

**Porirua Chamber of Commerce Submission
to Porirua City Council
on the proposed Transport Bylaw**

8 November 2020

“Where can you park? To encourage people to come and shop or eat at the variety of stores and cafes that Upper Hutt has to offer, there are no parking charges for parking within the city centre.”¹

ABOUT THE CHAMBER

The Porirua Chamber of Commerce (the Chamber) is a business membership association and represents Porirua’s Business Community, of which there are over 4,400 business units operating in our city. The Chamber’s mission is to promote the business community by advocating policy and supporting businesses to enable them to invest, employ, and grow. We want to see a Porirua business community that is vibrant and prosperous – how to achieve this in the impending next ‘new normal’ continues to be a changing proposition.

BACKGROUND

The Council is undertaking a review of the Transport bylaw. This impacts where visitors can park, how long for, and introduces parking charges. The proposed plan provides a range of parking options around the city (on weekdays from 8am to 5pm) including:

- First hour is free in some standard car parks and the first 30 minutes free in all premium short-term car parks
- Short-term parking from \$1/hr (standard) to \$2/hr (premium)
- Long-term (all day) parking from \$5/day (standard) or \$10/day (premium)
- Free parking outside the city centre.

SUMMARY AND RECOMMENDATIONS

The Chamber welcomes the opportunity to submit on Porirua City Council’s (the Council) proposed Transport bylaw.

Businesses in the Porirua region are facing immense challenges from the pandemic, and as their

¹ <https://www.upperhuttcity.com/Services/Roads-and-parking/Parking-in-Upper-Hutt#:~:text=in%20Upper%20Hutt-,Where%20can%20you%20park,parking%20within%20the%20city%20centre.>

representative, the Chamber is committed to keeping locals employed, and keeping the city moving.

The Chamber is concerned that this proposal comes at a time when businesses do not need further pressures, costs, or uncertainty. The Chamber is further concerned that introducing car parking charges will discourage and deter people from coming into the CBD, making the city an unfriendly place to meet and an unattractive destination to visit.

That's the last thing we want for Porirua.

In response to the consultation question "Do you think that the proposed parking zones in the Porirua City Parking Management Plan provide a suitable range of options for people visiting the city centre?" The Chamber's response is no. Introducing paid parking is a blunt policy tool. It falls victim to perverse incentives that will push visitors away from Porirua, rather than onto other forms of transport.

We also believe this is an equity and access issue for many in our wider community. These charges target those already hit hard by the rising cost of living. What may be perceived as "spare change" to some can be an insurmountable barrier for the most vulnerable to access these valuable spaces in our community.

Noting our objection to introducing these charges, we do support the council's intent, though mistargeted, to minimise impacts for businesses. We recognise that the 30 minutes to hour free proposals and tiered charge system attempts to mitigate the impacts. Our concern here is that these measures fail to provide the right settings to attract and enable the business community, are too clumsy and confusing for compliance, and are not protected – they can be too easily overridden by future councils. Further, concerning the free parking, there is patchy evidence to suggest that it achieves what is intended.

The Chamber recommends that the Council not proceed with the proposals that relate to paid parking that is presented in the Transport Bylaw.

The Chamber would like to present and speak to this submission in person.

COMMENT

Consultation design concerns

Before we comment on the substantive issues of the proposal, there is an initial concern the Chamber would like to address and draw attention to, to enable better policymaking and consultation best practices in future. The public consultation questionnaire form design is

concerning², of the nine consultation questions, covering essentially three areas of changes, there is just one question on the proposal to introduce paid parking. The Chamber believes this is not sufficient to gauge the public's opinion on the proposal, given the wide impacts of what is proposed and given previous majority opposition to the community on this proposal.

Secondly, how the question is worded is far from nuanced. We believe the question would not withstand academic rigour or a pollster's methodology. We are disappointed at the missed opportunity here to engage with ratepayers and users – it leads us to question whether this is a meaningful consultation or a predetermined process. We have appreciated the opportunities the Chamber has had to meet and constructively engage with representatives and officers on this matter in good faith, but must raise that the design of the questionnaire is itself questionable.

