

30 January 2023

Sutherland Shire Council  
Locked Bag 17  
Sutherland NSW 1499

## **Review of Sutherland Shire Council Draft Parking Strategy**

Dear Sutherland Shire Council,

We have been engaged by Shirebiz to make comment on the Draft Parking Strategy 2022-2032 submitted to the Sutherland Shire Council Strategic Planning Committee on 7 November 2022. We have prepared this letter in response to the Draft Parking Strategy. We note the importance of this document in setting a parking strategy for the next 10 years; and that this Strategy is intended to align and integrate with Council's planning and transport strategies.

Council parking infrastructure and controls are used to balance the needs of residents, commuters, shoppers and visitors. Council's Parking Strategy provides a prime opportunity to support Shire business and economic development. However, there is limited mention of how this Strategy will support business and the economy. Furthermore, in reviewing the Strategy, we have identified a number of issues and concerns that warrant further investigation to meet business and community needs.

From the perspective of supporting business and the economy, we provide the following comments:

### **Context and relationship with other planning documents**

- We note that Council wishes the Strategy needs to integrate with other supporting documents (e.g. Active Transport, Economic Development). However, as the Parking Strategy notes, some of these are still under development. Thus, there is a need for Council to review and ensure alignment of documents once finalised to ensure consistency and community outcomes.
- We also note that where documents do exist, there is a lack of cross-referencing or tracing to dependent or related actions impacting the Parking Strategy. For example:
  - The impacts of the public transport strategic actions outlined in Integrated Transport Strategy may have flow-on parking impacts that have not been identified.
  - The use of electronic wayfinding listed in the Integrated Transport Strategy is not mentioned in the Parking Strategy.
  - Action 4.6 – Advocate to TfNSW for commuter parking with action in 2023 – this also exists in the Public Transport Strategy (item 3.1.2) but is listed as ongoing, which is in conflict with the Parking Strategy.

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## **The relationship of parking to economic development**

- The Parking Strategy can have a direct impact on the Sutherland Shire Economic Strategy outcomes and objectives. However, there is no specific mention of how it could support the following existing Economic Strategy related outcomes:
  - Outcome 2: Business community needs and objective to increase Shire's business output by 15% by 2030
  - Outcome 4: Tourism and the objective to increase average tourism spend by 20% by 2030.
- An outcome of Council's current Economic Strategy is to support late night trading. However, the Parking Strategy does not mention how it supports this effort.
- There is a general lack of acknowledgement and description about how parking can support a vibrant and sustainable business community and economic development. Parking is a crucial element of supporting Shire businesses and this needs to be addressed.

## **Council's role in parking**

- It is noted that council separates four types of parking into on-street, off-street, private and commuter parking. However, the Parking Strategy does not specifically recognise how these four parking types will be used to balance needs and deliver on Council outcomes and satisfy resident, visitor and business needs. There is a lack of clarity on how Council intends to manage these different facilities to provide holistic community outcomes.
- It is suggested that Council define an integrated approach to manage the supply and demand of these facilities within the Parking Strategy.

## **The current parking situation, issues and forecast demands**

- There is a lack of information provided in the Strategy about the current parking situation across the Shire. Without this baseline information, it is difficult to understand what the Parking Strategy is addressing and to understand the merits of the included Implementation Plan action items.
- Although a list of priority centres is identified, there is no understanding of current parking problems or issues experienced in each of these centres. Further information on these centres would assist with explaining the context, issues and relative priorities. Additionally, it is not clear through this list of centres whether all Shire parking areas have been adequately reviewed for needs.
- We suggest that the Parking Strategy contain a description and characterisation of the current Shire parking demands and occupancies, travel and parking user behaviour (by traveller type, e.g. services, commuter, shopper, recreational), community needs and issues that exist. This should be done for major Shire town centres, activity centres, commercial/business centres, industrial areas, shopping centres/areas, commuter and recreational facilities (both on-road and off-road). This will help provide a current-state view and highlight problems and concerns that need to be addressed.
- Furthermore, it would be beneficial to show expected demands and increased growth in traffic and parking requirements for these locations, and where problems are forecast to

emerge. This provides some information about future demands and issues that should be addressed in the Strategy.

- It is suggested that further community consultation is performed to understand needs, demands and parking issues. In particular, business representatives (such as Shirebiz) should be consulted.
- Drivers of change are noted in the Strategy, however, it is not clear how any of these drivers are directly addressed by the strategy and implementation plan. It is suggested that suitable actions be identified and linked to these needs.

### **Decision-making frameworks**

- The decision-making frameworks presented are limited to managing road and kerbside space allocation. However, they do not deal with the demands and interplay of the four parking types identified: on-street and off-street, private and commuter parking. It is suggested that Council needs to consider decision-making across these different parking types in order to provide a holistic parking strategy.
- While the decision-making frameworks align with common government practices, without a baseline understanding of the current Shire parking behaviour across key activity centres, these tools and their application lack meaning.
- Although decision-making frameworks are useful, it is suggested that Council also needs to balance the needs of business and the community so that decision-making is not just process-based but accounts for and appreciates the local conditions, constraints and issues. The application of these frameworks should only be done on a case-by-case basis after understanding of each parking area's need (reference comments in the previous section).

### **Consultation**

- The 2019 consultation results, although interesting, do not provide much detail to explain the parking issues faced throughout the Shire. It is recommended that further consultation be performed to identify community and business parking issues and concerns to be addressed by the Parking Strategy.

### **Objectives and Measures**

- Objectives and measures are listed; however, there are no objectives that directly support economic and business development.
- Additionally, there are no specific relationships between the objectives and the Implementation Actions which makes it difficult to understand which actions contribute to each objective.

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## Implementation Plan

Given the lack of explanation about the current situation and parking issues, it is difficult to fully determine the merit and priorities of the included action items. Council should review the list of action items once the priority areas and parking issues are clearly identified and described in the Parking Strategy. In the meantime, the comments below about included actions are provided on “face value”:

- It is suggested that any action with a timeframe marked as “ongoing” is at risk of not being delivered in a timely fashion. Thus, it is recommended these items have a firm delivery date established.
- It is not clear how the implementation actions answer the Parking Strategy’s objectives. It is recommended that each action specifically be linked to the objective and measures.
- There are limited implementation actions to support businesses in town centres (focus 2) and the community (focus 3).
- There are no actions to specifically address off-street parking by Council (except advocating for commuter carpark facilities to TfNSW). Council manages more than 10,000 off-street parking spaces, and thus it seems remiss to not address current and forecast demands for off-street parking.
- Action 1.1 – The TfNSW Guide to Traffic Generating Development document that Council is planning to align its Development Control Plan to is more than 20 years old. It may not be relevant to the Shire’s needs (e.g. it still contains references to video stores traffic generation) and thus care should be taken in its application.
- Action 2.4 – It is suggested that Precinct Parking Plans for prioritised town centres should be specifically listed and their prioritisation for action be based on an understanding of current situations and forecast demands.
- Action 2.6 – It is suggested that the neighbourhood areas be specifically listed in accordance with community needs and their prioritisation for action be based on an understanding of current situations and forecast demands.
- Action 3.4 – It is suggested that the focus of engagement be broadened to include business groups, especially to address parking in various business areas and precincts.

We suggest that Council take the opportunity to review, consider and address these issues raised within the current Draft Parking Strategy. We also recommend Council further consult with business representatives such as Shirebiz to ensure optimal parking and business outcomes for the community.

Yours faithfully,



David Yee  
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