

## To Whom It May Concern,

GoGet Carshare would like to thank Transport for New South Wales for the opportunity to provide a submission relating to the review of the government Parking Space Levy (PSL). As Australia's leading carshare operator we feel we are uniquely positioned to provide commentary on the levy from a context of innovative transport offerings and their impact on mobility services in NSW.

While we will make the case for the exemption of carshare from the PSL, we would like to preface this by voicing our broad support for the levy as well as any future road use charge to help ease congestion in our cities. We believe that the levy has been a wide-scale success in working to dis-incentivise private car use in our core urban areas, and has helped provide significant investment for much needed public transport infrastructure. We support the continuation of the levy as a key lever available to the government to reduce private car dependency through both supply and demand mechanisms.

That said, we strongly believe that an exemption of carshare is in order because it is closely aligned with the essential spirit and purpose of the PSL. The following letter will go into extensive supporting detail for our position, but the key points are:

1. Carshare, which provides an alternative to the private car for over 60,000 businesses and residents of Greater Sydney, has been proven to ease congestion and its expansion has been endorsed by Council and government across NSW. The PSL acts as a disincentive to this expansion;
2. A single carshare vehicle replaces 10-14 private cars, as such, a parking levy on such a vehicle runs counter to the purpose of the levy which is to discourage private car use;
3. Carshare has been proven to encourage public/active transport use, a benefit which increases with the availability of carshare vehicles. Without a levy exemption, carshare growth will be impeded, especially in critical, public transport-dense areas;
4. It has been proven that carshare encourages individuals not to commute into the city in a private car and to use public transport instead by providing cars when needed. When these vehicles are not conveniently accessible, these users will tend to revert to commuting in their own private vehicles.
5. Applying the PSL to Carshare vehicles encourages private car ownership amongst the residents living within the leviable districts, by subjecting those using carshare to increased costs compared to ownership.
6. NSW is currently the only state which does not exempt carshare from a parking levy. Offering this exemption would seem to be a natural fit with how NSW is leading the way with its Future Transport Roadmap. For example, as a part of this NSW has already recognised the future benefits of integrating carshare into its public transport Opal payment network.



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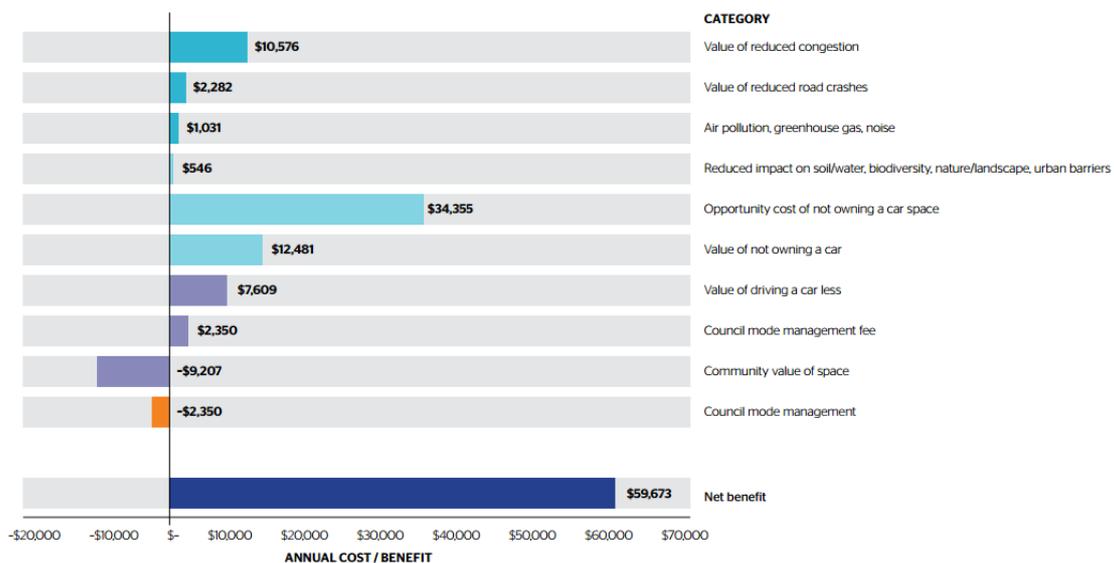
## Background

