullet point 3 reads: *...we need to ensure that the way we manage parking: enables kerbside space to be utilised for more beneficial activities.* This suggests that the current predominant and default use of kerb space – on-street parking – is never the most beneficial use. However, in the vast majority of roads, notably throughout Tier 1 areas which comprise most of Auckland's roads, the access kerbside parking facilitates to local residents is undoubtedly the most beneficial use of kerb space. This principle should therefore be amended to read: *...enables kerb space to be used for the most beneficial activities.*
 - Principle VII states that *in areas with highest readiness for change (i.e. good access to PT and denser land use activities) parking will be managed proactively and in a way that prioritises/encourages travel by modes other than the car.* We acknowledge and have signalled our strong support for Principle VI that parking approaches will be tailored to local transport and land use patterns. However, outside of the major centres, the only example of PT access referred to in the draft Strategy is the presence of multiple Frequent Transit Network (FTN) routes.

We continue to be concerned that AT intends to manage parking supply solely based on the availability of PT (and density) at the location (destination). Such decisions need to be based on the access needs of people who travel to that location, including their ability to access PT at their trip origin and get to their destination within a reasonable travel time. This principle needs to be amended to better reflect user needs.

19. We strongly believe AT should be taking a mode neutral approach to transport planning – providing for the right mode(s) in the right locations to meet Aucklanders' access needs and reduce emissions.

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| <p>Recommendation: Amend the draft Parking Strategy principles to focus on achieving the best access and sustainability outcomes for all Aucklanders on a mode-neutral basis (recognising that in many locations, this will involve provision/retention of kerbside parking).</p> |
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Proposed approach to Parking Management

The Strategic Transport Network

The purpose of parking removal

20. The draft Strategy states that the Strategic Transport Network (STN) needs to carry as many people as possible in the space available. The AA agrees with this approach. To us this means prioritising the right modes in the right locations. However, the proposed approach to parking management and the draft parking policies focus almost entirely on repurposing on-street parking on the STN for PT, walking and cycling. It is therefore unclear to us whether the primary objective of removing parking on the STN is to maximise the movement of people or simply to provide more choices.
21. The AA supports removing parking to maximise people movement at the busiest times on Auckland's most congested roads, including encouraging and prioritising non-car trips, where there is clear evidence that this will move more people where they need to go in a more sustainable fashion. However, we do not support reallocating parking space simply to improve travel choices where this will neither maximise movement nor reduce emissions.
22. Decisions on reallocating parking space, even on Auckland's busiest roads, need to be informed by a comprehensive understanding of trip demands and the ability of different modes to meet them.
23. In the densest parts of Auckland, including much of the STN, reallocating parking space to PT, walking and cycling often makes sense. Conversely, even on significant parts of the STN, the dispersed nature of trip origins and destinations means most trips can only realistically be served by private motor vehicles. On these parts of the network, achieving the maximising movement objective may mean converting parking space into T2 or T3 lanes.
24. The draft Strategy cites T2 and T3 lanes as a benefit of reallocated parking spaces prominently in the *Foreword, the Benefits of Better Parking Management* section and in a short AT video on the draft Strategy. However, there is no mention of converting parking space into T2 or T3 lanes in any of the parts of the draft Strategy which set out the proposed changes to Auckland's parking arrangements.
25. On congested roads, where it will best support short to medium term transport demand and achieve the greatest net reduction in emissions through reduced idling time, parking space should be allocated to T2 or T3 lanes. In line with the draft Strategy's dynamic approach, this decision can be revisited as further intensification, greater numbers of shorter trips, concentration in trip destinations, which can be better served by other modes, and improvements in PT, occurs over time.
26. The consultation AT recently completed on the planned New North Road upgrade illustrates our concerns with reallocating road space without clear evidence of which modes will move the most people more sustainably. The consultation material was silent on this matter. Without this information, it is impossible to make informed decisions on the optimal allocation of road space along the corridor both to improve people movement and reduce emissions.
27. As well as spatial variation, there is also substantial variation in transport demand across the STN at different times of the day. When considering how removing parking can make the best possible contribution to Auckland's transport objectives, we recommend AT also consider the maximum utility of that space for Aucklanders at different times of the day and night.
28. The AA remains very concerned that the wrong solutions on roads with ongoing traffic growth simply risks worse congestion and emissions. A heavily congested traffic lane, with idling cars adding to the city's

emissions next to an underutilised bus or cycle lane, cannot be Auckland's definition of success.

