

11 March 2021

Parking Management
Waka Kotahi
Private Bag 6995
Wellington 6141

Dear Sir / Madam

NATIONAL PARKING MANAGEMENT GUIDANCE

Kāpiti Coast District Council is pleased to make the following submission on the National Parking Management Guidance:

1. General Comments

- 1.1 The National Policy Statement on Urban Development (NPS-UD) represents a step change in parking management with the removal of parking standards from District Plans, and Kapiti Coast District Council supports the intention to encourage mode shift and welcomes guidance. However, there are some areas of concern that Council would like to raise and see addressed. There are other areas where further clarification or guidance is sought.
- 1.2 There are a number of recommendations in the report where, whilst useful, would require further guidance or significant resources to support mode shift and parking management approaches. These include the following:
 - the increase in infrastructure investment for alternative modes, which without an increase in funding assistance, will have an impact on rates and the Councils financial strategy;
 - development of District Wide Parking Management Strategies / Plans;
 - District Wide Parking Surveys / Data Collection on parking supply and demand (including occupancy surveys and rates i.e. how many people use a space per day and how long for);
 - origin-Destination surveys (which rely on significant resources and an all stop cordon or other technology to support this);
 - area based parking management plans;
 - development of prioritisation and street space allocation frameworks;
 - the conflict between the provision of on street parking and standards used to guide the new development, e.g. NZS4404;
 - encouraging other modes;
 - development of a parking fee policy including demand responsive pricing;

- real time apps;
 - smart technology to guide people to spaces and determine length of stay / charges applicable;
 - residents parking schemes; and
 - enforcement.
- 1.3 Councils are working with limited resources, which will be impacted further by COVID-19, and no additional funding is being provided to support the measures identified in the guidance. This funding would fall to ratepayers. The costs being directed to ratepayers is already increasing in response to a number of other nationally-prescribed requirements such as:
- those under the National Planning Standards;
 - the Freshwater package; and
 - the evidence-base requirements necessary to give effect to the urban development requirements of the NPS-UD as a Tier 1 Council.
- 1.4 This impact on rates is important, as many Kapiti residents are on fixed incomes, and housing affordability has become a significant issue in the District. Through our Long Term Plans and financial strategies, Councils have to balance spending on a wide range of activities within the context of reducing debt and keeping rates increases as low as possible. The District has a large population of older residents, a relatively high number of people who are not in the labour force and/or are on fixed incomes, and several areas of high deprivation¹.
- 1.5 Demographics also influence travel patterns, and the ability to move around easily can be impacted by factors including health, age, affordability and availability of services. The guidance refers to a number of case studies, but in many cases the success of these case studies is either unknown or limited. They also relate to cities rather than smaller towns and rural areas such as the Kapiti Coast District, which is made up of a series of smaller urban areas separated by rural areas. We have 245km of sealed urban roads and 169km of rural roads. This makes the ability to support alternative modes to the private car more difficult to achieve than in cities.
- 1.6 Public transport in the north of our District is comparatively poor, with limited bus services and one capital connect service per day into the city for residents north of Waikanae. Many of our residents also look north of our District for healthcare and other services, yet there are limited public transport options available to these residents. We have advocated for some time for electrification, dual tracking and more rail services north of Waikanae, as well as better bus services, which can be as infrequent as every hour².
- 1.7 This leads to an over reliance on the private car that is in conflict with the NPS-UD and can make parking management difficult. Additionally, the guidance refers to the fact that car parking takes up space that could be given to the development of infrastructure for other modes. However, it does not address the issue that in order to reduce car use, and therefore the demand for car parking, alternative modes (and the infrastructure to support this) needs to be in place and resourced.

¹ According to the 2018 Census, the median age in the Kāpiti Coast District is 47.9 which is 2% higher than it was in 2013; 40% of residents are not in the labour force compared to 31% nationally; estimates suggest close to 40% receive income from New Zealand superannuation or Work and Income, compared to approximately 25% in the wider Wellington Region; and the median income is the 2nd lowest in the Wellington region (\$29,700 compared to \$36,100 for the entire region).

