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BIKESydney's Response to the City of Sydney's DRAFT NEIGHBOURHOOD PARKING POLICY

Introduction

BIKESydney is an incorporated not-for-profit community organisation.

We want to live in a city:

- Where riding a bicycle is part of everyday life
- That is vibrant, healthy, productive, creative and robust
- That values community, mobility, health, wellbeing social equity and sustainability
- Where people of all ages can make easy choices to ride a bicycle, walk and take public transport.

We advocate on behalf of our members and people who ride bicycles who live and work in the inner Sydney area.

Preamble

Why is a bike advocacy group interested in influencing the Policy?

Changing the approach to on-street parking matters to BIKESydney because:

- The perennially-quoted need to “protect” on-street car parking is a very significant barrier to the delivery of the cycleway network, the most important element of City’s cycling strategy;
- Increasing parking supply will necessarily result in increased traffic and congestion and materially reduce safety for people who ride on the roads;
- On-street parking is a major determinant of both the liveability of the city and on the safety of cycling within the City, particularly as the need to “protect on-street parking spaces” is always quoted as a barrier to the delivery of cycling infrastructure such as cycleways.
- More turnovers and parking manoeuvres means more dangerous car door openings (most accidents reported by riders in the in the LGA relate to “car’doorings”);
- Because of the opportunity it presents to *properly* price on-street parking;
- This Policy presents one of the City’s most significant opportunities to encourage mode-shifting away from personal car use;
- There are a significant financial and community benefits in properly valuing (costing) the provision of on-street parking and encouraging cycling.

Our submission is based on the following principles:

- Parking policies should be improve safety and liveability;
- The streets are for moving people (mobility) NOT the storage of private property (cars);
- The Policy should actively discourage personal car trips and encourage trips by sustainable transport, and in particular trips by bicycle;

- The Policy must include mechanisms for community participation in the management of parking demand (eg, by participating in consensus decisions about parking allocation, market-driven pricing or through “auctions” for parking access);
- The Policy must incentivise the public to be involved in choices about parking management;
- The long-term viability of the Policy requires it to explicitly articulate the financial costs and benefits of parking. To not do so will leave the Policy short of being able to price on-street parking sustainably, which in turn, will undermine demand management.

Documentation Reference

We present the following recommendations in response to the **Draft Neighbourhood Parking Policy** (hereafter referred to as the “Policy”) displayed on the City of Sydney’s website during June 2013.

Presentation of Our Submission

Our submission is presented in two main sections as follows:

- commentary in overview
- responses specific to each section of the Policy.

Overview Response

Responses specific to each section of the Policy are outlined in the following section. This section summarises the key changes to the Policy we are recommending.

Messaging

In order to properly direct the Policy and to set the community's expectations, the Policy needs to include the following key messages explicitly:

- The City's roads are for moving people not storing personal property (cars);
- On-street parking is a public resource, not an automatic entitlement of any citizen;
- The City seeks to encourage car-free and low-car lifestyles;
- The City needs to cap the total number of car parking spaces within each of the City's parking precincts. The City will accommodate nearly 100,000 new residents - a 60% increase - in the next 30 years [page 1, Connecting Our City] and it will not be possible to increase the on-street parking supply accordingly;
- In order to maintain a sustainable Sydney, it is essential that parking revenues better reflect the true cost of providing on-street parking.
- The City will hypothecate on-street parking revenues to sustainable transport.

Capping the Number of Parking Permits

The Policy must require that the total number of parking permits within a parking precinct is capped. The current approach of issuing permits without limit undermines the sustainability and equity of the parking management system.

On-street Parking is a Public not Private Resource

It is unsupportable that streets be managed as a residential carpark. The Policy must clearly articulate **a strategy to actively de-couple the community's sense of "automatic entitlement" to on-street parking**. As witnessed at community consultations, in the media and in particular, from our seat on the City's Local Pedestrian, Cycling and Traffic Calming (LPCTC) Committee, this expectation is the driver of the City's response to parking management. The City's anticipation of the community's "entitlement" to on-street parking also heavily informs the City's street designs.

In the next 5 years, we must have transitioned the public's conception of the street space to being **a public resource devoted to mobility (ie, moving people) NOT to the storage of private property (cars)**. There will always be some need for on-street car parking, however, we have long ago moved past the point where this is space enough for everyone to park AND to provide also for other street-borne infrastructure such as cycleways.

