

SENATE STANDING COMMITTEE ON FINANCE AND PUBLIC ADMINISTRATION INQUIRY INTO THE ADMINISTRATION AND EXPENDITURE OF FUNDING UNDER THE URBAN CONGESTION FUND

SUPPLEMENTARY SUBMISSION BY THE STOP NORTH EAST LINK ALLIANCE

October 15, 2021

The purpose of this supplementary submission is to amplify certain matters which were discussed in the submission by No North East Link Alliance which was lodged with the Committee on September 10, 2021.

In doing so, we draw to the particular attention of the Committee issues related to policy and practice at state and local government level and also provide additional information related to proposed commuter car parks at four railway stations in the Division of Kooyong at Glenferrie, Camberwell, Canterbury and Surrey Hills railway stations.

When and what did Boroondara know?

Boroondara Council's submission (Submission 8) to this Senate inquiry says it was first consulted in October 2019 on the Federal proposal to fund four railway car parks in the municipality. However, it was reported in *The Age* newspaper on September 16, 2021 that the council moved to provide a corrective on what and when it knew about the proposals. The article said in part that a council spokesperson "provided an updated submission to *The Age* and the *Sydney Morning Herald* that says council officers...'provided feedback ... with respect to sites in Boroondara' to Mr Frydenberg's office in March 2019."

Then, at a meeting of Boroondara Council on September 27, 2021 the council was asked to clarify any council views or support for the proposal conveyed to Kooyong M.P. Josh Frydenberg prior to the election promise to fund the car parks announced by the Liberal Party on May 1, 2019.

The council only provided a partial response, saying that: "Council support to investigate park and ride services is outlined within its adopted Integrated Transport Strategy as an action as previously advised. Council is undertaking feasibility studies to deliver a combination of long-term and short-term parking in Hawthorn, Camberwell and Canterbury. This piece of work is not finalised as such and council is yet to form a view. Council's submission to the Senate inquiry notes council officers were consulted not that council had expressed support on this matter."

As noted above, however, the council submission to the Senate inquiry, to which this response refers, relates only to council communication with Mr Frydenberg subsequent to the announcement of the projects on May 1, 2019, not prior to then. We still do not know what comfort, if any, Boroondara Council provided to Frydenberg, that the proposal would be well received by the council, prior to it becoming public knowledge.

One significant matter of interest revealed in the answer quoted above is that the council is now being funded by the Commonwealth to conduct a form of "feasibility" study into the projects at three of the four locations in Kooyong, to address both short-term and long-term

parking in these locations. It also appears that council's focus is no longer on "congestion busting" park-and-ride facilities as announced by Mr Frydenberg on May 1, 2019, but rather a net increase in car parking capacity at these locations.

Involvement of the Victorian government and the City of Boroondara

The Victorian government is responsible for planning, funding and operating the public transport system in the state. This logically includes addressing access modes with the heavy rail network in Melbourne.

Additional railway car parking capacity has not been identified as a priority by the Victorian government under its Car Parks for Commuters Program at any of these four railway stations in Kooyong. They are not listed among 51 such projects currently identified on the program website.

Local government has no responsibility for the provision of public transport services, and in this regard its role is largely one of advocacy. Its responsibilities do include the operation and maintenance of the local road network, which if managed effectively can facilitate public transport services as well as active transport.

As the local planning authority, however, local government has a major interest in the effectiveness of the public transport in its area, because of its impact on land use. In this regard, poor public transport services typically result in greater road congestion, reduced local amenity and the deployment of more land for road space and parking facilities.

As far as the City of Boroondara is concerned, it advised the Committee in its written submission that as an element of its Integrated Transport Strategy, the council proposed to investigate additional park and ride facilities. And that in this respect the "Car Parks nominated as part of the CCPF were consistent with the strategic planning frameworks...."

However, this transport strategy is now very dated, having been written in 2006, and it is not known whether any initiative was taken over the years by the council to examine additional park and ride facilities in the municipality.

It is also a relevant consideration that the framework is written at such a high level of generality that it could equally entertain quite substantially different and mutually contradictory approaches to linking transport modes.

In any event, it appears that no such examination was taken by or for the Commonwealth Government before it announced the offer of the four commuter car parks in Kooyong during the 2019 Federal election campaign.

Any such examination would logically include an assessment of the modes railway patrons currently use to travel to each of these four stations.

In this regard, at the Boroondara Council meeting on August 23, 2021, the council was asked to advise of:

- the numbers of connecting trips on weekdays by different modes (including walking, cycling, bus, tram, train and by car (differentiated for drop-off and parking)) that are made

by rail patrons at the Surrey Hills, Mont Albert, Canterbury, Camberwell and Glenferrie railway stations; and

- any analysis the council proposes to undertake, or has access to, which assesses likely mode shift from car-based connecting trips to each these stations and the likely uplift in rail patronage at each of these stations that would accompany improvements in connecting public transport services and walking and cycling facilities in the absence of increased car parking capacity at these railway stations.

In response, the council responded that “....it does not hold or have access to mode share data for trips to train stations. (In the council’s view) An expensive, intrusive and lengthy face to face survey of every train passenger would be required to gather reliable data to the level of detail described in the question.”

