

Parking Discussion Document Submissions Report

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1. Introduction

In June 2014 Auckland Transport (AT) released a Parking Discussion Document (PDD) for public consultation. The PDD set out the proposed approach to the management and supply of car parking in Auckland (both on-street and off-street), and called for community feedback on those approaches. The release of the PDD was supported by wide publicity and over 20 public presentations and workshops including a workshop with the Auckland Development Committee in July 2014.

The PDD generated widespread public interest, and over 5,500 submissions were received. Almost 70% of these were in the form of pro forma letters relating to parking in specific locations (e.g. Howick, Freemans Bay, Mangere, and Parnell) or signatories to petitions (e.g. Belmont).

Written submissions were also received from local boards (19), key stakeholders and advocacy groups (28), business associations (42), and resident groups (27). Almost 300 submissions were received from individual businesses, and over 1,200 from individuals.

All submissions were coded, and the responses analysed by themes. An interim report was presented to the AT Board in October 2014, including a high-level summary of the issues raised in submissions, and initial officer responses.

The purpose of this report is to provide a more thorough summary of the submissions received in relation to each of the themes in the PDD. For each theme, the report summarises the proposed approach in the PDD, and key issues raised by submitter type. The report also summarises the officers' responses to the issues raised.

Further detail on the key submission points for each of the subject areas is available on request.

2. Overview

2.1. Submissions received

Table 1 shows the number of submissions received by theme and submitter type. This is summarised in Figure 1. A large number of submissions were received on the overall demand management of parking (24%), parking on residential streets (18%), park-and-ride (18%), and parking on arterial roads (11%).

Figure 2 shows the geographic distribution of submitters. A large number of submissions were received from Central Auckland (27%), the CBD and fringe suburbs (22%) and east Auckland (20%).

Table 1: Number of submissions received, by theme and submitter type

Submission theme	Local Boards	Key stakeholders & advocacy groups	Business groups	Resident groups	Business	Individuals	Petition & pro forma submissions	Total
Overall Parking Management	19	26	41	23	197	910	2,546	3,762
City Centre	3	7	4	3	18	101	690	826
Metro/ Town Centres	15	12	36	13	137	586	2,539	3,338
Public Transport	14	12	28	15	53	240	697	1,059
CPMPs	9	8	12	3	7	7	-	46
Parking on residential streets	9	16	24	20	103	457	697	1,326
Off-street parking in City Centre	10	15	16	8	41	215	205	510
Investing in off-street parking facilities	4	7	8	5	22	100	-	146
Prioritising & managing access to on-street parking	9	13	24	8	63	198	690	1,005
Parking on arterial roads	18	20	29	11	97	312	1,999	2,486
Allocation of non-residential permits	11	10	12	4	42	77	-	156
Investment in Park and Ride capacity	15	20	24	13	64	421	205	762
Park and Ride pricing	16	17	14	10	25	365	690	1,137
Other themes	13	13	23	16	53	178	690	986
On consultation itself	3	1	11	9	5	40	485	554
Objectives for managing parking	4	7	3	5	17	30	205	271
On changing parking policy	2	-	2	2	4	30	-	40
Research and evidence	3	-	2	6	2	10	-	23
Returning revenue to local areas	3	1	6	-	14	5	-	29

Figure 1: Submission themes

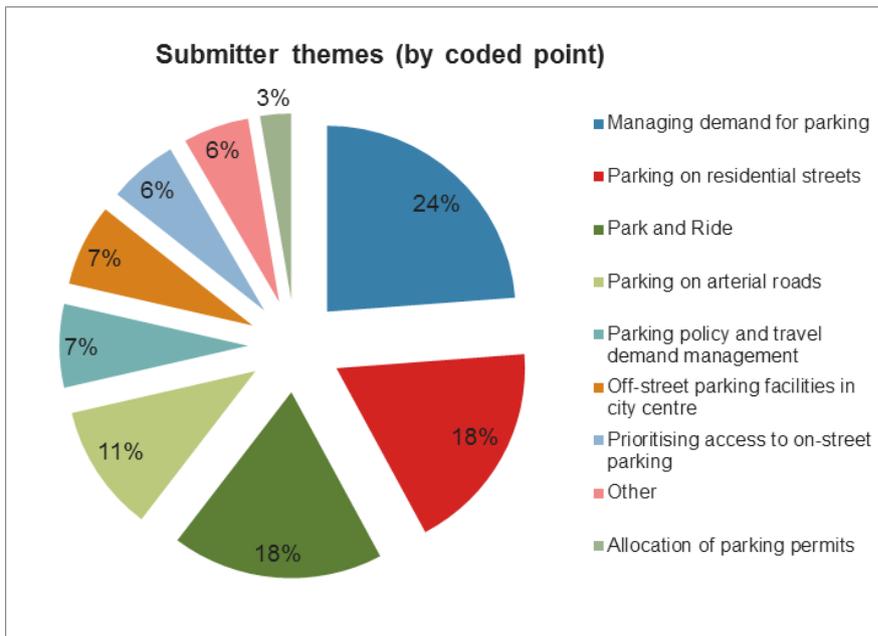
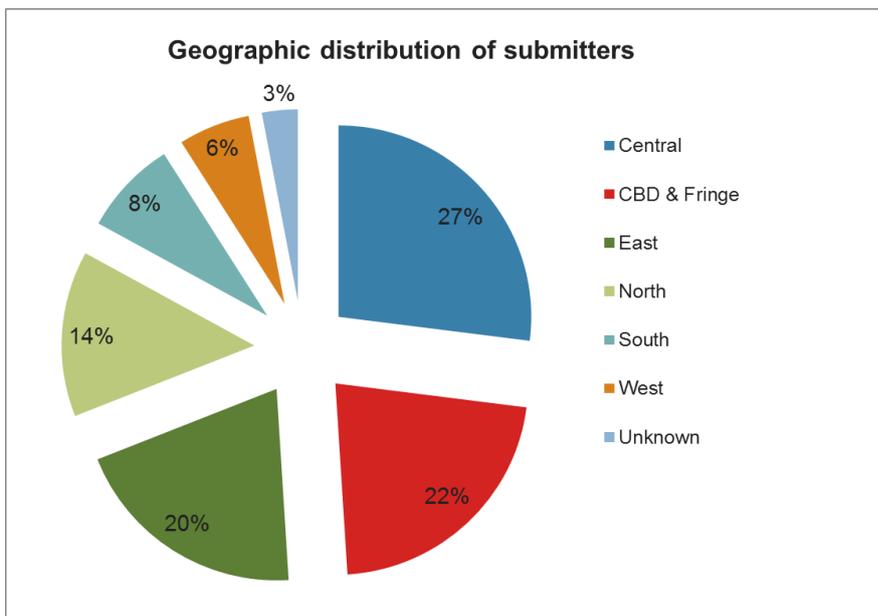


Figure 2: Geographic distribution of submitters



2.2. Comments on the process

A number of submitters expressed their appreciation for the public consultation and opportunity to provide feedback on what is seen as an important issue. However, some submissions were critical of the limited time available to respond to the PDD (especially resident groups). There were also calls from some submitters to make the feedback on the PDD available to the public.