GoGet Carshare is an Australian company that began in Sydney in 2003. Starting with 12 members sharing 3 vehicles, GoGet has consistently invested in carsharing, developing our own Australian designed and purpose built software and technology. From these humble beginnings, and thanks to a commitment to provide an alternative to the private car, we have grown to over 90 000 members' nationally sharing over 2000 vehicles, including plug-in hybrids and one of the world's first wheelchair accessible shared vans.

From the very beginning, and carrying on to today, we have operated under a philosophy of seeking to improve the livability of our cities through Shared Mobility. Carshare only works because of NSW's strong public transport network, which make it possible for our members to make most of their daily trips across the city without the use of a car. In essence, carsharing acts as 'the missing link' within our transport system, allowing residents and business to increasingly live car-free. Through the development of our network of shared vehicles we have allowed tens of thousands of Australians to live without owning a car, or to avoid the purchase of a second vehicle. This has recently been quantified in a report by Phillip Boyle and Associates<sup>1</sup> as resulting in removing 10-14 vehicles from the road per carshare vehicle. This same report sets out that the impact of the service on the City of Sydney alone (with a network of 700+ vehicles) has removed roughly 10,000 vehicles from the road (equivalent to a line of parked cars on both sides of George Street running from the Central Station to Circular Quay), as well as removing up to 37 million VKT from the LGA per year. Further this reinforces sustainable transport behaviour by encouraging the use of public/active transport by unbundling and demonstrating the true costs of car travel through hourly usage fees.

These results provide a first class example of a public private partnership. It costs Government very little to establish, but results in a Cost-Benefit ratio of \$6.16 in public benefit for every \$1 invested by the government.

### SUMMARY OF BENEFITS AND COSTS



Note: Council administration and infrastructure has been estimated by the City of Sydney to cost \$2,350/space and is fully recouped from each service provider.

Source: PBA modelling



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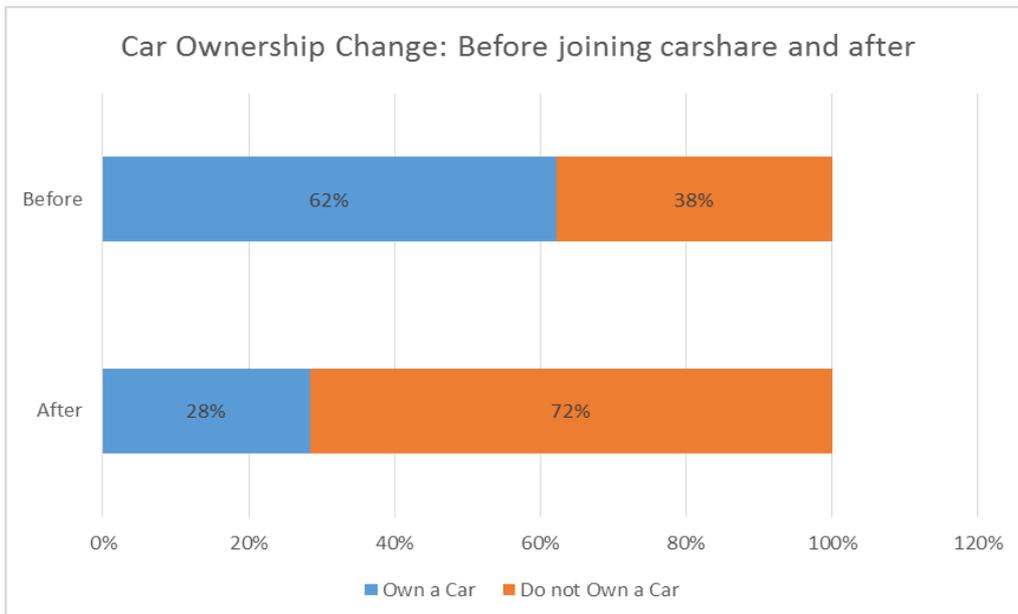
Our most recent annual member survey (conducted in November) reinforces these findings. Showing that nationally 62% of all members report that they no longer own a vehicle at all, with 50% of members reporting that they have actively avoided the purchase of a first or second vehicle altogether because of their access to carshare.

