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Department of State Growth
10 Murray Street
HOBART TAS 7001

By email: transportaccess@stategrowth.tas.gov.au

To Whom it May Concern

Tasmanian Government Draft Transport Access Strategy

The Local Government Association of Tasmania (LGAT) welcomes the opportunity to comment and provide feedback in relation to the Tasmanian Government's Draft Transport Access Strategy ("the draft Strategy").

Incorporated under the *Local Government Act 1993*, the LGAT is the representative body for Tasmanian councils, fostering relationships between Local Government with both State and Federal Governments and promoting the efficient administration and operation of councils.

It is understood that a number of councils have made direct submissions to the Department of State Growth in relation to the draft Strategy. Any omission in this submission of comments that individual councils have made directly should not be viewed as a lack of support by LGAT for that specific issue.

General Comments

Local Government recognises that transport is critically important to the social, cultural and economic success of the Tasmanian community, both in urban and regional areas. In particular, the prioritisation and provision of decent access to affordable, reliable and proximate public transport for the State's residents, particularly those disadvantaged through economic circumstances, age or disability, is an objective that is supported by councils.

Draft Strategy's Purpose and Priority Areas

The seven outlined priority areas are by and large appropriate and supported by councils in principle; however the LGAT has received comment from some councils indicating that the aims are somewhat narrow in focus. In particular, feedback indicates a perception that any real commitment will be focused on the inner urban areas of the State's two major cities; Hobart (Hobart and Glenorchy areas) and Launceston.

Local Government is keen to see mention of activities planned in other areas of the State. For example there is interest in the North West regarding the improvement of transport options for Devonport based students who study in Burnie. In the South of the State, municipal areas including Kingborough, Clarence and Sorell are experiencing transport pressure in conjunction with strong growth in those areas.

A State-wide Transport Access Strategy should reflect the transport access task across Tasmanian more broadly.

Integration of Land Use and Transport Planning

The integration of transport and land use planning is critical to reducing the need for unnecessary travel, improving access to services and employment and reducing car dependency by providing other legitimate choices for getting around.

Given recent transport congestion issues with Greater Hobart and the well established transport access (and therefore labour market and social services) issues for many of Tasmania's most disadvantaged, there is an urgent need for the State Government to invest in integrated land use and transport planning for each of the State's three regions.

The Urban Fringe

The strategy acknowledges that people residing in the urban fringes are more likely to experience difficulty in accessing transport. It is suggested that State Growth could address this challenge by developing park and ride areas that cater for vehicles, cyclists and pedestrians along the major arterial transport corridors and servicing them with convenient express bus services.

Such areas would need to be compliant with the Disability Discrimination Act (DDA), and provide, as appropriate, services including street lighting, bus shelters, sealed car parks and bicycle storage facilities and safe pedestrian access.

Development and intelligent placement of park and ride sites would have the additional benefit of alleviating parking congestion within urban fringe centres and ensure parking for those people that live and work in those areas.

Often in urban fringe and regional/rural areas, people need to travel reasonable distances to access bus stops. Sometimes walking to the bus stop is not a feasible option. It is suggested that State Growth in conjunction with Metro could consider installing bicycle racks on the buses or secure bicycle storage facilities to enable more people to ride to bus stops.

Modes of Transport

The draft Strategy focuses on buses, active transport modes and taxi/ride-sourcing opportunities and confirms that buses should continue to be the cornerstone of public transport into the near future. This approach is understood and supported by Local Government.

Whilst that is the case, some councils are interested in understanding the State Government's position in relation to additional alternative methods of transport - an example put forward was ferries in the Hobart area - and whether such an option is a viable mode in the medium to longer term.

Availability and patronage

LGAT is aware that early in 2016 Metro modified a number of its bus services and routes to 'streamline' services and maximise efficiencies. This has resulted in reductions in the number of some services operating in affected areas. It is acknowledged that balancing the objectives of service delivery efficiency and maximised patronage is a challenge, particularly with Tasmania's highly dispersed population.

Notwithstanding, in order to achieve a successful public transport service, the public transport system needs to be available in the first place, and people need to be given the best opportunity to access it. In order to achieve this, it is agreed that governments and key service providers need to act cohesively in order to promote and encourage commuters to use public transport whilst administering an efficient service.

Public Transport Needs

Local Government acknowledges that the needs of public transport users are varied and that the provision of appropriate and accommodating bus design and supporting infrastructure are critical factors in determining whether an individual can access public transport or is precluded entirely. As the draft Report states, the accessibility of (disability discrimination compliant) bus stops and buses can be a significant barrier for people who wishing to use public transport.