While the public consultation was related to the PDD, there were several submissions that called for further targeted consultation with affected parties before any decisions were taken on changes to

parking management in their local areas. A number of submitters specifically requested that they be actively involved in that process.

Some submissions were critical of the lack of supporting evidence presented in support of some of the assertions made in the PDD. Some called for AT's research to be peer reviewed and for the results of this to be made available to affected parties for discussion.

Officer response and recommendations

In response to the request for an extension of time for consultation, the public consultation period was extended by one month. In addition, all submissions were accepted, reviewed and taken into consideration irrespective of when received up until the finalisation of the AT Parking Strategy.

The submissions report will be available on the AT website with the final AT Parking Strategy once it is approved. AT will meet with members of the community on an on-going basis to provide further information as required. Further information on submissions can be provided upon request.

The Parking Strategy sets out the community engagement and consultation process that will be undertaken in the delivery of each policy in a new section. AT is committed to ensuring that parking solutions take into account local characteristics and that a case by case approach is adopted. There are references to AT's commitment for targeted solutions that meet local needs and circumstances throughout the document.

In response to the submissions a new section has been included in the AT Parking Strategy on references that were used to inform the development of the Strategy.

Proposed Auckland Unitary Plan (PAUP)

A number of submissions raised concerns about the relationship between the PDD and the parking provisions in the Proposed Auckland Unitary Plan (PAUP), and some questioned the appropriateness of the PDD consultation process, given the scope of the matters under consideration. Some raised concerns at the potential impact of parking provisions in the PAUP. In particular, a number of submitters were opposed to the proposed removal of minimum off-street parking provisions, and considered that this, in combination with the PDD proposals, would have unacceptable impacts on the public, especially employees.

Officer response and recommendations

The relationship between the PAUP and the Parking Strategy was carefully reviewed. The Parking Strategy considers the potential impacts of the PAUP in a number of areas including Strategic Direction, Divestment Strategies, and Comprehensive Parking Management Plans (CPMPs). A key consideration in the development of the Strategy has been the potential impact of parking standards and the removal of minimum parking provisions in centres. The demand management approach to parking and case by case assessment provides the opportunity to respond to impacts from PAUP provisions.

The impact of the PAUP are implicit in the whole document.

2.3. Objectives for managing parking

Submitters generally supported the overall objectives for managing parking outlined in section 2 of the PDD. Some additional objectives were proposed:

- Add goals of public health (mental and physical) and encouragement of social connectivity
- Protection of residential amenity
- Protect inner city heritage suburbs

Some submitters noted that the PDD is about more than just parking, as it relates to use of the road reserve, including movement, placemaking and parking; and that this should be reflected in the purpose of the document.

Some submitters noted that the PDD is unclear on how the objectives are prioritised and trade-offs made between them.

Officer response and recommendations

The objectives and strategic direction of the strategy strongly support public transport, walking and cycling. The objectives were also changed into priority order to reflect strategic directions and the individual policies that help achieve each objective listed. The Residential Parking Policy specifically addresses the concerns raised about residential amenity and heritage.

2.4. Key themes to emerge

The following sections of this report contain a detailed summary of the main points raised in submissions. The following key themes emerged from the submission process:

- There was broad agreement with the objectives for parking management, including the need to facilitate a transformational shift to public transport. However, many submitters consider that the public transport system needs improvement before major changes to parking management are implemented.
- There was general acceptance of the proposed management approach for parking in the city centre, including a shift in emphasis away from commuter parking towards short stay parking. The use of paid parking in the city centre was widely accepted, and the use of demand-responsive approach to pricing was also supported.
- Outside of the city centre, however, there was less support for changes in the way in which parking is managed. While submitters appeared to be more supportive with time restrictions to manage parking demand, there was strong concern about paid parking, especially in locations that do not already have it. Opposition to paid parking appears to be strongest in locations further from the city centre.
- One size does not fit all: local circumstances vary, and not all people are able to easily use public transport alternatives. There was support for mechanisms, such as comprehensive parking management plans (CPMPs), which allow the actual responses in each area to take account of specific local circumstances.
- Related to this, there was a strong demand for further community and stakeholder involvement in the detailed development of parking management plans, and in advance of decisions to make changes to parking in local areas.
- The submission process revealed strong and somewhat polarised reactions to the proposals for residential parking, and parking on arterial roads. In part these reflect philosophical

differences about the way in which public road should be used, and whether or not some groups (e.g. local residents) should have a higher priority than others when demand for that space exceeds supply.

3. Responses to proposed approaches

The following sections of the report summarise submitter responses to the proposed approaches to parking management set out in section 5 of the PDD.

3.1. Overall parking management

Summary of approach proposed in PDD

- Adopt a target peak occupancy rate of 85% for on-street parking. When peak parking occupancy is regularly above 85%, AT will recommend the introduction of paid parking to better manage the parking and ensure spaces are available.
- Adopt the Auckland Transport Price Adjustment Policies region wide for applying demand responsive pricing for on-street parking and AT car park buildings in Appendix 1. This will ensure consistent and transparent parking management across the city.
- Adopt the on-street parking intervention trigger points and policy set out in Table 6 of the PDD.

Submissions received

A total of 3,762 submissions commented on the overall approach to parking management in the PDD. Of these, 2,546 (68%) were in the form of a petition or pro-forma response, 907 (24%) from individual submitters, and 198 (5%) from businesses. There were 19 submissions from local boards, 28 from key stakeholders and advocacy groups, 41 from business groups, and 23 from resident groups.

Key themes raised in submissions

The responses to this theme were different for the city centre and metropolitan/town centres. In the city centre, where paid parking already exists, submitters were generally supportive of the proposed approach to parking management. In other centres, however, there was much less support for paid parking. For this reason, the detailed responses to city centre parking have been considered separately from those relating to metropolitan and town centres (see sections 3.1.1 and 3.1.2 below).

As a general rule, support for paid parking reduced with distance from the city centre, and there was significant opposition to paid parking from a number of submitters, particularly individuals and local resident or business groups in outlying centres.

Several submissions, especially those from local boards, expressed concern at what is seen as a “one size fits all” policy, and pointed to the need to take account of local circumstances, including local board plans where appropriate. Local boards also highlighted the differing needs of communities in different parts of Auckland, particularly in smaller suburban centres and rural towns, and where public transport alternatives were not well developed. Key stakeholders, while generally supportive of the intent to develop a consistent management approach, also identified the need for the policy to be sufficiently flexible to deal with different local circumstances.

