



Draft Parking Discussion Document

Submission by North Harbour Business Association

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Please note: We would like to make an oral presentation to this submission if this is possible.

EXECUTIVE SUMMARY

The North Harbour Business Association (NHBA) believes that a one-size fits all approach to parking applied across Auckland Council’s jurisdictions will not work for the Business Improvement District (BID) area as our parking demands are quite different to those of a town centre or metropolitan area. We would like the Parking Strategy amended to reflect the parking requirements of light / heavy industrial and general business zones as defined in the Proposed Auckland Unitary Plan (PAUP).

Auckland Transport (AT) state that the discussion document suggests approaches for addressing parking problems. We believe that these solutions are not comprehensive enough to address the specific needs of the business communities represented by NHBA and other similar BID’s. Therefore, we suggest that in the strategy document a separate section for Business Zones is established which addresses the specific parking problems for such zones and lists the possible solutions (parking regimes and tools) that can be implemented to address those problems.

Many issues within the North Harbour BID area are caused by commuters travelling through the area to the CBD and beyond. Parking issues around the successful park and ride sites are also causing problems. The majority of demand in the area is for all day parking because there are no real alternatives at the moment for the estimated 24,000 employees.

The following summary table sets out the issues identified by NHBA and suggests recommended solutions to be considered by Auckland Transport, and Auckland Council.

Issues	Recommended Solutions
Define metropolitan areas and town centres.	Include a category for commercial centres and light/heavy industrial and general business zones.
Will commercial centres and industrial estates be included in the AT parking strategy?	Define what is a commercial area and industrial area and how parking congestion will be managed in these areas.
According to the proposed criteria for on-street parking, North Harbour BID area has already reached the trigger point for introducing time or paid for parking restrictions.	Adjust the trigger points and/or provide alternative parking areas or alternative modes of transport to the North Harbour BID area.
The introduction of no stopping lanes and bus lanes during peak times on arterial roads triggered by peak period congestion and unreliable travel times. Is AT going to introduce bus lanes on arterial roads in the North Harbour BID area?	NHBA agrees that arterial roads should be kept ‘free-flowing’ BUT if parking is removed how and where will it be replaced? Suggest parking brokerage and use of vacant lots.
Will Comprehensive Parking Management Plans (CPMPs) be applied to the NHBA area?	AT to indentify where the defined areas for CPMPs will be put in place?
Will AT carry out the CPMP or employ consultants?	NHBA requests to be a main stakeholder in the CPMP process – able to provide valuable local knowledge.
As part of the CPMP an evaluation of private off-street parking will be undertaken.	Seek clarification regarding ‘how’ private off-street parking data will be utilised by AT.
What is the timeframe for the introduction of CPMPs?	Seek clarification for when CPMPs will be introduced
How comprehensive will the CPMP be? If applied to the North Harbour BID area will it include an inventory of all businesses and education establishments? Will it include an inventory of vacant lots?	Close involvement with NHBA and inclusion of an inventory of all businesses and education establishments in the North Harbour BID area.

Issues	Recommended Solutions
If on-street parking charges are introduced into North Harbour BID area, AT needs to clarify what will happen to the revenue generated.	A % of revenue should be made available to NHBA to promote alternative modes of transport to the private car, and pay for the management of a parking brokerage system.
Will residential parking permits be introduced within the mixed use (residential) zones within North Harbour BID – the defining trigger points for the introduction of ‘residential’ permits means that they could be applied to local streets.	Seek clarification on the introduction of residential parking permits especially if there are businesses operating in the same mixed use/residential area as they will be adversely affected by the permit allocation system.
Investing in off-street parking by AT will only be considered where it does not fill a gap provided by the private sector.	NHBA believes investment made during the feasibility of a potential PPP should be supported by AT.
Prioritising access to on-street parking should be different in commercial areas and industrial estates when compared to town centres as they have differing needs.	NHBA suggests priority parking based on the needs of the business community and the ongoing economic vitality of the area.
Removal of parking on arterial roads would be detrimental to local businesses	If arterial road parking is removed it should be replaced by parking on vacant lots or through parking brokerage
Parking for events	Will the parking criteria be applied to sporting venues within the North Harbour area?
The allocation of parking permits	Seek clarification if the permit system will be applied to the North Harbour BID.
Investment in P&R to reduce spill-over into the local road network	Invest in multi storey P&R car park at Constellation Drive instead of managing over-demand for parking by pricing commuters out of the car park.

