



Tasmanian Council of Social Service Inc.

Transport Access Strategy: TasCOSS Response



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Introduction

Thank you for the opportunity to comment on the Draft Transport Access Strategy. TasCOSS welcomes the release of the draft, which is an important step forward towards our vision of a state where all Tasmanians are able to travel where they need to go to participate in work, training, education, volunteering, and social and recreational activities, and to access services. The finalised Transport Access Strategy will play a vital role in shaping Tasmania's future transport network, both by guiding ongoing processes such as the renegotiation of bus contracts and infrastructure funding and by giving the go-ahead for exploration of innovative collaborations and development of future transport options.

As a statement of intent, the draft Strategy is an encouraging document. We are pleased to see:

- A recognition of both cohort-based (economic disadvantage, age, disability) and location-based (outer regional) transport disadvantage. In other words, some people are transport-poor, and some locations are poorly serviced.
- A recognition of Tasmanians disadvantaged by economic circumstances as a key element of Tasmania's transport-disadvantaged cohort.
- A commitment to holistic, collaborative approaches to addressing transport issues and gaps.
- An acknowledgement of the need to support the three key areas of services, infrastructure, and governance.
- A commitment to improvement, integration and coordination of existing services as well as an acknowledgement of the need and potential for innovative services in addressing transport gaps.
- An acknowledgment of the importance of spatial planning in transport access.
- A good summary of public transport needs and of obstacles to accessing public transport currently faced by many Tasmanians.
- The identification of a number of interesting opportunities for action, as well as of existing initiatives.

Where to from here

The final Transport Access Strategy will be a crucial document that will inform the future shape of Tasmania's transport system for years to come.

We would like to see a final Transport Access Strategy:

- Clearly articulate the Government's vision for transport services in the state. Tasmanians are entitled to know the scope of the Government's ambitions for the transport system, in the short term and into the future.
- Clearly spell out, in its own section, the objective of the Strategy. At the moment this is only partially articulated at various points scattered across the Purpose and Policy Context sections of the draft. Drawing on the existing language of the draft, we believe this should be:
"To improve access to transport services for all Tasmanians, particularly those disadvantaged through economic circumstances, age or disability."
- Lay out key principles for Tasmania's transport system. These should include commitments to:
 - A passenger-first approach
 - Continuous improvement of services and of the transport system as a whole
 - A whole-of-government, cross-sectoral approach based on collaboration and partnership.

- Lay out key outcomes of the Strategy. We believe these should be:
 1. An integrated transport network bringing together public and private bus operators, not-for-profit transport operators, taxis, new services such as ride-sharing services, and community initiatives such as carpooling, and active transport modes such as cycling and walking.
 2. A user-driven public transport system that adopts a culture of continuous improvement in the provision of frequent, reliable, affordable and accessible services.
- Clearly articulate the relevance of the Strategy's priority areas and actions to the other initiatives and policies referenced in the draft (currently simply enumerated). The list of other initiatives and policies should also include:
 1. The Tasmanian Climate Change Action Plan. Tasmania's greenhouse gas accounts indicate that at 2.03Mt, the transport sector accounts for 23.6% of Tasmania's total emissions (before discounting for carbon sinks in land use/land use change/forestry) of 8.6 Mt, and that emissions from the transport sector increased by 28% between the 1989-90 baseline and 2012-13 – a rate tied for first place with that of energy industries.¹ Development and expansion of alternatives to the private motor vehicle furthers the CCAP's objective of sustainable transport options.
 2. The 2016 Hobart Congestion Traffic Analysis. As noted by that report, Hobart's road network "is consistently near capacity during peak periods," and Hobart is now the third most congested state capital in Australia as well as the most congested of Australian cities with populations of less than 800,000.² Reducing traffic congestion furthers the liveability principles found in (for instance) the Urban Passenger Transport Framework, the Northern, Southern and Cradle Coast Integrated Transport Plans, the Residential Development Strategy, and the Hobart City Council Sustainable Transport Strategy.
- Reorder/reword/reformulate the priority areas for the Strategy, which currently are not always clear and contain elements of duplication as well as gaps. Drawing on the draft, these would then be:
 1. Better data
 2. Improvements in service levels and quality
 3. Better integration and coordination of services and of different modes of transport
 4. Innovative pricing
 5. Improved infrastructure for public and active transport
 6. Support for innovative approaches to filling transport gaps
 7. Better coordination and promotion mechanisms and procurement practices.
 8. Improved spatial planning for transport.

