ROAD SAFETY COMMITTEE

INQUIRY INTO PEDESTRIAN SAFETY IN CAR PARKS

Melbourne — 14 September 2009

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Ms A. Malloch, team leader, city issues,
Ms C. Lazenby, manager, community safety and wellbeing, and
Mr S. Wickramasinghe, manager, planning and building, Melbourne City Council.
The CHAIR — Thank you for being here today to assist the Road Safety Committee’s inquiry into pedestrian safety. Today’s proceedings will be recorded by Hansard. You will get a copy of the transcript and you can change it as appropriate. Anything you say is protected by parliamentary privilege, but that privilege is not afforded if you repeat those comments outside. If you could just start off by introducing yourself and then proceed with your presentation.

Ms LAZENBY — My name is Colleen Lazenby. I am the manager of community safety and wellbeing, and in my branch are all the safety programs for Melbourne City Council, which are grouped under five special plans. The first is called embedding a culture of safety, which is a very broad agenda to make sure that not only the City of Melbourne but all of our partners are engaged in city safety. Crime prevention and community safety is the second one; injury prevention is the third; drugs and alcohol harm minimisation is the fourth; and the fifth is syringe management and syringe education.

Broadly those are our city’s safety portfolios. We currently operate under what is called the Strategy for a Safer City 2007–10. Our strategies usually have a finite period so that we can review and update as needs change, as new evidence comes in or whatever, but we do not have a never-ending strategy for a safer city. We like to have evidence-based planning, including research, perceptions of safety, crime statistics, all of those things. We also do significant community engagement to develop our strategies and we have significant investment in partnerships. The ones that will be important for you will be our partnership with Victoria Police and our partnership with the car park operators. Also in my branch, briefly, will be the indigenous programs, the homelessness and housing programs for people without homes, and disability access and inclusion for people with disabilities.

Mr WICKRAMASINGHE — Good morning. My name is Shiran Wickramasinghe. I am the manager of planning and building at the City of Melbourne. In terms of planning, my area specifically focused on statutory planning, so in essence most uses and development that you see built within the city or in the city’s environs comes under my area of responsibility. The Minister for Planning, is the responsible authority for any development which is greater than 25 000 square metres, so the equivalent of, the Eureka Tower is a ministerial approval as opposed to a City of Melbourne approval. However those developments are referred to my particular branch in the City of Melbourne for consideration and comment.

In terms of the building aspects, the building system is privatised; however, we have a team within council which issues building approvals. There is nothing to stop any developer applying to the City of Melbourne for development approvals within the capital city or indeed outside of the capital city. Built form is really the area that I work in.

Ms MALLOCH — Good morning. My name is Anne Malloch. I am a member of Colleen’s branch. I am the team leader of city issues. Colleen ran through five specific action plans that fit within her branch under the Strategy for a Safer City, and as team leader of city issues it is my responsibility to manage the staff who are involved in delivering those action plans and also in terms of reviewing the strategies, and we also have currently developed a policy for a 24-hour city.

Mr WICKRAMASINGHE — Perhaps while we are waiting for the computer to start, we might continue. I have gone low tech, which I reckon works.

My understanding is that the committee is interested in how car parking is assessed and approved. If I am incorrect in that assumption, I am happy to take questions, but I will work on that basis. In essence, as a planner, my area uses what is known as the Melbourne Planning Scheme as a guide to making decisions on applications. Typically car parks are associated with particular uses and developments as opposed to car parks being approved or applied for as a single use.

The capital city is slightly different where you will get commercial car parks that are constructed and operated in that way, but typically they are associated to a use such as office, residential, retail, places of worship. I have appended a particular clause of the planning scheme to this very brief dot point submission, that is known as clause 52.06 of the Melbourne planning scheme, it is actually a car parking table. I can take you to that fairly quickly. If you go to page 4 of 6 — the page numbers are at the bottom right-hand edge — what you will find is a clause which is headed ‘clause 52.06 car parking tables’. What you will see is that it specifies particular uses and then nominates the number of car spaces that are required for each of those uses.

The one that is probably more routinely applied in the City of Melbourne is relates to office development.
If you want to construct an office, then you need to provide 3.5 car parking spaces per 100 square metres of floor area. Another typical use which might interest you is for a commercial use such as retail. The obligation is for eight car spaces per 100 square metres of retail floor area. If you go out to the suburbs, and you see the large mall-type centres, typically 8 car spaces per 100 m² of floor area is provided unless a reduced car parking rate is negotiated.

