

**Submission by**

**Hamilton City Council**

Private Bag 3010  
Hamilton 3240  
New Zealand

TEL 07 838 6699  
FAX 07 838 6599  
EMAIL [info@hcc.govt.nz](mailto:info@hcc.govt.nz)  
[hamilton.govt.nz](http://hamilton.govt.nz)

## **WAKA KOTAHI NZ TRANSPORT AGENCY - DRAFT NATIONAL PARKING MANAGEMENT GUIDANCE (NOVEMBER 2020)**

**11 March 2021**

### **1.0 SUMMARY OF KEY POINTS AND RECOMMENDATIONS**

- 1.1 Support the overall intent and direction of the Draft National Parking Management Guidance.
- 1.2 Support the Guide's call to promote a consistent, best-practice guide for the management of public parking.
- 1.3 Recognise that the location and design of parking can lead to poor urban design outcomes and that there is a need to ensure that parking does not erode the sense of place, character and streetscape.
- 1.4 HCC supports the development of a National Parking Management Guide to promote a consistent best practice approach for managing public parking. We strongly support the flexibility and adaptability it provides, allowing scope for individual councils to respond to local dynamics, removing the potential risks associated with a 'one size fits all approach'.
- 1.5 Recommend that the Draft National Parking Management Guidance is accepted with minor changes and clarifications as outlined in this submission.
- 1.6 HCC will consider Waka Kotahi finalised Guidance when developing future parking management plans.
- 1.7 HCC's submission is supported by Waikato Regional Council staff.

### **2.0 INTRODUCTION**

- 2.1 Hamilton City Council (HCC) supports the overall intent and direction of the Draft National Parking Management Guidance.
- 2.2 HCC supports the Guides' call to promote a consistent, best-practice guide for the management of public parking.
- 2.3 We also support the guiding key principals of parking management set out in the Draft National Parking Management Guidance.
- 2.4 HCC recognises that the location and design of parking can lead to poor urban design outcomes and that there is a need to ensure that parking does not erode the sense of place, character and streetscape of the central city.
- 2.5 HCC will consider Waka Kotahi finalised Guidance when developing future parking management plans.
- 2.6 HCC's submission is supported by Waikato Regional Council staff.

### 3.0 SECTION ONE: OVERVIEW

- 3.1 HCC would like 'micro-mobility' to be included alongside 'public transport, walking and cycling' (paragraph 1, p.5).
- 3.2 We suggest that the word 'promotes' is changed to 'support', reading "*this guide supports a consistent, best-practice guide for the management of public parking throughout New Zealand*" (paragraph 3, p.5).
- 3.3 HCC understands that as stated, this guidance does not cover bicycle parking or micro-mobility. HCC recognises that there is no guidance for 'micro-mobility' parking but looks forward to possible guidance in the future to address and guide this new and emerging technology (p.5).
- 3.4 Following the NPS-UD and the removal of minimum parking requirements, HCC will consider the requirement for 'Travel Demand Management Plans' to be developed alongside the required 'Transport Impact Assessments' for ALL new developments (p.7).
- 3.5 We recognise the current parking fine pricing loopholes and would like there to be updates on the progress of the "*necessary regulatory changes to enable parking fines to be set to discourage inappropriate behavior use in residential areas*" as stated on page 8.
- 3.6 HCC supports and agrees with the 8 key principles of parking management as outlined on page 14 of the Draft National Parking Management Guidance i.e.:
  - *Prioritise public space to deliver the highest value.*
  - *Efficiently use space dedicated to parking.*
  - *Prioritise those with the greatest need for parking.*
  - *Equitably pay for the costs of parking provision.*
  - *Ensure parking supports wider transport outcomes.*
  - *Ensure parking supports a quality urban form.*
  - *Make evidence-based decisions.*
  - *Provide a high-quality user experience.*

### 4.0 SECTION TWO: THE PARKING MANAGEMENT FRAMEWORK

- 4.1 HCC has identified that the flow chart is missing a crucial step i.e. 'Council resolution' needs to be included after 'public engagement' and before the final step of 'on-ground changes' (p.16).
- 4.2 HCC supports that parking management plans cannot be delivered in isolation. An integrated transport strategy is essential to provide the guiding principles (p.17).
- 4.3 We support the three key messages set out by Waka Kotahi (p.24) i.e.:
  - *Decisions on parking management and supply should be guided by a parking strategy that aligns with local and government policy direction.*
  - *Parking management plans can be used to respond to parking issues or to proactively guide urban improvement initiatives and should align with the parking strategy and include area-specific considerations and clarity on what interventions are needed.*
  - *Gathering information about parking supply, utilisation and resource costs is an essential part of developing a robust parking management plan.*

### 5.0 SECTION 3.1: ALLOCATING STREET SPACE TO PARKING

- 5.1 HCC agrees and supports the principles outlined but acknowledges the following minor

improvements are needed (p.29-31).

- 5.2 We recognise that the terminology used in the section 'In residential environments' should be reflected in the 'One Network Framework' or to the current 'One Network Road Classification' in response to the use of 'arterial roads' in the following sentence "*On arterial roads, the efficient movement of people and goods*" (p.29).
- 5.3 Following the NPS-UD legislation, preventing local authorities from setting minimum car park requirements, HCC would like the guidance to reflect greater emphasis on how to manage on-street parking in high density residential areas (p.29).
- 5.4 HCC would like to ensure that Waka Kotahi is aware that most small footprint commercial developments do not have off-street loading and that on-street loading is the main/only option for these developments (bullet point 6 of 'In commercial center environments', p.29-30).
- 5.5 However, this raises concern with bullet point 1 of 'In industrial environments' (p.30). HCC agrees that it's more important to facilitate the trafficking of heavy vehicles in an industrial environment but would like guidance when it comes to managing room for on-street loading in areas with heavy vehicle movement taking priority (p.30).
- 5.6 HCC would also like to ensure that the final bullet point under 'Removing existing car parking' addresses that 'safety is not compromised'. Angle parking is more dangerous for cyclists and less efficient than parallel parking, where there is a lot of access. HCC would like there to be a reduction in maneuvering space regulations in low speed environments to support this (p.31).