Similar concerns were expressed by local business and resident groups, particularly those in outer areas, who generally favour time restrictions as the primary parking management tool, and oppose the introduction of pricing. A number of the individual and pro forma submissions were also opposed to the possible introduction of paid pricing in centres such as Howick.

Several submissions highlighted the need for more focused local consultation ahead of any changes to parking management in specific centres.

Officer response and recommendations

There are different parking controls that can be used to manage on-street parking. It is important that decisions to change controls are based on policy principles and empirical data. It is also useful for the public to understand how decisions to amend parking controls are made.

The Parking Intervention Trigger Table provides the trigger points where a new parking management control will be recommended to manage an increase in demand for parking.

Areas which experience low demand, or no change in demand, and don't reach the trigger points will not require any change.

Where parking demand is high, AT will apply various parking restrictions to achieve a target peak occupancy rate (the average of the four highest hours in a day) of 85% for on-street parking. This means that the parking resource is well used but people can still easily find a space, thus reducing congestion and frustration. In other words one parking space in every seven should be vacant. When peak parking occupancy is regularly above 85%, AT will recommend a change to the parking management approach. This is a recognised international approach to the management of on-street parking. AT will conduct surveys and monitor the appropriateness of parking controls that are applied on an ongoing basis.

The Parking Strategy also now includes a separate section on the management of parking in out of centre locations that generate vehicle trips and proposes the use of travel demand management plans in tandem with other appropriate policies in the Strategy.

3.2. City centre

Submissions received

826 submissions referred to city centre parking management. Of these, 791 were from individual submitters, including 690 that were in the form of a petition or pro-forma response. The remaining submissions were from local boards (3), key stakeholders and advocacy groups (7), business groups (4), resident groups (3) and businesses (18).

Key themes raised in submissions

There was general support for the proposed approach to the management of parking in the city centre, including the price adjustment policies and the intervention trigger points. This reflects the fact that paid parking is already well established in the city centre, and there is a demonstrated need to manage demand.

There was also a recognition from submitters that the approach to parking management needs to be aligned with the wider strategic approach of supporting an improved public transport system. In this regard, a shift in emphasis from commuter parking to short term parking was widely supported by submitters, although some considered that the public transport system should be further improved

before this policy can be fully implemented. Demand responsive pricing was widely supported, as was the proposal to phase out early-bird parking in off-street parking buildings. The congestion-buster product suggestions also received strong support from submitters.

Local boards: The Waitemata Local Board supported the shift in focus away from commuter parking and the prioritisation of short stay parking. The Board also called for a review of whether the Council should continue to own or manage off-street parking buildings.

Although submissions from other local boards were mainly focussed on parking issues in their own areas, some Boards commented on parking in the city centre. While the management approach was generally supported, some Boards, especially those in peripheral areas, considered it important that some provision for commuter parking continues in the city centre, as some commuters need to use their vehicles during the day; and the quality of public transport needs to improve.

Key stakeholders and advocacy groups: These submitters generally supported the proposed approach in the city centre, especially the removal of early-bird parking, and the shift in emphasis away from commuters to short stay parking. The congestion buster product was also well supported.

Some submitters noted that the public transport system needs improvement to support the parking management approach. The provision of some commuter car parking to maintain the attractiveness of the city centre as a business location was also noted by some. Submitters noted that the private sector is the dominant supplier of commuter parking in the city centre, and warned that care is needed in the application of the policy. There were mixed views on whether or not the Council/AT should continue ownership of off-street parking buildings in the city centre. Where it is involved, greater attention to urban design issues and alignment with the Central City Master Plan was advocated by some submitters.

Business associations: There was support for the shift in emphasis from commuter to short stay parking and the removal of earlybird parking. There was also support for continued council ownership of parking buildings, and pricing of parking buildings during events. An additional criteria to take account of urban design issues was suggested.

Business and resident groups from CBD fringe locations highlighted the need to address potential flow-on effects for surrounding areas from constraining commuter parking in the city centre.

Businesses: Submissions from individual businesses were mixed. While several submitters felt their existing earlybird and daily commuter rates are counter-productive, others were opposed to the prioritisation of short stay parking. The potential impact of reduced commuter parking on city fringe areas was highlighted by some. Several felt that the provision of parking in the city centre should be left to commercial providers, although others supported investment in new off-street facilities.

Individuals: Many individual submitters supported an increased focus on short-term parking, with many noting that it is difficult and expensive to park in the city centre. While there was support for demand responsive pricing approach, the removal of early-bird parking and congestion-buster products, some submitters felt that the proposals were aimed at squeezing more revenue out of Aucklanders.

205 pro forma submissions from Howick East objected to policies that discouraged city centre commuters to park in parking buildings.

Officer response and recommendations

Public feedback has identified a widespread acceptance of the need to use demand responsive pricing to achieve a balance between demand and supply in the city centre, and has also supported proposals to shift the emphasis away from commuter parking in AT's off-street facilities. The recommended approach is to:

- Continue to improve the public transport offering
- Confirm the PDD proposed management approach for the city centre
- Continue to apply the on street price adjustment policy to manage on street parking demand, and use the parking restriction policy (see below) to determine the best allocation of available spaces
- Prioritise short-term casual parking over all day commuter parking in AT off-street facilities, and continue to use the off-street price adjustment policy to manage demand
- Remove the incentive for commuter parking products as demand for short term parking increases
- Introduce new technologies to improve parking management and customer service.

3.3. Metropolitan and town centres

Submissions received

3,339 submissions referred to parking management in metropolitan and town centres. Of these, 586 were from individual submitters, and a further 2,539 were in the form of a petition or pro-forma response. The remaining submissions were from local boards (15), key stakeholders and advocacy groups (12), business groups (37), resident groups (13) and businesses (137).

Key themes raised

In contrast to the submissions relating to the city centre, most submitters were opposed to the extension of paid parking to metropolitan and town centres (particularly those that do not already have paid parking). Time restrictions are the preferred mechanism for managing parking demand in these locations. As noted below in Section 4 below, some submitters suggested allocating revenues raised from the introduction of paid parking back to the local area in which they are raised.

Local boards: Most local boards are opposed to the prospect of paid parking in their local town centres, although they support time restrictions as a management technique. Many expressed concern at the economic impacts on local businesses and town centre vitality if paid parking was to be introduced. However, the Boards in areas closer to the city centre, or in locations where paid parking is already in place, were more supportive of the proposals to use pricing as a demand management technique.

Key stakeholders and advocacy groups: These submitters had mixed views of the proposals for metropolitan and town centres. While a number supported the use of a consistent set of intervention triggers, there were also concerns that not all centres are the same, and some groups opposed the extension of paid parking to suburban centres.

Business associations: Most local business associations opposed the extension of paid parking to their areas, and were concerned at the economic impact that this would have. The use of time restrictions rather than paid parking was generally supported.

