BICYCLE·GROUP
342 Livingstone Road
Marrickville 2204
9294 5900 (voicemail)
massbug@massbug.org.au
www.massbug.org.au

# Submission to Parking Space Levy Review

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Submission by: Marrickville-South Sydney Bicycle Group (MASSBUG)
Contact address: 342 Livingstone Road
Marrickville 2204
Email: massbug@massbug.org.au

## Marrickville-South Sydney Bicycle Group (MASSBUG)

Marrickville-South Sydney Bicycle Group is a local bicycle user group established in 1991, affiliated with Bicycle New South Wales. We work with Marrickville and South Sydney Councils and state government bodies for the improvement of cycling infrastructure, urban amenity, community health and safety. We also provide information, advice and rides for members of the local community and local schools.

Our vision is for a safe, healthy, vibrant community whose planning and infrastructure provide for greater share of transport by walking and cycling, in order that the personal, community and environmental benefits of more sustainable transport can be realised. We also regard public transport services as essential.

We are pleased to present this submission to the Parking Space Levy Review and would welcome any opportunity to discuss further any of the issues in this submission.

## Introduction

**Marrickville-South Sydney Bicycle Group strongly supports the continuation and enhancement of the Parking Space Levy.** Reducing traffic congestion is essential for improving air quality[1] and for reducing the economic cost of congestion.

In summary:

- We support the Levy, but believe it should be strengthened & improved;
- It should improve access to public transport for *all* users, not just motorists;
- It should be more consistent with whole-of-govt policy, including increasing cycling (more lockers; parking rails; incentives for CBD building end-of-trip facilities; cycleways);
- Projects must not increase VKT as in the past;
- Success should be measured by a reduction in parking spots in levy areas.

[1] European studies show that mortality due to vehicle related air pollution is around twice the road toll from crashes. Künzli, N., Kaiser, R., Medina, S., Studnicka, M., Chanel, O., Filliger, P., Henry, M., Horak, F., Puybonnieux-Texier, V., Quenel, P., Schneider, J., Seethaler, R., Vergnaud, J-C., and Sommer, H. (2000). Public-health impact of outdoor and traffic-related air pollution: a European assessment, *The Lancet*, Vol 356, September 2000, pp 795-801.

| Country | Pop. (m) (1996) | Traffic accident deaths | Mortality due to traffic air pollution | Ratio |
|---|---|---|---|---|
| France | 58.3 | 8,919 | 17,629 | 1 : 2.0 |
| Austria | 8.1 | 963 | 2,411 | 1 : 2.5 |
| Switzerland | 7.1 | 597 | 1,762 | 1 : 3.0 |

## 1. Where should the Levy apply?

**1.1 We <u>support</u> the expansion of the Parking Space Levy to new areas of the City of Sydney and to other business districts only where the same principle – that the area suffers from traffic congestion and is well served by public transport – holds true. The Parking Space Levy should be applied to Sydney Airport.**

## 2. Should all parking spaces be liable? / exemptions

We support reducing the number of exemptions and concessions both to simplify the scheme and to better support the objective of the legislation.

Some of the existing exemptions are not contrary to the objectives and should remain, including disabled parking (since there may be no accessible public transport alternative); emergency vehicles (since this will not lead to more car trips); and bicycle and motorcycle parking (since this serves to reduce traffic congestion). However, councils need to be discouraged from providing free parking. Shops, clubs, restaurants, car businesses etc, all should be discouraging their patrons from driving. Ideally all organisations would be producing Transport Access Guides[2] for their customers and staff, promoting access by public transport, cycling and walking whenever possible. The cooperation of all these businesses is needed for success in reducing congestion in business districts.

**2.1 We <u>recommend</u> abolishing the additional category 2 exemptions and the general exemption for council owned or occupied spaces.**

**2.2 We <u>support</u> the abolition of concessions for casual parking.**

Further, we suspect that the current exemptions are regularly exploited, including by using loading bay spaces for permanent staff parking.

