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Submission: I am writing to raise a series of concerns about the thinking framed in the IPART Fares Review and to object particularly to the change in eligibility for the Gold Opal Card.

1 Flaws with the Cost Benefit Analysis (used to determine socially optimal fares)

- Social impacts not considered: The report talks of socially optimal fares and looks at the likely impact of an increase in fares on overall patronage in other words the bottom line. The report fails to consider the social impacts on society. A service that is too expensive will deter sectors of society from using it, leading to social isolation and exclusion from mainstream activities.

- Carbon emissions ignored: The report discusses "... road capacity and the level of road congestion ..." (Section 3.2) but the cost benefit analysis does not take into account the impact of carbon emissions or conversely the reduction in emissions if more people are encouraged to use public transport.

- Misconstrues impact of length of journey on road congestion:

The claim that "... the further a journey extends outside the CBD, the lower the external benefits of using public transport instead of driving as the roads become less congested ..." (Section 2.3) does not add up. Whether a person is undertaking a long or short train journey if that travel centres on Sydney (arriving at or departing from) then it does provide an 'external benefit' i.e. less road congestion. Furthermore, urban expansion out from the CBD is leading to increasing road infrastructure requirements. 'External benefits' remain a valid consideration on longer journeys.

2. Negative impact in the way caps are set

The report states that "... the weekly cap for Opal Concession fares should be set at 50% of the cap for Adult fares ..." (Section 2.6.2). There is a problem with this methodology for people on fixed incomes. For example, in my case the proposal will see fares and caps increasing each year leading over time to the fare become dearer relative to my fixed income. This does not of course apply just to me. Another way of determining the concessional charge needs to be found.

3. Adverse impact on me

I live on the south coast more than 100 kms from Sydney. I have worked for 37+ years and recently decided to retire. I don't receive any government support instead I have a fixed pension from my superannuation fund. I travel to Sydney on occasion to:

- ▣ spend time exploring our beautiful city;
- ▣ attend events (e.g. Vivid, Climate March); and
- ▣ view special performances or visit museums.

I also expect to use local trains as I become more involved in local community organisations as a volunteer.

The proposal would mean that I am moved onto a Concession Opal Card. This represents a 25% fare increase and it becomes a financial disincentive to use public transport. Further, the annual increase in fares will over time have an increasingly serious impact on my fixed income.

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