1.0 Introduction

NHBA agrees that the approach that AT is following is robust and will provide the following:

- Management of current and emerging trends/problems across Auckland
- Production of an overarching framework for parking
- Auckland wide consistency, with local customised responses to parking supply, demand and management
- Resolution to conflicts between parking and accessibility on arterial routes
- Public Transport (PT) growth versus on-street parking demands

It is understood that feedback on the Draft Parking Discussion Document (DPDD) will assist in development of the Regional Parking Strategy – included in the next Integrated Transport Programme, due for completion mid 2015. This parking strategy is in support of the Auckland Plan, Proposed Auckland Unitary Plan and Regional Public Transport Plan.

2.0 Objectives for Managing Parking

NHBA largely agrees with the stated objectives but would like to see the addition of parking strategy tools that support the economic development of the Light Industrial/Heavy Industrial and General Business centres.

3.0 Direction for Parking in Auckland

In the Auckland Plan 2010 -2040, Albany has been identified as a growth area. The economic needs of Albany/North Harbour BID area needs to be included when reviewing parking management.

NHBA have applied for a change of base business zone for the current BID area from predominantly light industrial to predominantly general business. Please see appendix 1 NHBA PAUP submission. Parking minimum requirements in the PAUP are:

- 1 parking space per 50 sm2 GFA or alternatively 0.7 parking spaces for every full time equivalent full time employee –whichever is lesser. The industrial activity can also chose to provide more parking than is required as referenced in the Proposed Auckland UP accessory parking fact sheet

The PAUP reference only refers to maximums whereas General Business/Light Industrial zones have minimum parking requirements. However, NHBA understand that in order to manage the increase in congestion, then minimum parking standards must be introduced to new developments.

NHBA largely agrees with the parking and supply pricing bullet points (page 8) but our priorities are as follows:

- Support development and economic activity in growth centres
- Support the transformation of the public transport system
- Reduce dependence on car travel
- Reduce car travel to contribute to reduced energy consumption and climate change mitigation
- Facilitate safe and efficient access to land use activities
- Enhance walkability especially in metropolitan and town centres by careful consideration of the location, design and management of parking facilities

NHBA generally supports the investment in Park and Ride sites and services but notes in the section “The Regional Public Transport Plan” (page 8) the “focus P&R on outer areas where PT services are limited” will guide investment decisions.

NHBA BID area needs to be acknowledged as an area where investment will be focused. There is a high demand for Park and Ride in the NHBA area, as the growing popularity of the Constellation Drive and Albany P&R stations demonstrates.

4.0 Issues and Trends

4.1 City Centre

It is important that P&R/Kiss & Ride compensates for reduced inner city parking supply. Therefore it is important to expand P&R along the Northern Expressway.

NHBA would like to point out the importance of enforcement if kerbside space is to be managed.

(P12) NHBA agrees that “ongoing investment can continue to encourage a shift to PT by locating sufficient park and ride facilities in the right location on the Public Transport Network.” NHBA would like to see that investment along the Northern Expressway route.

Projected travel demand to metropolitan centres is expected to grow by 65% car journeys, 232% PT by 2041 with the bulk of these increases taking place between 2021-2041. PT cannot be expected to meet all the commuters/visitors ever increasing demand for parking. The Draft Parking Discussion Document comments that priority is for visitors (short term parking). This is agreed if it increases the options for people doing business in the CBD and encourages economic growth. NHBA members conducting business in the CBD should not expect to have new and additional charges which will become an additional cost to business.

(P13) NHBA suggests that the current legislation that “prevents local bodies charging more than an administration cost for a permit” be reviewed to allow for market demands to apply to parking permits.

(P15) NHBA do not support the introduction of parking levies or the concept of taxing employer provided car parking spaces.

4.2 City Centre fringe

(P15) Residents parking zones are not relevant to North Harbour BID except where employees are commuting into North Harbour BID from other areas. They may then park in resident streets and commute from there. This is a potential growth issue especially if the bus network is upgraded.

4.3 Metropolitan centres and town centres

(P16) NHBA isn't a metropolitan centre or town centre and so this section is not relevant to us. However the proximity to metropolitan areas such as Westfield Albany may have an impact on NHBA members wishing to conduct business in that area.

4.4 Parking on arterial roads

(P20) NHBA agree that the arterial routes need to flow freely and should include FTN bus routes. However consideration needs to be given to loading zones and any removal of parking should be replaced nearby.

The North Harbour BID area has existing unimpeded cycle lanes (that are currently under utilised) therefore NHBA would question the justification for the removal of parking spaces to provide more cycle lanes. NHBA note that the provision of separated cycling lanes is preferred by cycle lobby groups.

NHBA would request to be notified in advance if there are any plans to change the designation of roads within their BID area. This would facilitate engagement between AT and the wider business community that NHBA represents.