**2.3 We <u>support</u> an increase in random checks by OSR to improve compliance.**

## 3. The Levy rate threshold

At only $3.23 per space per day, the existing levy rate is well below that required to achieve a significant level of commuter behaviour change.

**3.1 We <u>urge</u> that the parking levy rate increases must always outstrip public transport fare increases.**

Since the aim is to reduce the number of people driving (i.e. parking), we <u>suggest</u> that the measure to indicate success is a reduction in the number of parking spaces within the Levy area. When existing spaces are converted to other uses then the Levy has truly succeeded at reducing car use. It should continue to be increased until it reaches this threshold.

## 4. Utilisation of Levy Funds

Interpretation of "improve access to public transport" - for all?

The Discussion Paper states the Public Transport Facilities Fund "provides for the construction and maintenance of infrastructure that *improves access* to public transport". While the interchange projects may include disability access, the primary focus seems to be on access for *motorists*. Given the need to increase walking and cycling and the obligations to meet the timeframe for the Standards for Accessible Public Transport, much higher priority should be given to improving pedestrian, bicycle and disability access.

**4.1 We <u>recommend</u> funds be used to accelerate the implementation of the Easy Access Program and that pedestrian and bicycle access improvement projects have parity with car park provision.**

[2] See www.rta.nsw.gov.au/transportaccessguides

Aim for mode shift from car to *all* sustainable modes.

The broader Object of the Act, to discourage car use in business districts and correspondingly to improve air quality, is subsequently sold short by the narrowness of "to encourage the use of public transport". Replacing car trips with cycling and walking trips will reduce traffic congestion and improve air quality. It is Carr Government policy to triple cycling (Action for Air, 1997) and to improve health by increasing physical activity.

Mode shift to bicycle is achievable and should be supported.

In many cases replacing car trips with cycling trips may be more achievable than with public transport trips. In Sydney 33% of current car trips are less than 3km (= the required 30 minutes a day, walking) and 55% of car trips are less than 5km[3] (just 15 minutes by bicycle). The NRMA Multimode Travel Time Survey (1997) reports that, "43% of journeys to work [in Sydney CBD] are drawn from areas within a 10 kilometre radius of the CBD. This data suggests that there may be significant potential for more trips to be made by bicycle" (p.4). They also found that for 10km journeys to the CBD, "Bicycle travel times were generally similar to car travel times (between 4 minutes longer and 7 minutes shorter)…" (p.9). The results of the TravelSmart Individualised Marketing intervention in Perth and South Perth[4] found that "Cycling has the greatest change potential and has achieved the greatest relative change, albeit from a low base". Modal shift to cycling should be supported.

We commend the Public Transport Facilities Fund investment in bicycle lockers at stations and ferry wharves (omitted from the Discussion Paper).

**4.2 We recommend expanding the bicycle locker program to provide at least 100 bicycle lockers per annum.**

**4.3 We recommend that, in addition, a program of installing bicycle rails in secure locations (i.e. under an operating surveillance camera or within view of the ticket office window) for all stations be carried out over the next two years.**

Parking is a determinant of mode choice - for bicycles too.

The Discussion Paper notes that, "the most common reason given for travelling to work by public transport was to avoid parking problems and/or costs". Availability of parking is undoubtedly a major determinant of mode choice, for cars and for bicycles. RTA research[5] documents that many people are deterred from cycling to work due to a lack of bicycle parking and end of trip facilities. While new buildings are required to include bicycle facilities in the City of Sydney (and some other council areas), there is no incentive for existing buildings to retrofit facilities. For lack of such an incentive, this traffic-reducing mode is currently suppressed and RTA bicycle infrastructure under-utilised.

**4.4 We strongly recommend that either or both of the following measures be adopted to encourage provision of bicycle parking and end-of-trip facilities in CBD buildings:**
**(i) a concession for buildings providing bicycle facilities (eg. to the equivalent of one car space levy for each six bicycle parking spaces where there is also access to shower/change facilities); and**
**(ii) a program under the Public Transport Facilities Fund to fund (or partially fund) construction of bicycle end-of-trip facilities within existing buildings.**

Both would require certification by the DIPNR Bicycle Strategist (or delegate) that the facilities meet a required standard.