² <https://www.metlink.org.nz/assets/Network-maps/untitled.pdf>

- 1.8 There needs to be financial assistance from the Government available to Councils to aid in addressing the matters identified above to relieve financial pressure on ratepayers in the face of ever-increasing unfunded nationally-prescribed requirements.
- 1.9 The guidance also does not provide guidance on types of development that do not 'fit' easily within the definition of residential or commercial development. One such example, is residential care homes that provide a range of accommodation types including supported living, hospital type care, and villas / cottages, as well as associated social activities. We are already experiencing issues with these developments due to a lack of parking, and Council receives a significant number of parking related complaints across our network.
- 1.10 Council would like to see further guidance that addresses these concerns, and further detail on how these should be resourced, within the context of limited Council funding.

2. Detailed Comments

Overview

- 2.1 The overview in the guidance includes a statement that, whilst both public and private operators manage public parking, this guidance relates mainly to road controlling authorities. Whilst Council understands that policy development is largely a role of the Territorial Authorities, much of the parking in and around the town centres in Kāpiti are operated privately or by Greater Wellington Regional Council. To this end the guidance could provide further direction on how organisations can work together to achieve the desired outcomes.

Section 1.1: What is Parking Management

- 2.2 Section 1.2 of the guidance identifies that the Strategic Fit for this guidance includes a relationship with the document Keeping Cities Moving (NZTA), reflecting the fact that this is largely city centric. Council would welcome further guidance on how these principles would apply to Districts like Kapiti, which has smaller towns and serves a wider rural population for which alternatives are not available or viable.
- 2.3 Related to the above the Keeping Cities Moving document, considers that parking management can allow for higher density, free up street space for alternative modes and reduce price subsidies for parking. However, later in the document the guidance recommends considering on street parking to address the issue of a lack of on-site parking, which means street space is not freed up. More clarity on how Councils can balance conflicting is needed.

Section 1.2: Strategic Fit of This Guidance

- 2.4 Section 1.2 of the guidance also identifies that there is a strategic fit with Road to Zero and that on street parking can make areas safer by slowing speeds. However, the opposite can also be true, parked cars can represent a danger to road users, particularly vulnerable road users by restricting sight lines and narrowing movement lanes. Further guidance is needed on how these issues are balanced, and how Councils can ensure access for emergency vehicles when relating this with New Zealand Standards on geometric design (further detail on this is provided later at section 2.22 of this submission).
- 2.5 The Queenstown example (Case Study 1) is interesting, but requires a certain level of public transport service to be provided, for which some Road Controlling Authorities such as Kāpiti Coast District Council rely on Regional Council support and funding. The Queenstown example also relies on the infrastructure and vehicles to be available to run frequent enough

services, which is difficult to achieve in rural areas. If we are to achieve this, funding is required to improve public transport provision and related infrastructure.

Section 1.3: The Need for Good Parking Management

- 2.6 Section 1.3 of the guidance recognises that there will be stronger demand on public parking due to growth, and that private parking will not increase as fast as happened historically, which places more demand on public spaces. Parking management will be required to address this, but it is the Road Controlling Authority that will have to address the effects of this. Lack of parking and having no parking requirements can have limited bearing on car ownership rates in areas which have limited public transport options or large rural communities. Therefore, Council is seeking clarity on how alternatives to the private car will be funded to support mode shift.
- 2.7 Section 1.3 of the guidance identifies that parking and pricing can influence behaviour, but a strategy to set pricing policies requires funding, the source of which has not been identified. Council is looking for further guidance and evidence to support this, for example,
- how do you determine fees and what is the tipping point that makes alternative modes more attractive than the private car; and
 - how will assets to support alternative modes be funded and who will provide them.
- 2.8 Section 1.3 of the guidance identifies that subsidising parking can lead to congestion and undermine investment in public transport. It would be useful to have access to the evidence to support this. This can help to gain support when putting a strategy or policy in place. Many car parking spaces are provided by private developments e.g. at supermarkets and shopping malls. Therefore, it would be useful to understand from your evidence the level of subsidy Councils like Kāpiti provide for parking, and how far this will effectively go to support alternative modes?
- 2.9 This guidance identifies that parking has substituted valuable floor space, but there has been no demonstration of the economics of this. In considering the viability of development, the development industry has commented that car parking is affecting economics. However, it has been unclear if this has been based on open book discussions with developers, and whether the inability of people to reach the development due to a lack of alternatives to the car would have a similar effect on retail viability. In considering parking management strategies, it would be useful if there was evidence from Waka Kotahi to support the strategies and justify decision making.
- 2.10 Section 1.3 of the guidance also identifies that parking adds disproportionate costs to low income households who may not own a car. Can evidence be provided to support this, and what are these costs? As an example, what is the proportion of spending from Councils like Kāpiti on parking supply, compared to rates used for public transport?

