

CHRISTCHURCH CITY DRAFT PARKING STRATEGY - SUBMISSION

INTRODUCTION

Spokes Canterbury is a local cycling advocacy group dedicated to including cycling as an everyday form of transport within local regional planning. The group is affiliated with the national Cycling Advocates Network (CAN) and includes a number of national executive members. Spokes provides significant cycling expertise through the membership of many longstanding advocates, transportation professionals and (most importantly) regular cyclists. The group is represented on Christchurch City Council's cycling steering committee and provides regular feedback on various council transport/planning proposals.

We are pleased to offer this submission to you regarding the draft Parking Strategy and would be happy to provide any further information or clarification if required. In making this submission, Spokes has based its feedback on the public consultation brochure, and the earlier reports available on the CCC website.

GENERAL

Overall, we are very supportive of this proposal to manage parking provision in the city in a clear and consistent manner. The flow-on effects to transportation planning policies in general will make for a more balanced transportation network for all road users. This will certainly benefit cyclists and, while there are often winners and losers in the short term, we believe that it will enhance the city for all in the long term.

Our biggest concern is with the likely willingness to implement this strategy fully. While the strategy addresses parking for all modes, it is clear that the greatest (and some would say only) problem is parking for cars and light vehicles. Many motorists and businesses may feel that the proposed strategy impinges on their rights, and will no doubt air their grievances both now and when specific projects appear to impact adversely upon them in the future. It will require a certain amount of "backbone" from Councillors to see the bigger picture and to apply this strategy as consistently as possible and without delay.

The biggest concerns will no doubt be related to the Central Business District, where many people perceive that there is insufficient car parking. To put the city's parking situation in perspective, Bachels, Newman & Kenworthy¹ found that Christchurch's CBD district had **928 parking spaces per 1000 jobs**, one of the top four out of 49 cities examined worldwide. Their examination of successful cities elsewhere suggested a need for no more than 200 spaces per 1000 jobs; clearly Christchurch is considerably over-subscribed. The most "attractive" central city areas studied also had ratios of resident population to parking spaces greater than 1, whereas Christchurch currently has a ratio of <0.1. Moves to encourage central city living and higher-density suburban nodes will limit the amount of "urban sprawl" and the subsequent demand on parking in the CBD.

Rather than complain that there is insufficient parking in some places, it needs to be accepted by the community that this is the case (and always will be), and therefore they should consider alternative strategies, e.g. travel at a less busy time, use a different mode of travel. Some may feel that another response will be to go somewhere else. While that may be true for some, there are certain trips for

¹ Bachels M., Newman P., Kenworthy J. 1999. *Indicators of Urban Transport Efficiency in New Zealand's Main Cities: An International Comparison of Transport Land Use and Economic Indicators*. Institute for Science & Technology Policy, Murdoch University, WA, Australia.

which there is no alternative location (e.g. designated sports venue, specialist shop) and new people will also be attracted to the area, if an improved "people environment" is perceived.

We have some specific comments about aspects of the draft strategy that we will highlight below. Where no comment has been, then tacit agreement of the proposed strategy can be assumed. Although some of the suggested additions may seem (to experienced Council staff at least) obvious or indirectly implied in the strategy, we feel it is important that a public document such as this states things explicitly and sends a clear unambiguous signal to the community. Our comments have been arranged in order of the sections within the strategy to enable them to be followed through the document.

