



la Ara Aotearoa Transporting New Zealand

submission to

Nelson City Council

on:

Parking Strategy

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1. Representation

- 1.1 Ia 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 to have a parking strategy.
- 2.3 Transporting New Zealand welcomes the opportunity to comment on Nelson City Council's (NCC) Draft Parking Strategy (the Strategy).

3. Comments on the Strategy

- 3.1 Section 1 refers "By creating a more sustainable transport system, we aim to reduce congestion in Nelson, meet greenhouse gas emission goals and create a parking system that allows visitors to spend quality time enjoying retail and hospitality in a people-focused city.". We agree with the objective of enabling visitors to access the city however, we urge NCC not to forget that parking also plays a key role in providing a thriving economy. City workers and goods rely on parking and without them there would be little to no visitor demand.

- 3.2 In our view, from a fundamental policy making perspective, there seems a disconnect between what NCC want to achieve for Government and NCC's current understanding of public demand for parking.
- The strategy appears to be intent on manipulating parking availability as a means to create a more sustainable transport system and shift people to public transport so there is less demand for parking
 - On page 4 NCC take the view there is "enough supply to meet current parking demand" however, the same page refers to NCC hearing during pre-engagement on the Strategy that "many people experience a lack of parking". While this kind of disconnect exists, we believe there is considerable risk in NCC developing a strategy.
 - 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 a road network exists. As a consequence, this perversely poses greater risk to economic sustainability rather than improving the city's economic outlook.
- 3.3 Section 4.1 refers to one of the NCC objectives as "supports mode shift – by using parking tools and reallocating street space to support a shift to more sustainable transport modes (walking, cycling and public transport)".
- In our opinion NCC's Strategy lacks a high degree of realism. In terms of realistic alternatives and a modal hierarchy, those people that currently drive and park in the city may, when finding parking prohibitive, catch public transport or cycle however, we believe it is highly unlikely they would walk. As a corollary, between the modes of air, road and sea, there may be some mode shift between air and road however it is unlikely those that use air will shift to using shipping as an alternative.
 - Furthermore, we believe timing and coordination in the provision of alternative transport modes is key to this success and we are concerned that the strategy does not provide sufficient acknowledgement of this risk. Unless access to public transport or cycle ways are dramatically improved and are available, then that mode shift will not occur.
- 3.4 Section 4.2 refers "Street space is prioritised to deliver safety and mode shift outcomes". We disagree with these outcomes being the priority. While we agree that safety and emissions are important, as mentioned in 3.2 above, these are externalities and the priority of street space should be to enable movement, business and support services. We are concerned that policy makers are overlooking the fundamental reason for having street space.
- 3.5 Section 6 refers that "making changes won't be easy" and we agree with the challenges identified. We would also add:
- The cost of public transport is only one element to consider in increasing patronage and a strategy that merely reduces the costs will, in our opinion likely fail. Achieving levels of service that meet customer demand, in particular, frequency, accessibility and destination coverage are critical to make substantive mode shift. There is an inherent critical mass dilemma with this issue that does not seem to have been considered, or if it has, NCC should be more transparent about. The level of public transport service that needs to be provided involves considerable cost and

resource, for example, bus drivers. To do such, even if feasible is almost certainly not economically viable without considerable subsidy until the population has grown to such a degree that it can support the infrastructure and support required.

- Section 6 also refers to the fact that “Legacy transport and land use planning in New Zealand have led to urban sprawl.”. We are concerned that the underlying design philosophy being applied in this Strategy is based on what has been done in European cities which are contextually very different. For example, many of those European cities have much higher population densities, they do not suffer the urban sprawl, they have well developed public transport systems and many people live in apartments. We do not believe NCC has given adequate thought or consideration to these differences and the risks of applying a similar strategy.

3.6 Section 7 regards the parking road map and generally we agree with this approach.

- Section 7.1.1 refers to measures to mitigate parking losses such as changing parallel parks to angle parks and we agree that such alternatives should be explored. We also urge NCC to consider factors such as the size of individual car parks. Our national light vehicle fleet has changed significantly over the last couple of decades and utilities and sport utility vehicles make up a large proportion of the fleet. These are wider, longer and higher than conventional sedan style vehicles and parking spaces need to be fit for purpose.
- In addition to spatial factors, NCC should also take into consideration safety factors with the respective parking configurations, particularly given the Strategy, if successful, will increase the risk exposure of vehicles interacting with vulnerable road users such as, pedestrians, cyclists, and people on mobility scooters etc.
- We agree with the approach of using a Parking Hierarchy, as outlined in Table 1, Section 7.1.2. We would like NCC to clarify whether it intends to treat all categories within the respective priority class equally, for example, are mobility parking, loading zones and taxi ranks all given equal priority? Our view, is that when determining which of a particular high priority parking designation should be allocated to a space, then in addition to the One Network Framework activity type, other factors should be taken into consideration such as the needs to service the respective businesses in the area. For transparency, we recommend NCC provide more detail on how the six respective high priority parking designations will be allocated.
- Section 7.2.8 includes some interesting information about parking technology however, in our view this section lacks substantive strategic direction. For example, 7.2.8.3 refers “Electronic permits can also be integrated with Nelson’s pay by plate meters, improving enforcement efficiency.”. In our opinion comments of this vagueness are not strategic. We recommend this section could better inform readers on explicit current problems and whether they could be remedied by technology and under what conditions that change might be made, for example, if the benefit exceeds the cost.

3.7 We support NCC including a Parking Strategy Action Plan as section 8 refers and we note the timeframes for the respective activities. We believe even more value could be added to the Strategy by including commentary on the prioritisation of

the respective focus areas and actions. For example, two short term actions include developing a parking monitoring framework and developing operational guidelines for car sharing in Nelson. Bearing in mind these actions involve rate payer funding, we believe it would be helpful if the Strategy gave some consideration to the return on investment of the respective actions and some degree of prioritisation accordingly.

- 3.8 In the section on loading zones in the Appendix, one of the guidelines refers that “Generally, no more than one loading zone parking space per block should be provided in commercial areas. Ideally loading zones should be placed at the beginning or end of an area of parking to reduce the need for awkward manoeuvring by larger vehicles.”. We disagree with a prescriptive approach like this and recommend that the provision of loading zones should be allocated based on demand and being fit for purpose. To do otherwise increases risks to health and safety, both for those using the loading zone and other road users. As an example, unloading of vehicles to a car dealership has very different needs to service access to supermarkets or small goods retail stores.

4. Concluding comments

- 4.1 Transporting New Zealand agree parking is an important factor when considering a transport system holistically and appreciate the work and good intent of NCC in developing this Strategy.
- 4.2 We urge NCC not to focus too much on the externalities related to transport and lose sight of the fundamental reasons that street space exists, namely movement, business and support services, otherwise there will be considerable risk that there are perverse outcomes to a thriving and sustainable economy.
- 4.3 We appreciate that the scope and focus of the Strategy are the respective roads that come under the mandate of NCC, as differentiated from those roads that are state highways managed by Waka Kotahi NZ Transport Agency. However, we are mindful that good resilience and contingency planning should include the consideration that events will occur that prevent access to state highways and in that eventuality a local authority road becomes the alternative. An example of this would be if Rocks Road (SH6) is unable to be used then the traffic would likely be diverted to Waimea Road. Bearing that type of scenario in mind, we request NCC consider that changes to parking will still allow for such contingencies.
- 4.4 We also recommend NCC consider more carefully that our topography and terrain has resulted in urban sprawl and we have relatively low population density therefore policies and strategies need to recognise and take that into consideration rather than being too eager to follow strategies being implemented in European cities.