Invest in cycling infrastructure.

For best results in achieving reduced car use and improving air quality, considering the large potential for replacing car trips with bicycle trips, it would be appropriate to invest in constructing bicycle routes. The NRMA Multimode Travel Time Survey recommended, "Investigate improvement of cyclist facilities travelling towards Sydney CBD. Given the similar

[3] *Integrated Transport Strategy for the Greater Metropolitan Region, Sydney*, NSW Department of Transport, 1995
[4] *TravelSmart/Individualised Marketing in Perth, Western Australia*, Bruce James & Werner Brög, 2003
[5] "Of the workplace facilities, lack of a shower and change room was considered to be the most important barrier to bicycle use – a complete obstacle for nearly a fifth of commuters. Secure bicycle parking was a problem for nearly 30% but only 10% described it as a complete obstacle." *(BikePlan2010 - The state of cycling – a review of current data and research*, RTA, 1998*)*

travel times of bicycles and cars, improvements in cyclist's safety and efficiency would be desirable to promote this alternative mode" (p.2).

**4.5 We <u>strongly recommend</u> that under a new program, the Public Transport Facilities Fund make funds available to councils on a 50/50 basis for the construction of bicycle routes to those business districts to which the Levy applies.**

*Using the Parking Levy to fund bicycle routes has a strong element of natural justice; since it is often the "need" for on street parking that takes precedence over bicycle traffic in the allocation of road space.*

Avoid car park projects that *increase* VKT.

While the Object of the Act is to reduce car use in business districts, there is need to evaluate the outcomes in terms of the Carr Government's broader aim of reducing growth in Vehicle Kilometres Travelled[6]. A Sutherland Council study[7] evaluating one of the Discussion Paper's listed projects, a 400 space multi-storey car park in Sutherland in 1995, found that the new car park resulted in an increase in Vehicle Kilometres Travelled (VKT). Rather than attract new customers to rail, it attracted people who previously drove to closer stations who now preferred the more convenient parking; drivers who previously parked on street; and those who had walked or caught the bus to the station. Free car parking encourages car use. There should always be a charge for commuter parking to reduce VKT and to provide equity with bicycle lockers.

**4.6 We <u>recommend</u> that projects focus on making public transport more accessible by walking, cycling and other public transport rather than by car. All projects must be VKT neutral or negative.**

Invest in the provision of car sharing infrastructure

Car sharing services facilitate access to a fleet of vehicles by multiple users. Car sharing has been employed as a successful strategy in many cities around the work to effect a modal shift away from private car use (note: car sharing is not car pooling, it operates more like a local membership-based hourly car rental scheme). In the Sydney CBD it would allow businesses and organisations to centralise their vehicle fleet needs and lead to a reduction in the total number of cars and therefore car parking bays needed. Car sharing trips are priced up-front, allowing users to correctly price the different modes available, allowing public transport to compete effectively with car use. Considerable potential also exists to allow the growing residential population in the Sydney CBD to access car sharing facilities out-of-hours when they are not being utilised for business or work purposes.

**4.7 We <u>recommend</u> that projects scope, develop and implement car sharing infrastructure to facilitate a shift away from private car usage and give businesses and residents an attractive alternative that complements walking, cycling and public transport.**

## <u>5. Charging the Levy</u>

We support keeping the levy simple, as a rate per parking space. We suspect some building managers abuse the system, making a profit by charging each car the levy but using a valet to stack more cars into the spaces, pocketing the difference.

We support the two-tier structure as justifiable given the difference in scale of the congestion problem and public transport coverage.

## <u>Conclusion</u>

**We strongly believe that the Parking Space Levy should be continued. However it needs to be strengthened and improved to serve *all* public transport users and to better reflect and support whole-of-government policy including reducing VKT growth and increasing cycling and walking.**

[6] *Action for Transport 2010*, NSW Department of Transport
[7] *Sutherland Railway Commuter Car Park Survey*, Environmental Science & Policy Unit, Sutherland Shire Council, 1996