Presently, the City's current delivery of public domain improvements is dictated to by the need to avoid the loss of on-street car parking. Further, mobility within the City is still heavily prioritised to roads and cars and public domain improvements such as cycleways, outdoor dining, and kerb buildouts are regularly being curtailed by the "need" to preserve on-street parking. (The LPCTC Committee is now newly receiving complaints from residents about the loss of on-street parking due to first of the City's in-street tree plantings.)

Paying a Fair Price for On-Street Resident Parking Permits

The City's charge of \$49 per annum for a resident parking permit significantly under-represents both the value of, and cost of providing on-street parking. This very low pricing of public car storage encourages residents to own and use cars and actively discourages them from using sustainable transport (why catch a bus when you can so conveniently store and access your car?). The Policy must direct the pricing of resident permits to better reflect the infrastructure, congestion and health cost burdens borne by the City in providing street parking. To achieve this, the Policy will need to raise awareness of the true cost of providing parking spaces.

Further, should the City decide to proceed with the policy of restricting households to one resident parking permit (as it should), this low pricing will ensure that the then-restricted number of permits will be contested by almost *all* existing permit holders, as none will be discouraged from applying by the low cost of a permit.

The Policy must require of individuals wanting an inner city lifestyle that includes a car, that they bear the responsibility to accommodate it or at least pay a fairer proportion of the cost of doing so.

The current pricing of permits falls well short of facilitating credible demand management.

Proper Pricing Depends on Knowledge of True Costs and Benefits

True and sustainable pricing of on-street parking can only be achieved if all associated costs (including compliance, administration, roadworks, linemarking, congestion and health costs) and benefits (convenience, cartage) of its provisioning are known or estimated. The Policy and its supporting documentation suggest that this information is not known.

On-Street Bike Corrals are Good for Business

The Policy's response to serve retail interests needs to expand beyond merely encouraging parking "turnover". In the first instance, parking surveys indicate that much on-street parking does NOT relate to the adjacent land use. Further, research^[1] indicates that for certain business types, **retail spend is increased by providing on-street bike corrals** rather than car parking (primarily because of the increase in the number of shoppers that can be delivered directly to the retail door.)

The Policy needs to be updated to reflect the role that on-street bicycle parking can play in the delivery of efficient, sustainable transport.

[1] Lee, Alison and March, Alan (2010) 'Recognising the economic role of bikes: sharing parking in Lygon Street, Carlton', *Australian Planner*, 47: 2, 85 — 93

<https://www.bicyclenetwork.com.au/media/vanilla/file/good%20design%20guide/on%20street%20parking%20-%20lygon%20st%20Australian%20Planner%20june%202010.pdf>

Incentivisation

The Policy must include a section on incentivisation measures. The Policy must furnish responses to questions such as: what role can public transport play in the reduction of parking demand? how can we remove the need for car trips? how can the Policy overtly encourage walking and cycling? How can the Policy Encourage residents and businesses to voluntarily relinquish their permits?

This Policy encourages car ownership. This flies directly in the face of the City's 2030 Vision which clearly articulates the aspiration for a city that promotes walking and cycling and a reduction in personal car trips. As presented, the Policy encourages personal car trips (eg, "increasing turnover" and low cost of parking permits) despite championing the opposite.

The Policy must adopt more ambitious measures to arrest the burgeoning parking demand. The City of Sydney area will soon accommodate many more residents, workers, students and visitors as its large-scale urban activation projects come online (eg, Green Square, Harold Park, Central Park, UTS, Barangaroo, Darling Harbour). It is untenable that this Policy does not **include a vision for the (5- and 10-year) future management of parking.**

The City should limit to one the number of permits granted to each household. There should be no household with more than one resident permit unless extenuating circumstances apply. Some communities will accept the withdrawal of resident permits if their entitlement to visitor permits is increased.

Introducing "Smart" Parking Meters

Simplistically, smart metering refers to the deployment of a network of parking meters linked to a central database that is capable of altering the price of parking dynamically according to demand. Sophisticated smart metering systems also include the ability to detect the presence of cars within parking bays (so as to allow for flexible, to-the-minute charging), payment by credit cards, e-tags and smartphones and integration with apps and the internet to facilitate remote user interaction with the system (rather than at only the parking meter).

