

Living Streets Aotearoa



Submission to Wellington City Council on the proposal to increase central city parking fees

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Date: **7 June 2017**

Thank you for the opportunity to submit on this important proposal.

1. Support in principle

We support the effective and efficient use of road space and the principles and objectives of WCC's Urban Growth Plan (including transport strategy) and Parking Policy, and as part of that we agree that parking fees need reviewing.

2. Ratepayer subsidy of private car use

These parking fees have not increased for 13 years, and, according to RBNZ, transport costs in general have risen 26% in that period. The proposed 50c increase on the current \$4 per hour will take fees to the level that would have maintained the status quo in 2010. This lack of increase, when costs for other transport options (e.g. bus and train fares) have been rising, represents a significant ratepayer subsidy of private car use. That in turn creates a perverse incentive to use private car rather than other options that impose fewer costs on ratepayers (e.g. road maintenance costs).

3. WCC Urban Growth Plan

This subsidy is inconsistent with the Urban Growth Plan <http://wellington.govt.nz/~media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/wgtn-urban-growth/wgtn-urban-growth-plan2015.pdf> to reduce carbon emissions (pp10, 23) and with the Plan's classification of the private vehicle as the least desirable transport mode within the city (p46), and it does the opposite of "support[ing] our sustainable transport hierarchy by encouraging walking, cycling and public transport over other modes of transport" (p46). To be consistent with the Plan, fees should increase by at least 25%, or \$1 on the \$4 hourly rate.

The proposal says "*The aim is to encourage turnover of parking spaces and reduce congestion by providing a greater financial incentive to park in less central locations.*" This is a very narrow and unambitious aim, unfortunately consistent with the proposal's apparent assumption that central city parking fees have no connection with the Urban Growth Plan (or even with the Parking Policy). To be

fully consistent with the Plan and the Policy, mode change should be included in the aim with at least as great emphasis as changing parking habits.

4. WCC Parking Policy

The Parking Policy <http://wellington.govt.nz/~media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/parking/files/parking2007-09.pdf?la=en> says:

6.1.1 g. A 15% vacancy rate will be used as an indicator to measure the effectiveness of the Council's management of the parking system. A 15% vacancy rate conforms to international best practice for managing parking, ensuring that turnover and the ability to find a space are balanced. Spaces will need to be managed through a combination of pricing, time limits and enforcement.

The proposal says that there are complaints about lack of available parking, so clearly this vacancy rate is not being achieved in the relevant areas. The proposed fees may or may not solve this - there is no information given on this - and there is no mention of the other two elements of the combination mentioned in the Parking Policy, time limits and enforcement.

The Parking Policy has been in place for ten years. We are not aware that the 15% principle has been applied, and we submit that it is about time that it was. Other jurisdictions, such as Auckland <https://at.govt.nz/about-us/transport-plans-strategies/parking-strategy/> and San Francisco <http://sfpark.org/>, have implemented such a policy, reviewing and adjusting parking fees to achieve an 15% vacancy rate, and we can see no reason why WCC cannot do the same.

While the proposal explicitly refers to the central city and implicitly to current paid parking hours, it can often be difficult to find a parking space outside that area, and at times when there is currently no charge. Implementing the Parking Policy fully would enable people to park easily, instead of driving around in circles looking for a place to park. Also, unlike current practice it would also be in accordance with the Urban Growth Plan.

5. Consistency with other WCC projects

Thorndon Quay and Oriental Parade are covered by both this proposal and the current cycleways/road allocation projects. Each proposal needs to be consistent with and take account of the other.

We note that in the Thorndon Quay discussions, the purpose of parking provision is a key issue. It is recognised in that process that the type of parking provided (e.g. 10 hour versus 10 minute) affects how that space will be used. Short-term parking to allow people to visit shops is seen as having greater economic benefits to a commercial centre than providing commuting parking.

6. Lack of relevant and supporting information and analysis

There is a lack of supporting information presented. For example, there is no reference to:

- a) WCC Parking Policy, despite this being a clear parking issue;
- b) WCC Urban Growth Plan (including the transport strategy), despite this being a clear transport issue;
- c) existing parking fees, so the size of the proposed increase is hidden;

- d) any proposed actions on time limits or enforcement, despite the proposal saying “*It is recommended that this demand is managed through a combination of pricing, time limits and enforcement*”;
- e) the status quo, including current fees and parking occupancy rates (the latter is mentioned, but only anecdotally);
- f) proposed occupancy rates;
- g) the broader effects on transport and the urban environment.

7. Our submission

We submit that:

- a) the aim of the proposal should be changed to be fully consistent with the Urban Growth Plan;
- b) the WCC Parking Policy be implemented, particularly paragraph 6.1.1 g, including managing through time limits and enforcement;
- c) the WCC Urban Growth Plan be implemented with respect to emissions targets and the relative treatment of private cars and other modes of transport;
- d) if the Parking Policy cannot be implemented this year, parking fees be raised by 25% as an interim measure for a maximum of one year, pending full implementation;
- e) all proposals explicitly need to:
 - i. present the full facts and analysis relevant to both the current and proposed situation;
 - ii. be consistent with other proposals affecting the same areas;
 - iii. be consistent with all relevant WCC Plans and Policies.

If there is an opportunity, we would like to be heard in support of the submission.

About Living Streets

Living Streets Aotearoa is New Zealand’s national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking friendly planning and development around the country. Our vision is “More people choosing to walk more often and enjoying public places”.

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see www.livingstreets.org.nz.