29. We urge AT to adopt a pragmatic mode-neutral approach to the reallocation of parking space on the STN that is clearly focused on using strong evidence of trip demands to maximise movement, more sustainably.

Recommendation: Amend the draft Parking Strategy to make clear that the purpose of STN is to move as many people as possible more sustainably. This means decisions on the allocation of road space will be informed by comprehensive evidence of location-specific trip demand, including how this varies by time of day.

Consultation on parking removal

30. The AA applauds AT taking on board feedback about the importance of consultation on the removal of parking on the STN. Given the impacts on local businesses and communities, it is right they should have a chance to both have their say and be heard.
31. We recognise and support that, on the busiest roads where changes are planned in the next 10 years, in most cases, this will mean parking will need to be removed, at least at certain times of the day. For this reason, when consulting on proposals to remove parking, it will be important for AT to clearly show:
- why it needs to be removed to provide for more movement and
 - that it will be reallocated based on strong evidence of which mode(s) will move the most people and achieving improved sustainability outcomes.

Monitoring success

32. The decisions AT makes to repurpose parking on the STN's busiest roads will affect the many thousands of people who use these roads every day. Once changes have been implemented, it will be important to closely monitor both the total additional number of people moved and the numbers being moved by individual modes. This will help identify whether an intervention has been successful or needs to be changed to support more people movement. This is also consistent with the Strategy's dynamic focus. It will also provide useful information on which kinds of interventions are likely to be most successful on similar STN roads.

Recommendation: Amend the draft Parking Strategy to provide that parking space reallocation will be closely monitored to ensure interventions have been optimised to maximise people movement and access more sustainably.

Tiered approach to parking management

Removal of long-stay parking in Tier 2 and Tier 3 locations

33. In our submission on the Parking Strategy Discussion Document, the AA signalled our general comfort with the proposed approach to Tier 3 locations. The key change with the draft Strategy is the focus on removing all long-stay parking in Tier 3 and 2 locations.
34. There is arguably a reasonable case for removing or restricting long-stay parking in the City Centre in the medium term but the AA cautions against pursuing this right now, when now more than ever, there is a need to make the most of all options for attracting people back into the city.
35. The case is much weaker in other major centres where PT options are much more limited. Our Members' survey found 12 percent of respondents who work in other major regional centres rely on on-street parking while at work. A clear majority (60 percent) of our Members are either angry or resigned to the proposed changes to on-street parking in major regional centres, with the remaining 40 percent split between those who are either relaxed (17%), appreciative (9%) or do not have a view (14%).

36. We suspect these results reflect a combination of:
- the absence of reasonable alternatives to these locations for many commuters and
 - many workers use their vehicles during working hours (46 percent of our survey respondents who work outside of their home).
37. Travel time has always been and remains a critical factor in most people’s transport choices. The illustrative table below compares current car and PT travel times for typical commuter trips to three Tier 3 locations. The significantly longer PT travel times underlines the need to clearly understand the extent to which PT and active modes can effectively meet commuters’ needs when considering removing long-stay parking.

