



Public Transport Users Association
Submission in response to Draft City of Melbourne Transport Strategy
3 April 2006

General Comments

The City of Melbourne has prepared a Draft Transport Strategy for public comment. The Public Transport Users Association supports this Strategy and sees it as an important positive step by Victoria's capital city council towards joining the world's other major liveable cities in adopting a 'best practice' approach to urban transport.

The need for such an approach has been adequately explained in the peer review reports prepared for Council by Professors Peter Newman and Jeff Kenworthy and Dr Jan Scheurer [1], Dr Paul Mees [2] and Prof Graham Currie [3] in response to the East West Integrated Transport Proposal. These expert reports have all concluded that expansion of road and/or car parking capacity in response to car traffic pressures is a counterproductive measure, both because it fails in its objective of reducing traffic congestion or parking pressure, and because it undermines the amenity of urban environments. This conclusion has rightly been adopted as the basis of the Council's Transport Strategy.

Council expects the daily number of visitors to the CBD to increase to one million by 2014. It should be self-evident that the only way to achieve this is through measures that more efficiently move people in and out of the CBD area, and that this cannot be done by private motor vehicle: there is simply no space to accommodate them. It is therefore vital for the continued growth and vibrancy of the City of Melbourne that investment be made to encourage walking, cycling and public transport not only within the CBD, but for travelling to it.

The alternative to the ongoing stream of big-ticket infrastructure proposals that reinforce car dependence is the 'evidence based planning' approach. This starts with city-wide goals for liveability and prosperity, and evaluates alternative strategies by reference to these goals and to evidence about current conditions and the effectiveness of various approaches. Proposals for specific infrastructure measures come at the end, rather than the start, of the process.

While we note some reservations on specific points, the PTUA largely agrees with the assessments and conclusions drawn by the panel of experts and urges that these continue to inform the formulation and implementation of Council's Transport Strategy. The comments in this submission may be taken as supplementary to those already made by the experts.

Specific Comments

Section 1.2

For reasons given in [1] and [2], we do not agree with the proposition that the metropolitan rail and tram networks are experiencing capacity constraints. While buses provide greater

flexibility from the viewpoint of transport operators, fixed rail provides better environmental performance and greater investment certainty when large numbers of passengers are to be carried. In evidence-based planning, assessment of the required transport task occurs prior to the selection of an appropriate mode.

Section 1.4

On the merits or otherwise of the Committee For Melbourne proposals and the East West Integrated Transport Proposal we defer to the peer review reports [1,2,3]. As these reports explain, the inclusion of public transport corridors in freeway proposals is best seen as a 'greenwash' tactic that is inconsistent with strategic objectives.

Section 2.1

Also highly relevant to transport at Federal level are the Commonwealth taxation arrangements which discriminate in favour of car use and against sustainable transport, chiefly through deductibility of motor vehicle expenses where similar deductions are not available for public transport, and through concessional FBT treatment of company cars and car parking.

Section 2.2.4

This section correctly hints at the privileged position of VicRoads relative to the Public Transport Directorate in DoI, but this could be made more explicit. The DoI organisational chart shows PTD as one of seven minor divisions reporting through the DoI Secretary and Management Committee with no formal channel of communication to the Minister, while Vicroads is a separate, powerful agency reporting directly to the Minister. The peer review reports recommend the public transport planning function be removed from within DoI and given instead to an independent and competent agency similar to Vicroads.

Section 4.1.5

In regard to alternative fuels we note that all available evidence suggests they can make only a limited contribution to the transport task and most have unwelcome side effects (such as increased emissions of certain pollutants). We also note that the UK Royal Commission on Environmental Pollution in 1994 found that "there would not be any overall environmental advantage in widespread use of alternative fuels in the UK".

Section 4.2.1

Equity reasons in our view preclude the use of road pricing initiatives for passenger vehicles until the coverage and frequency of public transport is addressed, to ensure people have alternatives to driving in congested traffic. Public transport capacity is not a barrier to increased coverage, as [1] and [2] explain.

Section 4.4.2

It is suggested that for the avoidance of doubt, "not new roads" be augmented to "not new or expanded roads".

Section 5

Suggested wording: "In the future, frequent, safe and reliable *go-anywhere-anytime* public transport will..."

Section 5.2.1

We do not agree that City Loop capacity or Dandenong line triplication are urgent issues for the metropolitan train network; see [1] and [2]. Under evidence-based planning, specific infrastructure proposals emerge only at the end of the process, after there has been agreement on what the objectives are and what approaches are effective in meeting those objectives. For this reason we also regard the north-south underground rail proposal in [3] as premature and potentially counterproductive.

