

22 February 2021

Christchurch City Council
PO Box 73012
Christchurch 8154

PROPERTY COUNCIL NEW ZEALAND SUBMISSION ON CHRISTCHURCH CITY COUNCIL'S DRAFT CENTRAL CITY CAR PARKING POLICY

1. Recommendations

- 1.1 Property Council New Zealand (Property Council) supports the Christchurch City Council's (the Council) Draft Central City Car Parking Policy with the following recommendations:
- A focus on enforcement and need should guide decisions in policies one and two;
 - An amendment to Policy 4 to remove some restrictions in relation to high demand parking areas;
 - Council considering ownership of its parking assets and divesting them;
 - Balancing sustainable alternatives alongside individual needs and demands of commercial and industrial workspaces in the CBD;
 - Closing temporary off-street surface parking where they are within a 200m radius of a parking building.

2. Introduction

- 2.1 Property Council welcomes the opportunity to submit on the Council's Draft Central City Parking Policy.
- 2.2 Property Council's purpose is "Together, shaping cities where communities thrive". We believe in the creation and retention of well-designed, functional and sustainable built environments which contribute to New Zealand's overall prosperity. We support legislation that provides a framework to enhance economic growth, development, liveability and growing communities.
- 2.3 Property is currently New Zealand's largest industry with a direct contribution to GDP of \$29.8 billion (13 per cent). The property sector is a foundation of New Zealand's economy and caters for growth by developing, building and owning all types of property.
- 2.4 Property Council is the leading not-for-profit advocate for New Zealand's largest industry - property. Connecting people from throughout the country and across all property disciplines is what makes our organisation unique. We connect over 10,000 property professionals, championing the interests of over 600 member companies who have a collective \$50 billion investment in New Zealand property.

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3. Overview

3.1 Traffic flow and car parking is critical to residential, commercial and industrial property throughout the CBD and surrounds. The Property Council welcomes the Council's intention to focus the draft car parking policy on the following goals:

- Promote 85% occupancy of parking spaces in the central city at peak times
- Support high amenity off-street parking that makes efficient use of space
- Support greenhouse gas emissions reduction targets
- Support a vibrant, people-friendly, central city
- Improve Council's parking data and information

3.2 We acknowledge the need to balance competing demands on limited on-street space, and the need to differentiate between central core and wider central city parking issues and needs. This also must be balanced with safety, public access and commercial viability.

3.3 Property Council has members from many different competing interests, so we have balanced our recommendations alongside the various different perspectives from within our membership.

4. Policies 1 and 2: General prioritisation of on-street space and variations of those priorities

4.1 Property Council supports the intent of both Policy 1 and Policy 2 relating to on-street parking. The prioritisation of spaces in the Commercial Central City Business, Commercial Central City mixed use and Residential Central City areas to ensure appropriate access. Property Council submits that Council should generally prioritise short stay visitors over commuters using free all-day spaces to encourage activity within the CBD. We believe meeting the target of 85 per cent occupancy of parking spaces in the central city at peak times can be met by enforcing this priority.

4.2 We submit that Council's enforcement will be critical to the success of this prioritisation, and to ensure the rules are followed. Property Council is interested in understanding whether the Council has any plans to enhance enforcement through current mechanisms or alternative solutions.

4.3 Property Council agrees with the exemption of special purpose areas from Policy 1 for the streets identified on page four of the draft consultation paper.

4.4 Property Council supports the considerations to guide a departure from prioritisation under Policy 1. As a starting point, we believe one size cannot fit all and that departures from prioritisation will need to be met to ensure Council meets its stated goals. Property Council would like clarification of whether the considerations are in priority order or general considerations.

4.5 Property Council would submit any consideration to depart from Policy 1 priorities should focus on the direct needs of both customers and building occupiers rather than a rigid hierarchy of considerations. Different sections of the CBD will require different priorities, and the Council's parking policy should reflect that need to be flexible.



5. Policy 3: Improving access for those with restricted mobility

- 5.1 Property Council supports improving access for those with restricted mobility, though we would like to see more communication given to those who need access on the spaces and zones available presently.

6. Policy 4: Apply parking management criteria in areas of high demand

- 6.1 Property Council recommends an amendment to when applying parking management criteria in areas of high demand in the Commercial Central City Business, Commercial Central City mixed use and Residential Central City areas.
- 6.2 We recommend removing unrestricted on-street parking for most of the CBD. As a default position, we support a maximum 120-minute stay for Commercial Central City Business Commercial Central City mixed use Residential Central City areas when occupancy of unrestricted on-street parking regularly exceeds 85% at peak times. For other areas, the maximum should be 180 minutes. This aligns with our belief that short stay and visitor parking should be prioritised over commuters and other long stay visitors. This also aligns with Council's summary feedback that commuter parking was generally considered the lowest priority for on-street space.
- 6.3 If Council does not support this recommendation, we would like Council to consider whether a blanket P120 maximum could be applied to all parking areas. This could be limited to business hours, or slightly relaxed on weekends and evenings.
- 6.4 Property Council supports the Council's policy intent for areas where occupancy of time restricted spaces regularly exceeds 85% at peak times, and when occupancy of paid parking in on-street spaces regularly exceeds 85% at peak times.