Resident associations: Submissions from resident associations were similar in nature to those from business groups, with strong opposition to paid parking, especially in suburban centres.

Businesses: Over half of the submissions from individual businesses were from businesses in Howick, and were opposed to paid parking in Howick because it is not seen as necessary.

Individuals: Individual submitters were generally opposed to paid parking in town centres, although there was recognition from some that paid parking is appropriate in busier centres such as Newmarket. A number saw the proposals as a revenue gathering exercise. As with businesses, a large proportion of these submissions were from Howick.

Officer response and recommendations

The concerns raised in submissions highlight the need to avoid treating all centres in a homogenous “one size fits all” manner, and to ensure that the appropriate management techniques are applied in different circumstances and that changes to parking management are only required where there are demonstrated problems with the current approach. The Parking Strategy now provides for a more graduated approach that recognises local circumstances, and that paid parking is only introduced in situations where alternative management tools do not prove adequate. This involves the following actions:

- Revised intervention trigger points to provide for a more graduated management response in metropolitan and town centres, including a shift to tighter time restrictions ahead of the introduction of pricing
- Retain the 85% occupancy trigger level
- Use time restricted parking in centres further from the CBD where public transport options are not as viable. Various time restrictions can be used to encourage short stays on the main street and long-term parking further away.
- Introduce pricing only where demand warrants further intervention using 85% peak occupancy as a trigger, and in consultation with community.
- Develop CPMPs for centres (see section 3.5 below)
- Introduce new technologies to inform on PT options and car parking availability and explain these in final strategy
- AT will work closely with local boards and business associations to take a pro-active approach to managing parking in town centres. This includes a new section on the public engagement process.

3.4. Public Transport

Submissions received

1,059 submissions responded to the PDD in relation to public transport aspects of parking management. These included 937 from individual submitters, including 697 that were in the form of a petition or pro-forma response. Submissions on this subject were also received from local boards (14), key stakeholders and advocacy groups (12), business groups (28), resident groups (15) and businesses (53).

Key themes raised in submissions

The dominant theme from submissions was support for the objective of reducing car travel, particularly the commuter trips, and thereby encouraging the use of public transport. However, most submissions expressed concern that the public transport system needed to be improved ahead of implementation of the parking strategy, particularly increased charges.

Local boards: Submissions from local boards generally accepted the connection between parking management and public transport, but most considered that the public transport system needs improvement before the parking strategy is implemented and parking charges increased. This response was particularly strong from boards in outer areas where public transport is not considered to be a viable alternative for many commuter trips. Local board submissions also included some specific suggestions for improvements to public transport, including some support for encouraging employers to shift away from providing employee parking, and providing HOP cards instead.

Key stakeholders and advocacy groups: These submissions expressed general support for the overall approach, but highlighted a need for public transport improvements. For example, some did not consider that there was sufficient public transport to justify an increase in charges at this time, and that a better public transport alternative needed to be in place before any actions which would significantly disadvantage commuters. Stakeholders also noted that some groups would be particularly disadvantaged, especially those who would find it difficult to use public transport (e.g. people with disabilities, parents with young children, shift workers etc.).

Some stakeholders questioned the consistency of current policies in relation to demand management. For example, some suggested removing the current exemption on parking charges for the Santa Parade. There was also some support for having a stronger focus on place making, cultural and safety objectives.

Business associations: Business groups pointed to the need for improvements to public transport precede significant changes to parking management, particularly in the outer areas where the existing public transport system is not seen as a good enough alternative, meaning that people will need to continue to use their cars. Some submitters reviewed the proposed approach as AT trying to force people out of their cars and into an underdeveloped public transport system.

There was opposition to the suggestion of a parking levy from business submitters, who noted that this proposal has already been considered and rejected.

Resident groups: These submitters generally supported a shift in emphasis away from commuting by car, but cautioned about the suitability of the public transport system, particularly in outer areas. In other submissions, the need to improve public transport in advance of significant parking management changes was highlighted.

Submissions from some resident groups in the areas close to existing public transport fare stage boundaries identified the need to take account of parking demand in setting public transport fares, and there was some support for relocation boundaries to reduce pressure on residential parking demand. Some submitters from inner suburbs felt that a stronger focus on residential parking in fringe areas would assist in shifting commuter demand to public transport.

Businesses and individuals: Submissions from businesses and individuals raised similar issues to others in this section: public transport is not suited to all, and it needs to be adequate before committing significant changes to parking management.

Officer response and recommendations

- The Parking Strategy highlights the interdependencies between parking policy and public transport. In addition the strategy includes a new section on public transport.
- AT will continue to improve PT projects and services across the City to encourage PT patronage and deliver better connections.
- A section on travel demand management has also been included to encourage alternatives to the private vehicles, particularly in areas less well served by public transport.
- AT is also improving communication of public transport service level improvements for different parts of Auckland and the associated roll-out programme

3.5. Comprehensive parking management plans (CPMPs)

Summary of approach proposed in PDD

- Develop parking management plans for the city centre, metropolitan and town centres according to the programme identified in Table 7 of the PDD

Submissions received

46 submissions made specific reference to CPMPs. These included nine submissions from local boards, eight from key stakeholders and advocacy groups, 12 from business associations, three from resident groups, and 14 from individuals or businesses.

Key themes raised

The submissions generally supported the concept of CPMPs, provided provision is made for local stakeholder input. Some submissions questioned the rationale behind the sequencing of CPMP development shown in Table 7 of the PDD, and some made suggestions for changes to the programme. These submissions appeared to favour a higher priority for metropolitan and fringe areas, and centres with access to good public transport.

Local boards: the majority of local board comments supported the approach to managing parking in centres using CPMPs, and emphasised the need for stakeholder input from local boards and local businesses. Priorities for the development of CPMPs should be based on need, and CPMPs need to take account of the unique characteristics of each location.

Key stakeholders, business associations and resident groups: The majority of submissions from these groups supported the CPMP approach, emphasising the need to involve community and business stakeholders, and reflect local issues.

Officer response and recommendations

The Parking Strategy states that CPMP's will be developed in consultation with the local community and business stakeholders to reflect local issues. CPMPs provide a comprehensive assessment of parking across the study area, an analysis of issues, and make short, medium and long-term recommendations.

The section on CPMPs now more clearly outlines the criteria that will applied in developing CPMPs.

AT will prioritise the development of CPMPs with regard to:

- An overall assessment of parking problems based on centre hierarchy, projected traffic demand, public transport availability, market attractiveness to support growth, use of available parking capacity, and amount of non-retail employment.
- Requests from the community, business association or local board as a result of demonstrable parking problems
- Requests from Auckland Council in relation to the development of centre, area and precinct plans
- The integration of parking with major transport projects (e.g. AMETI).

CPMPs will make recommendations for parking management that take into consideration local issues and characteristics.