The CHAIR — Just on that point, when you say there is an obligation, is there a specification for how wide the car parks have to be?

Mr WICKRAMASINGHE — Yes.

The CHAIR — And how long they have to be?

Mr WICKRAMASINGHE — Yes, there is. Again that is nominated in this particular clause and there is a table on page 3 of 6. Typically as you would experience it, car parking is at 90 degrees, so imagine a normal shopping centre. For 90-degree car parking; a standard car space is 2.6 metres wide by 4.9 metres long, with a 6.4-metre backing area. Typically that is the requirement. Another example is parallel car space. It can be narrower: the width of the car space is 2.3 metres wide with a 6.7-metre length and an access way of 3.6 metres so you can side up to the car space and back in, which is what typically happens.

There is also an Australian standard which is applicable. The Australian standard allows a council to reduce the length and width of car spaces. That is typically done in association with our traffic engineers and after consideration of the location and the number of vehicle movements that might transpire in the area.

Mr KOCH — Is the rate of 3.5 per 100 square metres an arbitrary number? Why not 3, why not 4? Why 3.5?

Mr WICKRAMASINGHE — They have been in place for a very long time as a starting point. The car parking provisions are state provisions — they are nominated by the State. Typically they have been based on surveys done over time of the number of car spaces that would be required for a particular use. In fact if you went to traffic engineers today, and applicants do this where they apply for large buildings, they will actually go out and do surveys of modern office buildings and come up with rates of less than 3.5 as being the norm and seek a reduction in the provision of car parking. It is an empirical assessment based on surveys that have been done over time.

Mr KOCH — Right.

Mr WICKRAMASINGHE — Just for your information, these rates are currently being reviewed by the Minister for Planning, and we are eagerly awaiting the results. That review may well effect a change to this particular clause.

I have identified clause 52.06 for you and the fact that there are provisions specifically for car parking requirements.

I guess a critical thing which will be a point of interest for the committee would be that the stated purposes — on the front page I have highlighted the matters that may be of interest to you,— including:

To ensure the provision of an appropriate number of car parking spaces having regard to the activities on the land and the nature of the locality.

That is what I have just spoken to you about. Further, the clause requires the designing and providing of the following in car parking areas:

- Creates a safe environment for users, particularly at night.
- Enables easy and efficient use.

The clause is really looking at things such as layout. It is also looking to see if there are layout features which will create an unsafe environment. It is about the nooks and hiding places that can occur. There is a planning principle which is called CPTED — crime prevention through environmental design. Planners, when they are assessing these layouts, look to make sure that any areas which could be used as hiding places or are unsafe are eliminated as part of the design. Frankly, most of the time architects and draughtsmen do a pretty good job in coming up with good designs as well.

I will move on. There are also design and construction guidelines. I have already spoken to you a little bit
about the width of the car spaces and dimensions generally, as you asked a question about this. The other things that are really important that we need to look at in terms of design and construction are the provision of pedestrian movement within and around car parking areas; the measures proposed to enhance the security of people using the car parking areas; and the ease and safety with which vehicles gain access to the site and circulate within the parking areas.

If I can work through each of those dot points in turn. A critical observation with respect to most of the approvals that we look at is that pedestrian movement is really not something which seems to come to the fore. That is not to say it is done poorly, but in typical car parking areas cars and pedestrians share space. There are no dedicated aisles or paths through the car parks for pedestrians. It is my view that car parking design needs to evolve a little bit and start to incorporate pedestrian paths. These days we see car parks where even the aesthetic of the car parks through landscaping is being diminished; often there is no incorporation of landscaping areas to provide shade and to some extent shelter. From my perspective, that is something that could be looked at.

In terms of security, again I think what we do is ensure that there is an efficient layout. However, matters such as lighting are not something we regulate from a planning or building perspective. There is perhaps a gap in the way that works. The other consideration is that security is enhanced by visual surveillance. There are no attendants in many multi-storey car parks and there is no obvious surveillance other than the ubiquitous camera, which people may or may not pay a lot of attention to. You do not know whether they are live in any event.