Example morning peak travel times by car and PT for Tier 3 destinations

| Origin* | Destination | Car travel time** | PT travel time*** | Additional travel time by PT (based on mid-range) |
|-----------------|-------------|-------------------|---------------------------|---|
| Te Atatu South | New Lynn | 14 – 26 mins | 39 – 55 mins | + 27 mins |
| Titirangi South | | 9 – 14 mins | 25 – 38 mins | + 20 mins |
| Mangere Bridge | Manukau | 12 – 18 mins | 55min – 1hr 6 min | + 46 mins |
| Howick West | | 18 – 40 mins | 1hr 1 min – 1hr 13 min | + 38 mins |
| Gulf Harbour | Albany | 30 – 50 mins | 1 hr 10 min – 1 hr 27 min | + 39 mins |
| Birkenhead West | | 16 – 28 mins | 56 min – 1hr 3 min | + 38 mins |

* Actual origins of commuter trips bound for destination identified, based on 2018 Census data

**According to Google Maps

*** According to AT Journey Planner

38. In Tier 2 locations the PT system is even more poorly equipped to provide reasonable alternatives for people commuting from a wide variety of locations across the region.
39. The AA is concerned that removing all long-stay parking in Tier 3 and 2 locations will reduce access to these locations for many employees with adverse impacts for businesses, workers and Auckland’s economic productivity.
40. We are also concerned about the impact removal of long-stay parking will have on residents who live in relatively low density residential areas that fall within Tier 2 and Tier 3 zones. While we appreciate that *Map 1 – Parking management tiers* is a concept only, we note that the Tier 2 locations in particular (and even some Tier 3 locations) encompass significant areas of low density housing. There will undoubtedly be many households in these locations that rely on on-street parking to meet their travel needs. We do not believe that in all of the highlighted areas it would be justified to remove or disincentivise long-stay parking through the implementation of time-restricted or paid parking, as is signalled in the draft Strategy.

Recommendation: Amend the draft Parking Strategy to make clear that decisions to remove long-stay on-street parking in Tier 2 and Tier 3 locations will be based on location-specific assessments of the extent to which current and projected demand from both residents and employees can be met through other means.

Tier 2

PT access and “readiness for change”

41. The AA is particularly concerned with the proposed approach to Tier 2 locations. The sole criterion presented for assessing “readiness for change” in terms of access to PT is the presence of multiple FTN routes.
42. Transport access assessments need to be informed by comprehensive information on trip demands – both origins and destination and to and from a location – and the ability of different modes to serve those demands. A simple input measure focused on the number of frequent buses at the destination is a manifestly inadequate means of assessing PT’s ability to meet that demand.
43. Such a measure appears to assume that large numbers of existing commuter trips made by private motor vehicles to and from Tier 2 locations can be replaced with PT trips. It also appears to assume that Auckland’s very low PT mode share outside central Auckland³ is primarily a reflection of the public’s dislike of PT rather than limitations in its reach, coverage and service frequency.
44. Any assessment of transport “readiness for change” needs to carefully consider the proportion of trips currently made by private vehicles and the extent to which reasonable PT alternatives genuinely exist for most of those trips. This includes defining what constitutes reasonable alternative travel time differences for trips currently not made by PT.
45. If such an assessment shows that significant numbers of people cannot access FTN services for journeys to Tier 2 locations without unrealistic and punitive travel times (for instance due to the need to make connecting services with poor wait times etc), then this should provide a clear signal that the scope for parking intervention is limited.
46. A pragmatic approach to assessing readiness for change is clearly needed. This means that decisions on parking interventions for most Tier 2 locations need to be grounded by the reality that at the busiest times for PT and active modes, less than one in five trips⁴ are currently made by these modes (and substantially less than that outside peak times). This underlines the fact that even where there are multiple FTN routes at a Tier 2 location, PT will realistically only be able to meet a small proportion of trip demand.

Recommendation: Amend the draft Strategy to state that PT “readiness for change” will be identified based on the proportion of trips to/from Tier 2 locations that can realistically be made by public transport and active modes.