3.6. Parking on residential streets

Summary of approach proposed in PDD

- Implement residential parking zones in residential areas where parking occupancy rates regularly exceed 80%
- Provide a capped number of residential permits equal to 60% of total number of on-street parking spaces in a particular zone
- Give priority for permits to residents and heritage properties (built before 1944) with no off-street parking.
- Provide additional one-day visitors permits to local residents and a daily charge
- Apply paid parking to residential streets adjacent to busy shopping areas

Submissions received

1,109 submissions responded to the PDD in relation to the management of parking on residential streets. These included 697 from individual submissions in the form of a petition or pro-forma response, and a further 240 submissions from individuals. Submissions on residential parking were also received from local boards (9), key stakeholders and advocacy groups (16), business groups (24), resident groups (20) and businesses (103).

Key themes raised

The submissions demonstrated a mixture of support and opposition to the PDD proposals for the implementation residential parking zones. Generally, inner suburb groups and residents are supportive of the proposals, but a number of other submissions were opposed to a scheme which would give priority to residents on public roads.

Submissions supported the objective of retaining residential amenity and accessibility, particularly in inner suburbs that are impacted by commuter parking. Submissions also expressed support for the parking needs of local businesses over and above those of CBD commuters.

A number of submissions commented on the proposals for allocation of parking permits. Most considered that permits should be available to all residents within a zone; but there were opposing views on how permits should be priced. Local resident groups generally favoured a minimal price for permits, but some other submitters did not consider that residents should receive preferential treatment. There were some strong points raised opposing a perceived “privatisation” of public roads for residents.

Submissions also highlighted the need for a clear consultation process for the rollout of residential schemes.

Local boards: Submissions from local boards gave conditional support for residential parking zones and permits, but there were different views on how restrictions should be imposed. Some considered that permits should be confined to residential properties without off-street parking, but others favoured a more permissive approach.

The Waitemata Local Board, which covers the city fringe areas most impacted by residential parking restrictions, favours a rollout of residential parking zones, but does not support the proposed limitations on availability.

Key stakeholders and advocacy groups: Submissions from these groups reflected a range of views. For example, the AA supported the extension of the current St Mary's Bay approach, but the Auckland Transport Blog objected to handing over the rights to occupy public land for a minimal cost.

Business associations: The impact of residential parking zones on the parking needs of local businesses was a significant concern of these submissions, and a number expressed concern at the restrictive approach being proposed. While there was support for residents to have some priority to park on street, concerns were expressed at the impacts on employee parking, and the low priority that has been accorded to local businesses. Some (e.g. Parnell Inc.) suggested providing an opportunity for local businesses to purchase exemptions.

Resident groups: These submissions presented a range of suggestions for the allocation of residential permits. There was some support for an extension of the current St Mary's Bay scheme, but some submitters noted that the proposed approach in the PDD may not be effective meeting the concerns of inner-city residential areas. Concerns were raised at the impacts of residential schemes on local businesses, particularly staff parking. Some agreed that residents should pay for permits, but favoured a more flexible approach to allocation.

Businesses: Submissions from businesses reflected the concerns outlined by business associations above, particularly in relation to the impacts on staff parking.

Individuals: Individual submissions reflected a range of views. Some submitters supported the proposed approach, but others were opposed, and some questioned why residents in the inner suburbs should have special rights. Others considered that resident permits should be more freely available, with minimal or no charge. The potential negative impacts on local businesses were highlighted by number of submissions.

Officer response and recommendations

There is an ongoing need to manage the demand for parking in residential areas that are subject to demand pressures, especially in locations on the city fringe. This needs to provide a balance between the parking requirements of local residents (especially those in areas that have not traditionally provided off-street parking), and the need to maintain reasonable public access to the public roads. To achieve this balance AT is making the following policy responses:

- Apply time restrictions (typically P120) to approximately 25% of streets where parking problems have been identified and most properties have off-street parking
- Implement residential parking zones in older residential areas with limited off-street parking where occupancy rates regularly exceed 85%, and where the local community has requested

- Apply a time restriction suitable to local circumstances across the zone
- Restrictions will apply at different times depending on the specific situation but typically Monday to Friday (excluding public holidays)
- The number of residential permits will be capped at a percentage of the total number of parking spaces
- Parking permits will be issued based on priority
- A daily parking charge to give local residents, businesses and their visitors the ability to stay longer than the time restriction. Residents will receive 50 free days per year for visitors.
- Properties built after the notification of the Unitary Plan (30/09/2013) will not be eligible for permits.
- If a street is less than 6.5 metres in width and there are known access problems AT will complete an assessment of the street. If it is determined that there are limited places for vehicles to pass and emergency access may be compromised then AT will propose to remove parking on one side of the street.

3.7. Off-street parking in the city centre

Summary of approach proposed in PDD

- Prioritise short-term casual parking over all day commuter parking.
- Continue to manage parking buildings following the AT Price Adjustment Policy – Parking Buildings.
- Commuter parking products will be used to fill additional capacity but as demand for short-term increases commuter parking will be phased out.
- Introduce a “congestion buster” product that offers a discount to vehicles that do not enter or exit the car park during the peak congestion times.

Submissions received

510 submissions related to off-street parking in the city centre. Of these, 420 were from individuals, including 205 in the form of a petition or pro-forma response. Other submissions on the subject were received from local boards (10), key stakeholders and advocacy groups (15), business groups (16), resident groups (8) and businesses (41).

Key themes raised

The majority of submissions were in favour of prioritising short-term over commuter parking, and most supported a shift away from early bird parking. Some submissions, particularly from outer areas, noted that there would always be a demand for some commuter parking in the city centre, particularly for employees that needed their cars during the day. Some submissions were opposed to price increases, but there was general support for the congestion buster product.

Local boards: Submissions from local boards were generally supportive of shifting the focus away from commuter parking, including the phasing out of earlybird parking, although some boards highlighted the need to make provision for commuters from outer areas who do not have good public transport options. The introduction of a congestion buster product was supported.

Key stakeholders and advocacy groups: While submissions from these groups were generally supportive of the shift in emphasis from commuter to short-term parking, some challenged the idea that AT can have a significant influence on commuter demand because it doesn't control most of the off-street parking in the city centre. The AA and the EMA consider that the impact of the policy on

commuters needs to be better understood. However, most submitters supported the removal of early bird parking, and there was a wide level of support for the congestion buster concept.

Business associations: The Heart of the City submission supported prioritising short-term over long-term parking, and the removal of early bird parking. Continued council ownership of parking buildings was also supported.

Some business association submissions raised concerns at the creation of a private sector monopoly if the Council was to withdraw from providing off-street parking.

Businesses: Several submissions noted that early bird and daily rates are counter-productive, but others noted that reducing long-term commuter parking in the city centre car parks would make the situation worse in the city fringe. A number of submitters felt that the provision of off-street parking in the city centre should be left to commercial third parties.