Does this proposal mitigate or exacerbate the impacts of Covid for businesses?

The question that Councillors and officers must satisfy themselves of is this overriding question – does this proposal mitigate or exacerbate the impacts of Covid for businesses? The Chamber is concerned that this proposal comes at a time when businesses are already pressured to attract customers and instead places perverse incentives on visitor behaviour.

We are concerned that introducing car parking charges will discourage and deter people from coming into the CBD, making the city an unfriendly place to meet. That's the last thing we want for Porirua.

Data and information relied upon is limited to inform a robust parking policy response

We note that a majority of submitters were opposed to this proposal. When there is a majority of ratepayers in opposition to a proposal, the onus on Council to prove why it is needed beyond a reasonable doubt. We do not believe this has been substantiated in the communications or policy material provided as part of this consultative process.

Our previous submission³ raised issues about the lack of supporting detail, such as information on the current occupancy rates and turnover, capital investment costs, and revenue projections, to consider any support was missing from all consultative documentation. Further to the point above, any decision taken should include information on current parking behaviours and costs.

Section 3.4 of the Porirua City Parking Management Plan⁴ asserts that "previous studies and recent assessments we know that closer to the city centre there is significant pressure on occupancy" and then goes on to list four bullet point with some 'recent observations'. As we have said in previous submissions, the Chamber would like to see more robust information presented rather

² <https://submissions.pcc.govt.nz/submission.aspx?z=WJ0S8E&sID=xJCK/xCBrRs|eq>

³ 20210427-PCC-LTP---Porirua-Chamber-of-Commerce-Submission-FINAL.pdf

⁴ https://poriruacity.govt.nz/documents/5705/Porirua_City_Parking_Management_Plan_September_2021_Draft_2.0.pdf

than asserted, and this is supported by member feedback which asked for this information as well. Simply put: What is the number of cars that park every day in the various parking spaces around the CBD and for how long on average? This type of information we would then expect to inform the options, both the tiered demand and tiered pricing options as proposed.

We are also disappointed not to see analysis similarly sized cities to Porirua, given the statement “We are one of the last places in New Zealand of this size that doesn’t have some form of paid parking.”⁵ Of the five cities that make up the Wellington region, the two other comparable cities ‘of Porirua’s size’ – Upper Hutt and Kapiti - have no paid parking. Petone, another destination centre, also has no paid parking. The rationale on the Upper Hutt Council’s website states “Where can you park? To encourage people to come and shop or eat at the variety of stores and cafes that Upper Hutt has to offer, there are no parking charges for parking within the city centre.”⁶

Further, of similarly sized cities to Porirua with paid parking a number have ‘first hour free’ policies in place. We would like to see analysis or learnings from these councils to inform what is proposed for Porirua. A good example, that we have raised previously, is the Hutt City Council, where an hour free was trialled but not proceeded with. The Chamber still remains to be convinced about the justification and workability of thirty minutes or hour free policies.

We recognise the attempt of the 30 minutes to hour free proposals and tiered charge system attempts to mitigate the impacts on businesses while balancing a user pays approach. Our concern here is that these measures fail to provide the right settings to attract and enable the business community, and are potentially too clumsy and confusing for compliance. Again, we would be interested in the experience of other councils.

We would like to emphasise that monitoring will be critical to the implementation of any changes. We would like to see some more definitive timings for the surveys of parking occupancy, such as dates and frequency, particularly given there will be no smart sensor technology. We would also like the Council to undertake a six-month follow-up report on how the impact of any changes, as set out in 6.2 of the draft Parking Management Plan⁷.