Smart meters would serve to significantly reduce costs (compliance, administration, fraud) and critically, would catalyse the approach to market-driven pricing. The arrival of credit card technologies such as Pay-Wave and smartphone applications ('apps') present opportunities to introduce the next wave of parking meters as smart meters. The City could even seek commercial and technology partners to fund and deploy the infrastructure as has been done for London's public bike share scheme. (A partnership with Barclays Bank.)

Pricing Parking so as to make Public Transport Attractive

The Policy has a responsibility to price parking such to trigger mode-shifting to public transport. **The Policy needs to provide pricing mechanisms that will present sustainable transport as a financially attractive option.** Car parking in commercial parking stations attracts fees of around \$100/day in parts of the CBD which much better reflects the true appetite for car parking amongst the community.

Any introduction of smart metering should seek to integrate with the State Government's introduction of the Opal (public transport) card so that drivers have can appraise the costs of parking against the costs of their public transport use. This approach would only be viable where there is a strong financial incentive to use public transport.

Redirecting Parking Revenues to Sustainable Transport

The Policy must enunciate a principle to **direct parking meter and fines revenues to sustainable transport**, eg as in the manner of the State Government's hypothecation of revenues from its parking space levy. Such a strategy would serve the City an accepted and valued justification for properly charging for parking. Any attempt to do so now in the absence of a targeted strategy is taken by the community to be an unabashed grab for money which dissuades the City from acting.

The City's Cycleway Network Will Depend on the Withdrawal of Some Parking

The delivery of the City's cycleway network will necessarily depend on being able to reallocate existing parking. The Policy should include a strategy for converting on-street parking to mobility corridors. Articulating such a strategy would empower traffic engineers by providing guidance and justifications that have been endorsed by Council.

In order to provide an appropriate platform for community dialogue, the Policy should provide contextual information such as what percentage (%) of the City's road surfaces is devoted to parking, ie, to merely storing vehicles. It should then represent this as a congestion benefit.

The Policy must articulate the goal (whether near-term or long-term) of **introducing metered parking throughout the LGA**, ideally using smart-meters that can price parking individual spaces dynamically according to demand. The initiatives espoused by Donald Shoup (Distinguished Professor of Urban Planning, UCLA) are instructive here <http://shoup.bol.ucla.edu/>.

Granted, the introduction of paid parking can be a hard story to sell (although it will be no matter which approach is adopted), but **it is untenable that the parking policy of central Sydney does not include strategy for arriving to the metering of on-street parking throughout the local government area.**

It would appear that **a progressive introduction of a visitor parking scheme** - including the favourable granting of visitor permits at the expense any second- and third-held resident parking permits would be a sensible and tractable soft introduction. BIKESydney understands that the City has had some success in this regard in Ultimo and Pyrmont.

Either way, it is essential that the parking policy articulate a move toward metered parking throughout the LGA. Increasing the allocation of visitor permits is the mechanism most likely to facilitate this transition to metered parking.

Analysis of Existing Internal Trips

There is no evidence that the Policy has been informed by an analysis of what short internal (intra-LGA) trips are presently being undertaken; these being the trips that the Policy should avoid providing parking for, and targeted to be served by sustainable transport modes. Notably, the Policy proposes amalgamating the eleven existing parking precincts served by the 5km central section of the Bourke St cycleway into one parking precinct. Doing so will materially undermine the appeal of taking "internal" trips within the now-enlarged precinct by bike as it will then be possible to drive and park for free. This move competes directly with the City's cycling team's pillar strategy to target short (<5km) car trips to encourage trips by bike.

Progressively Reducing the Provision for On-Street Parking

The Policy needs to commit to not only **capping the total parking provision within precincts** (or at least LGA), but to eventually, REDUCE that provision. Achieving the City's 2030 goals will depend on this.

Moving Away from Ad-Hoc Provisioning

The City's LPCTC Committee often re-assigns parking provision without any control on the increase in parking and traffic "entropy" - an increase in the total number of "vehicle hours parked". It is unsustainable that increasing provision in one area is done in the absence of reducing provision from another area.

The Policy needs to provide a mechanism that will allow empower its LPCTC Committee and Traffic Engineering team to **move away from an ad-hoc responses to provisioning**. Presently, parking provision is too much determined reactively in direct response to individual requests from residents. The current approach of administering parking provision street-by-street (sometimes house-by-house) results in incoherent demand management.

