



**la Ara Aotearoa Transporting New Zealand**

**submission to**

**Auckland Transport**

**on the:**

**Draft Auckland Parking Strategy**

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# **la Ara Aotearoa Transporting New Zealand submission to Auckland Transport on the Draft Auckland Parking Strategy**

## **1. Representation**

- 1.1 la Ara Aotearoa Transporting New Zealand (Transporting New Zealand) is made up of several regional trucking associations for which Transporting New Zealand provides unified national representation. It is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 32,868 people (2.0% of the workforce), and has a gross annual turnover in the order of \$6 billion.
- 1.2 Transporting New Zealand members are predominately involved in the operation of commercial freight transport services, both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and as multi-unit combinations that may have one or more trailers supporting rural or inter-regional transport.
- 1.3 According to Ministry of Transport (MOT) research (National Freight Demands Study 2018) road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand.

## **2. Introduction**

- 2.1 Transporting New Zealand provides sector leadership and believes we all need to operate in an environment where the following must be managed and co-exist:
  - The safety and wellbeing of our drivers and other road users, our drivers are our most valuable asset
  - The impacts of transport on our environment
  - The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
- 2.2 Transporting New Zealand believes parking is an important element to consider in a holistic transport system and therefore we support the broad intent of roading authorities such as Auckland Transport (AT) having a parking strategy.
- 2.3 Transporting New Zealand welcomes the opportunity to comment on AT's Draft Auckland Parking Strategy (the Strategy). The predominant lens and scope of our submission is the impacts and risks related to commercial (road freight) traffic and the economy that traffic serves. For the purpose of this submission we have provided on the Strategy, we consider the terms 'freight' and 'goods' to be the same and interchangeable.

## **3. General comments on the new Strategy**

- 3.1 Transporting New Zealand generally agree with any initiatives that make the road network operate more efficiently and safely as this benefits the movement of freight and our national economy.

- 3.2 Transporting New Zealand notes that initial consultation on the Strategy was undertaken in 2021 with a Discussion Document and we commend AT on taking on board that feedback and in particular, subsequently making changes to policy and including indicators of success respectively.
- 3.3 Generally Transporting New Zealand agrees with the strategic objectives underlying Auckland's transport system (page 12 of the Strategy refers). We do however have a concern that the objective of "Enable and support growth" (page 12 of the Strategy refers) is too vague and open to interpretation. We contend that the transport system is there to drive the economy and consequently improve the quality of people's lives. In our opinion, objectives that are too broad present increased risk of perverse outcomes.
- 3.4 While arguably it is outside the scope of a parking strategy, we would also like to raise some concern in regard to how these objectives are achieved as we do not believe the risks below have been sufficiently considered:
- We appreciate and agree that the repurposing of the transport system will require a multi-faceted approach as page 13 of the Strategy refers. Whether it be the safety improvements, investment in public transport, improvements to the cycle and micro-mobility network or implementing road pricing, in our view the timing and phasing of delivering these various elements will be key to their degree of success. For example, unless access to public transport or cycle ways are dramatically improved then the change to a low emission transport network will not occur.
  - We are also concerned that the emerging focus on transport emissions, which ultimately is a mobility and access externality, is trumping quality thinking around why the road network exists. Page 13 of the Strategy refers "these measures will dramatically improve the attractiveness, competitiveness, profile and understanding of Auckland's transforming PT and cycle and micro-mobility networks.". We believe a 10-year Strategy should be more balanced and that too narrow a focus on the alternative modes could perversely pose greater risk to economic sustainability of the city rather than improve its economic outlook.
- 3.5 We agree with the rationale on page 19 of the Strategy that better parking management can unlock network efficiencies, particularly by converting parking lanes to bus/T3/T2/freight/traffic lanes; or by converting parking spaces to loading zones or other activity of higher priority.
- 3.6 Over the next 10 years we are anticipating that technology, particularly telematics-based systems and communications, will enable much greater flexibility to be applied to how road space is managed. We urge AT to maintain a close watch on these future developments and to work in an agile way so it manages the risk of regret costs with investments, particularly those implemented earlier in the 10-year period.