SPECIFIC COMMENTS

PAGE/PARAGRAPH	COMMENTS
EXECUTIVE SUMMARY	
p.2, 1st para	<i>"Almost every journey ends at a park..."</i> We strongly dispute this statement and its implications for this strategy. The most recent LTSA Travel Survey ² shows that nearly 20% of all private trips in Canterbury are walking trips, requiring no parking facilities. The figure is likely to be higher in urban Christchurch and it has to be remembered that 12.4% of Christchurch households do not own a motor vehicle ³ . In fact, more than half of all private travellers either travelled by foot, cycle, bus or as a car passenger. Clearly increases in these travel modes over sole-occupant private cars will have the greatest effect on relieving parking pressure, and should be encouraged.
1.INTRODUCTION	
p.5, 2nd para	<i>"...volume of traffic is predicted to rise by 43%."</i> Suggest adding <i>"if the status quo policies remain."</i> The proposed parking strategy and other related council policies can clearly do something about this prediction if done properly.
p.5, 5th para	<i>"The strategy is a non-statutory document..."</i> Our concern is that the non-statutory nature will mean that when "push comes to shove" (e.g. protest by businesses) the intent of the strategy will fall by the wayside. The council must investigate means to enshrine key policies of this strategy in the City Plan, bylaws, and other legislative tools.
2. THE FACTS	
p.6, 6th para	<i>"If all of these trends continue, demand for parking will also increase."</i> This is not necessarily true if car trip use decreases. Increased car ownership/availability does not have to translate into more car use. If better encouragement of alternatives travel modes is provided and technology allows greater use of "tele-commuting/shopping", then cars may be seen more and more as "backups" to these options.
p.7, figure 2	It needs to be clearly highlighted that the travel-to-work data in no way represents travel around the city as a whole. Journeys to work make up approximately only 10% of all private trips made by people ² , with

² Land Transport Safety Authority 2000. *Travel Survey Report 1997/98: Increasing our Understanding of New Zealander's Travel Behaviour.*

³ Christchurch City Council 2001. *Pedestrian Strategy for Christchurch City: "A Step in the Right Direction"*. Feb 2001.

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	shopping and social/recreational trips for example, making up larger proportions. These other trip purposes are much less likely overall to involve private motor vehicles.
p.7, 4th para	<i>"...estimated growth in the number of MOTOR vehicle trips..."</i>
p.7, figure 3	It is difficult to see how a predicted 13% growth in population over the next 20 years (top of p.6) can translate into an apparent 30% growth in trips over the same period.
p.8, 1st para	The 47% growth in traffic stated is different to the 43% quoted in the Introduction. Also the proportions for the three contributory factors stated are misleading, as people may infer that they refer to actual growth rate percentages. We have still yet to see any evidence to quantify the <i>"...increased propensity of people to travel."</i>
p.8, 4th para	<i>"One of the most commonly perceived barriers...to visiting the city centre is parking. ...provide more parking, cheaper parking, ...and free parking."</i> This is a predictable "self-interest" response. In reality, we do not come close to having a parking "crisis" in the CBD as implied by this section. The previously quoted figures from Bachel's, Newman & Kenworthy ¹ puts these concerns in perspective. The fact that the next section states <i>"...92% of residents were satisfied or very satisfied with the City as a place to live..."</i> also highlights the point that parking is not a make-or-break concern to most.
General Comment	<p>The biggest concern about this section (and indeed, similar chapters of other transportation studies) is the perceived inevitability of the projected trends. Nowhere does it indicate what could be achieved with a well-planned parking strategy and associated policies. A knee-jerk reaction to the projected 47% growth in traffic could be to conclude that more parking is required, when clearly this merely creating a self-perpetuating growth spiral.</p> <p>Given the obvious economic, environmental and social problems associated if the projections become reality, a more enlightened response would be to say:</p> <p><i>"OK, you've shown us what will happen if we do nothing, and we don't want that. Now tell us how to prevent it."</i></p>
3. VISION FOR PARKING	
p.9, Vision	In general, we support the vision and its four goals; however the devil is in the detail. It is perhaps notable that currently only the third (Economic) goal is done reasonably well, at the expense of the other (Community, Environment, Transport) goals.
4. OBJECTIVES	
p.10, Objective 1	<i>"To ensure parking is provided safely."</i> Presumably the corollary also applies that <i>"parking is not provided where it impacts on the safety of others."</i>
p.10, Objective 7	<i>"To support a vibrant Central City and suburban centres."</i> Does this mean more or less parking? It could be interpreted either way, depending on your viewpoint. Suggest clarification or removal of this objective.

