



Council of Social Service of New South Wales

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Independent Pricing and Regulatory Tribunal
Review of Public Transport Fares in Sydney and Surrounds
Submitted online at <http://www.ipart.nsw.gov.au>

To whom it may concern,

Public transport is essential for people to live their day-to-day lives. Every day, public transport services are relied upon to go to work and access services like hospitals, child-care and schools.

NCOSS recently consulted with more than 200 community organisations across NSW in preparation for our pre-budget submission. The accessibility and affordability of public transport was raised repeatedly by community sector representatives attending our consultations. The transport recommendation arising from this process is included as an attachment.

Viewed from a social perspective, it is important that public transport fares are set at a level that ensures affordability for everyone, and encourages people to use the form of transport that will have the least social and environmental cost.

NCOSS has concerns about aspects of IPART's proposed approach that potentially run counter to the objectives we outlined previously, namely:

- The cost of transport is being considered in isolation from the cost of car transport. The proposed approach will consider fare structures that support public transport network efficiency, however we consider that overall transport network efficiency should also be taken into account.
- The proposed approach has the potential to distort the relative costs of public vs private transport. As we previously submitted, including the marginal excess burden of taxation will increase the cost of public transport relative to the cost of driving because these costs are not passed on to road users in the same way.
- Socially optimal fares are appropriate in theory, but particular consideration should be given to the impact of fare changes for people on low fixed incomes. A concessions system can theoretically ensure affordability for these people, but while there have been significant improvements, some are still falling through the cracks.
- As previously submitted, we do not think the proposed approach takes the full range of external benefits and costs into account. IPART has decided against including social inclusion as a marginal external benefit, however:
 - NCOSS maintains that social inclusion benefits should be considered.
 - As an essential service, transport is an enabler for employment, education, and access to services and supports.

We note that IPART has agreed to further consider the costs associated with congestion such as lower reported life satisfaction, well-being and physical activity, including investigating the work of Mulley et al. We wholeheartedly support and commend this decision.

We would very much welcome the opportunity to discuss this submission with you in greater depth. Should you have any questions in relation to this proposal, please do not hesitate to contact me or Deputy CEO, John Mikelsons on [REDACTED]

Yours sincerely

Tracy Howe
Chief Executive Officer

Attachment: NCOSS' Transport PBS Recommendation

7. Transport services should be available, accessible and affordable for everyone – no matter where they live or who they are

Premier's Priorities:

- *Building Infrastructure*
- *Improving Government Services*

Recommendation

Improve access to public transport services by investing an extra \$42.7 million to:

- Expand investment in new infrastructure and services;
- Make existing infrastructure and stock more accessible for people with disability;
- Lower fares for people on low incomes and who are unemployed; and
- Support Community Transport services.

The end result

People in NSW can access affordable, accessible public transport.

What's the issue?

Public transport is essential for people to live their day-to-day lives. Every day, public transport services are relied upon to go to work and access services like hospitals, child-care and schools.

Yet many people cannot access to the services they need.

In many parts of NSW services are either infrequent or non-existent, particularly in the regions. Otherwise, certain groups – such as people with disability, those on low incomes and people who are unemployed – are excluded due to problems with accessibility or affordability.

Often, service gaps are filled by Community Transport (CT) services operated by the non-government sector. However, with recent changes to service regulation and other government-led reforms to the sector, many CT services are struggling to survive.

The action needed

New investment in regional infrastructure and services:

- Invest \$24.7 million to provide an extra 50 town-to-town bus and coach services in targeted regional centres in need of more services;
- Provide an additional two daily train services between Orange and Dubbo by including additional stops in existing limited stops services.

Make transport more accessible for people with disability:

- Provide a clear and complete schedule for completing train station accessibility upgrades across the NSW and Sydney trains network; and
- Require contracted private bus services to meet standards under the Transport for NSW Disability Action Plan.

Lower fares for people on low incomes and people who are unemployed:

- Reduce the daily cap for Concession Opal Card users from \$7.50 to \$2.50, in line with the Opal Gold Card.
- Provide \$1.5 million supplementary funding to the Community Transport sector to deliver the additional services required by transport disadvantaged clients no longer able to access the ADHC funding for disability-related transport, who are not eligible for an NDIS package.