#### **4. Specific comments**

- 4.1 Generally we agree with the Parking Principles proposed in section 4 of the Strategy. In paragraphs 4.2 to 4.4 inclusive below we have made comments on areas of particular interest to us.
- 4.2 For Principle III, we are concerned that loading zones are proposed to be prioritized lower than public space improvements (ranking four (4)) and mobility parking (ranking five (5)). We contend that inadequate or inappropriate loading zones can pose a significant risk to health, safety and security during the delivery of goods. Furthermore, if businesses suffer from poor goods delivery access then there can be adverse economic consequences. Loading zones and the delivery of goods are critical to the movement of freight and it is nonsensical to separate them. Therefore, we recommend loading zones be included with freight in priority ranking three (3). Furthermore, when loading zones are considered, they are provided fit for purpose, for example, an area to accommodate courier deliveries needs to be significantly different to one facilitating truck deliveries.
- 4.3 With the caveat we discuss in paragraph 4.6 below, we support Principle IV, i.e. vehicle parking is the lowest priority use of kerbside space on the Strategic Transport Network.
- 4.4 We support and commend AT on its proposed Principle XIII, i.e. that where proposed changes on the Strategic Transport Network are in essence a fait accompli, then an informative as opposed to consultative approach will be taken. We hope this approach will save money and time in implementing change.
- 4.5 In regard to section 5 of the Strategy we agree with the proposed tiered approach based on readiness for change. As with Principle XIII, we hope this approach will also save money and time in implementing change.
- 4.6 Our caveat to supporting Principle IV above is that the scope of the term Strategic Transport Network when used in this Strategy explicitly and consistently includes both people and freight. This Transporting New Zealand submission is based on the presumption that whenever the term Strategic Transport Network is used in this Strategy it refers to the network that will benefit from improvements to the movement of people and freight.

We are concerned that throughout the Strategy the term Strategic Transport Network is used inconsistently in terms of scope and definition. In particular, sometimes there is reference to that network being for people and other times it refers to it being for people and goods. For example:

- “Strategic Transport Network - the main transport routes that connect people and goods throughout Auckland.”. (Page five (5) of the Strategy refers.)
- “The Strategic Transport Network needs to carry as many people as possible in the space available.”. (Page 30 of the Strategy refers.)
- “... these routes are critical connections across Auckland that need to transport as many people and goods as possible, in the most efficient way. Projects that help to move more people and goods and improve travel times are the most beneficial use of kerbside space on the Strategic Transport Network.”. (Page 40 of the Strategy refers.)
- A parking policy indicator of success is described as “Delivery of the Strategic Transport Network as planned, increasing the throughput of

people and goods on the Auckland transport system.” (Page 43 of the Strategy refers.)

- “The Strategic Transport Network consists of the main transport routes that connect people throughout Auckland. They are predominantly roads, but also include railway lines, busways, and off-road cycleways.” (Page 71, of the Strategy Glossary refers.)

We are also mindful that AT already refers to a number of specific strategic networks, for example, the Future Connect Strategic Networks Report<sup>1</sup> includes explicit strategic networks for: public transport; general traffic; freight; cycle and micro-mobility; and walking. Further confusion and ambiguity is created by the map on page 32 of the Strategy that refers to the highlighted roads, coloured black, as “Sections of the Strategic Road Network identified for improvements in the next 10-years” as opposed to those sections being referred to as part of the Strategic Transport Network.

If the term Strategic Transport Network is being used by AT as a generic descriptor that encompasses all the specific strategic networks and it is AT’s intent that an explicit one for parking be added to those in the Future Connect Strategic Networks then AT should clearly explain that accordingly as currently it is unclear.

We raise this because a strategy that focuses on moving people is likely to be significantly different to one that focuses on moving people and freight and as a consequence, we are concerned at the risk that currently there could be significantly different understanding among various stakeholders. We believe it is critically important that AT clearly explains the differences in these terms and clarifies the respective strategic network hierarchy and that this is remedied before the Strategy is finalized.

- 4.7 In regard to the Group 3 Parking Policies for specific vehicles and particularly loading zones (page 53 of the Strategy refers), we note AT’s view that loading and servicing functions should be typically provided for on-site. In principle we agree however, we urge AT to work with other parts of Auckland City Council that consent the design of commercial premises because our anecdotal observation is that it is not uncommon for local authorities to permit commercial sites without allowance for suitable on-site loading/unloading. We are grateful the policy includes industry consultation on identifying loading zone requirements and we look forward to assisting AT where possible.
- 4.8 In regard to the Group 4 Parking Policy about permit and coupons we urge AT to consider that the global and national trend of increasing on-line purchasing is seeing an increase in deliveries to a wider range of addresses therefore AT need to consider the impact that parking constraints have on enabling that service in residential areas.

## **5. Concluding comments**

- 5.1 Transporting New Zealand agree parking is an important factor when considering a transport system holistically and appreciate the work and good intent of AT in developing this Strategy.

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<sup>1</sup> [Future Connect - Auckland Transport's Network Plan \(at.govt.nz\)](#)

- 5.2 We urge AT to remedy the confusion caused by inconsistent use of terminology and definitions regarding its various strategic networks.
- 5.3 We do not envy the difficult challenge that AT has in remedying the terrible traffic congestion that blights so much of Auckland's road network however, we urge AT to maintain a good balance and well managed approach so that its focus on making an environmentally friendly transport system is done while also maintaining a thriving and sustainable economy.