Individuals: Many submitters noted that parking is difficult and expensive in the CBD, but a number supported increasing the supply short-term parking by reducing the focus on commuters. The congestion buster products were supported.

Officer response and recommendations

The management of off-street parking facilities is designed to align with AT's strategic objective of facilitating a mode shift towards public transport. To achieve this AT will:

- Prioritise short stay parking over commuter parking to achieve a consistent approach.
- Use a demand responsive management approach. The intervention trigger table will be applied to assess the appropriate parking control. Where parking demand is high AT will apply various parking restrictions to achieve a target peak occupancy rate.
- Apply the Demand Responsive Pricing Policy when setting prices.

3.8. Investing in off-street parking facilities

Summary of approach proposed in PDD

- Off-street parking should not be provided to expand the supply of free or low-cost parking, especially in locations where existing parking supply is not already priced in an appropriate level
- AT investment and off-street parking will be considered where it will fill a gap and demand that is not provided by the private sector
- Enable a more effective use of the road network by relocating parking activity to off-street locations, specifically to support frequent and reliable public transport
- Improve safety and community outcomes by enabling shared parking
- Any new investment in off-street facilities will be subject to a robust business case that addresses the criteria in table 8 of the PDD.

Submissions received

146 submissions referred to investment in off-street parking facilities streets. These included 4 from local boards, 7 from key stakeholders and advocacy groups, 8 from businesses associations, 5 from resident groups, 22 from businesses, and 100 from individuals.

Key themes raised

The submissions generally supported the investment criteria, although there was some support for the addition of urban design considerations. Some submissions noted that the criteria should also be taken into account in relation to divestment. A number of submitters, particularly resident groups, businesses and individuals supported additional investment in off-street facilities.

Local boards: Submissions from local boards generally supported the investment criteria. The Waitemata Local Board suggested that divestments should also be considered when the criteria are not being met.

Key stakeholders and advocacy groups: These submitters generally supported the investment criteria, although Cycle Action Auckland did not support investment where planned improvements to the PT system are not sufficient to cater to projected travel demand. Generation Zero highlighted the need for new investments to provide an acceptable rate of return, and for new car parking buildings to provide active ground floor frontages.

Business and resident associations: These submitters were generally in favour of the investment criteria, although some questioned how investment would be funded. Heart of the City suggested an additional urban design criteria. Business associations were also supportive of proposals for shared parking.

Businesses: A number of submissions were supportive of providing a central shared parking facility, and most considered that off-street parking needs improvement.

Individuals: Many individual submitters noted that investment and off-street parking should be a priority and there was a strong level of support for investment in new facilities and main centres. However, some submitters felt that AT should divest off-street parking assets, and use the capital elsewhere, leaving the provision of off-street parking to the private sector.

Officer response and recommendations

The submission process did not raise any significant concerns with the proposed criteria for investment in off-street parking facilities, other than the suggested addition of urban design considerations. The Parking Strategy includes this statement: “Any development of additional off-street car parking should result in great urban design outcomes and be consistent with Auckland Council’s Urban Design Manual. “

3.9. Prioritising and managing access to on-street parking

This section combines two related sections in the PDD: “Prioritising access to on-street parking” and “On-street parking restrictions and events”.

Summary of approach proposed in PDD

- Use the priorities in Table 9 of the PDD to guide decision-making when requests are made for changes to parking restrictions, and when on street parking in a town centre is reviewed
- Use the on street parking restrictions policy in Table 10 of the PDD to guide decision-making on requests for changes in parking restrictions

Submissions received

1,005 submissions related to the prioritisation and management of access to on street parking. Of these, 690 were petition or pro-forma responses, and 198 from individuals. Submissions were also received on the subject from local boards (9), key stakeholders and advocacy groups (13), business groups (24), resident groups (8) and businesses (63).

Key themes raised

Local boards: The on street priorities were generally supported by local boards, although some suggestions were made for changes (e.g. increase priority for taxis, decrease priority on motorcycles).

Key stakeholders and advocacy groups: These submissions generally supported the use of the prioritisation approach in areas with high parking demand, reflecting the fact that roads are important public space. Some concerns were expressed at the shortage of loading spaces, the need for sufficient mobility spaces (and a higher priority for taxis given their use by the mobility impaired); and the need to add a category for very short term high demand customers (e.g. p5 or P10).

Business associations: Submissions generally called on the proposal for prioritising customers and visitors ahead of commuters, although some concern was expressed at a relatively low priority for centre visitors and customers. A number of submissions highlighted the need to provide for staff parking, especially in areas where other transport options are less attractive.

Businesses: While some businesses were supportive of the priorities in Table 9, others opposed them. Several submissions identified the need for a higher priority for short-term customer parking, and the need to take account of staff parking demand was also identified, as some must park on the street because they have no other choice.

Individuals: These submissions also highlighted the need for short-term customer parking, and a need for more loading and mobility spaces.

Officer response and recommendations

The public feedback on the parking priorities in Table 9 of the PDD highlighted some problems with this approach. It is very difficult to prioritise one parking use ahead of another and the location of the street also influences the type of priority given. It is considered that the Parking Restriction Policy in Section 1 of the Parking Strategy contains enough guidance on when and where each restriction should be used. Consequently it was decided to remove the parking priority from the Parking Strategy and just retain the Parking Restriction Policy.

3.10. Parking on arterial roads

Summary of approach proposed in PDD

- Consider removing on-street parking on arterial routes serving the FTN and on-road cycling corridors with proven safety issues or high current or projected use.
- The timing and detail will be determined on a case by case review.
- Consider providing replacement parking at convenient locations for local businesses adjacent to the arterial road.

Submissions received

A total of 2,486 submissions were received in response to the proposals for parking on arterial roads. Of these, 1,999 were petition or pro forma responses, and a further 312 were from individuals. There were 18 submissions on the subject from local boards, 20 from key stakeholders and advocacy groups, 29 from business associations, 11 from resident groups, and 97 from businesses.

Key themes raised

The submissions revealed a reasonable level of support for the removal of parking from arterials to improve traffic flow, particularly for public transport and cycling. However, there was some significant opposition to this approach from business and resident associations, and a number of petitions and pro forma submissions. Those opposed to the removal of parking on arterials expressed concern at the potentially negative economic impact on local businesses, and amenity and safety issues in centres.

Local boards: The majority of submissions from local boards supported the proposed approach. They supported removing parking from arterials to improve traffic flow and make room for frequent public transport and cycleways, but emphasised that this should only occur when realistic public transport options are available, and where alternative parking is available for affected businesses during business hours.

Key stakeholders and advocacy groups: Most of these submissions were either supportive of the approach, with its stronger emphasis on public transport cycling and walking, or noncommittal. Grey Power was the only advocacy group opposing the approach. Some submitters questioned the need for alternative parking to be provided when spaces were removed from arterials, particularly where the existing parking is not priced or under-priced.