A response here might be guided by Jan Gehl's idea: "Measure what you care about". The successful delivery of this Policy will depend on its adopting **quantitative metrics that its engineers can work to and against which success can be measured**. Leaving the Policy expressed as motherhood statements will mean necessarily that the Policy will be executed with discretion and potentially inconsistently.

Pilot Project

The Policy should necessarily include at least one "**pilot project**" that tests the efficacy of a strategy based on variable and market-driven pricing of on-street parking.

Responses Specific to Each Chapter of the Policy

Purpose

The Policy refers to “private vehicles” [presumably meaning motor cars] without recognising that bicycles have a legitimate and valuable role to play in the transport plan. The Policy should include discussion of the role, benefits and needs of bicycle parking so as to message to parking managers and the community the importance of cycling to the task of parking the *vehicles that move people around our city*. The effect of not including bicycle parking provisioning in this Policy is that provisioning of on-street bike parking will be “frozen out” of the fundamental planning stages of streetscape designs.

The Policy states that “the City ...recognises its obligation to manage parking demand fairly and transparently”. This is a noble cause, but stops far short of the purposing the Policy correctly. The Policy presents the chance to *influence* that demand, not merely *respond* to it. The fundamental approach of the Policy needs to shift to being a Strategy rather than merely a Management Plan. The preceding section has suggested strategies to enable this shift.

The Policy makes many mentions of “increasing turnover” without the regard for the significant extra traffic it induces. Approximately 30% of the traffic on the local network around the Enmore Theatre (just outside the City of Sydney area) in the lead-up to evening concerts is that of concert-goers circulating - often repeatedly - for parking. This, with a train station merely 5 min walk away, and the venue sitting on very well-served major bus routes. The response here should include price-discounted theatre tickets for those arriving by non-car modes.

1 Background

The Policy needs to be clearer about its conception of “sustainability” which it appears to interpret as a focus for making the transport network “sustainable” rather than also managing the road network to the betterment of the City’s 2030 sustainability goals.

The Policy outlines its goal to support the City’s “transport and environment goals” and yet fails to recognise the parking needs of cyclists, soon to reach 10-20% of all trips within the Local Government Area. The Policy should be amended to incorporate measures that encourage the **reduction of car use**.

The Policy states that it is founded on the principles of:

- Sustainability and efficiency of the transport network;
- Liveability and prosperity;
- Limiting vehicle congestion.

However, it's not clear how the Policy serves these goals.

Further, the Policy should be updated to include pillar strategies such as:

- reducing personal car use
- mode shifting (from cars to sustainable transport modes)

The Policy should articulate explicitly what would constitute **successful outcomes**. As it stands, the Policy is presented merely as a strategy to most equitably share the available parking resource - a necessary component of, but still, an incomplete statement of what its ambitions should be. **The Policy must include metrics against which the success of its implementation can be measured.**

Why does the Policy not offer a response to controlling the growth in parking demand? As the Policy notes, the City will accommodate 72,000 new residents in the next 25 years (2030 states 100,000 in the next 30 years - a 60 % increase). How relevant will the Policy's strategies be even in the near term when urban renewal projects such as Barangaroo, Green Square, Harold Park, Central Park, UTS, Darling Harbour area activated?

Indeed, the "Residential Parking Permits" Fact Sheet accompanying the Policy acknowledges that "...Some neighbourhoods like Newtown are [already] close to an oversupply of permits for available parking spaces while other areas, like Potts Point, Kings Cross, Elizabeth Bay, Rushcutters Bay and Darlinghurst already have an oversupply of permits."

The Policy must articulate a strategy to manage the surge in parking demand that will be occasioned by the activation of these major urban renewal projects.

2. Principles for Parking Management

2.1 Public Access

“Parking controls will recognise that streets are public spaces, open to all people, and to be managed in the public interest.”

This is one of the most important statements made by the Policy. It is not clear how the Policy’s instinct to provide parking of personal property (cars) over freeing the roads for the movement of people is justified. The statement should be amended to include recognition of road users other than the drivers of “personal [motor] vehicles” and that parking will be designed around the more important goal of maximising the road space for mobility, not storage of personal property (cars), for example:

“Parking controls are founded on the principle that streets are public spaces prioritised to moving people rather than storing personal vehicles.”

The bike parking corral immediately west of Redfern Station on Little Eveleigh St is a great example of a successful conversion of parking supply to sustainable transport modes.