Such data, although slightly dated, does exist. Such data was produced by Public Transport Victoria in 2014, and elements of it are quoted elsewhere in this submission. It is odd that the council has no interest in assessing data on alternative connecting modes and how effective they may be.

Place-making in Boroondara

Boroondara Council has undertaken place making exercises at Canterbury (Maling Road), Glenferrie, and now, more recently, Camberwell, the location of three of the four proposed commuter car parks. No such exercise appears to be in contemplation at Surrey Hills, the location of the fourth car park in the Division of Kooyong.

The idea of place-making, in its original meaning, being one of taking advantage of local assets and potential with a view to developing public spaces that enhance the local living environment, appears to have been lost in Boroondara.

For its part, Boroondara says that the objectives of placemaking in the municipality is to improve social interaction; create thriving local economies; contribute positively to the environment; and enhance the community’s quality of life.

However, the municipality has made no effort to assess the impact of increased motor traffic in these three activity centres or precincts. Nor has it considered the relative merits for placemaking of transferring trips to more sustainable and space-efficient modes of transport.

The council is yet to consult its own electors on the proposed car parks. When it does so it appears that it will not ask whether there is any merit in the proposals but, rather, how may the four car parks be built? It now seems unlikely that the council will ask a central question which is before the committee: whether it is participating in a program that is in essence corrupt.

Connecting with railway stations in the Division of Kooyong

Our first submission showed the means by which train patrons travel to Surrey Hills and Mont Albert stations on weekdays to connect with the heavy rail network, as shown in the survey conducted by Public Transport Victoria in 2014.

Table 1 below shows the connecting trips at all four railway stations in the Division of Kooyong which are proposed to receive funding via the Urban Congestion Fund.

It should be noted that data is also shown for Mont Albert station. Mont Albert station is to be closed in association with a grade separation project which will remove level crossings at Union Road and Mont Albert Road in Surrey Hills. A new and larger “premium” station is to be constructed at Surrey Hills. It can be expected that most train patrons who now use the train service at Mont Albert will go to Surrey Hills following the completion of the grade separation project.

Whilst somewhat dated, the data is likely to be quite representative of transport behaviour immediately prior to the onset of the COVID pandemic at the beginning of 2020.

	Bus	Car	Cycle	Train	Tram	Walked	Weekday entries
Camberwell	0	873	0	1368	522	3978	6,741
	0%	12.9%	0.0%	20.3%	7.7%	59.0%	
Canterbury	7	483	26	23	0	842	1,381
	0.5%	35%	1.9%	1.6%	0.0%	61.0%	
Glenferrie	0	496	128	1691	388	8188	10,891
	0.0%	4.6%	1.2%	15.5%	3.6%	75.2%	
Surrey Hills	59	1420	0	49	0	1431	2,959
	2.0%	48%	0.0%	1.7%	0.0%	48.3%	
Mont Albert	0	343	12	0	0.0	784	1,139
	0.0%	29.9%	1.0%	0.0%	0.0%	68.2%	
Totals	66	3,615	166	3131	910	15,223	23,111

Table 1: Connecting Trips to Railway Stations in Kooyong

Source: Public Transport Victoria, Passenger Activity by Metropolitan Station 2008-09 to 2013-14

It can be readily seen that the proportion of “walk-up” rail users is high at each of these stations. These numbers may increase with continued higher density development within each of these precincts. All of these stations except Glenferrie are served by connecting route bus services. But these services are mediocre, in all cases being characterized by poor service span and frequency. Camberwell and Glenferrie are each served by good frequency tram services on Burke Road, Riversdale Road and Glenferrie Road.

Unfortunately, running time is heavily compromised by heavy general road traffic on these routes. The introduction of more parking in these precincts would make the situation more difficult. The fact that the trams used on these routes are not DDA compliant is a further impediment. Low floor trams are much more accessible, for all users, and reduce loading times. Their roll-out across the network is proceeding and it can be expected that services on the affected routes will be provided with modern trams.

The number of connecting trips by bicycle, as can be readily seen from the table, is abjectly low. This could be enhanced significantly by the Victorian government and the Boroondara Council working in concert to improve access to each of these stations by bicycle. Measures would be centred on improving the safety and negotiability of the local road network and the provision of ample secure bicycle parking facilities.

The special case of Surrey Hills

Surrey Hills is not listed in the Victorian government's Car Parks for Victoria program. Announced in 2020 with a commitment to construct 11,000 extra railway car parks, principally on the metropolitan network, it also includes some non-metropolitan locations. See <https://carparks.vic.gov.au/projects/>

As late as June 2021, the Victorian Government's responsible agency, the Level Crossing Removal Authority, advised that the scope of the project is to rebuild existing car parks to provide around 290 spaces (the current number). However, the Level Crossing Removal Authority admitted to being in discussion with the Federal Government about their commitments to car parking at Surrey Hills railway station.

It can only be surmised that in the circumstances that the Victorian government is contemplating increasing the available car parking spaces at Surrey Hills, supported by Commonwealth funding, notwithstanding the fact that Surrey Hills is not identified in the Car Parks for Victoria program.