A critical element is the ease and safety with which vehicles circulate through the car park, and we look at that very closely. To give the committee an understanding of that, I have attached a plan to the back of the submission. I have picked a very simple plan because it is probably indicative of what is coming as opposed to what you might typically experience. This is a floor plan for a fairly small residential building. What you can see, which I have highlighted, is the typical car space dimensions that I have spoken about. You can see the 5-metre length, the 2.7-metre width. It is quite generous in comparison with the 2.6 and 4.9 that the planning scheme calls for. Then there is the 6.4 backing area, which is standard.

There are car lifts in this building, which is very different from the standard circulating ramps that you find in multi-level car parks. As land costs and development are at a premium, this sort of thing is starting to happen and is a real trend. The other thing that is starting to happen is instead of having single car spaces, we are seeing more and more applications where there are car stackers. Typically you drive in, there is a hydraulic lift, up it goes and another car parks underneath. In the UK you see whole buildings which are just car stackers. People come in and park the car and a lift takes it up and parks it in a multilevel building. This adds to the whole notion of safety and access as well.

**The CHAIR** — Does the driver get out and give the key to the car park attendant and they take the car?

Mr WICKRAMASINGHE — That is what happens in the UK. Typically here where there is a stacker the driver drives in, parks the car in the stacker, presses a button and the hydraulic lift will either take the car up or down and then the space is vacant for somebody else to park. The ones I have seen in Australia are for three cars, so you have a sump, if you like — the spaces go up and down. We are starting to see stackers proposed in domestic dwellings in capital cities as well, where space is at a premium.

They are some of the trends that we are seeing. If you turn over the page, there is a cross-section which gives you an idea of typically what we are seeing. You will see a basement car park and then upper level car parks at podium height.

The other thing worth mentioning is that from a planning and urban design perspective we encourage car parks to be located at basement level. There is a reason for that, which is we do not want to see them at ground level because car parks as open car parks are not very attractive, add nothing to the urban environment and reduce the opportunity for active retail frontages. We want to see activity rather than cars parked at street level. Equally, if you go above ground, and that is what tends to happen in the Docklands area because of foundation and excavation issues, you end up with a blight because all you see is a wall with a car park behind it, as opposed to activity in terms of apartments or offices with people actually working in them.

I appreciate the fact that burying car parks creates problems in terms of safety and surveillance and accessibility. There is actually a tension between providing car parks which are safe and accessible and viewable, as opposed to, from an urban design perspective, something which is tucked away, car parks are a “static” environment, where people go in, park their cars and leave. Nothing much happens there. That is really, how it works in a capital city from a planning perspective. Perhaps we can take questions.
The CHAIR — From a planning perspective, for example, with the speed limits in these car parks — and I am not sure about the council-owned car parks — is there a recommended speed limit there?

Mr WICKRAMASINGHE — Walking pace.

The CHAIR — Walking pace. And how do you enforce — — 

Mr WICKRAMASINGHE — Again, 100 per cent of the car parks are really private car parks, whether they be private commercial car parks or privately owned car parks through a body corporate. There is actually no enforcement of speed restrictions within car parks; it is a reliance on putting shared zones, line work or speed humps within those car parks to reduce vehicle’s speed. Typically, though, because they are a confined environment, people do observe a low speed limit in a basement or within buildings. It is a different situation, I suspect, within the open-air car parks, particularly in the large shopping centres, where it is probably a bit more problematic.

Ms LAZENBY — And it is Victoria Police that would have the enforcement role, but as you might imagine, they cannot have an observer, an officer, on each floor of every car park.

Mr WICKRAMASINGHE — And I do not think they actually enforce in private car parks.

The CHAIR — In terms of enforcing, do you think councils should have that responsibility?

Mr WICKRAMASINGHE — No.

The CHAIR — No?

Mr WICKRAMASINGHE — No, we do not have the resources, skill or training to be able to do that.

Ms LAZENBY — And I think the obligation is on the owner-operator of the car park to do that, and that is what the program that I will talk about tries to engender.

Mr WELLER — Does the Melbourne planning scheme apply to other councils as well, or just strictly the Melbourne council?

Mr WICKRAMASINGHE — No, each municipal authority has its own planning scheme.

Mr WELLER — There would be similar dimensions and those types of things?

Mr WICKRAMASINGHE — As I said, the clause 52.06 is a State provision, so it is generally typical for every council. There is the ability to vary some of those requirements. The example is that in a capital city we have what is called a maximum car parking rate, whereas 3.5 per 100 for an office is a minimum car parking rate elsewhere. There is a specific goal of minimising cars coming into the capital city, which is very different from other municipalities. But, generally speaking, 52.06 is identical in every municipality that you go to.