This impact has largely been the result of our supportive relationships with the community, local Councils, property developers and private landowners.

As a result of these partnerships, in large parts of our inner cities carshare has already shifted away from being merely an alternative/niche service, into a fully-fledged piece of our Transport Infrastructure. This metamorphosis has been the result of the development of our on-street and off-street network of carshare locations (known as ‘pods’) which ensures that residents and businesses are able to utilise the service confident that the service provides the reliability and convenience needed to act as a private car replacement.

Because many of our cars in commercial carparks (where a PSL related surcharge exists) are also used by local residents who have opted to live without owning a car, these individuals are in essence being penalised by the PSL despite having chosen to ‘do the right thing’ by reducing their car usage. Meanwhile their neighbours who own private cars and park within non-levy applicable residential carparks are not impacted whatsoever. This has the unintended effect of actually encouraging private car usage within the very area which the PSL is meant to discourage such transport behaviour.

We also believe it is important to frame the NSW Parking Space Levy framework in relation to similar policies in other jurisdictions. New South Wales is in fact the only state which imposes a parking space levy on carshare vehicles. For instance, the Victorian policy relating to CBD parking spaces treats carshare spaces as an exempt parking use, in recognition of the services capability to supplement the governments own strategy for reducing car dependency. In addition to this TfNSW has also adopted a position working towards integrating carshare into the Opal Payment system, as part of the future transport plan.

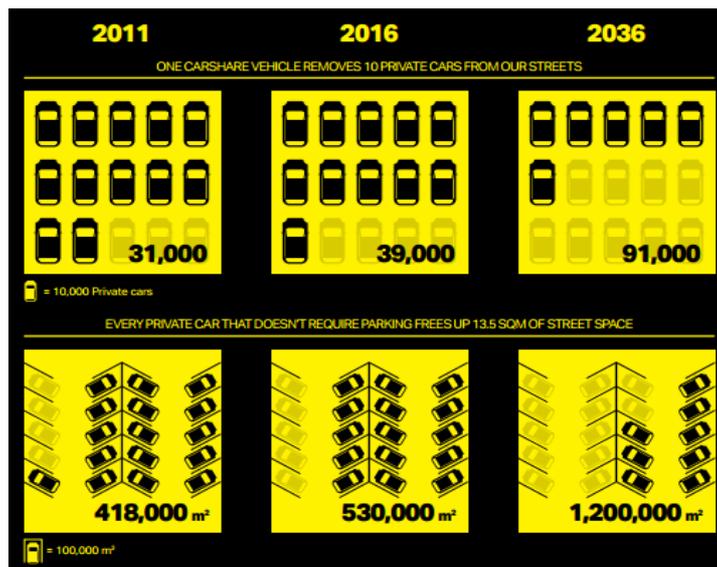


Likewise, a recent report by AECOM<sup>2</sup> has reaffirmed the results found by Phillip Boyle and further projected the potential impact which shared mobility may have on our cities well into the future. Their forecast sees the potential to remove a noticeable amount of traffic from our congested roadways. To achieve this potential, however, AECOM has identified 4 key points which government must address.