We note that it may be the intention of the statement in Section 2.1 to refer to “all people of the City of Sydney” rather than “all people” in light of assertions of preferential treatment made in other sections of the Policy (eg, Section 2.2). These statements should be reconciled (one or other way) to remove ambiguity.

2.2 Liveability

Road congestion significantly degrades liveability (as indeed Section 6.1 of the Policy tacitly recognises), and increasing parking provision will serve to increase traffic and congestion. (The phenomenon of “induced traffic” is very well established). Merely favouring the cars of locals over out-of-area users is an insufficient response to the impacts on liveability of on-street car parking. The Policy should include measures to *reduce* on-street car parking. On-street car parking often presents a barrier to the introduction of liveability initiatives such as better pedestrian access, outdoor dining, and cycleways.

It is an inadequate response that the Policy’s commitment to improving liveability is contained to merely favouring parking provisioning to locals over out-of-area road users. A meaningful response would necessarily reference measures that directly reduce rather than increase traffic and congestion.

2.5 Fair Use of Pricing

The Policy falls well short of properly valuing the (\$) cost and (\$) benefits of on-street parking. The number of commercially operated car parking stations in the CBD, and the fact that parking is priced as high as \$100/day at some, bear testimony to the existing demand for parking and its value to the community. The City's parking policy should necessarily include zones that use "smart meters" which facilitate flexible, dynamic, market-driven pricing, better coordinated parking demand, and improved compliance.

The Policy indicates permits will continue to be issued without it conferring upon the recipient a guarantee of a parking space. It appears that there is no cap on the total number of permits. This in spite of suburbs such as Kings Cross and Potts Point having 1.4-1.6 permits issued for every on-street parking space. (Noting that this level of over-subscription still does not include the demand from non-permit holders.) It is untenable that the Policy does not prescribe a cap on the total number of permits issued. It is unclear how this approach serves the goal of ensuring the "sustainability of the transport network". The Policy should explicitly enunciate a response to the increase in on-street parking demand expected from the City's various urban renewal projects (eg, Green Square, Central Park, Harold Park).

2.6 Consultation

From our seat on the City's LPCTC Committee, we note that a high proportion of community members presenting to the committee express the frustration of having not been consulted despite the City having undertaken consultation through conventional communication channels (typically through mailouts and advertisement on Council's website for example). We acknowledge that the City goes to great effort to keep the community apprised of its projects, and that the community often over-reports a lack of consultation. Nonetheless, it is evident that community engagement needs to be improved. A successful Policy will require it to be embraced by most of the community.

We also recommend that a communications strategy be devised to precipitate the discussion of on-street parking management issues *within* the community (ie, amongst themselves) in order that the public be better invested in decisions about parking management.

It is to be recognised that the City's role in prioritising parking access for one group over another is a difficult one. However, implementing new parking management strategies always brings this difficulty, and so policy development should necessarily de-couple from anticipating this concern. The setting of policy should rather focus on empowering City staff with the ability to respond robustly and consistently with well-reasoned and prominently-messaged strategies that clearly address the City's 2030 goals.

Once enshrined, the public communication of those strategies should encourage **cross-talk between community members**, and also include a system for conflict resolution. Online polls, smart phone applications ("apps") and social media will likely have a role to play here. The precise details of this engagement mechanisms would be best advised by communications and engagement experts.

2.7 Incentivisation

The policy should be amended to include a new section that outlines how the community might be incentivised to reduce its demand for parking and permits. Incentivisation could serve as one of the pillar responses to reducing demand and managing the finite parking resource successfully. The finite-ness of the parking resource should be seen as an opportunity not a limit.

Incentives could include:

- offering cash incentives for relinquishing parking permits
- issuing credits for public transport
- subsidising bike purchases in exchange for relinquishing parking provision

2.8 Sustainability

The theme of 'sustainability' needs to feature prominently as a pillar principle. The management of parking - and its resulting traffic - will materially influence whether the goals of 2030 will be achieved. The Policy does not address its responsibilities to the City's sustainability goals explicitly, and should do so.