The CHAIR — Colleen, would you like to talk us through the accreditation scheme?

Ms LAZENBY — Yes. I have no regulatory powers in my branch, but my branch focuses on how we can manage, develop, raise awareness about and somehow influence community safety. The car park accreditation scheme falls under the crime prevention and community safety subplan in my branch. We have two committees and an officer involved in this program. We have the safe transport steering committee, and one of the portfolios for that committee is car park safety. The Car Park Operators Forum — and I will get to that in a moment — is part of this, and I have an officer. It is part of her portfolio to manage the car park accreditation scheme.

This program is about trying to influence safety in commercial car parks — privately owned but commercial car parks. This scheme is 10 years old now, it began in 1999, but we reviewed it in 2007 because it was time to look at it again and because we do a periodic review of all of our programs. We revised this scheme as you see it now and launched it in 2009 with the aim of having all car park operators commence their accreditation under this 5-star scheme in November, so shortly. The reasons that car park operators are interested in being involved in our car park accreditation scheme
are really — look, it is about the bottom line for them. There are insurance costs associated with operating a car park, there are crime issues — theft of motor car, theft from motor car — and, as you may know, in the city of Melbourne there is quite a high incidence of crime, but it is no surprise since we have so many cars that come into the city. Proportionately it is higher than any place else, but that is a factor of the number of people who come in and bring their vehicles in every day. Other reasons are patron satisfaction and a commitment on the part of patrons to return to an accredited 5-star car park; and a better relationship with the Melbourne City Council, and, since this is one of the focuses of my branch, a better relationship with us and a better relationship with Victoria Police because they are partners in this program. This program also gives operators an industry forum; the Car Park Operators Forum is an industry forum for those people who operate about 150 car parks within the city of Melbourne. This is only about the city of Melbourne, not the inner-city area. This is only for our LGA.

The operators with whom we meet regularly were also, I think, of a mind to participate in this review because it is good business for them. This is currently a 5-star accreditation system, and previously it was a 4-star accreditation system — the old one was a 4-star one. There are key elements, and the first mandatory one is an emergency management system within a car park; the staff and customer service changes that will increase staff satisfaction, staff training, as well as customer satisfaction and loyalty; and other value-added services, and if those three are in place, then the physical environment and amenity of the car park will be improved. It is a logical sequence of accreditation.

The philosophy is that an accreditation service is an indicator of the level of commitment demonstrated by a particular car park operator in attempting to ensure safety and encourage appropriate social behaviour by operators and patrons alike. We will get you this. We will have it for you so that you can save it for your own purposes.

What is new about the revised scheme? The strong staff and customer care focus. It is mandatory to participate in the scheme for all car park operators who sign onto the scheme, and they must have emergency procedures and plans in place, staff trained to understand their role in relation to car park maintenance and the management of incidents within the car park and crime prevention through environmental design — CPTED — with the aim of planning the environment to discourage unlawful behaviour. We are not talking about altercations between individuals where one takes the other’s car space and they get out and have a bit of a scream at each other; we are talking specifically about crime and unlawful behaviour.

The objectives are to prevent unwanted behaviours, support desired behaviours, make users feel safe and place potential offenders at a disadvantage. We use CPTED principles. The car park operators are encouraged to anticipate, recognise and appraise crime and risk and then initiate actions to remove and reduce the risk.

Mr KOCH — Only encouraged?

Ms LAZENBY — Encouraged; we cannot compel that. When they sign on to this scheme they are doing so for their own motives.

Mr KOCH — Have they got to sign on for the accreditation program to operate?

Ms LAZENBY — No, they do not. This is voluntary on the part of operators. It is not required by law. That is what I mean when I say I have no regulatory power. Nor can police compel them to sign on to this, although police are partners in this.

Mr KOCH — Are parking operators rushing to sign on for this accreditation scheme or are they running around the edge of it?

Ms LAZENBY — They are. Most car parks — Wilson Parking, Secure, Austech, Premier, Federation Square car parks, City of Melbourne car park, the Arts Centre, the museum and Crown — have all signed on, and that covers, almost without exception, every commercial car park in the city.

