

Transport Legislation Review

General Submission Template

This template has been prepared to guide stakeholders in making submissions. It should be noted that those selecting to use this guide should ensure their submission is no more than 8 pages in length.

The closing date for submissions is 5:00pm 14 December 2007.

All submissions are to be lodged with the Project Information Desk. Contact details for the Project Information Desk have been provided below:

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Please provide a summary of the key issues and themes raised in your submission:

The Eastern Transport Coalition (ETC) consists of seven municipal Council's in the eastern region of metropolitan Melbourne. Its member Councils are Yarra Ranges, Knox, Maroondah, Greater Dandenong, Whitehorse, Monash and Manningham.

The ETC exists to advocate for improved sustainable and integrated transport

services within the region, and acts to reduce car dependency.

The ETC welcomes the opportunity to provide feedback in regard to the State Government's Transport Legislation Review.

The ETC represents one million residents in Eastern Melbourne through its seven member councils. Through this representation, the ETC includes a number of prominent activity centres, including the Ringwood, Dandenong and Box Hill Transit Cities which are pivotal to the success of Melbourne 2030 and enhancing Melbourne's liveability.

The ETC supports the premise of developing overarching transport legislation with the aim of ensuring a clear and united vision for the future of Victoria's transport system. It is clear however that physical integration of departments, such as VicRoads and the Public Transport Division of the Department of Infrastructure, is required to ensure a cohesive vision and level playing field between transport projects.

Currently VicRoads as a statutory authority, enjoys a number of benefits that are not available to either the Coordinator-Generals Office or the Public Transport Division. While the State Government has undertaken some steps in attempting to improve coordination between departments, a combined transport authority diminishes the conflict that inevitably exists.

In this regard, the proposed Transport Integration Act should be defined as a tier of objectives to assist in weighting each criteria. Such objectives need to be defined in the context of ensuring a sustainable and equitable transport system that delivers the efficient movement of people and goods.

These objectives need to be reinforced through policy goals that are codified

within the legislation, not dissimilar to proposed legislation designed to reduce greenhouse emissions. In this regard, the policy objective of increasing public transport modal share to 20% by the year 2020 needs to be explicitly stated as a goal of the proposed legislation, with policy objectives being designed to meet this goal.

What do you consider to be the key *current* issues for transport in Victoria?

Transport in Victoria is characterised by insufficient long-term planning, resulting in a disjointed, badly coordinated transport network that is failing to cope with demand.

Historically, transport planning has overwhelmingly favoured car travel, resulting in a public transport system that is uncompetitive with car travel due to a lack of coordination, inadequate frequencies and operating spans and network coverage. This has been exacerbated due to a lack of integration between various transport authorities and land-use planning, resulting in many parts of Melbourne being without adequate alternatives to car dependence.

The need for a public transport system that is competitive with car travel has been increasingly recognised due to the economic, social and environmental problems caused by car dependence.

While it is natural to focus on the needs of growth areas, the State Government must also ensure that it meets the transport needs of established areas of Melbourne, particularly those that are undergoing urban redevelopment and increased housing density. Transport services, particularly public transport, needs to be improved simultaneously with urban revitalisation to ensure that public transport is a competitive form of travel.

The key challenge will be the need to integrate government departments so

that sustainable transport (walking, cycling, public transport) is prioritised over car usage.

What do you consider to be the *future* issues for transport in Victoria?

Future issues relate to creating a transport system that promotes sustainability and economic growth. Expansion of the public transport system, particularly fixed rail, has the potential to spur private sector investment and hence economic growth. The State Government needs to recognise the benefits of public transport in an holistic manner and prioritise projects accordingly.

The State Government needs to recommit itself to the goal of 20% modal share by 2020 and integrate the various transport authorities into one statutory organisation. Likewise the office of the Coordinator-General needs to become a statutory authority in its own right to ensure appropriate integration between land-use and transport planning.