PAGE/PARAGRAPH	COMMENTS
p.10, Objective 9	<p>"To use parking PROVISION AND management as a tool to reduce the demand for private motor vehicle traffic." Adjusting the level of actual parking provision will probably have a far greater effect on motor vehicle use than simple management of the existing parking stock.</p>
5. GENERAL	
General Comment	<p>Throughout this strategy, many of the listed policies are not directly tied to specific methods, making it often difficult to assess how the policies will be implemented in practice. This needs to be reviewed; we have suggested in places some possible methods.</p>
p.11, 5.2.1 (City Council Function)	<p>Suggest adding the following methods:</p> <p>Review of Parking Strategy <i>Carry out regular reviews of the adopted City Parking Strategy every (say) 5/10 years.</i></p> <p>Comment: as with any strategy or policy, this document will need to change over time to reflect changes in best practice and community desires. Modification is also particularly likely with relatively untried strategies such as this.</p> <p>Staff/Councillor Training <i>Improve knowledge of effects of different parking policies by training/education, conference attendance, research, and studies of other cities.</i></p> <p>Comment: Many of the ideals in this parking strategy may end up being hampered by a lack of vision by both staff and councillors involved in the day-to-day implementation of it. Ongoing education is vital to ensure that a full range of options and their true impacts are considered in each case.</p>
p.11, 5.2.1, Methods	<p>Enforcement of Council-controlled Parking: Amend <i>"...increased monitoring at peak periods and in areas of special pedestrian amenity (E.G. OUTSIDE SCHOOLS) OR OF SAFETY/OPERATIONAL IMPORTANCE (E.G. CLEARWAYS)."</i></p>
p.11-12, 5.2.2 (Impact on Others)	<p>Suggest adding the following methods:</p> <p>Land-Use Controls (relates to Policy 5F: Road Function) <i>Ensure a strict balance of parking and "activity space" on-site of proposed developments to avoid on-street overflow, and apply strict access controls.</i></p> <p>Comment: If allowed to relax planning requirements, many developments can result in considerable disruption to nearby streets. A more robust planning process, such as used on State Highways, can minimise adverse effects from the beginning.</p> <p>Review of Existing Parking Provision (relates to Policy 5G: Safety) <i>Review and modify or remove if necessary parking spaces that are compromising traffic safety.</i></p> <p>Comment: Because of past planning controls that may have been less rigorous at times, there are many existing parking areas that impact adversely on adjacent traffic. Cyclists in particular can be greatly affected if relatively narrow cycle lanes are placed adjacent to kerbside</p>