A significant issue for councils within Tasmania has been and continues to be accessibility in relation to the installation of transport infrastructure - namely, bus shelters.

In Tasmania, there remains confusion in many areas around responsibility for the funding and maintenance of bus shelters, which in turn impedes the roll-out of accessible infrastructure; this is the situation despite previous attempts between Local Government, the State Government and Metro Tasmania (as a key transport provider) to address the issue.

As a result of the current impasse, there has been no determination of who should fund the required works to ensure that bus stops are compliant with the Standards. Instead, there has been an uncoordinated and ad hoc approach at various times from the respective parties regarding funding improvements, and there is little confidence that the State will reach the compliance targets set out by the Standards.

Priority Areas - Specific Comments

The following section provides specific comments on the draft Strategy's articulated Priority Areas. Comments have been kept brief for the sake of efficiency, however, if you require clarification or further comment please do not hesitate to seek further information.

Priority Area 1

Living closer: Improved opportunities for people to live closer to employment, education, services, recreational opportunities and key transport corridors.

Priority Area 1 Initiatives		
Initiative – Future Opportunities	Responsibility	Comments
1.5 Investigate planning mechanisms to provide stronger integration between land use planning and passenger transport provision.	Department of State Growth, Department of Justice	This initiative is broadly supported; however it is long past the time to investigate planning mechanisms, as they are well know and documented elsewhere. There is now an urgent need for the State Government to invest in this area and settlement planning more generally. Without this, the major of the remainder of the “Opportunities” will have little real impact on the issues currently in Tasmania.

	As a medium to longer-term measure, there is support for the inclusion of provisions for transport networks that do not affect the amenity of residents or pedestrian/traffic flow by inappropriate placement of street furniture, wherever this is possible in new developments (greenfield residential, commercial etc).
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Additional Comments

In order to achieve better integration between land use and passenger transport planning, the draft Strategy suggests "development and adoption by Local Government of street design guidelines that support walking, cycling and public transport".

Whilst it is desirable to implement street design guidelines that support active transport modes and public transport, it is important to note the disparate capacity of councils to be able to provide public infrastructure and the need to develop appropriate solutions for local communities.

In recent years Tasmanian Councils, with the assistance of the Tasmanian Division of Institute of Public Works Engineering Australasia have developed a suite of Standard Engineering Drawings and Subdivision Guidelines for use by Local Government in Tasmania.

These guidelines provide information on the *minimum standards* required by participating Tasmanian Councils for the design and construction of roads and utilities as per relevant statutory requirements and Australian Standards.

In setting minimum standards these guidelines are accessible and relevant to all councils; those councils that have a community need and corresponding capacity to provide additional infrastructure, particularly in urbanised areas are still in a position to provide infrastructure that facilitates active transport modes and access, without placing smaller and less well resourced councils and their rate payers in an untenable position.

Priority Area 2

Working together: Stronger collaboration and partnership between governments, key service providers, and public, private and not-for-profit transport providers.

The discussion in relation to this Priority Area is broadly supported. In particular, Local Government recognises the importance of ensuring transport access is considered in conjunction with land use planning. It is critical that key stakeholders work together cohesively to deliver an effective transport system. In this context it is also very important to have a clear understanding of roles and responsibilities to ensure that there are no weak links or transport gaps.

One of the key areas of concern for Local Government with regards to roles and responsibilities currently centres around the provision of DDA compliant bus stop infrastructure. This issue is discussed more fully under Priority Area 7.

Priority Area 3

Connected transport system: A focus on frequent, accessible, affordable, efficient and reliable services to connect people to employment, education, services and recreational opportunities.

Priority Area 3 Initiatives:		
Initiative – Future Opportunities	Responsibility	Comments
3.6 Implement the Main Road Transit Corridor bus priority and bus stop optimisation measures to improve travel time reliability.	Department of State Growth, City of Hobart, Glenorchy City Council	Supported in principle. LGAT would encourage development of partnerships with business and community organisations to develop creative solutions to public transport access barriers.

Priority Area 4

Better integration: ensuring public transport is easier to use through better coordination and integration of services.