2.9 Safety

The Policy should hold as a fundamental principle that parking demand will be managed to prioritise transport safety. Among the safety initiatives that should be promulgated by the Policy are:

- ensuring that parking is not permitted closer than 10m from any intersection (as required by RMS directives). Under pressure to find more parking capacity, Leichhardt Council parking rangers have been instructed to “permit” cars to park within 10m of local intersections. (Discussions with Leichhardt parking rangers indicate that the operating principle is to allow parking “up to the building facade line” - in line with the facades of buildings on the adjoining street - which results in significant obstructions of round-corner sight lines. The City of Sydney’s Traffic Committee has recently (at its meeting of May 2013) discussed adopting a similar approach this same provision to park within 10m of intersections in special circumstances;
- favouring parking provision to smaller vehicles - small cars, motorcycles, scooters, bikes) to shift the composition of vehicles moving within the LGA to safer, less dangerous (to non-drivers) vehicles. Such an initiative would increase parking capacity in a more sustainable and manageable manner;
- Devoting parking bays nearest intersections to small and low-height vehicles so as to much improve sight lines and safety for motorists, riders and in particular cyclists negotiating intersections.

3. Managing Street Parking

3.2 Commercial and Mixed-Use Areas

BIKESydney opposes the proposal to introduce 15-minute free parking within the LGA as this encourages trip-by-car and also degrades safety for cycling by increasing traffic, the number of car-door openings and unpredictable vehicle manoeuvres (as people hunt for parking).

Further, it appears that the justification of providing 15-minute free parking is based on only hearsay (potentially from the most vocal of small business owners) rather than corroborated by evidence. The relationship between 15-minute parked vehicles and adjacent land use is not well established. Further, the provision is highly susceptible to abuse by drivers who stay for longer than one 15-minute period.

In the instance that the City opts to introduce 15-minute parking then its introduction should necessarily be accompanied by an increase in the provision of bike parking, for example, in address of the move away from the sustainable transport goals of 2030.

There is evidence to indicate that retail spend is not only maintained, but increased where

on-street bike parking corrals are introduced in "high-turnover" retail areas (eg, restaurants and cafes) at the expense of on-street car parking spaces. As a minimum, the City should not implement 15-minute free parking without an accompanying trial of on-street bike parking. Any such trial should be monitored so that the relative parking supply/demand levels can be compared.

4. Managing Compliance

4.2 Response to non-compliance

Escalating the response to persistent non-compliance, to ticket parking may be an insufficiently robust response. The system should escalate to the deployment of smart metering where demand justifies this. Smart meters would alleviate the compliance burden and increase parking revenues (even though this may not be the goal of the policy).

5. Mobility Parking

No comment

6. Parking Permits

We very strongly support the need to coordinate permits with parking restrictions.

Further, we urge that the viability of the Policy be enhanced by having it include a cap on the total number of permits issued per precinct. Suburbs such as Potts Point are already over-subscribed as evidenced by the fact that there are 1.6 permits issued for every parking spot. Consider that this doesn't represent the demand from out-of-area parkers.

6.4 Pricing

The Policy rightly recognises (at Section 6.1) that the additional traffic that will be generated by new developments will reduce liveability and yet further diminish the attractiveness of public transport (by impacting the reliability of services for example.) It follows that the Policy should include an explicit principle that requires that demand management strategies do not impact on the provisioning of sustainable transport.

At Section 6.2 however, the Policy appears to control only SOME new development types. To this end, why should residents of dwelling houses be granted parking entitlement where the residents of flat buildings are not? Paradoxically, it is the house- or multi-dwelling owner who has more capacity to capture their parking burden on their own site.

7 Resident Parking Permits

7.1. Eligibility

It goes to the heart of the “parking problem” that, as the draft policy states at Section 7.1, “...Most households in the City of Sydney are eligible for parking permits”. This statement underpins rather than - as it should - counters the sense of entitlement that residents and business owners have to their “right to park”. The Policy needs to much more strongly message that parking is NOT an entitlement and indeed leaves the City with a significant burden. This Policy should deliver parking prowith a view to de-coupling the rate-payer’s sense of entitlement to be able to park their car on the street.

The Policy should articulate a model of graduated eligibility based on factors such as:

- proximity to public transport and cycleways;
- proximity to services (shops, schools, cafes, restaurants);
- potential for evolving car sharing communities;
- favouring smaller and more sustainable vehicles (bikes, scooters, motorbikes, electric cars).

