



SUBMISSION ON THE TAURANGA CITY COUNCIL DRAFT PARKING STRATEGY

TO: Tauranga City Council

SUBMISSION ON: Tauranga City Draft Parking Strategy

SUBMITTER: URBAN TASKFORCE FOR TAURANGA LTD (“UTF”)
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1. The Urban Taskforce for Tauranga appreciates the opportunity to make this submission to the Tauranga City Council’s draft parking strategy for the City.
2. The Urban Task Force (“UTF”) has been incorporated as a society with its purpose being to represent its members who are property professionals and funders, developers, Iwi and Hapu, and owners and managers of properties in Tauranga City. The UTF seeks to provide strong and informed leadership to Local Authorities, promote and foster productive local networks around property and related issues, and to advocate for our industry by making submissions to both Central and Local Government.
3. Tauranga is a growing city. Our community is facing unprecedented challenges because leaders have seen growth as a problem rather than an opportunity. The intent of UTF is to focus on the opportunities presented by growth and to unlock these opportunities by working collaboratively and innovatively across Government, Local Government, and private sectors. Part of UTFs role is to advocate for sound policies which will assist in resolving some of these challenges
4. Poor past policies relating to growth management has led to a failing City Centre, a lack of essential community infrastructure and facilities, and a lack of investment in utilities infrastructure necessary to support growth. The UTF advocates for connected thinking, connected planning, connected governments and strong, bold, leadership.
5. The UTF submission is in response to the Council’s draft strategy document and supporting appendices. UTF consider that parking is necessary infrastructure to support growth. Having reviewed these documents, our Executive have provided

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feedback and comments on the draft strategy which we have adopted as recommendations and suggestions in this submission.

General

Purpose of the Strategy

1. UTF agree there is a need for a parking strategy to inform and provide guidance in relation to the management of public carparking within Tauranga City. It is critical that both residents and visitors can easily access carparking within Centres for work, business, shopping, or leisure activities. The availability of carparking is critical to ensure the long-term sustainability and vibrancy of Centres such as Mount Maunganui and the Tauranga CBD and the changing nature of intensification planned for the cities Residential zones.

Centre Parking and CBD Revitalisation

2. Although the strategy appears to refer to a number of Centres, parking in the majority of these is largely private, and is therefore not subject to the strategy.

In relation to the supply of parking for Centres, a balance is required to ensure that transport planning is not unreasonably skewed towards improving only walking and cycling connections and public transport facilities. The supply of accessible and affordable public carparking has a key role to play in enhancing the long-term vibrancy and the desirability of a number of Tauranga's Centres (particularly the CBD). Without appropriate parking supply, the CBD will continue to suffer from under investment. An ongoing problem for the CBD has been a general lack of incentives for immediate and short-term investment and development. UTF have previously submitted in support of the long-term plan supporting a more ambitious program of CBD revitalization. This includes the need for a specific plan for the CBD for public parking. Failure of the Harrington Street parking building project has resulted in a loss of further anticipated parking supply for the CBD. Planning for further parking buildings/sites should occur in a targeted manner around and near significant CBD projects. Such an approach will provide an incentive for significant reinvestment in the CBD and should be reflected as an action in the strategy.

Specific policies are needed in the strategy which outline the Councils plan for replacement CBD carparking. Previous Council strategies in relation to the provision of carparking buildings has been to focus on single sites and to provide large scale multi-level carparking options. The concern with this approach is that:

1. The carparking locations are geographically discreet and may involve further travel time to reach destinations in the CBD which covers a wide area.

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2. Many of TCCs current carparking spaces are subject to long term lease arrangements which often result in inefficient use and a low level of occupancy. This needs to be addressed

UTFs view is that consideration should be given to smaller more pepper-potted parking buildings throughout the CBD which, if necessary, can be developed and leased and which will assist with the geographic spread of parking. Council should be working with the private sector to ensure that these are located and best placed to incentivize investment.

The strategy must also address the Councils approach to civic carparking on the waterfront area and the phasing out and revitalisation of this space. The waterfront is the most valuable commercial and amenity space in the CBD and a specific section is required in the strategy to address the long-term use and development of this area.