1. **Help the Public Understand the Benefits of Shared Mobility**
2. **Create Local Government and Developer Shared Mobility Strategies**
3. **Connect Shared Mobility with Public Transport**
4. **Prepare for Multi-Hire Autonomous Vehicles**

We believe that by providing an exemption for carshare within the PSL will go a long way towards achieving each of the above points by:

1. Demonstrating to the public the value of carsharing as a congestion fighting measure
2. Incentivise developers and car park operators to include carshare
3. Demonstrate carshare's support of Public Transport by linking growth in the shared mobility sector with a strategy for supporting Public Transport.
4. Assist the growth of carshare by reducing costs to operators, and thus assisting with the necessary societal shift towards the shared mobility model which will support the successful adoption of autonomous vehicles.



Source: AECOM

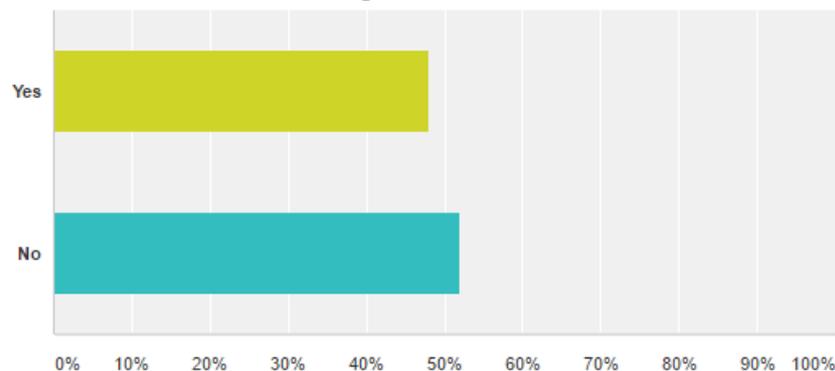
<sup>2</sup> AECOM, *Transport on Demand: Accelerating Australian Cities* [http://www.aecom.com/content/wp-content/uploads/2016/10/AECOM\\_Transport-on-demand-accelerating-Australian-cities.pdf](http://www.aecom.com/content/wp-content/uploads/2016/10/AECOM_Transport-on-demand-accelerating-Australian-cities.pdf)

## Business Use

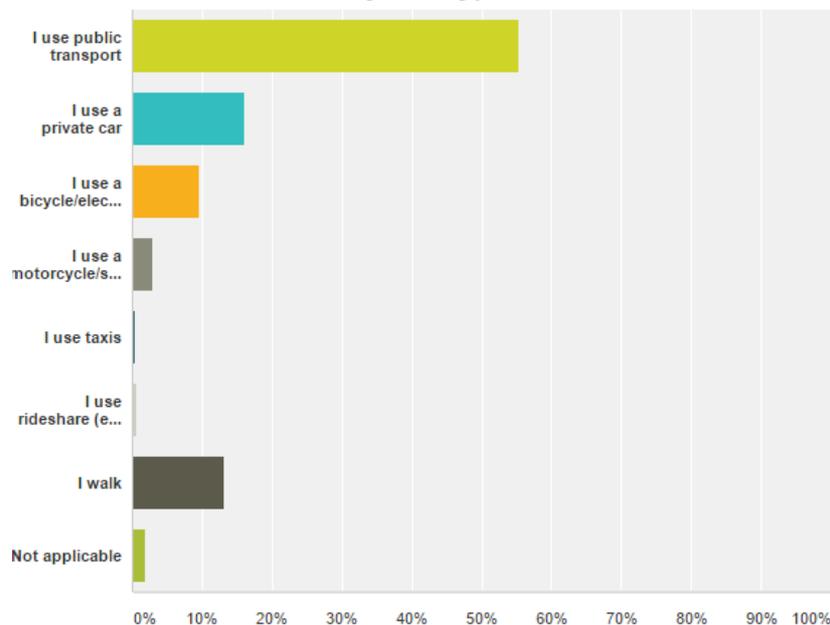
Alongside the impact carsharing is having in residential areas the service is rapidly growing in significance within our Central Business Districts, with a growing proportion of businesses, ranging from major financial institutions, to boutique firms and even small ‘mom and pop’ shops utilizing carshare vehicles to provide access to mobility without the need to own, operate, and store a private car for their exclusive use.

