



**Submission to the  
National Transport Commission**

**Exploring the opportunities for reform:  
discussion paper**

October 2011

Council of Social Service of NSW (NCOSS)

66 Albion Street, Surry Hills 2010

Ph: 9211 2599, Fax: 9281 1968

Email: [alison@ncoss.org.au](mailto:alison@ncoss.org.au)

## Recommendations

1. Transport planning should take place within a human rights framework, recognising the importance of mobility in enabling people to exercise their human rights.
2. The five policy priorities: A strong and smart economy; Liveability; Safe and healthy; Green and sustainable; and Fair, should be given equal weighting.
3. Planning for micro or flexible transport systems to address unmet need should be integrated with planning for other public and private transport systems.
4. Any changes to the current economic framework should acknowledge the inequities that are innate to current transport system and ensure these are not further reinforced.

## About NCOSS

The Council of Social Service of NSW (NCOSS) is an independent non-government organisation (NGO) and the peak body for the non-government human services sector in NSW.

NCOSS has a vision of a society where there is social and economic equity, based on cooperation, participation, sustainability and respect. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in New South Wales.

Established in 1935, NCOSS is part of a national network of Councils of Social Service, which operate in each State and Territory and at the national level.

NCOSS membership is composed of community organisations and interested individuals. Member organisations are diverse including unfunded self-help groups, children's services, registered training authorities, emergency relief agencies, chronic illness and community care organisations, family support agencies, housing and homelessness services, mental health, alcohol and other drug organisations, local indigenous community organisations, church groups, peak organisations and a range of population-specific consumer advocacy agencies.

### ***Transport Policy Advice Group***

NCOSS chairs the Transport Policy Advice Group (TPAG). TPAG consists of organisations, groups and individuals who are passionate about transport. TPAG was formed by NCOSS to provide advice on ensuring social inclusion and wellbeing across all communities by reducing transport disadvantage.

The objectives of the policy advice group are to:

1. Identify systemic issues that emerge for transport policy that affect access and equity for disadvantaged communities
2. Provide a forum for ideas and discussion on transport issues that may impact on policy

3. Provide advice and expertise to NCOSS on emerging issues for the transport sector
4. Provide policy advice and expertise on the interests and transport needs of communities with a focus on disadvantage.
5. Provide advice to and work with all levels of government to develop effective transport responses with particular focus on the needs of disadvantaged communities.

Current members of the TPAG are representatives from Community Transport, Action for Public Transport, the Aboriginal Transport Network, the Rail, Tram and Bus Union, Western Sydney Community Forum, Northern Rivers Social Development Council, Cancer Council NSW, PositiveLife NSW, Youth Action and Policy Association, and Aged Care Alliance.

## Introduction

The Council of Social Service of NSW (NCOSS) appreciates this opportunity to respond to the National Transport Commission's *Exploring the opportunities for reform: discussion paper*.

In Australia, transport is becoming an increasingly important social policy concern. In forums, discussions and focus groups within the human service sector, transport is routinely identified as a barrier to accessing to jobs, education and healthcare, and as a key factor limiting effective service delivery. These concerns are reflected in emerging literature identifying the linkages between transport and social outcomes<sup>1</sup>. The 2003 *Making the Connections* report<sup>2</sup>, for example, clearly defines the relationship between transport and social exclusion and led to stronger connections between social policy considerations and transport planning processes in the UK.

As the Discussion Paper prepared by the National Transport Commission (NTC) suggests, a number of national and international trends indicate that transport as a social issue will continue to gain prominence. In particular, rising oil prices, the urgent need to reduce carbon emissions, and an ageing population, all suggest that current approaches to transport will prove inadequate.

The comments below are therefore provided from a social justice perspective concerned with transport as a current and ongoing social policy concern.

## Why is Transport Important?

The ability to access transport shapes life opportunities, providing access to goods, services and social and cultural networks. In Australia, however, a lack of transport means that many groups are unable to realise their social, cultural and economic rights. This situation has evolved as a result of factors including inadequate

---

<sup>1</sup> See for example, Hurni, Anne (2006) *Transport and social disadvantage in Western Sydney*, available for downloading at [http://www.wscf.org.au/uploads/File/Transport\\_disadvantage\\_report\\_web.pdf](http://www.wscf.org.au/uploads/File/Transport_disadvantage_report_web.pdf)

<sup>2</sup> Social Exclusion Unit (2003) *Making the Connections: Final Report on Transport and Social Exclusion*

investment in public transport infrastructure, a lack of integration between transport and land use planning, and a focus on transport as an economic issue rather than a social issue.

While NCOSS acknowledges the strong linkages between transport and the economy, we believe that these links should not be the only driver for investment in transport. Transport planning – at every level – should take place within a human rights framework that recognises the importance of mobility in enabling people to exercise their human rights.

**Recommendation:** That transport planning take place within a human rights framework, recognising the importance of mobility in enabling people to exercise their human rights.

## What are the key national challenges for transport?

In addition to the challenges listed in Section 2 of the report, NCOSS notes the following:

### ***Lack of integration between land use and transport planning***

Section 2.4 describes the challenge to transport provision presented by dispersed, low density cities. It also notes that a move to higher density developments is often politically sensitive, particularly for local councils. The role of each level of government in transport and land use planning should be acknowledged, with a potential role for the Commonwealth in encouraging better integration between transport and land use planning by the states.