Section 2: The Parking Management Framework (Sections 2.1: Parking Management Overview and 2.2: Parking Strategy)

- 2.11 Section 2 of the guidance advises that an appropriate amount of parking needs to be provided. Further guidance on how the Council is to determine what an appropriate amount of parking is would be extremely useful. Many Councils will not have budgeted for, and there appears to be no extra funding available to support, the data requirements and policy development recommended by the guidance.
- 2.12 Section 2 of the guidance also discusses prioritising those with greatest need, further guidance is needed on how need is determined. Whilst some need is obvious, for example

the mobility impaired, there is also people in transport poverty for reasons such as no viable alternatives. Public Transport Services are poor in many parts of Kāpiti. As an example, buses run on average every 20 to 60 minutes in Kāpiti and less often in ³Ōtaki

- 2.13 Clarity is sought on what funding is available to Councils for the development of a Parking Management Strategy and Area Based Parking Management Plans identified in section 2.1 and 2.2 of the guidance. This is important since the guidance identifies that a parking strategy is critical in a town or city where parking needs to be managed.
- 2.14 The case study of Hastings, which lost \$805,000 parking revenue is interesting, as this could provide revenue funding streams for Councils. However, the cost of public transport services, and infrastructure to support alternatives to the car can be significantly more than this. Hastings is also a city serving a well populated area, the level of funding in towns in rural areas such as Kāpiti is likely to be significantly less. Has Waka Kotahi got any useful evidence in small towns that would be helpful to places of this scale and rural areas?

Section 2.3: Parking Management Plan

- 2.15 Section 2.3 of the guidance identifies that Councils should undertake occupancy surveys and origin-destination surveys, this requires resources and Council questions whether additional funding will be available to support this. Where origin-destination surveys are carried out these are usually very rare given the resources required, as an example the last Wellington region surveys were over 10 years ago.
- 2.16 Section 2.3 of the guidance also only identifies that the resource costs of parking varies widely e.g. value of land, construction costs, and operation and maintenance of the facility so it is very difficult to understand the impact of decision making. Council would like to see further work and evidence from Waka Kotahi in relation to this.

Section 3: Parking Management Approaches (Section 3.1: Allocating Street Space to Parking)

- 2.17 Section 3.1 of the guidance identifies that parking is one of the largest uses of land in cities, and that 50% of all land areas in post 1950's town or city centres is occupied by parking. It would be useful to understand the types of towns surveyed, so that we can understand if these provide useful comparisons to Districts such as Kāpiti that serve a rural population without any viable alternative.
- 2.18 Case study 3 identifies a rationalisation of parking and the change of some on street spaces to 'parklets'. Further information on this rationalisation of parking would be useful, and it is not understood whether there was a net overall loss of parking when some on street spaces were used for space for people. The case study refers to two cities (Sheffield and Wellington), for which strong alternatives to the car are in place, are there any examples of where this has worked in towns such as Ōtaki and Waikanae?
- 2.19 Case study 3 also identifies that this re-allocation needs to be "done through a careful decision making process that considers all potential users and uses, as well as how the benefits and costs of this allocation are distributed within the community". This relies on work being carried out to determine this, but there is no identification of how this work might be resourced and what evidence may be required to support it.