4.5 Park and ride facilities

(P20) NHBA supports Park & Ride (P&R) however both the Albany and Constellation Drive P&R stations generate significant commuter traffic, congestion and parking issues within the NHBA area. There is a current issue with Hide and Ride parking where commuters are parking their cars all day in private local car parks and then using the P&R bus to commute to the CBD.

This parking demand needs to be managed by AT through the provision of sufficient parking spaces at the P&R. This will ensure that P&R users do not park in adjacent streets or private car parks.

The proposed improvement to the PT network and the introduction of hubs will generate more bus journeys to and from these stations.

5. Suggested Approaches

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

NHBA does not support the instigation of paid parking on the roads within the North Harbour BID area because the majority of on street parking is by employees of our members and is all day in nature.

We could look to support the implementation of short term parking around specific hubs so that these businesses are able to have parking available to prospective customers.

NHBA seeks clarification as to whether or not the on-street parking interventions will apply to NHBA BID area

(P25) According to the trigger points identified in Table 6 the unrestricted on-street parking in the NHBA area has already reached the trigger point of 85% occupancy and therefore, the parking interventions would apply to all on-street parking in the North Harbour BID.

As a majority of the on-street parking is taken up by people working in the area and alternative public transport solutions are not robust enough to serve commuters, the removal of parking or instigating paid parking would be detrimental to businesses in the North Harbour BID.

Example: the demand pressure in currently unrestricted areas (a large percentage of the NHBA road network) requires an occupancy rate for currently unrestricted spaces to regularly exceed 85% at peak times. Once this has been triggered the policy for the “introduction of time restrictions suitable to local demand or paid parking to encourage turnover of spaces” would come into effect.

Peak period congestion on arterial roads includes commuters whose destination is outside the North Harbour BID area. We recognise that peak “period congestion causes low and unreliable travel times for all road users.” and that this will trigger the policy for the “[introduction of] no stopping lanes during peak times and bus lanes.”

NHBA would like clarification as to whether or not this applies to the arterial roads in the North Harbour BID.

5.1b Consistent approach to managing parking in centres

This policy is not applicable to NHBA unless the NHBA area is considered to be a “centre” in the context of the AT document.

(P26) NHBA supports the implementation of Comprehensive Parking Management Plans (CPMPs) providing they reflect local parking demand, geographical conditions and are

monitored and enforced consistently across the region. They should be developed for all areas not just metropolitan areas and town centres. NHBA request input, over and above basic consultation, into the process of developing the CPMP. NHBA would like to clarify when the CPMPs will be instigated. NHBA would like to see available parking spaces be optimised first.

The CPMP proposed by AT would include the following:

- Detailed analysis of the current and future parking issues.
- An inventory of parking supply (including private off-street parking).
NHBA requests that AT clarify what the private off-street parking data will be used for? If it is to be used to off-set a reduction in on-street public parking, the businesses may wish to negotiate with AT especially with regard to parking brokerage. Note many off-street parking spaces are used for turning heavy vehicles and for loading/off loading. Therefore, without local knowledge a person undertaking the count of private off-street parking may not achieve accurate results and therefore the recommended measures may be ineffectual.
- Effectiveness of current management arrangements (This refers to time restrictions and metered parking).

NHBA would like to see additional criteria added to the CPMP, which could include an inventory of all business, and education establishments within the area of the CPMP.

As part of the CPMP the number and size of organisations within the CPMP area should be included. Small businesses employing one or two people couldn't effectively operate a Transportation Demand Management (TDM) plan and therefore, should not experience parking restrictions that may adversely affect their business. However, organisations with 25+ employees could look to implement a TDM plan and be rewarded for doing so. These TDM's are only of any use if they are well written and then enforced by Auckland Council and/or AT.

An assessment of vacant building lots and parking spaces should be included in the CPMP in order to understand potential parking capacity. Financial support for private development scoping should be provided by Auckland Transport. Property owners will need to know if they require consents to create car parks and if their rates will be affected.

If on-street parking charges are introduced to the NHBA area, will NHBA receive a percentage of the revenue generated? Revenue generated in this way could be used to fund local initiatives to encourage travel by alternative modes to the private car e.g. NHBA would consider funding - discounted bus tickets, fund the operation of a parking brokerage system, personalised journey planning, prize draws etc. Parking brokerage is already underway in the NHBA area. The aim is to maximise the use of available parking for users who require parking at different times of the day.

NHBA suggest an AT/NHBA joint approach (joint funding) so that specific zones have Personalised Journey Planning to ascertain where people live, where they park, how they get to work and what alternatives could be used.