### ***Changes to service provision***

Changes in the nature of human service provision have resulted in significant changes in transport demand. These include, for example, the regionalisation of services, and earlier discharge practices in the health system. The current passenger transport system is mainly built around the transport requirements of commuters, resulting in a system in which people have difficulty accessing services such as healthcare.

## What do we want from our transport system?

The NTC discussion paper identifies five policy priorities for our transport system: A strong and smart economy; Liveability; Safe and healthy; Green and sustainable; and Fair.

NCOSS would like to emphasise that policy priorities 2-5 are not subservient to policy priority 1 (a strong and smart economy). The transport system should be designed with the ultimate goal of improving all people's quality of life – particularly groups that are marginalised and disadvantaged by the current system.

**Recommendation:** That the five policy priorities: A strong and smart economy; Liveability; Safe and healthy; Green and sustainable; and Fair, be given equal weighting.

Addressing unmet need should also be at the forefront of planning for an improved transport system. While this is implicit in the policy priorities ‘liveability’ and ‘fair’, decisions that centre around economic requirements frequently neglect other unmet needs within the community. This occurs even when transport services are available, with unmet need linked to income levels, health status, ethnicity and gender, as well as geographical location.

In many cases, it is impractical or unviable for mass passenger transport designed around economic opportunities to meet the needs of all transport users. Micro or flexible transport systems – such as community transport – have potential as a mobility solution in these circumstances. Planning for these services should be integrated with planning for other public and private transport systems.

**Recommendation:** Planning for micro or flexible transport systems to address unmet need should be integrated with planning for other public and private transport systems.

## Opportunities to address the national transport challenges

### *Infrastructure planning and investment*

Of the processes that link Government activities with the development of the transport system, infrastructure planning and investment is the clearest and most direct. The Australian Conservation Foundation’s report *Australia’s Public Transport: Investment for a Clean Transport Future*<sup>3</sup> found that over the last ten years, Governments at all levels have spent more than four times the amount of money on the construction of public roads and bridges than on the construction of public railways.

NCOSS believes that commitment to the development of a fair, equitable and sustainable transport system would require rebalancing the investment of public monies in favour of public transport.

The discussion paper also flags the potential for an increased role for private investment in transport. NCOSS remains to be convinced of the merits of this approach with respect to passenger transport.

Analysis of existing public-private partnerships in transport provision suggests that social issues are not given adequate (if any) consideration; raising serious equity issues. For example, while legislation such as the Disability Discrimination Act (1992) exists to protect the rights of some vulnerable people, there are no similar

---

<sup>3</sup> Australian Conservation Foundation (2011) *Australia’s Public Transport: Investment for a Clean Transport Future*. Downloaded 6 October 2011 from [http://www.acfonline.org.au/uploads/res/ACF\\_transport\\_funding\\_report\\_27-4-11.pdf](http://www.acfonline.org.au/uploads/res/ACF_transport_funding_report_27-4-11.pdf)

mechanisms to ensure access for other vulnerable groups. This can result in situations where certain groups of people are effectively prevented from using a particular service. For example, the absence of national standards for concessions means that private providers frequently do not offer the same concessions as those available on Government-run services, thereby excluding many low-income groups<sup>4</sup>.

### ***An economic framework for efficient transport markets***

There is the potential for reforms to existing road pricing systems to result in the more efficient use of existing infrastructure and to influence behaviour change in favour of more sustainable transport options.

While NCOSS encourages reforms that would more closely and accurately link road usage with road costs (including social and environmental costs), equity should be a central consideration in such reforms. People for whom no other transport options exist – such people with limited mobility – should not be further disadvantaged. In implementing such reforms, the relationship between car use and income also needs to be better understood. For many low-income households, the only affordable locations in which to live are on city outskirts with limited or no access to public transport. These households therefore rely on cars to access employment and education opportunities. Increasing costs may effectively trap these households in a cycle of poverty.

NCOSS also notes that any revenue raised from road-pricing reforms should not be automatically re-invested in roads. This would simply reinforce the historical imbalance in funding described above.

<p><b>Recommendation:</b> Any changes to the current economic framework should acknowledge the inequities that are innate to the current transport system and ensure these are not further reinforced.</p>
--

## **Conclusion**

The National Transport Commission's survey found that participants believe the current approach to transport is not working. NCOSS's own experience is that it is vulnerable and marginalised people who are most impacted by the flaws identified in the current system. Unless the system is changes, with efforts made to address the challenges facing the transport system, these groups are likely to be further disadvantaged.

NCOSS therefore welcomes the Commission's work to investigate opportunities for reform. We believe that an effective transport system is one that enables all people to realise their social, cultural and economic rights, and encourage the Commission to work towards this goal.

---

<sup>4</sup> Note that adopting a set of national standards for concessions was a recommendation of the 1997 Senate Inquiry into concessions. Parliament of Australia (1997) *Concessions – Who benefits? A report on concession card availability and eligibility for concessions*. Standing Committee on Family and Community Affairs, November 1997.