³ <https://backend.metlink.org.nz/assets/Uploads/Route-280281290-Aug-web.pdf>

- 2.20 The general principles of the parking management approach identifies that public transport and cycling should be prioritised. Can more information be provided on whether this relies on a good level of service being in place already, or a 'build it and they will come' scenario. We have poor levels of public transport service in the north of our District, and it is not clear what should come first. What is the aim of providing priority for public transport if there is an absence of planned service improvements.
- 2.21 The principles section in part 3 of the guidance also identifies that:
- for non-arterial environments such as local residential streets pedestrian movement is prioritised, then car parking is prioritised over maximising vehicle movements; and
 - on street parking can help keep speeds low as road space is reduced and side friction is created.
- 2.22 This causes an operational issue for Road Controlling Authorities and emergency services, and is in conflict with the geometric road design in New Zealand Standards 4404:2010 (NZS4404). Many authorities adopt NZS4404, or variations of it, as their engineering standards. As an example of an issue for most subdivisions of up to 20 dwellings, NZS4404 identifies a design standard of no footpaths, no parking, and movement lanes of 5.5 to 5.7m. If cars are parked on both sides of the road (which is likely if there is no provision on site) this would take up around 4m of space, leaving a gap of 1.5m to 1.7m wide. This is not wide enough to accommodate a rubbish truck, emergency vehicle or even a standard car (which is 1.89m wide). Similar issues could apply in trade and town centre environments, except where 200 to 800 lots are being created or accessed. NZS4404 does identify that parking and loading could be recessed or take place in the movement lane, but minimum road widths are still 5.5m to 5.7m wide. There is a danger that developers will choose to construct to the minimum standards given the cost of road building. Later in the principles section it then goes on to say that on street car parking can create safety issues in industrial environments. How do Territorial Authorities rationalise this and are you aware of any proposed amendments to NZS4404 to address these issues?
- 2.23 Similarly, in commercial centres it identifies that place should take precedence, and that people should be able to slow down and enjoy the environment. Whilst this is a good aim, what resources are available to undertake the studies and data collection required to identify what the extent of this reallocation should be, and without viable alternatives in place how will these centres remain commercially viable? Council would welcome any case studies of towns serving rural areas, with low levels of public transport where this has occurred.
- 2.24 The principles refer to public transport stops and states cycle parking should be prioritised over vehicle parking, but in Kāpiti this has created complaints and delays on Old State Highway 1 in a recent development in Ōtaki, which has taken place without parking. Will the final guidance provide further information on how this should be addressed and funding provided to support alternatives to the private car?
- 2.25 The parking guidance then identifies that parking and loading should be accommodated on site in the first instance in industrial environments. It appears this parking guidance for industrial environments is at odds with NPS-UD requirements, as Territorial Authorities have been directed to remove minimum on site car parking requirements from District Plans. The Council would, therefore, welcome guidance on how this should be achieved.
- 2.26 The guidance states that where public transport and safe walking or biking options are available commuters should be encouraged to use them. However, what about instances where they are not? How do Territorial Authorities balance a complex set of requirements against a backdrop of removal of parking standards from the plan, other than developing

costly prioritisation frameworks for which authorities have not been provided with additional resources?

- 2.27 Section 3.1 of the guidance discusses the use of residents parking schemes, these may be a good response in areas such as where commuters are causing problems, but can cause issues for visitors and the administrative costs may be a burden on rate payers. Can you provide examples of where these schemes have been successful and self-funding?
- 2.28 Section 3.1 of the guidance also states the importance of data collection but where is the funding for this to come from?

Section 3.2: Prioritising the Allocation of Parking

- 2.29 Section 3.2 of the guidance identifies a scheme where loading and parking can take place before 11am and there is no parking after 11am. What happens at night-time in this area when demand for parking would presumably be lower? Are there examples of successful stories in smaller areas with lower levels of alternative transport options where parking removal has not impacted on the economic viability of the town?
- 2.30 Section 3.2 of the guidance also advises that space should be allocated for high priority users, but how are these defined? Presumably those with no alternative / who are transport disadvantaged may be as high priority as those who are mobility impaired.
- 2.31 Section 3.2 of the guidance provides practice guidance for the development of a parking hierarchy but again does not identify additional resources to develop this. It also discusses loading zones and that these should be located on main streets or immediate side streets. Is this the best / safest option, and is there guidance on how the potential conflict between people unloading vehicles and pedestrians / cyclists can be addressed? This is also inconsistent with earlier sections of the guidance that advocates for loading on site in industrial areas. The guidance also further recommends that a 5 or 10-minute time limit should be put in place for loading / unloading. It would be surprising that commercial activities deliveries, for example a shop, could be completed in under 10 minutes. Supermarkets also receive deliveries throughout the day in large trucks that can take some time to unload. Is there evidence to support delivery timings and are there additional resources available to enforce this?
- 2.32 For mobility parking section 3.2 of the guidance advises working with mobility groups to determine need. Council is concerned that the outcome of this work may not truly represent need. As an example, 59% of people over 65 in Kāpiti are considered to have a disability, but mobility groups may not have the data required to determine need at a District level. The guidance further considers that mobility parking should be provided on site and not on busy roads at a rate that is determined in New Zealand Standard 4121 (NZS4121). However, NZS4121 is of no use as it only identifies the rate of disabled parking required where parking is provided. As the NPS-UD requires the removal of parking requirements from District Plans, and leaves provision to developers, there is no guarantee that parking will be provided at all. Council seeks further guidance on how disabled parking should be required and at what rates, given that NZS4121 is not in any way helpful in this regard.
- 2.33 It is not understood what is meant by "Taxi stands should not be located adjacent to mobility parking or loading zones to avoid spill over parking into these areas". Can you please provide further clarity?
- 2.34 The guidance recommends that time limits and parking costs should be the same for electric vehicles as for other cars. Whilst this addresses issue of space, how will it encourage the

use of electric vehicles from a climate change and climate change emergency declaration perspectives?