Other policy approaches that would better achieve Council aims without the perverse effects

It should come as no surprise that there are other policy approaches that the Chamber believes would better achieve Council aims without the perverse effects. Alternative options are available to the council, such as reducing parking time limits to ensure quicker turnover, greater enforcement of compliance, but again, this should be considered as part of a whole parking strategy. Further, there

⁵ <https://porirucity.govt.nz/services/parking-transport/transport-by-law-consultation/#npgsgh8n>

⁶ <https://www.upperhuttcity.com/Services/Roads-and-parking/Parking-in-Upper-Hutt#:~:text=in%20Upper%20Hutt-,Where%20can%20you%20park,parking%20within%20the%20city%20centre.>

⁷ https://porirucity.govt.nz/documents/5705/Porirua_City_Parking_Management_Plan_September_2021_Draft_2.0.pdf

are areas of the centre city that have no parking restrictions currently and introducing restrictions could mitigate the Council's concerns more appropriately.

Modal shift ought to be encouraged by efficient and reliable alternatives – be these active modes or public transport. This ought to be prioritised with actions that incentivise rather than have a perverse effect such as this, or should be phased so that the stick follows the carrot. We are encouraged to see this commitment set out in section 6.5 of the Parking Management Plan. However, current connections within Porirua City remain limited in this respect.

This is reflected in the Chamber member feedback we received, for example encouraging better park and ride facilities. Other key regional destinations from Porirua to the regional airport and hospital remain too inaccessible. Council must “continue to advocate to GWRC the need for improved public transport options particular to address commuter needs for those travelling to the CBD from around the wider Wellington region.”⁸

Payment Approach

While implementation and operating costing against revenue are not provided, in principle are supportive of the Council introducing the pay-by-plate payment. While we would have been interested in the research on sensor parking for enforcement and turnover monitoring, we acknowledge the capital costs involved in this. On the other side of this, monitoring will be critical to the implementation of any changes. We would like to see some more definitive timings for the surveys of parking occupancy, such as dates and frequency, particularly given there will be no smart sensor technology. We would also like the Council to undertake a six-month follow-up report on how the impact of any changes, as set out in 6.2 of the draft Parking Management Plan⁹:

- *Monitoring of complaints on paid parking.*
- *Monitoring the effects of parking changes in the city centre on surrounding areas.*
- *Analysis of parking data collected through payments including length of stay, estimates of occupancy, payment analysis etc.*
- *Feedback from retailers on the effect of the parking changes on the usage and non-compliance of the parking areas provided adjacent to retail areas.*
- *Resident Satisfaction Survey and the Quality of Life Survey.*

The material suggests “Paid parking should bring in revenue for the city and make sure that those who use parking are paying for it, and not the general ratepayer. Any net funds generated from parking will help keep rates lower.”¹⁰ As such, the revenue should be ringfenced and offset rather than placed into general rates take.

⁸ Section 6.5

https://poriruacity.govt.nz/documents/5705/Porirua_City_Parking_Management_Plan_September_2021_Draft_2.0.pdf

⁹https://poriruacity.govt.nz/documents/5705/Porirua_City_Parking_Management_Plan_September_2021_Draft_2.0.pdf

¹⁰ <https://poriruacity.govt.nz/services/parking-transport/transport-bylaw-consultation/#xkwnr63o>

Equity and Access considerations

In the “how much will parking cost” section, the consultation material states that “We are proposing to keep fees low, from \$1 to \$2 per hour. So *spare change* may be enough for a short visit. The first 60 minutes will be free in some standard parks and the first 30 minutes free in all premium short-term parking (such as Cobham Court).”¹¹ The use of the phrase ‘*spare change*, is unhelpful. It fails to take into account the equity and access issue for many in our wider community. Introducing these charges places greater costs on many at a time when the rising costs of living mean that any extra charges, even what may be perceived by Council as a small cost may be an insurmountable barrier to access.

Consequential flow-on impacts on other retail and council parking beyond the area

The Chamber is also concerned about the consequential flow on impacts this will have, and the parking pressures on the immediate surrounding areas. Given this affects just 24% of total parks available, we are concerned that there will be a shift for people to instead visit those destinations, particularly retailers, with private parking.

We understand that this will particularly impact surrounding retailers, as well as the Wi Neera Drive and Elsdon areas. The Chamber strongly encourages Council monitor and report the effects.