It may be that the Victorian government is going along with Commonwealth electoral ambition to increase parking capacity at Surrey Hills and at the other three locations because it is seen to be electorally popular. This is likely to be the case particularly at Surrey Hills, as it is located at the "apex" of three marginal Victorian state electorates – Burwood, Box Hill and Hawthorn. It is also close to the marginal Federal electoral division of Chisholm. This may also explain why the timelines for the level crossing project at Surrey Hills has also been brought forward by the Victorian government.

Car parks and travel times

A major issue, clearly not contemplated with these promised car parks, portrayed as "congestion busting," is the fact that it actually encourages greater car use on the local and arterial road network.

Successive Victorian governments have over decades sought to put a lid on travel times by increasing roads capacity. It has not worked. Travel times continue to increase. It is especially important to note that there is next to no scope to increase roads capacity within the City of Boroondara and the arterial road network is already overloaded. The only viable long-term approach is to transfer trips to more space-efficient and sustainable modes, including walking, cycling and higher quality bus and tram connections.

The election promise and the cost of car parks

The election promise in the Division of Kooyong, as announced on May 1, 2021, is to provide capacity for up to 2,000 car spaces at the four affected stations. To place this proposal into

context, the four car parks proposed would cater for only an additional 8.7% rail patrons on weekdays relative to those who are estimated to travel from these stations now (2,000 of 23,111). This figuring is based on the assumption that the only occupant of these cars would be the driver, which is very space-inefficient. On average in the morning peak period in Melbourne, though, private motor cars are on average occupied by 1.1 persons, including the driver. Another factor to bear in mind is that the provision of this car parking may provide an incentive for the displacement of connecting trips currently made by sustainable mode to in future be taken by motor car, which would further increase congestion in these precincts, and defeat the purported purpose of these car parks as “congestion busting.”

Car park costings

Whether 2,000 car parking spaces could be built in the Division of Kooyong with the funding promised is questionable. It has been reported that in many cases local members of parliament made their own estimates of the cost of projects in their electorate. This included Mr Frydenberg, who proposed the commuter car parks at Glenferrie, Surrey Hills, Canterbury and Camberwell. (Refer Shane Wright, *Car parks targeted list of marginal electorates, inquiry told*, Sydney Morning Herald, July 19, 2021)

One interesting line of inquiry for the committee may be to seek the range of informational assistance that the City of Boroondara provided to Mr Frydenberg in that regard.

Potential sites identified by Boroondara Council, as now shown on the council website, suggest multi-storey and underground solutions in the majority of cases. See <https://www.boroondara.vic.gov.au/about-council/projects-and-major-works/boroondara-commuter-car-park-projects>

Two potential sites in Canterbury are underground. At Glenferrie, one identified site is underground and the other two are above ground and multi-storey, and at Camberwell at least one of the two identified sites is above-ground and multi-storey.

The maximum spending commitment for these projects which was announced in May 2019 was \$65 million.

Based upon the assumption that each car parked requires 32 square metres of parking space, if all of the 2,000 spaces were to be undergrounded with minimal facilities, the aggregate construction cost may be in the order of \$95.4 million to \$102.8 million.

These calculations are based on very dated indicative costs (Rawlinsons Construction Cost Guide 2013). The Committee should secure estimates of current building costs for a more detailed analysis. In this regard, it has been reported that infrastructure projects are likely to face additional cost blow-outs in the next three years (See Shane Wright, *Labour shortage to hit major building projects*, The Age, October 13, 2021).

Concluding remarks

There is nothing to be said in favour of the four proposed railway car parks in the Division of Kooyong. They would be anything other than congestion busting.

The effectiveness of Commonwealth projects of this nature should be demonstrated publicly before public funds are committed. Instead, the Minister for Infrastructure is now reportedly pursuing a public interest immunity claim in the parliament to limit the public release of key information on the Commuter Car Park Fund. The responsible department was not able to provide meaningful advice to government on proposed projects (Shane Wright, *Internal documents show department was unsure if commuter car park projects had merit*, Sydney Morning Herald, October 15, 2021).

It is recommended that for any such project there should be full public disclosure of its merits, including a benefit cost analysis, and an exhaustive comparative examination of the relative strength of alternative approaches or projects which may achieve the same objectives.

That this should occur is particularly important where other levels of government are involved, as is the case of funding under the Urban Congestion Fund. Typically, state agencies have the major responsibility for operating land transport systems. Impacts on local government are also significant, especially where the ease of movement in local areas and the amenity of residential and commercial areas are impacted, as is the case with these projects.

It is reasonable to say that the approach of state and local government in addressing these projects has also often also questionable. The Victorian government in its own Car Parks for Victoria program does not meaningfully assess the relative merits of alternative approaches to private car trips to railway stations. Local government commonly reduces transport policy to one of “traffic and parking,” rather than mobility and appropriate land use. This approach should now be considered redundant, where population growth in metropolitan areas has been very high in recent decades, and in view of the looming shadow of the climate crisis.