

Submission

Permit parking guidelines

29 April 2025

Prepared by Northern Sydney Regional Organisation of Councils

Member Councils: Hornsby Council
 Hunter's Hill Council
 Ku-ring-gai Council
 Lane Cove Council
 Mosman Council
 North Sydney Council
 City of Ryde Council
 Willoughby City Council

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Overview

Thank you for the opportunity to make a submission on the draft Permit Parking Guidelines (the *Guidelines*) issued for consultation. This submission has been prepared with the input and support of our member councils but should be considered draft until it is formally endorsed by the NSROC Board.

Northern Sydney Regional Organisation of Councils (NSROC) is an association of eight local councils who have come together to collaborate and promote a united voice on key issues in our region. Our member councils are Hornsby, Hunter's Hill, Ku-ring-gai, Lane Cove, Mosman, North Sydney, Ryde and Willoughby. Collectively, the NSROC member councils service an area of 639km² with a population of 660,667. We work together on policy and operational matters to drive efficiency and to enhance our region.

The documents provided with the consultation draft Guidelines do not specify aspects of the in-force Guidelines that are problematic or are not meeting the aims of the Guidelines. As such the drivers for the proposed amendments are unclear.

NSROC is concerned the Guidelines remove the ability of local councils to account for impacts on place amenity, availability of on-street parking, and that property owners already fund maintenance and upkeep through local rates. The proposed revisions to the Guidelines seek to promote poorly defined equity without regard to impacts on traffic management, scheme simplicity (so that residents can easily understand their entitlements) and local resident expectations.

Comments

Equity: The proposed changes require that a council must not apply different terms (e.g. costs, eligibility, availability, priority etc.) on the basis of tenure, title-type, housing type or size. Defining equity at a broad scale as proposed is problematic as there are limited on-street parking spaces available and that a permit is issued in whole numbers (fractional permits are not feasible). Councils need the flexibility to manage entitlements as the number of car spaces available is limited and they need to also allow for parking by visitors, emergency vehicles etc.

Managing demand by reducing the number of permits available to *new applicants* alone as proposed will not be sufficient in many cases and will not satisfy equity as neighbours will end up with differing entitlements, which the Guidelines state should not happen.

Reducing the entitlement of permits for residential or business premises by the number of on-site parking spaces is supported however this needs to be implemented within an overall scheme of entitlement that recognises that housing type or size drives demand - larger houses are likely to have more residents and will require more parking spaces (on-site and on-street). In these cases, the Guidelines should allow for flexibility for a council to determine overall eligibility by housing type while ensuring equity amongst dwellings of similar type.

Not providing flexibility to councils to achieve equitable outcomes is likely to result in too many permits being issued which will mean that the permits become worthless. This is the likely result as the minimum entitlement can be set to 1 permit only subject to considerations of on-site parking spaces available to an applicant.

Further, while making the permit eligibility linked to *residence* (as opposed to owner or tenant) is a policy that is appealing, it has the drawback of imposing administrative burden on tenant applicants. Tenants will need to prove tenancy and/or a letter from the owner and any permits already on issue for

the property will have to be managed (issued permits are foreclosed, cancelled; advise applicant on alternative steps or refuse their application). The simplicity of linking the entitlement to home ownership is that the council can check its records to check eligibility. In cases where this policy is in force, tenants can ask homeowners (at the time of entering into a tenancy agreement or later) to apply for a permit for their vehicle and any associated fees may be reflected in the tenancy agreement.

NSROC recommends that the Guidelines remain silent on ownership/tenancy matters and allow councils to establish an equitable policy that reflects the expectation of their community.

Pricing - Parking at a location other than at a permit holder's residential or business premises: We support in-principle the requirements in the draft Guidelines to issue permits around foreshore areas, beaches, other natural attractions or tourist destinations to all applicants on an equitable basis. However, equity in these cases will require that the pricing for these permits should also take into account that local rate payers are contributing to the maintenance and upkeep of these common assets that are available to all members of the Australian community. Limiting the prices to take into account parking and transport demand only, does not recognise the contribution made by council ratepayers to the maintenance of the infrastructure at these locations.

The Guidelines should explicitly state that price setting by councils for parking permits around natural attractions and tourist destinations may take into account the contributions made by rate payers to the maintenance and upkeep of the infrastructure at such locations.

Implementation: A number of our member councils have recently completed an audit of their resident parking zones, on-street parking stock and updated their permit parking policies after extensive community consultation to comply with the Guidelines. Changing the policies to comply with proposed changes will impose an unnecessary burden with minor enhancement in community benefit. Accordingly, NSROC on behalf of its member councils, recommends that the Guidelines require compliance at the time the policy is reviewed next as part of council practice of policy review. Provisions relating to surcharges or fees associated with payment for parking to be borne by councils as parking authority may be implemented when existing contracts with service deliverers end and/or are renegotiated.

Conclusion

NSROC councils are committed to work to achieving strategic objective of the State Government and to maintain and grow the liveability of our region, with its natural attractions to be available all members of the Australian community. Achieving these objectives requires that we work together to a set of agreed principles and minimise use of rules. This will enable achievement of the strategic aims as well as reflect priorities and expectations of local communities.

Thank you for the opportunity to provide a submission on Permit Parking Guidelines – consultation drafts.

If you require further information, please don't hesitate to contact NSROC Executive Director Dr Meg Montgomery on 0401 640 823 or at mmontgomery@lanecove.nsw.gov.au.

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