- 2.35 Section 3.2 of the guidance considers that there are two types of public parking restrictions to manage parking, time limits and prices. However, how is public parking defined? Does it include parking owned and operated by Council, or by others e.g. shopping malls and how does / should Council influence other owner operators?

Section 3.3: Residential Streets

- 2.36 Section 3.3 of the guidance discusses parking on residential streets, it identifies that parking on residential streets is an issue, especially where there is commuter and commercial area spill overs, with residents often feeling they have preferential rights. However, the guidance offers conflicting advice to address this. It provides information on residents parking schemes, but also suggests that residential streets should be treated as a wider community resource, and then further suggests that on street parking should be a part of the solution to address the fact that there will be no requirement to make provision on site. Council seeks further guidance on how these various solutions can be balanced off against each other.
- 2.37 Also recommended for residential parking schemes is a 2 or 3 hour wait limit on one side of the street or for small sections of the street, which allows turnover but does not inhibit residential use. There are several issues / questions with this:
- Where has this been successful and in which geographical context?
 - Demand for on street parking will increase as there is no requirement for new subdivisions to provide on-site parking;
 - People will just park in the section where there are no limits;
 - What if this is the only place for a resident to park? Will they then have to move their car every two to three hours;
 - What additional resources are available to support the enforcement of this?
- 2.38 An alternative has been suggested where charging for parking occurs for both residents and other people in residential streets, and pricing would only apply when demand was high, e.g. 8.30am to 5pm). However, what happens if a resident leaves for work by bus at 7.30am and returns at 5.30pm but leaves their car parked on street? As with other proposals, there are resource implications (administrative and enforcement) that would need to be addressed further.
- 2.39 Case study 4 identifies demand responsive pricing in San Francisco and Auckland, but Council would be pleased to see successful examples for smaller towns similar to the size of Paraparaumu and Waikanae. The differences in the availability of alternative transport options between San Francisco and Auckland compared to smaller towns with a rural component such as Paraparaumu and Waikanae means the examples cited are not useful in the Kapiti context.

Section 3.4: Parking Demand Management Tools – Time Restrictions and Pricing

- 2.40 In section 3.4 (Principles for Parking Demand Management Tools), the guidance suggests that the pricing of parking should be determined by policy, and this should be supported by measuring demand and parking management plans. Council would like to understand what additional resources are available to resource this, as well as enforcement.

Section 3.5: Parking and Emerging Mobility Trends

- 2.41 Section 3.5 of the guidance identifies that there is a rise in technology such as ride hailing apps and shared e-scooters, however, it ignores the fact that this does not exist in many areas such as Kāpiti. Additionally, on one hand it identifies ride hail apps as a solution but then also identifies that this has created kerbside management issues that need to be addressed.
- 2.42 Case study 7 does refer to a small town example, however, this is related to a summer parking issue, which is not a problem in many areas. It is also unclear if the next steps of the project have occurred, what these are, and how successful they have been. It also refers to a shuttle bus to run people from the town to a surf beach, but provides no indication of whether the bus was capable of carrying surf equipment. The service also only carried 21 passengers per day and has viability issues. Council would welcome more guidance on approaches that have been successful in towns serving rural areas. Examples for day-to-day activities rather than peak-summer activities would also be useful.

Section 3.7: Parking Technology

- 2.43 Council understands the benefits of parking technology. However, the guidance provides little by the way of the cost of infrastructure for parking metres and parking technology that supports the management of parking (by directing people to empty spaces and reducing the need to travel around to search for one). Council would welcome more information in this regard, as well as case studies of where this has been successful in smaller towns.

3. Conclusion

- 3.1 Council welcomes the guidance and looks forward to the final guidance being issued. However, we seek further clarity in the final guidance, as well as more information and case studies showing success in Districts with town (rather than city) centres, which serve wider rural areas where alternatives to the car can be limited. Due to its focus on large cities, the guidance raises more questions than provides answers for smaller towns such as those in the Kapiti Coast District.

Yours sincerely



Wayne Maxwell
Chief Executive