Public Transport

3. Whilst generally we support the Council's priority to deliver increased levels of public transport and an overall decrease in car dependency, public transport options must be reliable, frequent and convenient. Further work is still required to consider better well-connected public transport throughout the City and the nature of this (for example, smaller and more frequent buses). The nature of bus parking has not been addressed or covered within the draft strategy and is currently leading to degraded levels of amenity (for example up to 12 buses parked within the streetscape. Successful and vibrant cities do not provide large area of bus "laybys" within their core. More efficient transit connection options are appropriate and should be incorporated to ensure that "parking" of buses in the city core is avoided. Parking should be restricted to immediate drop off and collection only.

Access to Centre Parking and Pricing

4. The vibrancy of Centres can be significantly adversely affected if it is difficult for the public to access parking or if parking is cost prohibitive. We support a focus on how pricing and time limits can be used to manage carparking more efficiently. However, care must be taken with pricing as rapid changes to parking pricing over short time frames will act against Councils current incentives for immediate and short-term investment and development in the City Centre.

Changes in the pricing structure should instead be gradual and this must be reflected in the strategy to avoid a "shock" effect. Insufficient carparking availability or unreasonable pricing will lead to changes in consumer behavior, for example travel to outlying centres where private carparking is available at no cost. The impact of this is well documented.

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Pricing of parking in the CBD must be based on a graduated system (the longer the parking period the greater the price to ensure that turnover of carparking is promoted). This graduated system has proved effective in the past in promoting visitors and shopping in the CBD. Use of technology to monitor efficiency should also be employed through trials.

Consistency of Carparking Policy within the Business Zones

5. There is an inconsistent approach with respect to carparking in various locations around the city, including enforcement. For example, carparking at Mount Maunganui has up until recently been managed under a different regime than carparking in the Tauranga CBD. Council needs to take a much more uniform approach to applying parking policy and this should be reflected in the strategy. For example, UTF understand that much of the Mount Maunganui carparking in the commercial zone is not regularly monitored and is not short stay in nature. Parking is often occupied by visitors and tourists over long periods. An approach which promotes efficiency and regular turnover of parking need to be uniformly applied throughout the business zones.

Parking Revenue

6. The strategy refers to parking revenue needing to cover the cost of providing parking, as well as encouraging private providers to operate in areas with a lack of supply. The strategy needs to set out how this will occur in more detail. Actions are required, such as whether this will occur through partnership and collaboration with the private sector.

National Policy Statement for Urban Development

7. The strategy appears to conflict with the National Policy Statement for Urban Development, which contains clear direction that the City Plan must not include objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity. It is important that this is acknowledged in the strategy, to ensure that the strategy only relates to the provision of carparking in public spaces. The strategy notes that through the City Plan review Council will investigate potential further regulation for the development and use of private carparking. The UTF opposes this approach and these provisions, as they are contrary to the National Policy Statement which does not enable Tauranga City Council (as a Tier 1 Local Authority) to regulate private carparking.

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Parking on Local Streets

8. UTF agree that as Planned intensification is to occur throughout the City, demand for the use of road space for on-street carparking will occur. UTF do not agree with Section 7.2 of the report which suggests that residents will prefer to use their garages or driveways “for other uses”. The reality is that based on the NPS-UD residential development will provide significantly less, and in some case no onsite parking spaces. This is not a preference, but rather is a practical reality of intensification.

Residents may have no choice with minimum parking standards removed from the City Plan, with housing affordability also being a driver in the removal of onsite parking. The result is that significant demand will be created for on-street spaces and this should be planned for under the strategy.

In the case of residential zones, we do not consider that the focus of the strategy should be on the provision of visitor parks in intensification area, as this is unlikely to be able to be regulated or enforced.

We disagree with Section 8.3 of the strategy in relation to the prioritisation of resident parking by way of permits or a lease. We do not consider that such a system would restrict the most optimal use of the space at any given time. Rather, if the pool of parking in residential streets is limited (relative to the number of leases issued) then such parking will be efficiently used. This also provides Council with the potential for a significant revenue stream which can be invested in the wider carparking network. The use of permit systems in intensification areas is well documented. Carparking can be paid for on a yearly basis with a permit being restricted to one vehicle per household. This avoids designated parking being provided per dwelling.