Business associations: Most business associations opposed the approach in the PDD, mainly due to concerns about the impact on business viability in centres. Concerns were also expressed at the potential for poorer amenity and safety outcomes from increasing traffic speeds, particularly in town centres. Where parking is removed from arterials, submitters were of the view that replacement should be provided.

Resident groups: The majority of resident association submissions opposed the removal of parking from arterials, mainly due to the safety, noise and amenity concerns that would arise if the traffic speeds are increased; and the potential downturn in economic activity.

Businesses: Businesses generally opposed the PDD approach, mainly due to the potential for adverse impacts on existing businesses which already have to compete with other areas with free off-street parking. This was seen as a greater risk than any improvement in congestion arising from removal of parallel parking. A minority of business submitters supported the approach however, citing improvements in traffic flow and reduced distraction and hazards for drivers.

Individuals: Around half of the submissions from individuals supported the policy approach, as it will provide an improved traffic flow and better conditions for public transport and cyclists. Approximately 25% of individual submissions opposed the approach however, mainly due to the potential adverse impacts on local businesses.

Petitions: Almost 2000 submitters signed petitions or provided pro forma submissions on this subject. These submitters opposed the removal of parking bays on arterials in Newmarket, Parnell, Belmont, Freemans Bay, and Howick.

Officer response and recommendations

There was general support for giving priority to public transport and vehicle flow along key corridors. However there were concerns around dealing with arterial roads within town centres, to avoid negatively impacting on streetscape, amenity, pedestrian safety and local economic activity. This will require a route-by-route approach to determine the most appropriate response. A case by case assessment will be undertaken to consider impacts such as economic and urban design issues. The recommended approach is therefore to manage parking on arterial roads by extending clearways, or removing parking where it:

- Inhibits the capacity of the road to carry more people (and goods) particularly in the peak periods; and/or
- Causes significant delays to the speed and reliability of public transport on the FTN; and/or
- Causes safety risks for cyclists or impedes quality improvements of the Auckland Cycle Network.

Consideration will be given to the impacts of any parking changes on place-making, centre amenity, traffic calming, and pedestrian environment where arterials pass through town centres.

If there is a significant loss of on-street parking on an arterial road AT will complete a parking assessment. This will include consideration of any parking changes in town centres located on the arterial road and appropriate parking mitigation measures. This may include the development of a CPMP for the town centre where qualifying criteria are met.

3.11. Allocation of parking permits

Summary of approach proposed in PDD

- Create five new parking permit categories with clear eligibility criteria
- Overall reduction in the number of parking permits issued
- No permits for tradespeople in the CBD and other paid parking areas

Submissions received

156 submissions related to the allocation of non-residential parking permits. Of these, 11 submissions were received from local boards, 10 from key stakeholders and advocacy groups, 12 from business associations, 4 from resident groups, 42 from businesses, and 77 from individuals.

Key themes raised

There was general support from submitters for a clear and consistent approach to issuing permits, and the potential to apply new technologies to manage permits was also supported. In general, affected interest groups support retaining parking permits, and there were some calls for the availability of permits to be extended to other groups (e.g. elected members or staff of local businesses).

The Local boards: Submissions from local boards generally supported a more streamlined and rationalised approach for permits, but some (e.g. Devonport-Takapuna) noted the need to take

account of historical arrangements which still remain valid. A number of boards suggested that parking permits should be available for elected members.

Key stakeholders and advocacy groups: These submissions were generally supportive of the approach. There was some opposition to trade permits, and support for the approach to the issuing of permits being as simple, transparent and non-bureaucratic as possible.

Business associations: Business association submitters generally supported the approach, and most agreed with the removal of trade permits in the CBD and areas with paid parking, as trade vehicles often compete with business customers.

Resident groups: There was some opposition to the proposal that trade vehicles should pay for parking, as this will increase costs which are passed on to customers.

Businesses: Most submissions from businesses were opposed to removal of the essential service permit, but agreed that contractors and tradespeople should not be given permits. However, there was some concern that costs would blow out if contractors were charged standard parking rates. A number of business submitters proposed parking permits for local business staff.

Individuals: Several individual submissions opposed charging for trade parking, as costs will be passed onto customers. In contrast, others supported payment for trade parking. Although submitters acknowledged the need for tradespeople to have reasonable access to convenient parking, a number consider that the current system is subject to abuse.

Officer response and recommendations

There is a need to rationalise the way in which parking permits are allocated, and to move away from the wide variety of legacy permits which is difficult to manage and results in inconsistencies. New technologies will improve the customer experience and enforcement. A coupon system will replace some of the existing permit categories which will remove large subsidies for parking. The recommendations are:

- Retain the proposed parking permit categories but provide a daily coupon system for tradespeople, councillors and some public service entities
- Coordinate the timing of parking permit changes with the rollout of improved parking technology to give tradespeople and contractors better parking options
- Develop a comprehensive communications programme to inform people of changes and the alternatives available

3.12. Investment in park-and-ride facilities

Summary of approach proposed in PDD

- Consider up to an additional 10,000 park-and-ride bays by 2040 taking into account the following principles:
 - Locate park-and-ride facilities where they can increase station catchments and contribute to the Rapid and Frequent Transit Networks.
 - Avoid locating park-and-ride facilities in metropolitan and town centres except as part of a stage transition to other uses.
 - Develop a programme that will deliver park-and-ride facilities for inclusion in the Integrated Transport Programme.

Submissions received

762 submissions commented on investment in additional park-and-ride facilities. These included 421 individual submissions, and a further 205 petition/pro forma submissions. Submissions on the subject were also received from 15 local boards, 20 key stakeholders and advocacy groups, 24 business associations, 13 resident groups, and 64 businesses.

Key themes raised

There is general support for increasing park-and-ride provision, particularly in peripheral areas. Many submitters identified the need for additional spaces to avoid unwanted commuter parking on residential streets. However, some submitters questioned the PDD rationale for 10,000 new spaces, and some submitters did not support the provision of park-and-ride at town centres which already have good feeder bus services. The need for improved security and surveillance at park-and-ride facilities was highlighted.

Local boards: Almost all of the submissions from local boards supported an increase in park-and-ride spaces, although a number considered that the primary focus should be on peripheral locations. A number of boards were concerned at the need to ensure sufficient customer safety and security at park-and-ride facilities.

Key stakeholders and advocacy groups: These submissions highlighted some opposing viewpoints. A number supported an increase in park-and-ride capacity, particularly on the periphery. However, others questioned the rationale for the 10,000 space target in the PDD, based on what was considered to be a superficial analysis of selected cities. The submissions pointed to the high cost of providing and operating park-and-ride facilities and the potentially adverse impact on the new public transport network. While park-and-ride is seen to have a place in peripheral locations, the submitters considered that the focus in town centres should instead be on transit oriented development.