Please see below for further detail on each of these priority areas.

- Clearly lay the groundwork for, and contain, a fully developed Action Plan that outlines:
 - Specific objectives
 - Specific future actions, grouped by short-, medium- and long-term, with target dates
 - Specific outcomes to be achieved

¹ DPAC 2015, *Tasmanian Greenhouse Gas Accounts: State Greenhouse Gas Inventory 2012-13*, p. 6.

² <http://www.themercury.com.au/news/tasmania/hobart-drivers-traffic-jam-struggle-is-real-as-survey-shows-tasmanian-capital-third-most-congested-in-country/news-story/b53f364173a1786158aeaac1788cbb3>

- Specific plans for monitoring and evaluation of the overall impact of the Strategy, above and beyond M&E for individual components of the Strategy.
- Clearly identify the funding available for the implementation of the Strategy.

Revised priority areas

To elaborate on each of the new priority areas outline above:

1. Better data

This does not correspond to any existing priority area, although it is alluded to in Priority Area 3. If any Strategy is to stand the test of time, it must be evidence-based, both to inform the development of actions and to justify their choice and prioritisation. It also needs to show evidence of how it has reached its assumptions.

This draft lays out a variety of priority areas and identifies a number of ongoing and future projects whose success depends on a comprehensive understanding of the environment in which Tasmanian transport services work. Nevertheless, the draft itself contains no mapping of the transport service sector; no spatial mapping of existing transport services or of the location of jobs, education/training, health and social service facilities, childcare, recreational destinations (the latter particularly important to tourists) or other trip attractors; and no current information or projections in relation to population numbers, demographics, settlement patterns, economic activity (including both location and working hours), tourism numbers and destinations, or other drivers of transport use such as employment patterns (for example, the percentage of local workers working non-standard hours). It also does not show evidence of how it has reached its assumptions. For example, the draft appears to start from the assumption that when set at concession levels, price is not in itself a barrier to accessing transport. This assumption needs to be examined, particularly in relation to services run by private operators. We note, for instance, that Home and Community Care (HACC) cars often end up driving the same route as a public bus because it is cheaper for the client and carer; while some clients may simply be saving money, others may not be able to afford the bus fare.

All of this information will be vital to understanding and planning for future transport movements. This information must be collected soon if it is to inform the 2018 bus contract procurement project. The draft does identify the need for more information collection (initiative 3.7), but only as a “future opportunity,” with no timelines set. This initiative should be changed to “Review existing data, identify gaps and undertake new data collection to improve public transport services,” and should be brought forward for completion in 2017, prior to the finalisation of the 2018 bus contract procurement project. We believe that the not-for-profit transport sector’s resources and client base needs should be included in this data collection process.

Meanwhile, all government facilities that serve the public, both state and local, should have an idea of how their clients reach them, and whether transport issues feature in failure to attend (services, appointments, etc.). The information gathered in these efforts should be used to help guide both transport service delivery and government service delivery (for instance, in shaping both bus routes/timetables and office opening times/appointment times).

Existing initiatives that fit under this priority area: 3.7.

2. Improvements in service levels and quality.

This priority area is roughly equivalent to the current Priority Area 3, “Connected transport system,” with the addition of elements from the current Priority Area 4, “Better integration.” The combined desired outcome of these two priority areas—frequent, accessible, affordable, efficient and reliable services that are easy to use—is entirely appropriate.

The 2018 bus procurement project will be a vital initiative in this area. However, it must be preceded not only by data collection, as noted above, but also by the development of state-wide public transport services standards, currently assigned a completion date of 2019. Minimum service levels and standards also should be set for areas of operation, in accordance with identified needs and demands and in consultation with bus operators, communities and major trip attractors (e.g. government services serving the area). Both of these processes should have completion dates of 2017, prior to the completion of the 2018 bus procurement project, which will lock in transport contracts for five or more years into the future.

Better information for passengers (current initiatives 4.2, 4.6 and 7.5) is a vital part of this priority area. The lack of a target date for a state-wide web/smart device-based ‘one stop’ passenger information resource remains a glaring gap, particularly in an increasingly tourism-driven economic environment. At the very least, the 2018 bus procurement project should include a requirement that all contracted services store their data in Google Transit.

Existing initiatives that fit under this priority area: 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 4.2, 4.6, 7.5.