7.2 Quantity of permits

We strongly urge the City to **limit the number of resident parking permits issued to any single household to one**. In any case, the granting of a second resident parking permit to any household should be on the basis of one or other style of market-driven “auction”. (Separately, the City should investigate opportunities for a pilot project based on issuing all entitlements by “auction”.) This would softly introduce the community to market-priced parking - essential for the longer-term viability of parking management - and would afford the City a means to show the community the true value of parking. A key requirement of the Policy is that it must include some form of market-driven pricing for parking.

The Policy should include a mechanism to either withdraw (or at least incentivise the surrender of) any second and third permits

The City of Sydney should explicitly message its enticement of individuals wanting to live a car-free and low-car lifestyle. There are great many such individuals living in the more populated areas of the LGA, eg, Potts Point and Kings Cross.

It is untenable that the Policy does not specify a time-restriction on the validity of resident permits issued. Resident parking permits should have to be renewed annually as a means to control permits being retained by drivers who have moved from the area.

7.4 On-site Parking

The Policy should nominate incentives and a protocol (criteria) for converting on-street parking to on-site parking.

8 Visitor Parking Permits

8.1. Eligibility

The Policy recognises that “most households in the City of Sydney are eligible for visitor parking permits” yet says nothing of capping the total number on issue. A sustainable system will require necessarily that the total number of permits (of all types, including visitor permits) are capped. This is particularly relevant if the Policy will newly award visitor permits also to businesses (Section 8.1).

8.2. Quantity of Permits

The Policy should extend its preferential provisioning of visitor parking permits by also offering additional visitor permits as an incentive to households to surrender their resident parking permit(s). This strategy however, requires the City to commit to capping the total number of resident permits offered throughout the precinct or LGA.

8.3. Validity

Visitor permits should be issued with a maximum, not minimum, period of validity. That period of validity should be no more than 12 or, in exceptional circumstances, 24 months

9 Business Parking Permits

Section 9 of the Policy should seek to better transfer the financial burden of the cost of providing parking to businesses without undermining their financial viability. Again, the ability to do this first requires knowledge of what the actual cost of providing of parking spaces is. Parking fees should not be a factor that removes the viability of that business, but businesses need to be bear more responsibility for the true cost of parking than presently they do.

Above all, the policy must recognise that businesses have the ability to pass on costs through the pricing of their goods and services. Other business costs such as rent and electricity for example, are passed on this way.

9.2. Eligibility

Clause 9.2 d) of the Policy needs to explicitly articulate what premises modification measures would be considered “reasonable”. Leaving this undefined will fail to influence parking management to the goals of the Policy.

9.3. Quantity of Permits

The Policy should include incentives to adjacent businesses to share their parking requirements, eg, the time-sharing of parking spaces or access lanes or encouraging adjacent businesses to take delivery of stocks through a single delivery service.

10. Care Worker Permits

No comment

11. Prevention of Fraud and Misuse

The capacity to defraud the system would be significantly reduced with the introduction of smart meters (discussed above).

12. Transitional Arrangements

It would be counter-productive to the City's 2030 goals to reduce the permit fee for the Jacksons Landing development. Indeed, doing so would signal to developers of the City's current large-scale urban development projects that it is reasonable to shift the parking burden of their future tenants onto the City. The City should be encouraging urban development that does not introduce additional parking demand on to the City's streets.

13. Parking Precincts

Parking precincts should be defined with reference to parking demand and other criteria such as proximity to sustainable transport modes rather than arbitrarily on geographical boundaries.

Section 13.1 of the draft policy should include the principle to reduce parking by out-of-area commuters, ie. individuals driving to and then long-term parking near a viable public transport node.

As outlined above, the Policy proposes amalgamating the eleven existing parking precincts served by the 5km central section of the Bourke St cycleway into one precinct. Doing so would materially undermine the appeal of taking “internal” trips within the now-enlarged precinct by bike as it will then be possible to drive and park for free. This move competes directly with the City’s cycling team’s pillar strategy of encouraging mode-shifting from personal car use to target short (<5km) car trips. While the goal to equalise the size of the City’s parking precincts is not unreasonable, it is not grounds enough to allow impacting on the viability of the City’s sustainable transport initiatives. Any adjustment of parking precincts must first consider these impacts. Again, parking precincts must be defined with regard for the potential to encourage shifting of behaviour to sustainable transport modes. Changes that encourage residents of Surry Hills to now drive to the Danks St retail area for free would be unacceptable.

Please feel free to contact us should you require any clarification or wish to discuss other matters.

Yours sincerely

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