



8 September 2021

Finance and Public Administration References Committee
Parliament House
Parliament Drive, Canberra, ACT, 2600
By email: fpa.sen@aph.gov.au

Dear Finance and Public Administration References Committee,

Inquiry into the administration and expenditure of funding under the Urban Congestion Fund (UCF)

Parking Australia is the peak body for the parking industry in Australia. Members of Parking Australia represent all segments of the parking sector including car park building and car parking technology companies. The association was founded in Perth in 1986 as an outcome of a Capital City Lord Mayors' Conference. The Lord Mayors felt there was value in having an organisation that would bring together the various elements of parking and promote excellence in the control and management of parking facilities.

The following submission to the Inquiry into the administration and expenditure of funding under the Urban Congestion Fund (UCF) comes from a deep understanding of the fund from the time Commuter Car Parks were announced till today.

Parking Australia has met with both Minister Tudge (in person) and Minister Fletcher (virtually) regarding the program with the view of promoting best practise and to offer our expertise and that of the industry.

Below we have specifically addressed the inquiries terms of reference:

a. The allocation of funding under the National Commuter Car Park Fund;

Parking Australia believes that the rationale behind the Commuter Car Park Fund is sound. This is reinforced by the fact that both major parties took similar policies to the 2019 election and that the NSW and Victorian Governments are also investing significant funds into train station car parks.

Getting people onto public transport by encouraging them to drive to a train station car park, especially from the outer suburbs, means less cars on our major arterials heading into the Central Business Districts (CBDs) of our capital cities.

The more cars that are in commuter car parks, and subsequently people on public transport will, in the long term, mean the Federal Government will have to contribute less to the financing of future road upgrades.

For example, the Federal Government have for years allocated funding into the upgrade and adding of new lanes to the Monash Freeway in the south-east of metropolitan Melbourne.

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The building of commuter car parks along the Cranbourne and Pakenham train lines makes complete sense.

Parking Australia is of the view that more in-depth analysis of commuter behaviour would have been advantageous.

The way in which the funding was allocated is within the responsibilities of the Federal Government and the minister. As such, the claim that the allocation of the funding is 'corrupt' has no basis. In addition to this, the program would not fall under the responsibility of an Independent Commission Against Corruption (ICAC) and there is no evidence to support that corruption has taken place at the federal level. However, Parking Australia would welcome further scrutiny of the way the commuter car park funds have been allocated by program partners delivering the projects.

As the peak body for the car parking industry, Parking Australia finds it difficult to understand why the costs of the car parks at Woy Woy, Panania and Berwick (as per the ANAO report) are so exorbitant. As such, it is Parking Australia's view that the inquiry examines the details of how taxpayers' money is being used by the delivery partners, whether they be local government or state government agencies. There is no doubt that the use of the allocated funds by the program partners could have been better utilised.

In terms of the way the funding was allocated by canvassing local members and/or candidates, this does have some merit. Local members/candidates do have a very good understanding of their electorates and are regularly receiving feedback from constituents regarding local issues, including parking.

The expansion or building of commuter car parks across our capital cities is required, especially in and around Sydney, Melbourne and Brisbane. However, there is some doubt as to the breadth of the canvassing and whether feedback was sought from a large enough sample of elected members and/or candidates.

Parking Australia agrees with the benchmark construction costs for two of the three car park scenarios stated in the ANAO report. At-grade and multistorey car parks should be built within the ranges stated in the report. If a car park is outside of these ranges, then serious consideration should be taken as to why and whether there is any real cost benefit of the project. However, there are instances where car parks may be greater than the benchmark due to peculiarities of an identified site. For example, Woy Woy may be greater due to being built close to the coast with greater work needed for the foundations on sandy soil.

The third scenario specified by the ANAO for the multistorey adjacent to the rail line provided by the ANAO is, in our view, not correct. For a car park to be built adjacent to a rail line it requires significantly more reinforcing to deal with a potential train derailment. This means added protection in the form of a reinforced wall and greater overall structural strength of pillars.

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Needless to say, most of the commuter car park projects could and should be built within, or less than, the funding that was allocated for these project sites.