3. Better integration and coordination of services and of different modes of transport.

This priority area brings together the current Priority Area 4, “Better integration,” and elements of current Priority Area 2 (initiative 2.1).

As noted in the draft, the 2018 bus procurement project will be a key point for ensuring that timetables are better coordinated to improve overall journey times. TasCOSS also concurs with RDA Tasmania’s recommendation that the development of common ticketing be part of the 2018 project as well to ensure the development of a seamless system. We also note the Tas Bus Association recommendation for common/integrated ticketing as a priority in addressing integration and co-ordination of services.

As currently drafted, this priority area is relevant primarily to the relationships between bus services and between buses and active transport. For a truly holistic approach, however, it should also include operations of the not-for-profit sector, both in terms of potential coordination of services/timetables and in terms of development of integrated ticketing and/or payment mechanisms between bus and not-for-profit transport operators.³

More broadly, as we have frequently noted, many locationally and economically transport-disadvantaged Tasmanians are not formally eligible to use existing not-for-profit transport options.⁴ Their inability to access not-for-profit transport affects not only them, but the viability of both for-profit and not-for-profit services; these lose out on potential fares, keeping them from growing their services and leaving them more dependent on continued government funding.

³ For an example of a smart card useable on both bus and not-for-profit services, see the Rural Wheels example cited in Brake, J, C Mulley and J Nelson (2006), *Good practice guide for demand-responsive transport systems using telematics*. University of Newcastle upon Tyne.

⁴ While HACC services can in principle transport non-HACC clients provided that a HACC client is not disadvantaged, the priority given to HACC clients means that a provider cannot reasonably be expected to take a booking for a non-HACC user, given that a HACC client might require a service at the last minute.

We strongly urge the inclusion of an action committing the Tasmanian Government to initiating negotiations with relevant Federal departments to discuss ways in which to circumvent or overcome legislative and funding barriers, particularly in relation to the HACC system, that currently stymie the development of open-eligibility flexible transport options, as well as to discuss the creation of consolidated funding pools for flexible transport.

Existing initiatives that fit under this priority area: 2.1, 4.1, 4.3, 4.4, 4.5.

4. Innovative pricing

This priority area is equivalent to the draft's Priority Area 6. We note that the Metro data on which this section's analysis is based dates to 2013, and does not reflect the impact, if any, of more frequent services along the Main Road corridor.

The 2018 bus procurement project should include the development of pricing mechanisms that address mismatches between funding and subsidisation of HACC-funded travel and private bus operators' fares in order to ensure that the latter are affordable to concession clients.

If public and commercial transport operators are not only to remain financially viable but to expand and improve their services for transport-disadvantaged Tasmanians, they need steady ridership, including full-fare passengers. The Tasmanian Government should use its position as the state's largest employer to help bolster transport operators' viability by creating and expanding incentives for public servants to use passenger transport, for instance through salary packaging arrangements.

At the broader level, we understand the importance of increasing full-fare ridership (as well as ridership more generally) and discouragement of use of the private car through increased parking fees to increasing the overall viability of public transport. However, a focus on cost recovery and deterrence should not detract from an overall government commitment to increasing funding for public transport. The Tasmanian Government's per capita level of spending on public transport remains the lowest in the country at \$209.86 per person per year. Even the Northern Territory spends more, at \$231.75 per person per year.⁵ We urge the Government to begin to plan the process of bringing transport funding to \$300 per person per annum, in order to deliver on the promise offered up by the draft Strategy.

Existing initiatives that fit under this priority area: 6.1, 6.2.

5. Improved infrastructure for public, active and mobility-impaired transport

This priority area is closely aligned to the draft's Priority Area 7, "Improved infrastructure." The latter focuses heavily on active transport, both walking and cycling. These are crucial low-cost, healthy transport options, and should be encouraged; TasCOSS supports the Heart Foundation's recommendations to this review in this regard.

However, growing interest in these modes of transport should not distract attention from improved public transport infrastructure, in particular bus stops, which in many instances constitute an obstacle to accessing transport over and above those enumerated on page 4 of the draft. We note and support these as also outlined in the Tasmanian Bus Association feedback.