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	parking areas with heavy turnover/use. A process to identify and mitigate these problems should be implemented.
p.12, Policy 5H (Cyclist & Pedestrian Needs)	<p><i>"To ensure that the provision and management of parking does not adversely Affect cycling or pedestrian activity."</i> Although we applaud the intent of this policy, we feel it should be more explicitly stated, as has been done for Policy 5I on Public Transport: (<i>"To ensure the public transport system has priority over on-street parking for road space."</i>). There is no reason why the strategy should not also give clear priority to cyclists and pedestrians over parking.</p> <p>Suggest adding the following method:</p> <p><i>Cyclist and Pedestrian Routes</i> <i>Review existing and designated routes for cyclists and pedestrians, and identify & mitigate any areas where there is conflict due to parking.</i></p>
p.12, 5.2.2, Methods	<p><i>Bus Lanes and General Clearways:</i> Peak-hour clearways can have major operational problems if not 100% enforced. They also pose additional problems for cyclists and are generally incompatible with marked cycle lanes. On the other hand, shared bus/bike lanes can work quite well, as demonstrated in Auckland, however a critical feature is the width of the combined facility to provide the least conflict between the two modes.</p> <p><i>Minimums/Maximums:</i> we strongly support the introduction of parking maximums for land-use developments.</p> <p><i>Landscaping of Parking Areas:</i> we note that there appears to be a problem with the enforcement of a reasonable maintenance standard of existing landscaping.</p>
p.12, 5.2.3 (Demand Management)	<p>Suggest adding the following methods:</p> <p><i>Level of Parking Provision</i> (relates to Policy 5K: Travel Demand Management) <i>Monitor overall level of parking available and increase/decrease as required in certain areas.</i></p> <p>Comment: Adjusting the amount of parking available will probably have a far greater effect on travel mode use than simple management of the existing parking stock. For example, in certain locations, one kerbside motor vehicle parking space could be converted into approximately five cycle parking spaces to provide a better balance of parking for all modes.</p> <p><i>Land-Use Developments</i> (relates to Policy 5L: Provision for Alternatives) <i>Developers can swap a proportion of required car-park spaces for bicycle spaces, or provide shuttle buses.</i></p> <p>Comment: Developers will generally seek to provide the minimum allowable parking provision to maximise the "productive" use of their property. Allowing some of their parking requirement to be made up by suitable bicycle parking (i.e more than their minimum bike parking requirement) will minimise their parking provision costs, while sending a clear message to on-site users about the increased emphasis of non-car users.</p>

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p.12, Policy 5N (Short-stay vs Long-stay)	<p><i>"To discourage long term parking provision in areas well serviced by public transport and with high cycle accessibility."</i> We would infer from this that the council could also reduce long-term parking in some areas (e.g. central city) by providing them with good bus/bike/walk accessibility!</p>
p.13, 5.2.3, Methods	<p><i>Priority Use of Kerb Space:</i> we have considerable concern that cyclist provision (e.g. cycle lanes) has not been explicitly listed in the priority tables throughout this document. While we have considerable faith in Christchurch City to provide for cyclists when considering new traffic proposals, the strategy does not send a clear signal to the community about cyclists' place in the priority. There is also a concern that "less-enlightened" councils who choose to use this strategy as a model for their own purposes may not automatically include cyclists in their kerb-side space deliberations. Throughout the other sections of this strategy we have indicated our suggested priority for cyclist provision.</p> <p>A similar argument can be made for pedestrian crossing facilities, which are also not included in the hierarchy. The provision of safe kerb "bulges" and central refuges of suitable lengths, where recommended by site studies, should also take precedence over parking in the same area.</p> <p>One thing not specifically mentioned anywhere is the use of "parking bays" (i.e. inset into existing berms) to achieve required widths for meeting a variety of needs. This approach has been successfully used in many instances where new cycle lanes have replaced the existing kerbside parking, and also where carriageway widths are reduced to control traffic speeds.</p>
p.13, 5.2.4 (Parking Supply)	<p>Christchurch is under-supplied in terms of adequate bicycle parking facilities, both on-street and on-site. It is imperative therefore that this section of the strategy includes explicit consideration of bicycle parking.</p> <p>We suggest adding the following policy (modelled on 5R: Parking for Disabled Persons):</p> <p><i>Parking for Cyclists</i></p> <p><i>To provide convenient and effective parking facilities for cyclists in order to support their access and experience of the city.</i></p> <p>We also suggest adding the following method:</p> <p><i>Cycle Parking</i></p> <p><i>a. Ensure that City Plan bicycle parking requirements for developments are complied with.</i></p> <p><i>b. Develop an ongoing additional/upgrade programme for council on-street and parking building bicycle parking.</i></p> <p>To speed up provision of additional on-street bike parking, we suggest that discussions are held with Adshel (advertised bus-shelter suppliers) to provide simple bicycle shelters in key locations. The ability of such parking shelters to penetrate areas that bus shelters cannot should be of particular marketing interest to Adshel.</p>
p.13, Policy 5Q (Park 'n' Ride)	<p>We have some reservations about blanket support for Park 'n' Ride (PnR) in a place like Christchurch. PnR works best where there are fairly direct long-distance bus services that can attract a good number of</p>