Short-stay pricing

47. The AA supports other aspects of the proposed approach for Tier 2 locations, with the key provisos that it is focused on locations where change is needed and the predominant land use is not residential. In general, this should mean that parking charges and time-restricted parking should only be introduced or increased where there is a clear shortage or emerging shortage of available parking.
48. Parking measures to disincentivise private vehicle parking and encourage a shift to more sustainable alternatives in Tier 2 locations should only be implemented where there is strong and transparent evidence that alternatives will provide reasonable access, meet local residents’ needs and achieve

³ Central Auckland accounts for almost two-thirds of all the region’s PT commuting trips but less than one-quarter of commuting destinations. This demonstrates that genuine PT alternatives are mostly thin on the ground for the rest of Auckland. Source: [Richard Paling Consulting, Analysis of 2018 Census Results: Travel to Work and Travel to Education in Auckland, October 2020](#) p 13

⁴ Ibid p16

improved sustainability outcomes. We remain concerned that without this evidence, parking charges and restrictions will result in significantly poorer access to and from many Tier 2 locations because other modes are not able to meet the displaced private vehicle demand. We also think there is a real risk that locals will seek to avoid the restrictions and charges by driving further to places where free parking is available, such as shopping malls – with a resulting increase in emissions.

Tier 1

49. The AA supports the “responsive parking management” approach for Tier 1 locations but we are concerned that the only example of a response to parking issues in Tier 1 locations the Strategy provides is priced parking.
50. The primary function of most streets in Tier 1 locations is to provide access to residential properties. Residents in these locations are even more reliant on their cars to meet most of their access needs than residents in other locations, and many rely on on-street parking outside their homes/workplaces to facilitate that access. For this reason, where parking issues arise in Tier 1 streets, the first priority should be to accommodate existing residents’ parking needs.
51. A number of Tier 1 streets also provide access for small businesses and their employees who tend to be equally reliant on their cars for the same reason.
52. In most Tier 1 streets, we question how priced parking could be the best policy response for meeting these access needs.

Recommendation: Amend the draft Parking Strategy to make clear that where parking issues arise in Tier 1 streets, the first priority will be to accommodate existing residents’ parking needs.

Proposed policies

Residential Parking in areas of high demand

Demand for Residential Parking Zones

53. The draft Strategy’s intention to “sparingly and carefully” limit the number of new Residential Parking Zones Policy (RPZs), appears at odds with the growing demand for on-street parking – particularly in streets with new developments that do not have off-street parking. The AA agrees that RPZs provide an exclusive parking right to eligible residents but the downsides of this are more than outweighed by the essential access function RPZ provides for residents in areas of high parking demand.
54. We are also confused with the prerequisites for assessing the need for an RPZ – that demand is measured for the peak period; that priced parking and time restrictions must already be in place and that only areas within Tier 2 or Tier 3 locations will be considered for RPZs.
55. It would seem to us, that if the policy is focused on residential parking, demand should be assessed when residential use is at its highest, which will be location-specific and is only likely to be at peak times in Tier 3 and some Tier 2 locations. Similarly, pricing seems a strange first-choice intervention, given that residential demand is long rather than short duration.
56. Government policies to remove off-street parking minimum requirements for new housing developments, and more recently, to allow widespread sub-division of single-dwelling properties into three homes, apply across Auckland. The impacts of these policies will therefore also be felt across the city so the RPZ policy needs to apply to all three tiers. The AA also considers these policies are also likely to mean a need for more RPZ’s than the minimalist approach signalled in the draft Strategy.

Recommendation: Amend the draft Parking Strategy to make clear that, due to a combination of Government and Council land use policies and ongoing growth and intensification, increasing use of Residential Parking Zones will likely be needed across all three Tier locations to manage demand for on-street parking and protect essential access for residents.