These issues were recognised by the Commissioner for Environmental Sustainability who found that *“A more streamlined approach to land use and transport integration in Victoria would be possible if a single strategic authority were established”*.

While creating an integrated transport Act will hopefully assist in creating an integrated transport network, physical departmental integration is required to ensure a level playing field within the auspices of good governance. Commendable programs such as SmartBus and ThinkTram have at times suffered due to a lack of integration between VicRoads and the Public Transport Division.

A key challenge for Victoria’s Transport System will be the creation of a single

strategic authority responsible for transport and land-use planning.

What are your comments on the draft objectives included in the discussion paper?

Inclusion of objectives within the legislation should assist in reinforcing the need for a whole of government approach. While the included objectives are generally relevant, current wording is vague and could lead to a myriad of interpretations.

Likewise there needs to a clear hierarchy of these objectives to provide a cohesive approach to Victoria's transport needs. In this regard the ETC is recommending the following hierarchy:

1st tier – overall aims of an integrated and sustainable transport system:

- A system that supports economic growth;
- An equitable, accessible and socially inclusive system;
- An environmentally sensitive system; and
- A system that encourages healthy communities.

2nd tier – relate specifically to the objectives of a transport system:

- To improve access to jobs, education and other key services for everyone;
- To reduce delays to the movement of people and goods;
- To limit transport emissions of air pollutants, greenhouse gases and noise; and
- To improve the condition of transport infrastructure.

3rd tier – matters that relate to the operation of the transport system:

- An integrated and coordinated system;
- A safe and secure system;

- An efficient and reliable system; and
- A system that provides value for money.

Definitions of each objective need to be clarified.

Firstly there needs to be a clear definition of what comprises a transport 'system'. In the case of Victoria, the ETC contends that this would include the road network (comprising of a road hierarchy), freight network (ports and airports) and public transport (buses, trams, trains), as well as walking and cycling networks.

What are your suggestions for transport objectives to include in the legislation?

Objectives need a holistic approach utilising a triple bottom line analysis, for example:

1. An integrated and coordinated system:

Melbourne's public transport system currently suffers from a lack of integration, where services are not coordinated - leading to lengthy delays, excessive waiting times and journeys that are not competitive with car travel.

An integrated and coordinated system needs to refer to more than just the road network; it needs to include transport interchanges, service levels and the provision of an integrated sustainable transport network.

Sustainable transport objectives need to be prioritised above car dependence to ensure that competitive transport alternatives exist.

This lack of integration is the consequence of a lack of a cohesive vision and hence the creation of a single transport authority is required to provide clear

accountability and good governance. A single transport authority would also assist other stakeholders, such as local government in being able to achieve sustainable transport outcomes, by provision of walking and cycling paths and structure planning.

Importance: This objective is crucial to ensuring a sustainable transport system that meets the needs of all Victorians.

How it should be framed within legislation:

There is a need to define ‘integrated’ and ‘coordinated’ within the Act. The ETC recommends the following:

Integrated – the incorporation of all organisations responsible for transport infrastructure and services.

Coordinated – cooperation between differing transport service providers to ensure the creation of a seamless transport network.

This objective requires appropriate linkages with Planning Legislation so that planning schemes require public transport infrastructure and services as part of major residential and commercial development.

2. A safe and secure system:

The aims of this objective need to be clarified – does it refer to personal safety or a system that provides sufficient security of service in case of disruptions?

How it should be framed within legislation:

Both ‘safe’ and ‘security’ need to be clearly defined so that measurement against these objectives can occur. In this regard specific design guidelines

for transport interchanges and safety standards for vehicles should be included.

Likewise, standards should be included that enforce response times in the event of network disruptions.

Importance: Safety is a concern for all transport users as is the need for a system that includes redundancy in the case of failure.

3. An efficient and reliable system:

Transport is a means of achieving other policy objectives such as social, liveability and sustainability objectives.