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	<p>drivers from the destination area (e.g. Wellington). Christchurch's existing bus system currently services all suburbs fairly well, but this is often through indirect routes that can't compete with a direct car trip. A move to more direct "express" routes could reduce the public transport level of service for many suburbs.</p> <p>Therefore PnR should only be encouraged for long-distance services that don't cover all suburbs at their destination and for direct-route services. For example, the "Rangiora Express" is a direct long-distance service but doesn't cover all of Rangiora, therefore many residents need to drive to the bus stop first (although Rangiora isn't within Christchurch City, their commuters have an effect on our parking). Other likely areas for PnR services include Lyttelton, Kaiapoi, Sumner, Halswell, Hornby, Rolleston and Burnham. That way more "express" services can be introduced while retaining the less direct suburban routes.</p> <p>We support more strongly "Bike 'n' Ride" which very neatly combines the trip-distance and personal flexibility attributes of both modes. For example, a cyclist in the outer suburbs could ride to the nearest Orbiter stop then connect to travel directly across town. Conversely, a Rangiora or Kaiapoi student could travel by bus to Papanui with their bike, then ride from there to University. To this end we suggest that Policy 5Q be amended to include BnR, and the following method be added:</p> <p><i>Bike 'n' Ride</i></p> <p><i>a. Provide additional bike parking at key bus stops around the city periphery.</i></p> <p><i>b. Liase with Environment Canterbury to provide bike access on bus services.</i></p>
p.14, 5.2.5 (Information and Education), Methods	<p><i>Information: amend</i></p> <p><i>"...improvements to ...information provided to drivers AND RIDERS seeking public parking, E.G. SIGNAGE, MAPS, MEDIA INFORMATION, WEBSITE INFORMATION."</i></p>
6. ARTERIAL ROADS	
p.15, 6.2 (Arterial Policies & Methods), Methods	<p><i>Off-Street Parking: Suggest adding</i></p> <p><i>Where possible, new accesses to developments should connect to adjacent side streets, rather than directly onto arterial roads. All new or upgraded accesses to arterial roads need to allow for forward in/out movement to avoid vehicles reversing out onto the road.</i></p> <p><i>Kerbside Parking Priority: Suggest adding at top of priority table:</i></p> <p><i>Cycle lanes (where cyclists are not already provided for)</i></p> <p>The provision of turning lanes and no-stopping areas (for sight distance clearances) of adequate length near intersections should also take precedence over parking areas and needs to be explicitly listed.</p> <p><i>Public Transport on Arterial Routes: We agree with the proposal to provide bus stops (technically "bus berms") in the kerb side lane on multi-lane arterial routes, but would add "...with provision for cycle bypasses where necessary." These would be similar to the current bypasses under construction along Fendalton Road.</i></p>

