



Independent Pricing and Regulatory Tribunal  
PO Box K35  
Haymarket

2 August 2021

**Re: IPART Review of Private Ferry Fares**

Dear Sir/Madam,

I must congratulate the staff of INDEC and IPART for the quality and amount of work that has gone into the 2021 Review of Private Ferry Fares.

However, the Church Point Ferry Service does have some concerns regarding some of key issues in this review.

**1. Ferry Operators proposed fares.**

Church Point Ferry Service proposed fare increase in line with CPI. Whilst this is currently believed to be 2% there is a difference between a flat 2% increase and an increase in line with CPI.

**2. Estimation of cost reflective fare.**

Further information on how the cost reflective fare is calculated would be of benefit in deciding whether to support it or not.

**3. Passenger vs subsidy payment**

The Church Point Ferry Service believes that any shortfall in the costs of operating a ferry service should be made by the taxpayer (i.e., government subsidy rather than an increase in fares.) This is because many of the external benefits generated by public transport such as

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avoided pollution and congestion are of benefit to all NSW residents rather than just the users of the ferry Service.

The use of the Church Point Ferry service, leads to lower air pollution and greenhouse gas emissions as do other bus, train or ferry journeys. Whilst the Church Point Ferry Service does not lower road congestion, the alternative is a private dinghy with an outboard, some of which are two-stroke engines which pollute oil directly into Pittwater, as well as producing the same emissions as road vehicles.

“Water based transport services include the Church Point Ferry Service (operational between 6.20am and 7.30pm) and the Pink Water Taxis (24-hour service). Due to the desire for flexibility and cost implications the majority of off-shore residents own a boat and utilise a mooring space on the mainland. “ Pittwater Council Church Point Plan of Management”

Furthermore, there are insufficient commuter dinghy mooring places at Church Point as well as Scotland Island and the Western Foreshores. This leads to dangerous and chaotic tie ups at Pittwater Council owned Commuter and Ferry Wharves.

Church Point provides a marine hub for off-shore residents and Pittwater users. Facilities include a Commuter ‘dinghy’ Wharf providing a designated tie-up area for small craft. No short term (i.e., 15mins – 2hrs) tie-up facilities currently exist with extensive ad hoc berthing of craft in ‘no tie-up’ zones favoured. Whilst the current commuter wharf is inadequate in terms of its size, its location is practical in terms of the needs of the off-shore residents.

Insufficient commuter dinghy mooring leading to chaotic and dangerous dinghy tie ups

Pittwater Council Church Point Plan of Management

Thus, there are additional costs to local government in Providing suitable, safe berthing for the commuter vessels owned by the residents serviced by the Church Point Ferry Service.

The Church Point Ferry Service is the only form of Public Transport for the residents of Scotland Island and the Western Foreshores of Pittwater. It provides an invaluable service to this community. It offers the safest, most efficient and cost-effective transport, particularly for those less financially and physically capable.



There are also safety aspects of the use of small boats at nights, often without lights, and with insufficient safety equipment, which is particularly dangerous in bad weather conditions.

As there is extremely limited parking available at Church Point, we are extremely limited to how many leisure travellers we can take. There are also no shops or café available on our route so the only leisure activities we can offer are a ferry ride, or a walk.

I believe that if fares are increased to much, that we will see a shift away from public transport towards water taxis or the purchase of more boats.

#### **4. Fuel adjustment mechanism**

Given the size and lack of financial reserves that small ferry operators generally operate under, the fuel mechanism adjustment should be retained, but dropped to maybe a 10 or 15% change.

#### **5. Costs outside the control of ferry operators.**

The changes in Awards due in 2022 may cause large changes in wages for the private ferry industry. Given that they are one of the largest costs, this needs to be considered in relation to fares, either as an input in the fare increase or with its own adjustment mechanism like the fuel.

Kind Regards,

Penelope Gleen

General Manager

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