Future consultation and other changes

The Chamber supports the shift that so that Council instead uses appropriate to the specific change, guided by the Parking Management Plan and Council’s Significance and Engagement Policy. We would urge that any future changes must be informed by robust monitoring.

The Chamber is supportive of the other technical changes, such as updating references as they relate to technologies and parking coupons and removing the provision that prohibited returning to a parking zone within 20 minutes.

DIRECT MEMBER FEEDBACK

We asked our members to comment on the proposal, the below is some of the comments we received in response:

- *That’s not how Porirua does things; do they want people to work in, shop in and visit Porirua or not? I understand [what’s] behind the concept, and that those who come up with these*

¹¹ <https://poriruacity.govt.nz/services/parking-transport/transport-by-law-consultation/#kuehvb9f>

ideas... [they] won't be affected and don't care, but we already pay so much in rates and don't get our voices heard, this is insulting.

- *At the moment in this covid situation globally it is not good, and it has done damage to local businesses in New Zealand. I think that our locals in Porirua income is not stable enough and with this charge of parking fees it will be a bad idea because less people will park in Porirua. So it will mean less customers will come and buy from local business in Porirua and this will negatively affect my business and others that are here.*
- *This is out of touch.*
- *My take on this. Ridiculous idea We are becoming a vibrant city and bringing people for everywhere, would request council not to ruin it for us. Is the highest rates in the country not enough that we have to now pay for parking when we go to shop?*
- *As a resident and business owner in Pukerua Bay, equidistant between Porirua and Paraparaumu, goes where I'll be shopping, meeting up and dining if Porirua City introduces paid parking. My many Wellington friends often come to Porirua to shop and meet up as parking and prices in Wellington have become so horrendous. I guess they'll now come to Paraparaumu with me.*
- *If Council wanted to make it easier to find a park, then they would ensure there were more parks available as has been done for the Train service. We can all see how successful that has been.*
- *As a Porirua city building owner. I believe this is a bad move. If Porirua city council wants to kill Porirua then charge for the parking. It will send people to the mall and kill the surrounding streets businesses.*
- *Utterly disgraceful. 0/5 stars, would not recommend.*
- *Claiming that Council believe it will make it easier to find a park is, to coin a popular phrase, disingenuous and will make doing business in the city harder.*
- *I have seen no evidence from Council that introducing payment for parking will make it easier to find a park.*
- *The recent reduction in parking spaces in Cobham Court, along with the increased population of the city, has made parking in the city so few that there are now insufficient parks available for those wanting to shop. Introduction of a cost for parking would certainly reduce demand, therefore 'making it easier to find a park'. But then, on the same basis, so would removing even more parks.*

- *[This] makes it harder to get into the city by restricting access.*
- *I dont agree with the changes. It will reduce the trips I make [into the city].*
- *I am totally against this.*

WEBSITE QUESTIONNAIRE RESPONSES AND RECOMMENDATIONS

Question 1: Do you think that the proposed parking zones in the Porirua City Parking Management Plan provide a suitable range of options for people visiting the city centre?

No.

Recommendation:

The Chamber recommends that the Council not proceed with the proposals for paid parking that are presented in the Transport Bylaw.

QUESTION 8: What would you like the Council to do to encourage better use of public transport, walking and cycling?

- Modal shift ought to be encourage by an efficient and reliable alternatives – be this active modes or public transport. This ought to be prioritised with actions that incentivise rather than have perverse effect.
- The connections within, as well as to and from Porirua City remain limited in this respect.
- Better park and ride facilities, capacity, and availability.
- Key regional destinations from Porirua, such as to the regional airport and hospital remain too inaccessible.
- Council must “continue to advocate to GWRC the need for improved public transport options particular to address commuter needs for those travelling to the CBD from around the wider Wellington region.”¹²

Recommendation:

The Chamber recommends that the Council should encourage through positive incentives modal shift alternatives, focus first on park and ride facilities, ensure regional destinations remain accessible for residents.

¹² Section 6.5

https://poriruacity.govt.nz/documents/5705/Porirua_City_Parking_Management_Plan_September_2021_Draft_2.0.pdf