In fact, our current member survey of business members has shown that 48% of all business members report that having an easily available vehicle has allowed them to reduce or stop driving to work each day entirely. We expect this percentage will only go up if the current PSL related CBD fees were removed and we were better able to provide an increased level of supply. Further, this is reflected in that 55% of corporate members report that they commute to work via Public Transport, with a further 22% commuting by walking or cycling.

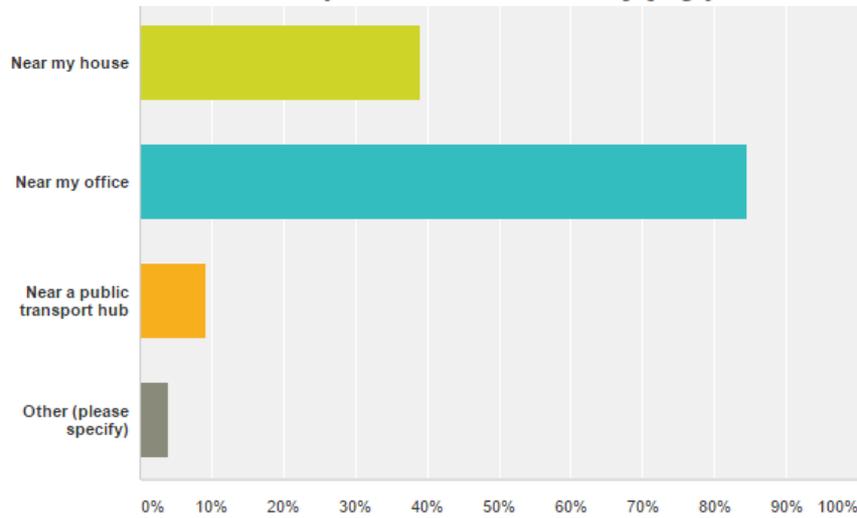
**GoGet gives you access to vehicles you can use for work during the day. Does the availability of a vehicle close to work mean that you drive to work less, or have stopped driving to work at all?**



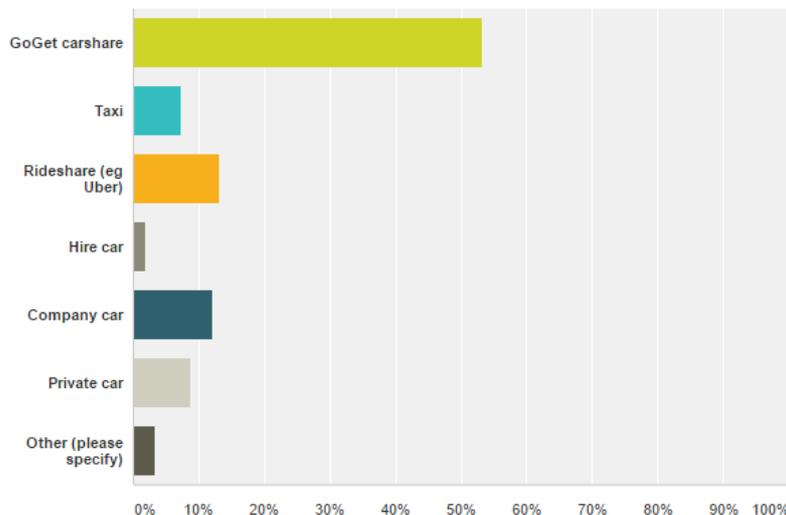
**How do you usually get to work? (Where multiple modes are used, please select the option used for the longest part of your journey)**



### Where are the GoGet vehicles you use located? (select all that apply)



### What would be your first preference for business travel assuming circumstances allowed you to make a choice?



Government have also begun adopting carshare to lower operating costs and increase efficiencies. The NSW state government is leading the way in Australia through its adoption of carshare, with the Department of Industry, and Department of Planning and Environment both getting rid of all CBD pool cars to utilise the carshare network instead. We look forward to continued partnerships and innovative projects with NSW state government to further increase the efficiencies of our City.