⁵ Tasmania's 2016-17 spending: passenger transport: \$3.573m; metropolitan general access services: \$38.942m; non-metropolitan general access services: \$7.626m; rural and special needs bus services: \$23.72m; student-only passenger services: \$25.646m; Transport Access Scheme: \$4.518m; Pensioner Air Travel Subsidy: \$10k; Metro Bus Fleet Initiative: \$4.5m. Total: \$108.535m; population as of September 2015: 517,183; per capita: \$209.86. Northern Territory spending on passenger transport in 2016-17: \$56.66m; population as of September 2015: 244,484; per capita: \$231.753. Northern Territory (2016), Budget 2016-17, Budget Paper 3, p. 217; ABS 3101.0, Australian Demographic Statistics, Table 4.

The draft's Initiative 4.4 current identifies the need to upgrade bus interchanges and bus stops to facilitate transfers. This initiative should be extended to include that major rural and remote bus stops and transfer points have an agreed basic level of suitable infrastructure, including curbing and shelter. As the Tasmanian Bus Association has suggested, consistent design and branding of bus stops across the state would help develop awareness of services among locals and tourists alike.

Meanwhile, as has been noted by both the not-for-profit and taxi sectors, most urban areas of Tasmania have a dire shortage of places to drop off and pick up mobility-limited clients. All local governments should increase the supply of three-minute drop-off spots in commercial areas, near health facilities and chemists, and near bus stops, as well as the supply of disability parking spaces in these areas.

Existing initiatives that fit under this priority area: 7.1, 7.2, 7.3, 7.4, 7.6, 7.7.

6. Support for innovative approaches to filling transport gaps

This priority area corresponds to the current Priority Area 5, "Closing transport gaps." As noted in the draft, transport gaps can be spatial or temporal, and both scheduled and demand-responsive adjunct services are appropriate for consideration. New approaches have the potential not only to fill in existing gaps, but also to respond to emerging gaps resulting from, for example, Metro's moves to streamline services along main roads.

The draft notes a number of possibilities, but provides little detail into how these might be operationalised or moved to scale. To achieve progress in this priority area, the Strategy should include two key initiatives:

- 1) Research into Australian and international innovations in non-traditional public transport. As noted by Prof. Corinne Mulley in May 2014 at TasCOSS' Transport Innovations workshop, worldwide, flexible transport systems have been developed to address most of the bottlenecks in Tasmania's passenger transport environment:
 - Local and feeder services to trunk haul services
 - Replacing low-frequency conventional services
 - Replacing fixed routes in evening or weekends
 - Services in low-density rural areas.
- 2) One or more pilot projects aimed at developing integrated, collaborative transport environments in different transport environments (rural, urban, peri-urban) in the state. The goal of the project(s) should be not only to develop more efficient, inclusive and coordinated provision of transport services in these areas—potentially including new flexible transport options—but also to change behaviour among existing and potential transport users as well as destination entities (schools, services, businesses) and local planners.

Existing initiatives that fit under this priority area: 5.1, 5.3, 5.4.

7. Better coordination and promotion mechanisms and procurement practices.

This priority area gives focus to the general intent of current Priority Area 2, "Working together." Transport services fall across many departments and levels of government; no single body has an overview of the whole sector or of all transport-related policy initiatives, making it difficult to achieve a coordinated approach. Furthermore, the impact of transport extends to employment, education, tourism, health and human services. Some form of centralised oversight and a degree of strategic consistency is necessary if all government and government-funded bodies, as well as all parts of the

transport spectrum, are to work towards the same goals—a point clearly articulated by a wide range of stakeholders in TasCOSS' Transport in the Community consultations.⁶

As noted in the TasCOSS Transport in the Community project final report, other jurisdictions worldwide have addressed this issue through the establishment of a whole of government role.⁷ This role, usually located in human services portfolios, typically hold responsibility for coordinating policy, strategy, funding, services and resource-sharing across government departments, the full range of transport providers, planning bodies, and local government. In addition, the role takes responsibility for ensuring appropriate consultation mechanisms for community, business and the non-government sector to inform transport planning and the promotion of transport awareness (for example, the development of transport access plans) among employers and services.

TasCOSS believes this role would provide Tasmania with targeted co-ordination and provide an evidence base for procurement practices as well as informing overarching decision making. The core functions of such a role (based on international examples) is highlighted below:

- Cultivate partnerships and multi-agency coordinated transportation activities.
- Research needs and demands for users, identify funding alternatives, review regulatory processes, facilitate communications between agencies, and develop incentives to encourage agency participation as needed.
- Research mobility management innovations around the country. Remain current on best practices and concepts of mobility management.
- Develop educational programs such as rider training materials, travel trainer programs and community forums.
- Develop new ways to remove barriers for transportation to and from jobs and employment support services for individuals with disabilities in rural areas.
- Maintain communication with appropriate local, state, and federal agencies, as well as private interests.