Residential Parking Zone Permit Fees

57. The AA was most concerned to read that AT intends to advocate to the government for legislative change to include the costs of providing and maintaining the parking asset and to charge for the market value of the parking space in RPZ permit fees.
58. "Provision" and maintenance costs are fully covered from a combination of rates and National Land Transport Fund revenue. To avoid accusations of double-charging, AT would need to separately account for how it has spent rates and NLTF revenue collected from RPZ residents and ring-fence RPZ revenue for maintenance of kerbside parking but not other parts of the road, which would presumably remain funded by ratepayers and the NLTF. This would require convoluted monitoring and reporting arrangements and also raises wider equity questions about why RPZ users should be singled-out from other residents to pay separately for these "provision and maintenance" costs.
59. The proposal to charge the market value of parking spaces seems to be overlooking the essential access function on-street parking provides residents who don't have off-street parking. This gives the impression it is driven by a combination of revenue generation and a desire to force affected residents out of their cars, irrespective of how this impacts their ability to access services and activities.
60. We note that Auckland's current RPZ permit fees are broadly in line with Sydney's where annual permit costs range from AUD 43-164⁵ depending on a vehicle's emissions ratings. Sydney clearly recognises the important role on street parking provides for residents, and despite greater density and a vastly superior PT network, does not consider there is a need to profit from this by charging to receive a commercial return for on-street parking.
61. The draft Strategy needs to be amended to make clear that AT will continue to charge the costs necessary to administer RPZs but will not advocate to collect costs for a function for which it is already fully-funded or to capture a commercial return for providing needed access for residents.

Recommendation: Amend the parking strategy to make clear that AT will continue to charge only the costs needed to administer Residential Parking Zones.

Overflow Parking

62. The extent of emerging on-street parking problems resulting from the decision to remove off-street parking requirements for new developments is arguably early evidence of policy failure. It is a very visible illustration of why land use and transport policies need to be carefully calibrated to achieve a realistic pace of change and avoid perverse outcomes.
63. This problem will undoubtedly become significantly worse as these policies come into full effect and further development occurs,

⁵ <https://www.cityofsydney.nsw.gov.au/transport-parking/apply-residential-parking-permit>

64. Our survey results indicate that a strong majority (almost 80 percent) of Auckland AA Members consider that developers should be required to provide off-street parking to manage growing demand for on-street parking. The AA agrees with this view.
65. We recognise changes to requirements around parking minimums would require a change in Government policy and believe AT should be advocating for this (further detail on this is provided below). In the absence of, and potentially even with, a policy change, we recommend RPZs (see above), would be the next best option for managing demand for parking on residential streets.

Recommendation: Advocate to the Government for a change in the National Policy Statement on Urban Development to again allow Councils to mitigate the growth in on-street parking by requiring the provision of off-street parking in new developments.

Park and Ride Management

Charging for parking

66. The draft Strategy states that the purpose of Park and Ride (P&R) sites is to improve access to the PT network and reduce downstream traffic congestion. Substantial research and analysis is therefore needed to establish whether charging for P&R spaces will contribute to or detract from this purpose.
67. In the outer parts of Auckland, where alternatives to driving to P&R sites are minimal or non-existent, there is a significant risk that charging for parking will deter many drivers from taking PT at all. If so, the increased congestion and emissions will likely substantially outweigh the benefits from those who are able to and choose to switch to other modes to access RTN stations in response to the charges.
68. Decisions to implement charging at P&R sites at other parts of Auckland will need to be informed by clear evidence that charging will achieve its' objective of encouraging "other ways of accessing RTN stations". The AA is concerned that where the "other ways" will result in significantly longer journey times, people will just give up PT altogether and switch to making the entire commute by their cars.
69. In some more central locations where more realistic choices are available, there may be more scope for introducing low-level parking charges without adversely affecting PT use. However, it is unclear what problem AT is trying to solve by moving to charging for use of P&R spaces. If it is to avoid spaces being taken by people who are not using PT, then surely the solution would be to limit free (or, if needed, all) access to PT users by requiring electronic evidence that a qualifying PT trip was taken in the same period as the parking space was occupied. This could be achieved through HOP card or credit card transactions for example.
70. If the problem is demand for P&R spaces exceeding available supply, then there needs to be sufficient evidence that charging will deliver a better outcome than increasing supply. Many cities at similar stages of development to Auckland, would regard excess demand for P&R spaces as a sign of success and prioritise their expansion, particularly given the generally longer distances typically associated with PT trips from P&R sites. Unless the evidence shows charging will still attract similar numbers of PT users as free parking, there is a strong case for arguing retention of free parking will make a better contribution to Auckland's transport objectives.
71. It is salient to note that Sydney allows up to 18-hours free parking a day at all the city's P&R sites⁶, so long as people use a PT service. It would seem to us that rather than making it harder to use PT than it already is, Auckland should be doing the same as Sydney and making it as easy as possible. This means not