Priority Area 4 Initiatives:		
Initiative – Future Opportunities	Responsibility	Comments
4.4 Upgrade bus interchanges and bus stops to facilitate transfers, including: <ul style="list-style-type: none"> Implementing the Hobart CBD and Launceston CBD bus interchanges. Identifying the location and upgrade requirements for major transfer points on the network. 	Department of State Growth, bus operators, councils	Local Government supports this initiative in general; however councils have expressed concerns regarding resourcing of bus interchanges and bus stops - there needs to be a consistent and equitable/appropriate approach to funding these between all parties. Currently for a majority of councils, private operators fund bus stops, whilst councils fund supporting infrastructure e.g. pathways.
4.5 Introduce common ticketing across bus companies, including consistency of fares and concessions.	Department of State Growth, bus operators	Some councils are keen to understand the feasibility of introducing common ticketing across all modes of public transport, not just buses.

Priority Area 5

Closing transport gaps: developing innovative approaches to enable those members of the community who are transport disadvantaged to overcome transport barriers.

Priority Area 5 Initiatives:		
Initiative – Future Opportunities	Responsibility	Comments
5.3 Trial the use of taxis (including accessible taxis), ride-sourcing, school buses and community transport in urban,	Department of State Growth	A number of councils have shown enthusiasm for this approach.

<p>urban fringe and rural areas to:</p> <ul style="list-style-type: none"> • Replace existing bus routes which are poorly patronised, circuitous and inefficient. • Address 'first mile/last mile' issues. • Increase span of hours. 		<p>In addition, one council has suggested that there may be merit in considering additional resources or conducting a trial for public transport operators to include assistants helping people on and off the bus (eg. elderly, parents with prams etc)</p> <p>Issues such as insurance provisions and other barriers around the use of community cars etc. would need to be addressed in any trial that is undertaken.</p>
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Priority Area 6

Innovative pricing: developing innovative pricing mechanisms to support the greater use of public transport in order to make it more viable.

Priority Area 6 Initiatives		
Initiative – Future Opportunities	Responsibility	Comments
<p>6.2 In conjunction with local government explore the opportunity to manage the demand, supply and pricing of car parking through measures such as:</p> <ul style="list-style-type: none"> • Examining the way that car parking requirements are set for developments. • Shared parking provisions. • Developing an accord between councils to manage parking across municipalities. 	<p>Department of State Growth, Tasmanian Planning Commission, Department of Justice, councils</p>	<p>There has been support shown by a number of councils for this approach and further exploration would be warranted.</p>

Priority Area 7

Improved infrastructure: providing more opportunities for people to walk, cycle and use public transport by making sure infrastructure is safe, accessible and attractive to use.

Priority Area 7 Initiatives		
Initiative – Future Opportunities	Responsibility	Comments
<p>7.6 Continue to improve the safety, amenity and accessibility of bus stops.</p>	<p>Department of State Growth, bus operators, councils</p>	<p>Local Government supports this initiative; discussed in more detail in 'Additional Comments' below.</p>
<p>7.7 Continue to implement the Walking and Cycling for Active Transport Strategy 2010 focusing on:</p>	<p>Department of State Growth, councils, cycling advocates</p>	<p>Local Government supports this initiative and notes that the approach aligns with a number of councils' Active Transport</p>

<ul style="list-style-type: none"> • Working with stakeholders to implement the principal urban cycling network. • Implementing the State Growth Cycleway Directional Resource Manual. • Working with councils to improve walking and cycling connections to major destinations. 		Strategies.
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Additional Comments

As highlighted within the draft Strategy, access to public transport can be a significant challenge for people living with a mobility related disability. Whilst councils are acutely aware of the requirements set out in the *Disability Standards for Accessible Public Transport 2002*, funding and resources are a significant issue for Local Government bodies, as well as for private service providers, in relation to meeting those requirements.

Councils continue to struggle in meeting their objectives set out by the Standards beyond current levels achieved, in significant part due to an historical lack of State and Federal financial support; for example, it is understood from previous discussions with State Growth that the State's original endorsement of the Standards in April 1999 was conditional on the Australian Government funding the implementation phase.

Despite a request for funding of \$10 million in 2005, no assistance has yet been forthcoming. This lack of funding has flow on effects that impact on the ability of councils to provide the necessary infrastructure to meet the requirements of the Standards.

It is proposed that discussions between LGAT and State Growth occur in the near future, in consultation with private service providers, to cooperatively address this challenge and to develop a commonly supported solution to improve accessibility to transport services and infrastructure.

Contact Details

Thank you for the opportunity to comment on the draft Strategy. Should you wish to discuss any of the comments within this submission, please contact Melanie Brown, Senior Policy Officer, on 03 6233 5961 or at melanie.brown@lgat.tas.gov.au.

Yours sincerely



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