



Council of Social Service of New South Wales

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The Chief Executive
Independent Pricing and Regulatory Tribunal of NSW
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Dear Sir

Review of Bus Fares
Metropolitan and Outer-Metropolitan Bus Services
Rural and Regional Bus Services

The Council of Social Service of NSW (NCOSS) welcomes this opportunity to be able to comment on the current review of bus fares. NCOSS is the peak body for the social and community services sector in NSW. NCOSS is committed to social justice and ensuring that the rights and needs of socio-economically disadvantaged people are addressed and met.

NCOSS submission is predominantly in response to the submission from the Ministry of Transport though we have also covered some other matters.

NCOSS knowledge of Newcastle and rural and regional services is limited, so we have limited most of our comments to metropolitan and outer-metropolitan bus services. NCOSS will leave comments on these other services to those that have a greater knowledge of these areas.

However, from the outset NCOSS expresses our concern that public transport fares continue to increase in real terms, exacerbating the financial pressure on low to moderate income households. NCOSS considers that a fare increase cannot be justified. We submit that the average weighted increase should not exceed the increase in CPI over the last 12 months.

Cost of Metropolitan and Outer-Metropolitan Services

NCOSS agrees with the comments made by Action for Public Transport (APT) that the costs of service improvements should not be wholly recovered from the farebox, which is implied by the Ministry of Transport keeping the farebox revenue contribution at 41%. As the APT notes service improvements have broader, external benefits applicable to the community generally, including improved **availability** of access and increased property values.

NCOSS also notes that the Ministry suggests that IPART might in future “consider the scope of the additional costs Government incurs in investing in essential capital expenditure when determining fares for buses” in a similar manner to that discussed in the CityRail review. NCOSS supports the APT request that, as well as external costs, the external financial benefits of an efficient bus system must also be taken into account.

NCOSS also recognises the high costs involved in providing bus priority infrastructure. However, such infrastructure should be seen as an improvement of the transport system itself, and not just a benefit to fare-paying bus passengers.

Full Buses

NCOSS notes that while statistics are recorded for early, late, incomplete and cancelled services, there is no measure of insufficient services.

NCOSS believes that a record should be kept of how many stops were bypassed or how many would-be passengers were left behind because the bus was full. Similar figures are recorded in Brisbane. This could also include a survey of the impact this had on the person on that day including such things as missed appointments, especially health related.

The IPART Determination from December 2007 did request that information about insufficient services is reported in future years. (Section 4.1, p.22.)

Issues Not Dealt With

NCOSS supports the APT comments in their submission noted below:

IPART says in its Fact Sheet, that under Section 28J of the Passenger Transport Act, it is required to consider:

- *monopoly abuse*
- *ecological sustainability*
- *social impact*

The Ministry submission, as a discussion paper, provides negligible material on these subjects, nor are they dealt with in IPART's Fact Sheet.

Electronic Integrated Ticketing

NCOSS argues that a holistic fares policy is necessary for the Sydney transport system. This should take into account the overall efficiency and effectiveness of the system and the role that it plays in addressing issues of climate change. NCOSS encourages the Ministry to engage with the community in developing and reviewing such a policy.

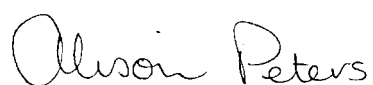
However, NCOSS is strongly opposed to a ticketing or fares policy that is distance-based, as opposed to zone-based fares, and the flag-fall charges associated with mode change. Distance based fares would impact most significantly on many low income households who, as a result of housing and associated costs, are forced to live at greater distances from places of employment, education and recreation.

NCOSS would also like to remind IPART that every other mainland capital has a zone-based fares system.

NCOSS also agrees with the APT skepticism about the ability of a distance-based fares system to “encourage multi-modal travel” as claimed by the Ministry. In Sydney, any change of mode with a distance-based fare system has always meant payment of another flag-fall.

For further information please do not hesitate to contact Samantha Edmonds, Deputy Director Policy and Communications on (02) 9211 2599 ext 111 or samantha@ncoss.org.au.

Yours sincerely

A handwritten signature in cursive script that reads "Alison Peters".

Alison Peters
Director