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	<p>We also suggest that consideration be given to bus berms on some single carriageway routes too, as is done overseas. In the right location, these can act as a strong bus priority system, e.g. CBD shopping streets. The new Metro "smart cards" will help to minimise delays to following traffic.</p> <p><i>Bus Lanes/Clearways:</i> suggest amending this method to also include cycle lanes.</p>
7. BUSINESS AREAS	
p.16, 7.2 (General Business Policies & Methods)	<p>We strongly support the encouragement of Business Travel Plans, particularly for "large" organisations. In conjunction with these plans, the allowance for lower minimum parking requirements seems appropriate; it is not clear however whether this should be incorporated into the City Plan requirements to send a clear signal to businesses.</p> <p>We understand that Christchurch City Council and a number of other organisations are already trialling Travel Plans. We suggest that Christchurch Hospital, Christchurch Airport, and some major shopping centres should be specifically targeted next to maximise impact and awareness of their benefits.</p>
p.16, 7.2 Methods	<p><i>Cyclists & Pedestrians/Runners:</i> amend</p> <p>"a. ...secure covered parking...require such for new AND UPGRADED developments through the City Plan."</p> <p>"b. ...change/shower facilities...AND REQUIRE SUCH FOR NEW AND UPGRADED DEVELOPMENTS THROUGH THE CITY PLAN."</p> <p>Comment: For consistency, both requirements should be provided for in any new developments. And to improve take-up of such facilities, any significant upgrade of an existing development (i.e. where council input is required) should also be required to come up to an acceptable standard.</p>
p.16, Policy 7B (Cash in Lieu)	<p>It needs to be clear that financial contributions in lieu of appropriate parking provision are only acceptable if the money is used to remedy the likely adverse effects. This ensures that the intent of this parking strategy (and traffic management policies in general) are met.</p>
p.17, Policy 7D (Layout of Large Parking Areas)	<p>We support the safe consideration of pedestrian needs in large carparks. However there are many existing examples of poorly laid out parking areas (including some council ones), so there needs to be some encouragement to upgrade existing areas as well provide in new ones.</p>
p.17, 7.2, Methods	<p><i>Design Guides:</i> For consistency, we suggest that the development of a national design guide for parking facilities is preferable to local design guide development. Either way, a key concern for cyclists is the design of kerbside parking adjacent to cycling facilities. Cyclists need room either clear of parked car doors, or (better still) no parked cars. Recent local research in this area^{4,5} needs to be translated into clear design policies.</p>

⁴ Newman A., 2002. *Cycle Lane Delineation Treatments: An Empirical Assessment of Current Problems with the Existing Cycle Lane Marking Standard and Recommended Changes*. Christchurch City Council, Jun 2002.

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	<p>Suggest adding the following method: <i>Service Lanes</i> (relates to Policy 7E: Servicing Sites) <i>Require the provision of service lanes for major new and upgraded developments on arterial routes.</i></p> <p>Comment: In many cases existing arterial roads are expected to provide considerable parking and loading access to adjacent developments, to the detriment of through traffic safety. This needs to be discouraged.</p>
p.18, 7.3, Methods	<p><i>Kerbside Parking Priority</i>: Suggest adding at top of priority table: <i>Cycle lanes (where cycle route is designated and cyclists are not already provided for)</i></p>
p.18, 7.4, Central City Policies & Methods	<p>"...the Central City is very accessible by bicycle..." We strongly dispute this statement. A highly accessible CBD would incorporate more traffic calming and street closures to reduce both the numbers and speeds of motor vehicles, as well as providing additional bicycle parking in key locations.</p> <p>"Experience indicates... people are more likely to use retail areas where the environment is improved with more pedestrians and bicycles and fewer vehicles." We agree wholeheartedly with this concept, and can only ask that the Council start seriously putting this approach into practice within the CBD, while educating affected sectors of the community on the likely outcomes.</p>
p.18, 7.4, Methods	<p><i>Kerbside Parking Priority</i>: Suggest adding at top of priority table: <i>Pedestrian & Cyclist areas</i></p> <p>Comment: As indicated above, in many cases the most successful central city initiative is to reduce the amount of road corridor allocated to motor vehicles and to provide a friendlier environment for pedestrians and cyclists</p> <p>Suggest adding the following method: <i>Street Closures & Traffic Management</i> <i>Identify areas where removal of motor vehicle access & parking is needed to improve street amenity.</i></p> <p>Comment: This encapsulates in practice the discussion in this section.</p>
p.19, Policy 7J (Off-street Parking)	<p>"To give priority to short-stay... vehicles in public off-street parking." On comparison of this policy with the On-Street Parking policy 7I ("...encourage long-term parking... off-street"), the conclusion could be drawn that the Council wants no on-street parking! While we have no major problems with this (where motor vehicles are concerned) for many CBD areas, we suspect that this is not quite what the Council intends and would like the link between these two policies clarified.</p>
p.19, 7.5 (Industrial Areas Policies & Methods), Methods	<p><i>Kerbside Parking Priority</i>: Suggest adding below "Loading zones" in priority table: <i>Cycle lanes (where cycle route is designated and cyclists are not already provided for)</i></p>

⁵ Hughes T., 2002. *Cycle lanes outside parked cars*. IPENZ Transportation Group, Traffic Management Workshop, Rotorua, Sep 2002.