7. Policy 7: Council providing off street parking

- 7.1 Property Council supports the Council's intention to not generally provide off-street parking as part of their services. As noted, following the 2011 earthquake, the Council had an agreement with the Crown to replace the capacity of the parking buildings lost in the earthquakes to support the immediate recovery of the central city. This involved contributing to build of the Crossing and Lichfield car parking buildings, with the Council now operating the Lichfield and Art Gallery buildings with around 900 spaces. Almost a decade on, it is natural this agreement and service might change.
- 7.2 As many in the City will know, since 2011 privately owned car parking buildings have been constructed in several places in the central city to date. Property Council appreciates Council's belief in providing certainty for commercial providers and potential investors in off-street parking that the Council does not generally intend to provide further off-street parking. Property Council further supports Council's intention to encourage Cantabrians to uptake active and public transport and avoid undermining the commercial feasibility of permanent parking provision by the market.
- 7.3 Property Council recommends the Council considering its future ownership of parking buildings and evaluating their sale and agreeing to not invest in future parking assets.

8. Policy 8: Deter private business from storing vehicles on the road



- 8.1 Property Council agrees with Council continuing to prevent private businesses from using on-street parking to store vehicles on the road, as in the Traffic and Parking bylaw 2017.

9. Policy 9: Support parking for sustainable alternatives to petrol or diesel vehicles, to encourage greater use of these modes

- 9.1 Property Council supports the Council's priority in providing parking for sustainable alternatives to single occupancy motor vehicles, to encourage greater use of these alternatives. Alternatives include bicycles, micro-mobility devices, electric cars, car share, and motorcycles. The Property Council also wishes to support the use of mobility devices such as wheelchairs.
- 9.2 This should be balanced alongside commercial and industry demands of retail and business in the CBD. Many businesses will require cars, vans, trucks and other vehicles that presently do not have alternatives, or those alternatives are not economically feasible. The safety of short-term visitors and workers in the CBD should be considered when prioritising sustainable alternatives.
- 9.3 Our position on Policy 9 aligns with our position on Policy 2. The variation of parking for sustainable alternatives must also match the business/industry/building nearby and the priorities that exist for different sections of the CBD.

10. Policy 10: Support and adopt advances in parking management technology

- 10.1 Property Council is very supportive of Council exploring and adopting advances in parking management technology. This will not only help enforce the new Policies set out in the Draft Car Parking Policy document but could aid in better efficiencies in the parking system and creating safer streets – amongst other benefits. Property Council notes parking management technology advances across New Zealand and the world have been very beneficial.
- 10.2 Property Council would be interested in discussing with Council what work has been done to date and what technologies have been identified as being options going forward.

11. Policy 11: Review the role of temporary off-street surface parking lot

- 11.1 Property Council supports Councils' review the role of temporary off-street surface parking lots, although a balance should be met.
- 11.2 Temporary off-street surface parking lots provides a municipal good for visitors and commuters in the CBD.
- 11.3 However, we note, and endorse, the feedback in the Summary Feedback that raised concerns that "the number of temporary surface gravel car parks reduces amenity, affects the viability of providing parking capacity in multi-story buildings, deters the development of vacant land, and inhibits the recovery of the central city."

Property Council would offer to work with Council and our members to work towards equitable solutions. Generally we consider that any review of temporary parking should ensure that such parking is in fact temporary and that negative impacts on



amenity and development are managed and mitigated so far as possible. The policy should also retain a degree of flexibility as temporary parking remains needed in some parts of the city.

- 11.5 Property Council recognises there are permanent parking buildings and temporary off-street surfaces close to each other. Property Council recommends to the Council that temporary parks are closed where they are within a certain radius of a permanent facility – for example, within 200m.
- 11.6 In the meantime, Property Council's view is that land should be used to its greatest benefit – and until development can occur, temporary car parking provides a revenue stream for landowners to pay rates and provide services.

12. Conclusion

- 12.1 Thank you for the opportunity to submit to this consultation. Any further queries do not hesitate to contact Liam Kernaghan, Senior Advocacy Advisor, email: liam@propertynz.co.nz or cell: 021 715 108.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Riddoch', with a long horizontal stroke extending to the right.

James Riddoch
South Island Regional Chair
Property Council New Zealand