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## Proposal

When viewed through the lens of the overall goals of the PSL Act, we believe that together the above demonstrates that carsharing offers significant benefits to TfNSW and to the State in general, and could be used as an important tool to help achieve the outcomes sought through the implementation of the PSL.

As such, we believe that all carshare spaces ought to be exempt from the levy as a direct strategy of the PSL. This can allow TfNSW to continue to target the supply of parking available for private vehicles in the CBD, while reducing the overall demand for the need for private car parking by providing residents, businesses, and visitors with a non-private car alternative that maintains their ability to remain suitably mobile when needed in a manner that utilises our limited urban space and resources more efficiently.

Further, while we believe that at minimum carshare must be exempt from the levy. Transport for New South Wales may also wish to investigate the opportunity to use the PSL as an effective lever to encourage commercial carpark operators and property owners/developers to increase their provision of alternative transportation offerings such as carsharing. A number of approaches could be taken here such as the provisions of carshare bays resulting in a ratio of additional exempt bays e.g.: for every 5 carshare bays 1 regular space is made exempt. Or alternatively through a general percentage, such as if 3% of an operators parking spots are allocated to carshare then their leviable payment could be reduced by 3%. This would be an effective lever the Government could use to significantly grow carsharing and maximise the public returns brought upon by the service with what we believe would be minimal reduction in overall Government revenue.

We would be happy to work with TfNSW and the Office of State Revenue to fine tune such an approach if it is deemed appropriate.

### Summary

**1. The Government's preliminary view is that the objectives of the Act remain valid, and that the terms of the Act remain appropriate for securing those objectives. Do you agree? Why or why not?**

Yes, we support a parking levy and think that it remains a valid tool for helping to manage congestion in our cities. However, we believe the terms of the act need to be modified to support an exemption for carshare, due to carshare's role alleviating congestion.

**2. Do you support simplifying calculations of PSL liabilities?**

Yes, we support the simplification of reporting to remove administrative burden of the levy. So long as this does not impact on the Government's ability to introduce new and innovative approaches to assessing leviable spaces, or opportunities to support future schemes which support the overall goals of the PSL.

**3. Do you support simplifying reporting requirements for property owners? What changes would property owners most value?**



Yes, we support simplification for property owners, but are not able to comment on what changes they would most value.

#### 4. How should transparency in PSL expenditure be improved?

GoGet fully supports the open data policy which the NSW state government is embracing and feels transparency in revenue and expenditure of the PSL will be vital to ensure value for money and further future support for the policy. GoGet supports the majority of revenue being spent within the Levy region of transport projects that have a high business case ratio (BCR)

Projects like light rail and Sydney Metro are keys projects that make it easier to access the heart of our city, however further investment in off street loading and pickup zones could further increase efficiencies in the CBD and prevent clogging our streets with deliveries and point to point transport (rideshare and taxis).

Carshare has a very high BCR (6.61:1<sup>1</sup>) and would benefit from the removal of the levy and further investment and support from the PSL, such as parking provision and marketing/wayfinding for the service at transport interchanges and carparks.

#### Conclusion

In conclusion, we again would like to voice our support for the continuation of the parking levy as an effective tool to encourage sustainable transport options in Sydney. However, we strongly urge Transport for New South Wales to exempt carshare bays from the Parking Space Levy as a means to further achieve the goals of the act, while increasing amenity and equity for residents, businesses and visitors to our CBDs.

We believe that carshare can provide an effective tool for TfNSW should be investigated as a means to further support alternatives to the private car. If you have any questions relating to the above submission or if we can provide any further information or data please feel free to contact us at your convenience.

Kind Regards,



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