TasCOSS also concurs with RDA Tasmania's recommendation that cross-department responsibility for addressing transport issues be clearly articulated and agreed to, with identified time frames, measurable outcomes and nominated staff responsible for delivery in each department. Focal positions should be created in DHHS, Education, Justice, DSG and DPAC with the role of encouraging all institutions within their department's remit to:

- Draw up transport needs/gap assessments
- Create transport access plans
- Provide information to clients on transport options.

An initiative should also be included to ensure collaboration with tourism policy development and planning.

⁶ For example, TasBus has consistently advocated for the creation of TransportTas, a central authority to regulate and oversee the delivery of bus services across the state. TasBus (2013) "Moving People Tasmania: a moving people policy for a sustainable Tasmania." <http://www.tasbus.com.au/resources>

⁷ TasCOSS (2014) *Transport in the Community Final Report*.

<http://tascoss.org.au/Portals/0/Documents/Publications/Reports/TasCOSS%20Transport%20in%20the%20Community%20Project%20report%20Oct%202014.pdf>

In the run-up to the 2018 bus contract procurement, there is also a need for improvements in contracting models to ensure long-term flexibility. No provisions currently appear to exist in the government's funding and contracting models that reward a holistic approach to services by bus companies, or that permit the Department of State Growth to mandate adjustments in service offerings to meet changed needs. The 2018 bus procurement process offers an opportunity for the development of a funding/contracting model with flexibility to review service offerings at the Department of State Growth's initiative and in consultation with bus operators and communities; this should be completed no later than mid-2017.

Existing initiatives that fit under this priority area: 2.2.

8. Improved spatial and service planning for transport

This priority area corresponds to the draft's Priority Area 1, "Living closer." The identification of spatial planning as a key factor in access to transport is a crucial one. Spatial planning has a vital role to play not only in relation to planning transport corridors, but also in minimising the need for transport movements by increasing opportunities for employment near residential population centres, as well as by focusing residential development around transport corridors. TasCOSS supports the recommendation of the Heart Foundation to this review that State Policies should be pursued under the State Policies and Projects Act 1993 that articulate the requirements for effective integration of land use and transport planning across the activities of State Government and councils.

Nevertheless, this area should not be listed as the first priority of the Strategy. It is not a transport service; it is of limited relevance to many communities; and it is a long-term process.

TasCOSS concurs with RDA Tasmania's recommendation that further initiatives be delivered under this priority to reflect not only urban planning and residential density, but the location of government-funded activities such as education, training and health services in relation to transport accessibility by target clients, as well as incentives for business to increase employment options near large residential populations.

TasCOSS further concurs with RDA Tasmania's observation that reducing the need for transport sidesteps the problem of transport disadvantage, and with the recommendation that all departments investigate options that reduce the need to travel, and associated requirements such as broadband connectivity, for activities within their policy areas.

Existing initiatives that fit under this priority area: 1.1, 1.2, 1.3, 1.4, 1.5.

Funding

The development of the Strategy must be appropriately funded if it is to achieve all of these objectives. For example, the development of the Affordable Housing Strategy highlights the advantages of providing adequate funding to ensure investment in the knowledge and information required to deliver the longer term desired outcomes. As a consequence of additional funding for development of the Affordable Housing Strategy, drafters were able to:

- Commission independent research and expert advice from the University of Tasmania and the Australian Housing and Urban Research Institute.
- Hold extensive stakeholder consultations. While we are pleased that TasCOSS' consultations for the Transport in the Community project have informed the development of this draft, these were a limited exercise. The Affordable Housing Strategy's development involved multi-stage consultations with around 50 key stakeholders.

The Strategy that has resulted from this process from this process provides the breadth and depth of evidence and analysis necessary to inform long-term thinking about the state's housing system, as well as providing strong justification for the choice of actions included in the Action Plan.

We note that the Hobart City Council has allocated \$100,000 over two years for the development of a Hobart Transport Strategy, as well as \$1m over two years towards the implementation of the Strategy.⁸

Conclusion

Thank you for the opportunity to make this contribution. Please do not hesitate to contact us if more information is required.

⁸ Hobart City Council (2016), Agenda (Open Portion), City Infrastructure Committee Meeting, 27.7.2016, Item 6.7, p. 67.