Ms MALLOCH — For example, with Wilson Parking, as Colleen said, there is a working committee that is the car park operators committee. Wilson Parking is represented on that. That commitment from the executive of Wilson Parking brings in 150 car parks. Certainly they would have to work through the compliance under the accreditation system, but it brings on an interest for the 150 car parks they have in the CBD.

Ms LAZENBY — Once an organisation like Wilson commits, that covers all of their car parks.
Mr WELDER — When there is a new building and the building of a car park within it there would be regulations around the design of the car park that they would have to get the permit for, and the council has the power to say, ‘Okay, if you are going to have it, this is the design it has got to be’, and it would have that out.

Mr WICKRAMASINGHE — Yes. Typically the designers have a fair idea what the requirements are.

Ms MALLOCH — In fact when the car park at the city square underneath the Westin hotel was built, that was at the outset of the original car park accreditation scheme in 1999. That car park was built in accordance with the then accreditation and design guidelines.

Mr WELDER — So any new car parks being built have to be within the guidelines or you will not get a permit to build it.

Mr WICKRAMASINGHE — That is correct.

Ms LAZENBY — Under the planning scheme; that is right.

Mr KOCH — That is on the planning side, but from a pedestrian point of view this is trying to be picked up in the accreditation scheme, which is a voluntary scheme, and from what I am hearing there is not a lot more to it than feeling warm and fuzzy to be part of it, and there is no regulatory opportunity there to actually adhere to the scheme.

Ms LAZENBY — That is right.

The CHAIR — Since the beginning or inception of this accreditation scheme, for those car parks that were successful in obtaining the 5 stars what improvements have been had?

Ms LAZENBY — Safer by design principles, staff training and random inspections by Victoria Police.

Ms MALLOCH — For example, improved lighting — so additional lighting installed.

The CHAIR — But how is that translated into less accidents, less burglaries and less crime? Has that translated into all of that? Do you have the stats available?

Ms LAZENBY — No. I could perhaps arrange for you to get stats from Victoria Police. Would you like that?

Mr WELDER — That would be good.

Ms LAZENBY — We will arrange to do that. You know that theft of and from motor vehicles is a huge problem for Victoria Police.

The CHAIR — That is why I would be keen to find out whether this program and the impact of the changes associated with it have improved safety for pedestrians. Obviously car parks are one of those things where the driver and the pedestrian are one and the same person. Until they get out of that car they are the driver; when they do get out of the car they are the pedestrian. That is probably mostly the case in relation to car parks. Just on the accreditation scheme itself, do you think that this should be enforced in terms of regulation as a council?

Ms LAZENBY — I have said I do not think that council should be enforcing it. What we could do — and we have not gone that route because we do not want to be obliged by the enforcement — is make it a requirement for a commercial car park to be part of this scheme, but that would only apply to new car parks, not the existing car parks, where we could make that a part of the planning permit. For car parks that already have their planning permit, we are asking them in a voluntary way to participate.

Mr WICKRAMASINGHE — If we went down that route, any condition obligating the operator to comply would be appellable to the Victorian Civil and Administrative Tribunal. I would suggest to you that we would find it very difficult to make that condition stick.

Ms LAZENBY — Which is one of the reasons why we have this program.
Mr WICKRAMASINGHE — Purely because it does not really have a planning basis.

Ms LAZENBY — I have got to say we do have enthusiastic buy-in to this program from the operators. We feel we are managing that relationship well, and I should say Victoria Police is in that partnership with us. We are managing that relationship well enough that the operators are happy and enthusiastic to participate. We have great industry buy-in for this.

The CHAIR — What percentage do you think are not part of this scheme?

Ms LAZENBY — A minor percentage. I would say of the commercial car parks in the city there might be one or two that are operated by an individual, but all of the commercial operators — and I have listed them there for you — are part of this scheme.

Ms MALLOCH — You know how there can be a vacant block and little car park will spring up on that until the building commences; we do not have involvement from those groups. I made a presentation to the Parking Association of Australia about a month ago. It meets quarterly in a different capital city each time. It was in Melbourne one month ago. Surprisingly it had picked up quite a degree of interest from people who were consultants in New South Wales and in South Australia to take the accreditation program to be looked at very carefully in Sydney and Adelaide, given that Melbourne City Council is the only one that we are aware of that has such a scheme. Another thing is we do not have any opportunity to benchmark how we are travelling against other local councils, especially capital city local councils.