Business and resident associations: Business and resident groups were generally in favour of an increase in park-and-ride spaces in their local areas, as this would avoid local business areas and residential streets being clogged with commuter parking.

Businesses and individuals: Submissions from businesses and individuals mostly supported the additional park-and-ride capacity, especially on the periphery. Again, the impact on residential streets was identified as a risk if insufficient park-and-ride spaces are available.

Officer response and recommendations

Park and ride at the right locations effectively extends the PT market. AT has assessed that up to an additional 10,000 bays will be needed to meet modelled demand for park and ride over the next 30 years. The principles for prioritising park and ride are outlined in the Strategy. The fundamental principle is to ensure that park and ride is planned as an integral part of the PT network and encourages PT patronage. AT will prioritise strategic sites on the periphery. Park and ride will be delivered through: use of appropriately located under-utilised car parking facilities such as shopping centres; new builds including facilities built by AT as well as commercial opportunities and rationalisation and redesign of existing on street parking.

AT will apply the following principles to prioritise sites for Park and Ride provision in Auckland:

- Integrate with public transport – Park and Ride is planned as an integral part of the public transport network, extends the customer base and encourages public transport patronage.
- Maximise benefits of Park and Ride for public transport – site in locations that have frequent and rapid services available and less effective feeder services and walking and cycling opportunities.
- Locate facilities to intercept commuter trips by being ‘on the way’ from high potential catchment areas based on assessed demand.
- Relieve congestion – locate to relieve congestion by intercepting commuter traffic and ensure vehicles accessing the facilities would not worsen local traffic congestion.
- Provide in line with corresponding improvements to the public transport network such as station/ferry terminal upgrades to maximise investment.
- Enable a transition of land use that supports transit oriented development in the right locations.

3.13. Pricing of park-and-ride spaces

Summary of approach proposed in PDD

- Pricing for park and ride should not be introduced before the following triggers are met:
 - Feeder services to major park-and-ride stations are operating frequently.
 - The integrated fares zonal system is operational.
 - The AT HOP Card has the ability to be used for park-and-ride charging.
 - A full business case for pricing has been undertaken to set out the methodology, costs, the benefits and the impact on public transport patronage.

Submissions received

The PDD proposals for pricing of park-and-ride spaces attracted a total of 1,137 submissions. This included 690 in the form of a petition or pro forma submission, 365 from individuals, 16 from local boards, 17 from key stakeholders and advocacy groups, 14 from business associations, 10 from resident groups, and 25 from businesses.

Key themes raised

The submissions identified a strong level of public opposition to pricing of park-and-ride spaces, particularly in peripheral locations where there are limited feeder services. Charging a fee for park-and-ride was seen as counter-intuitive, with a risk that it would work against the objective of increasing other transport patronage. There was some limited support for charging in certain circumstances to help manage demand, and where there is a premium product on offer. If pricing is to be introduced, charges should be kept low, and integrated with the HOP card.

Local boards: Most local boards opposed charging for Park and ride, as it could act as a disincentive to public transport use. However some boards, especially those closer to the CBD (e.g. Orakei, Waitemata), supported payment in certain circumstances to manage demand, where frequent feeder services already exist, or for higher quality features. If pricing is introduced, use of HOP is supported.

Key stakeholders and advocacy groups: Most of these submitters were opposed to charging for park-and-ride, as it is seen as counter-productive. However, some considered payment appropriate

to manage demand and to ensure the effective use of resources. A number noted the need to set the prices at a level to avoid adverse impacts on public transport patronage.

Business associations: Almost all of the submissions from business associations opposed pricing for park-and-ride spaces. It is seen as a counter to the policy of increasing public transport patronage, and risks the relocation of commuter parking to surrounding streets. The Papakura Business Association noted that the previous introduction of paid park-and-ride in Papakura had resulted in an increase in parking on streets surrounding the station, and the payment system had been inconvenient for users.

Resident groups: These submissions were strongly opposed to charging, as it would discourage public transport use which is contrary to AT's objectives.

Businesses and individuals: Submissions from businesses and individuals mostly opposed pricing for park-and-ride facilities, as this would result in reduced public transport use, and increased congestion.

Officer response and recommendations

Decisions on pricing for park and ride sites managed by AT will be dependent on a number of criteria including: availability of additional capacity, viable alternative options being available such as frequent bus services, link with HOP card and technology improvements.

In each instance a case by case analysis will be undertaken. If pricing is introduced it would apply to a proportion of bays such as those closest to the station/terminal and free parking would still be available for the community.

AT will advance discussions with owners of appropriately located underutilised parking stations to negotiate provision of park and ride bays. The price applied will be determined by the lease arrangement.

Where commercial proposals are delivered and managed by the private sector the price will be determined by the operator.

4. Other issues raised

This section summarises the issues raised by submitters that are not directly related to the themes discussed in section 3 above.

Re-investment of parking revenues for use in local area

A number of submitters proposed that a proportion of the revenues raised from parking should be ring-fenced re-invested back into the local area from which they are raised, for the improvement of local amenities (e.g. streetscape upgrades, footpath cleaning, street trees, graffiti removal, green space provision and local public transport improvements). Some noted that this would help to make any increase in charges more palatable, and mitigate the impression of parking charges as being simply a city-wide revenue-raising exercise.

Management of parking in non-centre employment zones and rural towns

Some submissions, especially from business associations, noted that the PDD did not adequately address parking issues in locations outside of town centres, some of which have significant parking pressures. These areas include non-centre employment zones (e.g. North Harbour Industrial Zone),

entertainment facilities (e.g. Western Springs), and educational institutions (e.g. Unitec). The submitters requested that parking policies specifically address the issues faced in these locations.

Enforcement

Several submissions mentioned the need for more active and consistent enforcement of parking restrictions, and some called for an increase in parking fines to support this (acknowledging that this may require legislative change).

Technology

A number of submissions supported making better use of technology to manage parking in Auckland. This included opportunities to better inform customers of the options available, better options to pay for parking (especially in relation to non-residential permits), and more efficient enforcement options.

Officer response and recommendations

The issues outlined above include a number of useful suggestions that could be incorporated into the final Parking Strategy. The following contains AT's assessment of the above suggestions:

- Parking revenues will not be ring-fenced to reinvest back into local areas. Paid parking revenues are used to fund broader AT work programme across the region and used to offset funding from Council. AT also provides funding to Council for Local Board Funding for Transport initiatives.
- A section has been included within the Strategy that looks at policies for the management of parking issues at non-centre locations, and engage with local stakeholders in these areas
- Provide a level of parking enforcement that is appropriate to the problem being managed, to ensure that illegal parking is minimised and that traffic flow and safety is not impeded
- AT is advocating for a review of penalty charges to ensure that these provide a sufficient deterrent
- AT is currently investigating new technology options and a section is included in the Strategy. This will deliver operational efficiencies and enhance the customer experience.