Efficiency refers to more than just reducing congestion. It also refers to the efficiency of the public transport network and how an integrated public transport network, which reduces waiting times and hence encouraging multi-part journeys would improve its competitiveness and efficiency.

Likewise reliability also relates to public transport and the need for it to operate in a manner that instils public confidence.

The establishment of uniform frequency and operating span requirements across all modes would provide consistency and harmonisation across the public transport network.

How it should be framed within legislation:

Definitions need to be provided for 'efficient' and 'reliable'.

Efficiency – An efficient system is one that allows goods and people to reach

their destination as quickly and as effortlessly as possible. In this regard an efficient system is one that is also integrated and coordinated to prevent delays.

Reliable – A reliable system is one that does not incur delays or disruptions allowing people and goods to reach their destination without a need to seek alternatives to their journey.

The legislative framework will need to clarify which modes will receive priority when conflicts emerge. As an example, cycling and public transport priority may potentially reduce the efficiency of private vehicle travel, in such instances there is a need to consider other government objectives, such as sustainability.

For a truly intermodal transport network, public transport efficiency and reliability need to be maintained at a level that is competitive with private vehicle transport.

This objective needs to include service standards for all transport service providers which would be reflected in contractual arrangements with these providers.

Importance: This a critical objective for all transport modes as an efficient system should ensure value for money and a network that is integrated and coordinated.

4. A system that provides value for money

This objective needs further clarification to define the key stakeholders when considering value for money. As the example, the lower level of service provision in Melbourne's eastern suburbs has resulted in the belief that the

public transport system does not provide adequate value for money.

Likewise there is a need to view 'value for money' in a triple bottom sense, which includes economic, social and environmental factors. The evaluation of these externalities would help assess competing transport projects.

How it should be framed within legislation:

This objective needs to explicitly include the inclusion of externalities such as social and environmental impact when assessing transport projects. Likewise the economic benefits of public transport projects needs to be acknowledged and identified.

Importance: This objective is important if it includes externalities associated with transport. Given the implications of climate change and peak oil, it is imperative that this definition is broadened to include such externalities when comparing potential transport projects.

5. A system that supports economic growth

The provision of public transport infrastructure – like all forms of infrastructure – must have the potential to support economic growth.

This is even more relevant given the costs of traffic congestion. A modal shift from private vehicles to public transport would help mitigate rising congestion and assist in reducing business costs associated with delays.

How it should be framed within legislation:

The legislation must acknowledge the economic benefits provided by all transport modes and consider linkages to other government policies, including

the costs of externalities.

Importance: This objective needs to correlate with the externalities identified in 'a system that provides value for money' in order to correctly identify transport projects that support economic growth.

6. An equitable, accessible and socially inclusive system

Public transport has the potential to alleviate financial stress caused by car dependence and rising petrol prices. Recent patronage increases linked to rising petrol prices, has demonstrated that people are willing to consider public transport – where appropriate services are available.

It is important to recognise that while public transport is an alternative, it should not be seen as a second choice option or as a safety net. Public transport needs to be competitive with private vehicle travel to ensure it is sustainable and genuinely usable.

With increasing housing and rental costs, people on lower incomes are often residing in outer metropolitan suburbs that offer the lowest level of service. An equitable system should ensure that these areas are provided with a public transport system that is competitive with car travel.

How it should be framed within legislation:

Definitions are required for the terminology used within this objective:

Equitable – A system that provides comparable level of access across Melbourne and Victoria.

Accessible – A system that can be accessed by all people within the community.

Socially inclusive – A system that does not discriminate based on the location of where someone resides, and provides a competitive alternative to car dependence to minimise financial stress on households.

The legislation should codify the temporal coverage of Victoria's transport system to ensure that people have ready access to forms of transport. There is currently a policy objective of ensuring that 90% of all households are within 400m of a bus stop but minimum service standards for these routes are not competitive with car travel. As such there is a need for a policy objective so that people should be living within 800m of a premium level service, which offers a frequently and operating span competitive with car travel. Both of these objectives need to be enshrined within the legislation.