⁶ <https://transportnsw.info/travel-info/ways-to-get-around/drive/parking/transport-parkride-car-parks>

charging for parking at P&R sites, unless there is very clear evidence that existing demand can and will be met by connecting services and active modes.

72. The proposal that the P&R charges be set based on: the cost of PT access to the P&R site, to the City Centre, and demand for the P&R site (including from non-PT users) also seems odd. Unless current PT services to the Rapid Transit Station are sufficient to meet the majority of demand currently met by P&R, the cost of PT access to the station will be irrelevant. Similarly, the focus on cost of PT to the City Centre reinforces perceptions that PT is really only about trips to and from the City Centre. In terms of demand from non-PT users, we are curious as to why AT can't either just restrict P&R access to PT users or charges to non-PT users like Sydney.

Recommendation: Amend the draft Parking Strategy to clarify the problems with continued provision of free parking at Park and Ride sites, the options for addressing these problems, and why charging might be the optimal solution at some sites.

Recommendation: Amend the draft Parking Strategy to provide a robust and defensible basis for setting Park and Ride charges if AT identifies specific sites where there is a strong case for charging.

Redevelopment of Park and Ride sites

73. The proposed default policy appears to be to support redevelopment of P&R sites rather than protect them, and where there is sufficient demand, expand them. We were disappointed to note that AT only intends to “advocate” for retention of P&R sites where it considers there is “sufficient demand that is unlikely to convert to other modes.”
74. Our key question with this proposed approach is how AT intends to identify the extent to which P&R-related trips can be converted to other modes? We are concerned that AT may apply a narrow input measure similar to its proposed approach for assessing transport “readiness for change” in Tier 2 locations. The presence of limited feeder buses servicing what can be very large catchments is a poor proxy for assessing access to a rapid transit station. Access needs to be determined by identifying the extent to which other modes will provide reasonable provide realistic journey times for the majority of people using a P&R Ride facility.

Recommendation: Amend the draft Parking Strategy to set out how AT will determine the extent to which Park and Ride trips can be converted to other modes when it is considering which Park and Ride sites it will support for redevelopment.

EV charging at AT-managed parking facilities

75. The draft EV parking policy states that AT may provide or facilitate third-party provision of dedicated charging spaces at AT-managed off-street parking facilities.
76. One of the main barriers to the uptake of EVs is the limited availability of charging facilities. Recent independent research⁷, supported by the AA and a wide range of industry players, found that there is a vital role for public charging facilities to improve access for people who are unable to charge vehicles at home and that potential purchasers can be put off by perceptions that charging facilities will not be available or will be congested.

⁷ https://www.concept.co.nz/uploads/1/2/8/3/128396759/ev_study_report_3.pdf Concept Consulting's research in association with Retyna was supported by the following organisations who provided funding or data: AA New Zealand, ChargeNet, Contact Energy, Drive Electric, Fuso New Zealand, Genesis Energy, Imported Motor Vehicle Industry Association, Mercury Energy, Meridian Energy, Motor Industry Association of New Zealand, Orion, Powerco, Transpower, Trustpower, Unison Networks and Wellington Electricity.