In general, it is our view that there are failings by the Infrastructure Department, project partners and the minister's office but should not diminish the value of the policy to encourage people onto trains. We believe that the failings of the Commuter Car Park Fund to this point are a result of a lack of expertise in the field and the application of previous funding models to the fund. This view is supported in the ANAO report which was accepted by the minister.

It is Parking Australia's view that the initial allocation of funding for the majority of projects identified by the minister are acceptable, yet the additional funding for some of the projects requires further examination.

b. Whether the administration of the UCF meets the highest standards of governance, performance and accountability in the expenditure of public funds;

Parking Australia is mainly concerned with the performance and accountability of the Commuter Car Park Fund in terms of the delivery of these car parks. The ANAO highlighted the slow rollout of the projects which draws into question the performance and benefit to the taxpayer.

In terms of the governance of the fund, there needs to be greater scrutiny and accountability of the allocated funds. While program partners need to be accountable for the provision of the projects, the ultimate accountability of the funding and delivery of the fund falls on the Federal Government.

It is Parking Australia's view that the funding being allocated to the program partners could deliver better results for the taxpayer and commuters.

The awarding of projects to builders, architects and consultants, that do not have experience in the design or delivery of the projects is a major concern. The car parking industry is unique and requires different expertise in regard to the design, planning and building of car parks.

In one instance, a council awarded the design of the car parks in the LGA to an architect that has not provided standalone multistorey car parks. In another instance, funding was provided to a builder who did undertake a tender process, but the project was awarded to another builder who wanted to charge more than three times what other submissions had quoted.

There are more examples of best practise not being followed and the allocating of funding by the project partners to organisations who have little, to no expertise, in delivering car parks.

While the Infrastructure Department are not totally responsible for the program partners, they should allocate funding outlining certain specifications, technology and timelines for completion. If the program partners could not deliver the project in line with the funding,



then the funding should be reallocated to commuter car parks that could be delivered in other areas.

A key area that it seems has not been identified, is how can these car parks can be built in the most sustainable way possible. Parking Australia has been working diligently to educate the industry in this area. To encourage awareness of this, Parking Australia recently changed their best new car park award to the outstanding sustainable car park award in our annual awards program.

We encourage the department to scrutinise how program partners are going to incorporate best practice building technology. For example, there are building technologies and/or techniques which require less concrete, energy efficient lighting, solar PV electricity generation, water harvesting and the installation of EV charging. These should all be considered when funding is allocated to program partners.

It is Parking Australia's understanding that no such requirements were in place on the program partners to deliver the most sustainable building options in these car parks. In fact, we believe that many of these car parks were to be built in a traditional manner, with little to no thought given to innovation and environmental considerations, from a building or parking technology aspect.

There have been reports that ten of the car parks are not part of the train stations. Parking Australia does not consider this to be a significant issue at all. In fact, we believe that this is a strength of the program and can provide commuters with an even better outcome than if they must only be built as train stations. Train stations are built in areas that have rightly been developed. In many cases, there is no train station land to build a car park. As such, the government is making the right decision to partner with councils and potentially owners of private land (such as shopping centres) to provide additional commuter car parks.

One such example is Woy Woy, where there is no train station land available. The next best option is to build a car park on council or private land that is nearby.

Studies indicate that Australians usually park within 400 metres of their final destination. Given that the train stations are the final destination, the car parks should be within 400 meters of the train station.

It is Parking Australia's recommendation to improve performance and accountability that the fund be managed by someone with expertise in the car park industry. Parking Australia and those within the industry have tried to assist the delivery of this fund from its inception yet have largely had their expertise in the field dismissed.



- c. The role of the offices of the Minister(s), the Prime Minister and Deputy Prime Minister(s), and any external parties, in determining which projects to allocate funding to and who would announce these projects;**

Parking Australia has had no involvement in the allocation of funding or the identification of sites by the Minister(s), the Prime Minister and Deputy Prime Minister(s), and any external parties.

If, however, Parking Australia had been consulted further, we may have been able to advise on the suitability of sites and how much funding should be allocated.