Accessibility targets also need to be enshrined within the legislation - covering both infrastructure, such as transport interchanges and platforms and the actual vehicle (such as low floor buses and trams and accessible trains).

Public transport offers the potential to allow people with disabilities to participate in economic, social and community opportunities but this can only occur if both vehicles and public transport stops are accessible. Likewise there is a need for a frequency, operating span and coordination that is competitive with car travel to ensure that people with disabilities, like all members of the community, are able to travel to their destination in an efficient manner.

Importance: This is an important objective which recognises the need for a transport system that enables all members the community the capacity to access in educational, employment and recreational opportunities.

7. A healthy system:

While the health impacts of car dependence are widely acknowledged it is important to recognise that sustainable forms of transport inherently include some form of walking and cycling thus providing physical activity due to the need to walk to and from stops and destinations.

How it should be framed within legislation:

A healthy system is one that is also safe and secure and instils confidence in its use.

Health matters pertaining to transport should reflect sound governance and sit with and conform to government policies.

Importance: The health of transport users and system is important and should be viewed in the context of other objectives.

8. An environmentally sensitive system:

Environmental sustainability is of increasing importance given the implications of climate change and peak oil. A transport system needs to include consideration of all externalities including environmental costs when assessing projects.

How it should be framed within legislation:

Emissions relating to the transport sector should be considered when establishing greenhouse emission targets. Sustainable forms of transport should be provided to encourage usage and patronage in order to reduce the negative environmental impacts.

Importance: Environmental costs should be acknowledged as externalities

when assessing transport projects.

Other comments

State Government objectives should reflect the needs for a sustainable transport system in Victoria:

Growing the Victorian Economy:

The State Government has not commented on the economic benefit that public transport provides, both to the metropolitan and Victoria - wide economy. Public transport provides substantial economic benefits, through mitigating rising traffic congestion and also ensuring a greater level of accessibility within our communities.

Transport is often cited as a key issue in regard to people seeking access to employment, educational and recreational opportunities.

Improving environmental sustainability:

The State Government needs to explicitly link car usage with greenhouse emissions, and recognise the provision of frequent, competitive and well connected public transport will encourage greater patronage, and ultimately serve to reduce the substantial costs associated with road congestion and climate change.

Addressing disadvantage:

As stated, public transport has the potential to alleviate financial stress caused particularly by car dependence and rising petrol prices. Recent patronage increases, linked to rising petrol prices, has demonstrated that people are

willing to consider public transport – where the services are available.

It is important to recognise that while public transport is an alternative, it should not be seen as a second choice option or as a safety net. Public transport needs to be competitive with private vehicle travel to ensure it is sustainable and usable.

Changing land use:

Melbourne's first urban sprawl occurred predominately around the rail corridors that were established in the early 1900s. Recent urbanisation has generally occurred around freeways – this however is a symptom of the expansion of freeways that occurred over the past 50 years versus limited expansion of the public transport system.

The provision of public transport, particularly rail extensions in growth corridors would help re-shape urbanisation around sustainable transport. The provision of public transport and supportive land-use planning would assist in building higher densities around these areas.

Increasing and changing demand for travel:

In considering the changing and competing demand for travel, it would be expected that the Government would prioritise sustainable and active transport above car travel – particularly in instances where alternative road access is available.

Land use and transport integration:

It is welcoming to see the government acknowledge “that improved coordination land use and transport coordination is essential in progressing

government objectives.” In this regard the Government must examine departmental integration between planning and transport and also ensure that relevant planning legislation is included within the objectives of the Transport Integration Act.

The government has acknowledged the challenges this poses across a number of government departments but this integration needs to be tightened.

Codify policy goals:

Policy goals such as achieving 20% public transport modal share by the year 2020 should be enshrined in the legislation to ensure that government departments are united in achieving this goal.

Include attachments if required.