5.2 Balancing competing demands for parking in residential streets

(P28) Seek clarification as to whether resident parking permits will be applied to North Harbour BID as there are only a few mixed zone areas where people reside.

Businesses located within residential streets (i.e. dairies, medical etc) offer community services and should not be penalised through location. If they have to close down, local residents are likely to drive to find replacement services.

(P28) “The trigger point for AT recommending a residential parking zone will be if a street regularly exceeds 80% occupancy. That is if an occupancy survey determines that the average of the highest four hours occupancy on any given two days is above 80%.” If these criteria are implemented then every residential street that is surveyed at the highest four hours occupancy (i.e. when people return from work say from 6pm-10pm, or at a weekend) will qualify for residential parking zoning. However, the times when residential streets are most used does not correlate with peak parking times for businesses, However in the case of the NHBA area there could be a conflict between residents parking on the street (after hours) and visitors/commuters parking on the street during the normal working day.

(P28) AT state that “on-street parking is a finite resource and it is impossible to cater for the total demand from all users. Therefore AT will be unable to provide unlimited numbers of permits to all residents.” Businesses operating in a mixed use zone are at the bottom of the priority list for receiving parking permits. This would adversely affect the businesses who share these premises. AT needs to clarify this policy.

AT advise that “local businesses are low on the priority scale for eligibility of parking permits and staff should be encouraged to use public transport or seek off-street parking options.” This policy does not take into account the fact that many residential areas around the NHBA area are not well served with Public Transport, and therefore, staff may have no alternative but to use their cars to access their place of work. Again, this policy could be detrimental to small businesses operating in residential areas.

5.3 Managing off-street parking facilities in the city centre

(P30) Demand for CBD parking will continue until P&R capacity increases. Congestion buster is a positive move as it will reduce the congestion for NHBA members compounded by onward commuters during peak hours.

NHBA seeks clarification as to whether the congestion buster portfolio will be extended to include car poolers.

5.4 Investing in off-street parking facilities

(P33) Table 8 suggests off street business parking investment where PT improvements have not kept up with growth demand. NHBA is in favour of consolidation of parking – if this allows for greater traffic flow.

(P33) NHBA agrees with consistent regional approach, but only if infrastructure investment is consistently applied and the differences between City Centre, Metropolitan centres and Industrial Business Zones are understood.

NHBA understands the need for consistent business case criteria for off street parking and supports a simple payment structure plus additional commercial services (valet services and car washing etc).

“AT investment in off-street parking facilities will be considered where it will fill a gap in demand that is not provided by the private sector.”

Where on-street parking is removed in industrial/commercial Business Improvement Districts, AT should investigate replacement with off-street parking facilities. There are some pockets of undeveloped land within industrial areas that could, in the short term, be reallocated to parking to address any shortfall due to the removal of on-street parking. However a short term solution is just that and AT needs to recognise that long term issues need long term solutions.

5.5 Prioritising access to on-street parking

(P34) Table 9. It is unclear as to whether or not the On-Street Parking/Loading Priorities Policy, will apply to the streets of the North Harbour BID.

NHBA would like to make the following comments:

- Loading spaces: NHBA would like to stress that these spaces need to be kept vacant so that business services can operate efficiently.
- Cyclists within the context of NHBA area should be a lower rank than loading provision.
- If parking is allocated on the streets of the NHBA area according to the priorities outlined above, the commuters to the area are going to be severely affected by a shortfall in on-street parking provision
- NHBA would also question whether or not on-street parking allocation should be provided for cyclists and motorcyclists. NHBA would like to see parking provision for cyclists and motorcyclists in off-street parking facilities.

NHBA suggests a separate priority parking table to be implemented for light/heavy industrial and general business zones so that the on-street parking provision meets the needs of the businesses operating in those locations. The priority table could take the following format:

- Emergency Vehicles
- Mobility Permit Holders
- Loading
- Visitors
- Commuters
- Construction

- Public Transport (layover) should not be located on-street in commercial areas and industrial estates
- Cyclist and motorcyclist parking provision should be provided off-street and not take up valuable on-street parking in commercial areas and industrial estates
- Taxis can be accommodated at drop-off points at specific business locations
- Public transport can be accommodated at existing designated bus stops.

5.6 Reducing parking on arterial roads

In general NHBA agrees with the removal of 'peak period' parking on arterial routes if it provides enhanced road safety and through-traffic movement. However where parking is removed alternative parking must be provided nearby, in conjunction with excellent public transport services.

(P37) If parking is restricted on North Harbour BID arterial roads the economic vitality of adjacent businesses will be affected. This will in turn affect employee retention and attraction due to the area being perceived as a disadvantaged location due to difficult access. However, this could be mitigated by AT providing replacement parking at convenient locations for local businesses.