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8. RESIDENTIAL AREAS	
p.20, 8.2 (Residential Areas Policies & Methods), Methods	<p>It is important to remember that parking can be used as an element of traffic management schemes to narrow roads and create diversions⁶ (this is not necessarily limited to residential areas). We suggest adding the following policy:</p> <p><i>Traffic Management</i> <i>To incorporate on-street parking elements into local area traffic management schemes.</i></p> <p>We also suggest adding the following method:</p> <p><i>Traffic Management</i></p> <p><i>a. Construct angle/perpendicular parking or kerb extensions with parking bays to narrow down road carriageways.</i></p> <p><i>b. Provide staggered parking on opposite sides of streets to create indirect (chicaned) through-routes.</i></p> <p><i>Kerbside Parking Priority:</i> "Resident car parking" needs to qualified with "...<i>(where sufficient demand exists)</i>". In many cases, on-street parking can be removed or minimised for traffic management purposes with a negligible effect on residents.</p> <p>Suggest adding below "Resident car parking" in priority table:</p> <p><i>Cycle lanes (where cycle route is designated and cyclists are not already provided for)</i></p> <p>It is also not clear whether "Visitor car parking" includes parking for both visitors to residents and adjacent retail/business areas; ideally the two types of parking should be clearly separated (e.g. residential visitors could make use of residents' permit discs).</p>
9. RECREATION/LEISURE	
p.22, 9.2 (Recreation/ Leisure Policies & Methods), Methods	<p><i>Kerbside Parking Priority:</i> Suggest adding below "High occupancy vehicles" in priority table:</p> <p><i>Cycle lanes (where cycle route is designated and cyclists are not already provided for)</i></p>
p.23, Policy 9F (Major Events)	<p><i>Major Event Plans:</i> amend</p> <p><i>"This will include consideration of preferential parking for... AND CYCLISTS."</i></p> <p>Suggest adding the following method:</p> <p><i>Temporary Cycle Parking Facilities</i> <i>To have available for hire, temporary cycle parking stands and signage for major events.</i></p> <p>Comment: It is often difficult for event organisers to arrange suitable parking facilities for cyclists. The Council should take the lead to make available suitable equipment and provide guidance where necessary.</p>
10. EDUCATION	
p.24-25, 10.2 (Education Policies & Methods)	<p>We are strongly supportive of initiatives to encourage education facilities to limit their private car use, and the development of</p>

⁶ Haas-Klau C., Nold I., Böcker G., Crampton G., 1992. *Civilised Streets: a guide to traffic calming*. Environmental & Transport Planning, Brighton, UK.