I also hear, too, the point about the juxtapositioning of a relationship that is voluntary in its basis. That forms the basis of a number of the relationship programs that we have operating within Colleen’s branch. Whilst it means that quite a deal of our monitoring and evaluation relies on qualitative measures, as much as we can we try to rely on quantitative measures in relation to police figures and so forth.

One of the things that we do enjoy is an incredibly sustained partnership with industry. Whether it is nightclub owners in relation to our guidelines for licensed premises or whether it is this particular type of program, the involvement with the industry in actually developing the scheme, developing its criteria and determining how that can best be monitored and appraised and terms of compliance and so forth, for us, is one of the components. Hence we are working very closely with Shiran’s branch in relation to the regulatory side and how we can actually, inside council, benefit our relationships and so forth.

Ms LAZENBY — I might just go through the elements of what it takes to have 5-star accreditation. You will see some of the things we have introduced are about trying to determine the impact of the accreditation. To participate in the accreditation you must attend formal and regular meetings to monitor safety and security, have processes in place for preventive maintenance and be a member of a car park operators forum. You have to monitor perceptions of safety; that is new. We want car park operators to do that as a benchmark. From there they will be able to see the improvements, as will we and Victoria Police. We want them to also monitor incidents of theft of and from motor vehicle and patron antisocial behaviour and develop activities to reduce incidents and improve practices. We also want them to have developed a variety of special programs that they can share with the other car park operators. I will give you some examples of what Crown — which, as you know, has a massive car park — has developed.

They have special security cars which patrol their car parks. They are marked as security cars so people can identify them as that. They allow police to enter and monitor at random. That required a little work with the car park operators, but there is a 15-minute grace period where you can enter a car park and leave again if you do not need to be in there for a variety of reasons. That has been designed to include police vehicles, so the police can enter, with the cooperation of the car park operator, do a quick patrol and leave again, and the operators will just raise and lower the gate to let them out. I know that seems like a simple and obvious thing to do to contribute to the safety of car parks, but that required a little bit of negotiation with the operators.

Crown has developed and other operators are developing a lock-and-leave sign. Lock your car and do not leave anything that is visible and can be stolen from it. The operators, led by Crown and some of the other car park operators, participated in this very public launch of the new scheme at Federation Square. We had a lot of buy-in. Some operators brought very fancy cars, and the police had a competition where you could win parking for a year in a car park. They really have been enthusiastic about buying into this, and those are the elements that they have agreed constitute a 5-star accreditation.

The CHAIR — Thank you very much. Are there any questions?
Mr KOCH — Just one quick one. In-house security at Crown; that is fine. How regularly are police taking up the option to scrutinise what is going on there?

Ms LAZENBY — How often are police? I will ask them that question.

Mr KOCH — You are unaware?

Ms LAZENBY — I do not know how often police have agreed to do it. Do you know, Anne?

Ms MALLOCH — No, I do not.

Mr KOCH — How long has this been in place?

Ms LAZENBY — The new one is to commence being in place in November.

Mr KOCH — In November; right. So they have no schedule as to how often they will patrol.

Ms LAZENBY — No, but I will ask them.

Mr KOCH — Thank you.

Mr TILLEY — Achieving 5-star accreditation is all done by a process of self-assessment?

Ms LAZENBY — No, it is done by a process of application and an assessment by the City of Melbourne and Victoria Police together with the operator.

Ms MALLOCH — The self-assessment component is done prior to applying. That means that the operator can go through their particular site and evaluate it in accordance with the guidelines and then apply to have the group come through to determine their appropriateness.

Mr TILLEY — So what would happen in the event of, for example, an operator achieving a 5-star accredited rating and then having a high incidence of theft from or of motor vehicles or antisocial behaviour?

Ms LAZENBY — Might they lose their accreditation? We of course have not come to that question, but conceivably they could if it meant that the standards had declined so significantly in the car park. However, not all theft of and from is necessarily the fault of the car park operator. That car park might have been targeted by a gang, which of course would cause their stats to jump up. I suspect it would be a point of negotiation where the operator would say, ‘It is not my fault, because I am complying with the 5-star accreditation’.

Mr TILLEY — On matters of maintaining lighting and those sorts of safety feature, is there failure to address those types of things?

Ms LAZENBY — Yes, but we try not to be punitive. We try to encourage cooperation as much as possible.

The CHAIR — Thank you very much.

Witnesses withdrew.