UTF think that there are going to be significant tensions between intensification and the availability of carparking and that this matter needs to be further thought through and addressed in the strategy.

Parking Management Plan Approach

9. UTF agree that a responsive approach to parking management requires monitoring and review in relation to the preparation of “Parking Management Plans”. It is critically important that the Council consults with specific residents affected, businesses, and the community at large as part of the preparation of such plans. As we have seen in Auckland and elsewhere, changes to carparking regimes without sufficient consultation has led to significant adverse effects on businesses and residents.

Parking Near Schools

10. Parking near schools is typically short term in nature and consists of drop off and collection. In many areas this can be done more efficiently through closer

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collaboration with schools and surrounding neighbourhoods. This needs to be reflected in the parking strategy.

Cycle parking

11. The requirement for cycle parking as part of new developments has been incorporated as part of Plan Change 26 to the City Plan. Cycle parking on private land is normally done efficiently. The same cannot be said for public land. Council needs to ensure that cycle parking is laid out in an efficient manner.

Parking hierarchy

12. Table 4 of the draft strategy sets out the parking hierarchy. In our view, the carparking hierarchy (from highest to lowest) needs amendment. Short stay carparking should be prioritised in the table across all zones as this results in significant gains in carparking efficiency.

On-street carparking design

13. There are many examples of carparking throughout the City where carparking spaces, disabled carparks, bike parks and cycle parks have not been laid out and designed in an efficient manner. The strategy needs to incorporate a provision which directs those various types of parking spaces are to be laid out in the most efficient manner to promote the best use of street space.

Revisiting the City Plan

14. The strategy notes that through the City Plan review Council will investigate potential further regulation for the development and use of private carparking. The UTF oppose the inclusion of this provision. The NPS-UD directs TCC not to regulate private parking. Council must abide by the NPS.

Monitoring, review and survey

15. UTF supports the Councils approach to base changes to parking policy both in consultation with the community through Parking Management Plans as previously noted, as well as via sound survey and monitoring results. Significant tension and conflict has occurred in the past when adequate data has not formed the basis for engagement with parties affected by changes to public parking.

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Conclusions

16. UTF generally support the Councils initiative to prepare a strategy to outline how public parking is to be managed in the future. We do not support the strategy applying to private carparking as this is contrary to the NPS-UD.
17. Tensions exist in relation to the supply and provision of carparking spaces. It is therefore critical that Council acknowledges that available and efficient carparking is necessary to ensure a vibrant City Centre and intensified residential areas (particularly any price incentives for short term parking which will promote efficient use).
18. The form and nature of carparking buildings provided in Tauranga needs to change and the removal of leases and increased short-term and affordable carparking is encouraged. Pricing in parking buildings should be based on a graduated approach and significant increases in pricing over the short-term should be avoided. More smaller buildings should be “pepper potted” across the CBD to replace the Harrington Street building.
19. There is a need for a consistent approach to parking between Mount Maunganui’s downtown area and the Tauranga CBD.
20. Residential intensification under Plan Change 26 is likely to have a significant impact on the availability of on-street carparking. We do not accept that a permit system would result in this carparking being inefficiently used. We consider that if such a system is well structured and priced that it would result in a more efficient outcome than is currently occurring.
21. The parking hierarchy in the strategy needs to give priority to short stay parking.
22. A parking management plan approach is supported; however, this needs to be based on sound technical assessment through monitoring and reporting and an appropriate community engagement process. As we have seen through examples in the Auckland CBD and elsewhere, significant changes to parking policy can have major adverse effects on activities such as City Centre retailers where engagement with affected parties has not been appropriate and meaningful.

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Decision sought

23. The decision UTF seeks from Tauranga City Council is that the above matters be considered in their decision making on the draft strategy and that amendments be made to address the matters which are set out in this submission.
24. UTF would be happy to meet to discuss our submission in more detail.



SCOTT ADAMS
CHAIRMAN

Date: 06 October 2021

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