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	<p>management plans for each institution.</p> <p>The Council's Safe Routes to School programme is a key element in limiting private car use from any early age, by providing (for example) cyclist training, safe crossing facilities, and "Walking School Bus" schemes. We suggest adding the following policy:</p> <p><i>Encouragement of Alternative Modes</i> <i>To promote walking and cycling to schools.</i></p> <p>We also suggest adding the following method</p> <p><i>Safe Routes to School Programmes</i> <i>To develop with each school a Safe Routes to School programme, incorporating education, enforcement, encouragement, and engineering initiatives.</i></p>
p.25, 10.2, Methods	<p><i>Kerbside Parking Priority:</i> Suggest adding at top of priority table: <i>Cycle lanes (where cyclists are not already provided for at Intermediate, Secondary & Tertiary institutions)</i></p>
11. RURAL AREAS	
p.26, 11.2 (Rural Areas Policies & Methods), Methods	<p><i>No Stopping Restrictions:</i> amend <i>"...discourage drivers from stopping on dangerous sections of road, PARTICULARLY ON THE OPPOSITE SIDE OF THE ROAD TO DEVELOPMENTS."</i></p> <p>Comment: Many safety problems are associated with pedestrians crossing the road on high speed arterial routes.</p> <p><i>Kerbside Parking Priority:</i> Suggest adding at top of priority table: <i>Cycle lanes (where cycle route is designated and cyclists are not already provided for)</i></p>
12. MONITORING	
p.27, Table	<p><i>"Parking inventory for Central City..."</i> This must include the numbers of cycle parks to identify deficiencies in provision.</p> <p><i>"Journey to work mode split"</i> Other trip types should also be monitored to get a fuller understanding of parking & travel trends. For example: <i>Mode Split of All Trips; Annual; LTSA Travel Surveys</i> (to be updated annually now) <i>Mode Split of School Trips; 3 yearly; City Streets/LTSA/Schools</i></p>
13. IMPLEMENTATION	
General	<p>This implementation plan needs to tie in much more with the listed (and our suggested) methods in previous sections.</p> <p>Unless stated, the proposed priorities are generally deemed appropriate.</p>
Existing Management table	<p>Suggest adding: <i>Provide more resources for better enforcement of parking/no-parking areas; Parking Unit; Med; Better parking behaviour by road users</i></p>
Existing Physical Works table	<p>Suggest adding: <i>Install bus/cycle lanes; City Streets Unit/Environment Canterbury; High; Improve use of alternative modes of transport and limit on-</i></p>

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	<p><i>street parking in some locations</i></p> <p>Review existing on-street parking for effects on traffic safety/efficiency; City Streets Unit; Med; Improves parking behaviour and minimises impact of parking on other road users</p> <p>Implement traffic management and parking restrictions within the central city; City Streets Unit; High; Limit motor vehicle parking demand in CBD and encourage alternative modes of travel</p>
New Education, Promotion, Information and Communication table	<p>"Develop and distribute information and promotion packages..." We suggest location/route-specific bike maps be made available both online and for handout. In the same way that specific bus route timetables fill a niche below general city bus route maps, so more specific cycling maps would allow more focused information than can be provided in the city cycling map.</p>
New Management table	<p>"Allocating kerb-space priority when there are conflicts" We feel that this is a key element of this parking strategy and needs to be applied as soon as possible. Change priority to High.</p> <p>Suggest adding:</p> <p>Review City Plan and other Statutes for alignment with parking strategy; Environmental Services Unit; Med; Provide statutory tools to implement the parking strategy</p> <p>Develop plan for reducing or increasing parking provision in various areas of the city; Parking Unit/City Streets Unit; High; Influences the expected demand for parking provision</p> <p>Accumulate supply of temporary bicycle parking equipment; Parking Unit; Med; Improve provision of alternative parking for major events</p>
New Research, Data & Documentation table	<p>Suggest adding:</p> <p>Trial Business Travel Plans with companies; City Streets Unit; High; Reduce the demand for parking by business staff and customers</p> <p>Review this Parking Strategy; City Streets Unit; Low; Ensure that the strategy adapts over time to better fit the needs of the community</p> <p>Provide annual summaries of monitoring surveys and implications for the parking strategy; City Streets Unit/Parking Unit; High; Enables effects of new parking strategy to be assessed</p> <p>Develop ongoing training/education programme for Council staff & councillors; City Streets Unit; High; Ensure that staff & councillors are aware of international best practice and are fully aware of the consequences of parking proposals</p>
GLOSSARY	This should have been at the front, or at least highlighted there more.

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CHRISTCHURCH