## **6.0 SECTION 3.2: PRIORITISING THE ALLOCATION OF PARKING**

- 6.1 HCC recognises that short stay parking is an important element to ensuring and supporting the economic viability of small business and supports its prioritisation and position in the parking hierarchy over long stay and residential parking.
- 6.2 HCC would like to make the following comments regarding the table titled 'Example of Parking Preference Hierarchy' (p.34).
- 6.3 Clarification is sought as to where in all three of the columns in the table that bus stops are prioritised for enhancing PT ease of access, greater convenience and use.
- 6.4 For the column 'Industrial Areas', HCC would like to note that short-stay motorcycle parking is not likely to be used. Also, HCC recommends that that 'Mobility parking' (Priority 6) is prioritised before 'Long stay-general parking' (Priority 5) or be moved further up the hierarchy.
- 6.5 For the column 'Residential', HCC would also like to see that 'Mobility parking' (Priority 2) comes before 'Car share parking' (Priority 1) as it is important to ensure that those who hold a Disability Parking Permit are catered for before able-bodied people.
- 6.6 HCC would like to note that under heading 'Loading Zones' the current statement of "*A five or 10-minute time limit*", that 5 minutes is too short to unload, deliver, sign and return to vehicle and instead recommends the time limit is extended to 10-15 minutes (p.35).
- 6.7 We agree that in busy commercial areas, goods vehicles should be prioritised (p.35).
- 6.8 Under the heading 'Mobility parking' HCC has recognised that currently there is 'usually enough on-site parking', however moving forward this is likely to change (p.35).
- 6.9 HCC recommends that "*one hour above the limit*" is changed to "*double the limit*" via the previous Bylaw (p.35).
- 6.10 For bullet point 6 of 'Mobility parking', it is important to note that rear-loading mobility

vehicles require a longer car park to ensure the user is not loading into the middle of moving traffic/in the pathway of cars.

- 6.11 HCC supports that mobility parking access also needs to consider access to/from the footpath and suggests that the terminology 'universally designed' is used (p.35).
- 6.12 For the heading 'Pick Up Drop Off' (bullet point 1), HCC seeks guidance on how to signpost this (p.36).
- 6.13 For the heading 'Taxi ride and hail parking' HCC recommends rewording the sentence "*in 2019 Waka Kotahi amended the TCD rule to allow for*" to read "*In 2019 the TDC rule was amended to allow for*" (p.36).
- 6.14 Clarification is sought if it is illegal to back/reverse into an angle car park. This question comes in response to the "*EV car charging working best in angular or perpendicular parking*" (p.36).
- 6.15 We would like to see further guidance for parking management in a medical/hospital/emergency setting regarding how to prioritise/manage and cater for emergency vehicle parking (ambulance, midwives, first response, firetrucks etc.).

## **7.0 SECTION 3.3: RESIDENTIAL STREETS**

- 7.1 HCC supports the recommendations set out in this section, recognising that moving forward there will be more than just 'older suburbs' lacking space for on-site vehicles. This will become an emerging issue (p.38).
- 7.2 While we support the table (p.39), we note that it needs to be clearer around addressing whether it is to be a 'user pay' system rather than covered by ratepayers with pricing permits (p.39).

## **8.0 SECTION 3.4: PARKING DEMAND MANAGEMENT TOOLS - TIME RESTRICTIONS AND PRICING**

- 8.1 HCC supports the recommendation of using time limits and pricing (demand responsive parking) to better manage parking (p.41).
- 8.2 We have identified that the current national set infringement pricing has loopholes, with fines being cheaper than parking and now being subject to high levels of abuse.
- 8.3 HCC supports the view that time limits as a management tool do not reflect the true price of parking i.e. it does not encourage mode-shift and sees 'parking' being viewed as a 'common good' rather than 'user-pay' system.
- 8.4 HCC supports that parking changes (time and price) need to be supported and led by data/link to principle 7 i.e. make evidence-based decisions.
- 8.5 We agree that the parking occupancy rate of 85% supports maximum efficiency and is considered best practice.
- 8.6 We seek clarity on what % is recommended for price increase or decrease increments if the concept of demand responsive parking is used (p.44).
- 8.7 We would also like to know if there are any recommendations around how long a 'trigger threshold' is held for before there is then a prompt to change (p.44).

## **9.0 SECTION 3.5: PARKING AND EMERGING MOBILITY TRENDS**

- 9.1 HCC would like to see guidance on how to possibly manage the socio-economic strain that parking can bring as described (bullet point 7, p.47) when discussing discounts for EV owners/users.

## 10.0 FURTHER INFORMATION AND OPPORTUNITY TO DISCUSS OUR SUBMISSION

- 10.1 Should Waka Kotahi NZ Transport Agency require clarification of Hamilton City Council's submission, or additional information, please contact Jason Harrison (Transport Manager), email [jason.harrison@hcc.govt.nz](mailto:jason.harrison@hcc.govt.nz) in the first instance.
- 10.2 Hamilton City Council would welcome the opportunity to meet with representatives from Waka Kotahi NZ Transport Agency to discuss the content of our submission in more detail.

Yours faithfully



**Richard Briggs**  
**CHIEF EXECUTIVE**