Parking Australia has met with the Minister(s) and the Prime Ministers' offices since the program was announced offering our industry expertise and advice.

- d. The extent to which the management of the fund respected the caretaker conventions;**

It is Parking Australia's understanding that the funding for the car parks was allocated and signed off by the Minister and Prime Minister prior to the election being called. In a meeting with Minister Tudge and Parking Australia on 8 May 2019, it was stated that the funding was allocated prior to the election being called and would be built, should they have been elected or not.

- e. The fund's impact in reducing congestion, including whether the allocation of funding under the program was appropriately targeted to meet the stated objective of the UCF;**

Parking is a key part of solving the congestion issues facing our capital cities whether they be public/private off-street car parks, or on-street parking or commuter car parks.

The key to utilizing car parking to assist in relieving congestion is not just the car space itself but the technology linked to the car park or space. Just building a car park with little to no parking technology included in the project is just offering a half-baked solution.

Building a car park to get people onto public transport is ok but to have a real impact on congestion the commuter should know whether there are spaces available at their train station of choice prior to leaving home. There is no point in having commuters drive to a train station just to find that the car park is already full. This just increases congestion in, and around, the station.

There is no reason why a commuter cannot have this information and there is no real reason why a commuter should enter an already full car park.

For as little as \$1000 per space, technologies can be installed to inform commuters of space availability communicated to websites, apps and/or signage. In addition, parking guidance should be installed to assist motorists once they are in the car park to find a space quickly and efficiently. This is not just to aid congestion but also increases the safety of the car park.

To reiterate, building a car park is only part of the solution. Informing the motorist in real-



time is the key to helping reduce congestion. This information was provided to Minister Tudge in person on 8 May 2019, and again on 12 June 2019.

Parking Australia is of the view that the majority of sites which were allocated funding would, if designed appropriately and with the correct technology, help reduce congestion> While sites (which have now been withdrawn e.g.: Balacava) that have ample public transport (tram or bus or both) to the station, and thus really didn't require a commuter car park, would not assist with congestion.

f. Any related programs or matters.

Parking Australia has been frustrated by the delivery of the Commuter Car Park Fund. The industry has expertise in both car park construction and parking technology to ensure that the car parks are built cost effectively and efficiently with the correct technology installed to achieve the program's stated objectives.

In addition to this, the industry is cognisant of the disruption caused by car park upgrades and/or construction. For many of the proposed projects, a traditional build will see existing car parks removed for a period of the time while the car park is being built. This will probably take many months, even a year. More innovative construction methods would see the time of disruption greatly decreased, construction time significantly reduced and commuters being able to access the car parks sooner. All this at no additional cost, in fact they would be cheaper. This can be demonstrated by reviewing the tender submissions for the Berwick train station commuter car park.

In addition, the resulting disruption will add increased pressure on nearby on-street parking during construction. This causes increased pressure on local governments from residents and businesses who require the existing car spaces that would be accessed by those who choose to drive and park near a train station. While this is not the responsibility of the Federal Government, it should be a consideration when approving funding for the projects.

Unfortunately, the car parking industry seems to have been largely ignored on how to successfully deliver these projects in a timely, cost effective, innovative and sustainable manner, with the inclusion of locally built and developed parking technology.

The Commuter Car Park Fund is an excellent opportunity to enhance disability parking at these sites while trialling technology to make it easier for those with a disability parking pass to access these spaces.

Parking Australia is also disappointed that much of the focus by the opposition has been on the politics of the Commuter Car Park Fund and not the delivery. Ultimately, politicians can talk as much as they want about who said what and when, but it has no positive result for the electorate and does not assist in the delivery of the commuter car parks for those who need them.



In conclusion, Parking Australia believes that commuter car parks are part of the solution to solving our congestion issues. However, since the announcement of these projects, the taxpayer and commuter have been let down by those administering, delivering and building the projects.

It is our hope that the ANAO report and this Senate Inquiry will lead to the appointment of people with the expertise to deliver these projects, in the best possible manner for the benefit of commuters in our capital cities.

I would welcome to opportunity to address the inquiry. I can be contacted by phone on
or by email

Yours faithfully

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