



13 December 2017

Ms. Jen Guice  
Senior Project Manager  
Neighbourhood Parking Policy Review  
City of Sydney  
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Sydney NSW 2001

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Dear Ms Guice

The Sydney Business Chamber (The Chamber) is pleased to provide comment on the City of Sydney Council (the Council) Neighbourhood Parking Policy review (the Review). In particular, the proposal to broaden the criteria to enable more choice in the type of vehicle eligible for a business parking permit.

The Chamber is a division of the NSW Business Chamber and represents Sydney's leading corporations, advocating for Sydney to be a competitive and sustainable global city. The Chamber strives to identify, develop and promote the major issues that contribute to economic activity and growth in Australia's only global city, Sydney. We do this by representing and collaborating with government on behalf of business at the local, state and federal level.

The Chamber is supportive of the proposal but notes the following:

- The decrease in the number of businesses taking up a business parking permit is resultant from both a lack of awareness about the availability of the permit and the confusion and subjectivity around the vehicle chosen by the business that would qualify for the permit. The Review is an opportunity to address these issues. However, not all businesses require a permit for daily trade purposes.
- The Council has not released the criteria for the types of vehicles that will now be covered (noting the NSW Road Rules define vehicles 'constructed principally for the conveyance of goods') or how 'used to carry goods in the course of daily trade' will be assessed.

- Our preference is that the criteria should be principle based, designed to achieve an efficient outcome rather than prescribe a type of vehicle.
- The criteria for determining eligibility for a business parking permit may be something as simple as evidence of commercial vehicle insurance – many insurers allow a broad variety of vehicles to be insured for this purpose. As commercial (business) insurance premiums are likely to be higher than personal premiums, it demonstrates a genuine business need for the vehicle. Business parking permits can offset the insurance costs.

The Review is not proposing any changes for vehicles parked in a loading zone. Given the level of construction within the CBD, we strongly encourage the Council being as flexible as possible in ensuring access for delivery vehicles during this time. Interim loading zone measures to support businesses during periods of significant construction should be considered as part of this Review.

Longer term the Council should consider how last mile freight/deliveries could be improved in the CBD. The emergence of multiple small scale suppliers means the centralisation and coordination of last mile freight has reduced whilst the number of vehicles carrying small loads has increased. One option is for centralised small scale freight depots on the edge of the city that can coordinate deliveries to the CBD.

Please contact Robert Millar on 02 9458 7324 or [robert.millar@nswbc.com.au](mailto:robert.millar@nswbc.com.au) if you require any further information or comment.

Yours sincerely

A handwritten signature in cursive script that reads "Patricia Forsythe".

**The Hon. Patricia Forsythe**  
Executive Director  
Sydney Business Chamber