77. The report noted that insufficient EV charging facilities risks slowing the overall uptake of EVs and would be likely to result in more ICE vehicles entering the New Zealand fleet, with higher lifetime costs and carbon emissions. It concluded that there is strong public benefit from supporting charger investment while EV uptake remains low.
78. The AA agrees with the draft EV parking Policy's position that it generally doesn't make sense to provide on-street charging facilities for the reasons cited in the draft policy but this strengthens the case for charging in AT's off-street parking facilities.
79. The removal of minimum parking requirements for new developments means many residents will not have the option of charging their EVs at home. This increases the importance of ensuring public charging facilities are widely available to encourage and accelerate the switch to EVs.

Recommendation: The draft Strategy be amended to state that wherever practical AT will aim to provide or facilitate third-party provision of dedicated EV charging options in AT-managed parking facilities.

Advocacy for changes to Government policies

Parking on berms

80. We note AT's desire to ban parking on berms and its intentions to advocate to the Government to support this.
81. The draft Strategy notes that parking on grass berms impedes the safe movement of pedestrians and can damage public infrastructure. We agree will likely be the case in a number of locations, particularly the more denser parts of the city but it is important to look at this issue in a wider context.
82. Parking on berms is quite common in locations across Auckland, including outside sports grounds and schools, in rural communities where there is no on-street parking provision, and in narrow suburban streets where residents park either partly or wholly on berms to improve access for traffic. In some locations, trailers or boats parked fully on a road can obstruct traffic and reduce visibility more than when parked on a neighbouring berm.
83. A ban on berm parking in the wrong location can therefore cause rather than solve safety and access problems. For these reasons, the AA does not support a blanket ban on berm parking across Auckland and therefore also considers bans in particular locations need to be signposted.

Recommendation: The draft Strategy be amended to state that parking on berms will be banned in locations where it is causing safety or access issues and where bans are implemented they will be signposted.

Residential parking permit costs

84. As noted in the Residential Parking Zone Permit Fees section, we do not agree with the draft Strategy's proposal to advocate to the Government to increase residential parking permit costs to "recognise the value of on-street space". Charges set on this basis would severely compromise the essential access function on-street parking provides residents who don't have off-street parking, is inconsistent with AT's aim to build a connected city across all types of transport, and would inevitably be seen as revenue gathering.

City Centre Parking levies

85. We question the case for investigating private parking levies for businesses in the city centre. Private vehicle trips account for 44 percent of trips to the City Centre in the morning peak⁸ and a much higher share outside of peak times. We are concerned about the wider impacts of such a policy for the vibrancy and economic productivity of the City Centre.
86. The core purpose of private parking` levies would be to reduce demand for private motor vehicle access to the city centre. Levies should therefore be considered as a potential alternative to rather than as well as – congestion charging.
87. This proposal also raises significant private property rights issues which would require very careful deliberation before pursuing further.
88. We also question the wisdom of investigating this now when so many City Centre businesses are struggling to get back on their feet.

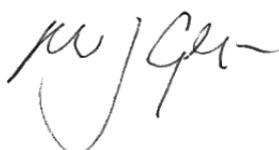
Requirements for provision of off-street parking

89. As noted in the Overflow Parking section, we believe AT and Auckland Council need to advocate to the Government to amend the National Policy Statement on Urban Development, to again allow District Plans to set minimum parking requirements. We believe that the extent of the emerging on-street parking problems occurring as a result of the Government's policy is a sign of policy failure, and this problem will only going to get worse as further development occurs.

Closing comment

90. Thank you again for the opportunity to comment on Auckland's draft Parking Strategy. We are very happy to meet with the team responsible for finalising the Strategy to discuss our views in more detail.

Yours sincerely



Martin Glynn
Policy Director

⁸ [Richard Paling Consulting, Analysis of 2018 Census Results: Travel to Work and Travel to Education in Auckland, October 2020](#) p13