NHBA appreciates the positive impact of the FTN, however any expansion of the no parking zones or cycle lanes without this in place, will require options for alternative parking.

In summary, if replacement parking that is convenient to local businesses is not provided then the removal of on-street parking on some of the arterial roads in the NHBA area would be detrimental to adjacent businesses.

5.7 On-street parking restrictions and events

(P38) NHBA agrees that there is a need for a consistent event parking management system providing advance notice is given and that the local economic impacts are understood.

Combining PT within event ticket pricing is supported by NHBA.

The document states that "AT wants to develop a consistent region-wide policy that explains how the various parking restrictions are applied" for events. It is not clear as to whether or not this will apply to events that take place within North Harbour such as hockey/softball events at QBE Stadium and the AUT Millennium Institute of Sport and Health.

(P40-41) NHBA seeks greater clarification with regard to how the events parking policy will be applied to the North Harbour area. The categories of parking that are considered in Table 10 do not include parking in light/heavy industrial and general business zones which is where most of Auckland Stadiums and sports facilities are located.

5.8 Allocation of parking permits

NHBA are concerned that significant increases in parking costs will simply be passed onto the client. NHBA appreciates the current system is open to abuse and suggest that a change in legislation could allow AT to increase the permit parking cost and therefore reduce misuse, rather than expect contractors to get vouchers.

The blanket removal of parking permits seems to apply only to the City Centre and will be replaced by a policy of paying for parking at an on-street parking meter and a revised parking permit system. All users of on-street parking facilities will pay the same amount (demand responsive pricing) for the right to park. This will impact on NHBA members conducting business in the CBD.

5.9a Investment in Park and Ride facilities

Constellation and Albany P&R expansion should be prioritised as they are both impacted by the timing of PTN review, major road construction projects, location of urban development and commercial development.

Further investment in Park and Ride (P&R) parking (which is an off-street facility) should be prioritised at Constellation Drive P&R which is already operating at capacity by 7am. This causes parking to over-flow onto neighbouring streets thereby stagnating on-street car parking for local businesses operating in the area adjacent to the P&R site. Consider constructing a parking building on the site, building upwards instead of across valuable commercial land. AT would be required to build and manage the car park.

(P44) Temporary P&R facilities are touted as an option which NHBA fully supports.

NHBA agrees with the strategy to deliver 10,000 bays by 2040 providing the staging reflects the above.

NHBA would also like to mention the following:

- More bike parking is needed at P&R facilities
- Carpoolers who use P&R facilities should be rewarded
- P&R could be free of charge at weekends
- Time restrictions at P&R sites to enable free 4 hours parking

Definition of Rapid Transit Network and Frequent Transit Network should be provided within the document – as they pertain to P&R services.

5.9b Pricing of park and ride spaces

(P49) Pricing P&R vehicle parking bays will displace the problem to surrounding all day free parking options which are already at capacity. The Draft Parking Discussion Document suggests that charging for P&R that can only be considered once the TPN feeders are in place

to make a carless journey a feasible option, or alternative off-street temporary/permanent off-street parking is available. NHBA supports this approach.

(P49) AT is considering “pricing park and ride to allow the demand for parking to be managed, ensuring that customers can always find a park if they are willing to pay”. However, this policy will effectively reduce the potential the number of people who would use the P&R facility and will simply use the current free on- street parking.

AT list the triggers for introducing pricing to park and ride facilities. One of these is the integrated fares zonal system. This system requires further clarification so that NHBA can establish how its members will be affected. NHBA supports the need for a full business case for pricing to be undertaken to set out the methodology, costs, the benefits and the impacts of this policy on public transport patronage. However in theory, NHBA supports the implementation of integrated fares.

6. NHBA - Further considerations

- At all times consideration must be given to the potential negative impact of any proposed change on the economic activity of the broader BID area and NHBA members. Issues that impact on the availability of either staff and/or trade parking through such measures as migration of parking from paid or restricted areas to unpaid, has the potential to significantly impact those businesses affected, and permanently alter their viability and the fabric of the North Harbour BID.
- Consideration needs to be given to businesses who are required to use fleet or specialist vehicles as an essential tools of trade.
- Economic impact of car parking.
- Change in attitude to how Aucklanders’ travel.
- Robust evaluation of resource consents and ongoing enforcement.
- The education sector needs to be identified in the review due to their traffic generation activities and the resulting concentrated off-street and overspill into on-street parking demand.
- Expand Find a car park initiative to maximise the use of low occupancy.