If we were nonetheless asked to nominate specific projects, we would include a number not mentioned here. Detailed proposals can be found in the PTUA publications *It's Time To Move* and *Five Years Closer to 2020*, and also in the report *Most Liveable and Best Connected?* prepared for the Metropolitan Transport Forum.

Section 5.2.5

Specific Federal and State taxation policies on which local government should urge action include changes to the 'statutory formula' for FBT motor vehicle concessions, distance-based charging for registration and third-party insurance, and indexation of fuel excise.

Section 5.2.6

It is agreed that free public transport is not a priority, including for tourist shuttles. The emphasis should be on value for money: currently service is poor and fares are high. Best-practice public transport systems offer the reverse: excellent service and low fares, as in Vancouver.

It would also seem to be appropriate that event organisers (not the government) pay for, or at least contribute to, subsidised public transport to big events.

Section 5.4.1.1

As explained in [2], a common component of road freight policies in liveable cities worldwide is disincentives for heavy trucks to use inappropriate routes on arterial roads, particularly where a parallel freeway route exists. One such disincentive in the City of Melbourne context post-Citylink is reduction in green time for King Street; this also aids other objectives by assisting the movement of trams on intersecting streets.

Section 5.4.3

In regard to short-term car parking, it is the PTUA's view that a more appropriate strategy to boost casual visits to the CBD is to press the State Government for improvements to off-peak, evening and weekend public transport services as a necessary complement to the *Melbourne 2030* Activity Centres policy. The alternative strategy of facilitating the development of short-term car parking leads to an unsustainable shift from public transport to car use for CBD visits.

The 2006 parking levy, being CBD-specific, may in the absence of other measures risk leakage of activity away from the CBD to other parts of Melbourne. The result would be a decline in CBD activity and an increase, not a reduction, in car journeys. Other planning measures also require attention so that the levy's effectiveness is not undermined; see response to Section 7.1.3 below. Council must insist as a minimum that State Government proceeds of the levy be applied to public transport improvements to make people less dependent on CBD car parking, particularly in the evenings and on weekends. The scope of the levy may also need to be broadened in order that parking pressure is not merely transferred to neighbouring municipalities.

Section 5.4.4

Incentives for use of alternative fuels in vehicles are an example of a policy measure that should arise out of an assessment of evidence for this and comparable measures. Such an assessment should consider the fiscal drain from these incentives and the extent to which this reduces the scope to improve public transport and active transport provision. Such incentives are also ineffective in the absence of measures to limit the increase in car travel, which currently negates the effect of alternative fuels, emission controls and more efficient engines.

Section 5.5.1

In recognition of the importance of transport between the City of Melbourne and Melbourne

Airport for business travellers, the City of Melbourne should press the State Government for more sustainable airport transport alternatives. Mees [2] considers a rail link to Melbourne Airport essential to Melbourne's future economic competitiveness. In the absence of such a link, Council should push for integration of Skybus services into the Metlink fare system.

Section 5.5.2

We note that with the regional fast rail project there has been a significant lost opportunity to increase frequencies, which is the most important element in encouraging mode shift.

Section 5.5.3

It is vital that any new coach terminal within or adjacent to the CBD integrate well with the existing public transport network, and provide convenient connections to suburban train services.

Section 5.5.4

We note that having made extensive improvements to regional roads, it is now important to improve regional rail and coach services to a similar standard.

Section 5.6

As a potential strategy to reduce the impact of car parking on parkland, Council may consider a phase-out strategy, such as reducing the number of spaces by 20% per year over five years, and ensuring public transport provision is increased to match.

Section 6

Suggested addition: "In the future, public transport will have better coverage, and there will not be fewer tram stops."

Section 6.1.1

There is a need to review green-light time for pedestrians, and increase this (or reduce cycle times) at locations where appropriate, such as King Street. The practice of terminating the pedestrian phase (green plus flashing red) ten seconds or more before the road traffic phase, as in Collins St crossing Elizabeth St, should be discontinued.

Section 6.1.1.2

The City of Melbourne has a very high number of pedestrian and cyclist casualties. Fatality and serious injury risks fall significantly when traffic speeds are below 40km/h. Lower speed limits also reinforce among motorists that CBD streets are not through routes and that this is a pedestrian priority zone. For this reason the PTUA strongly supports lower speed limits in the CBD. A similar policy should be considered for other locations with high pedestrian activity, and for local residential streets.

Section 6.1.1.3

Council should not overlook the role played by vehicles parked on a street in providing a buffer zone between the footpath and moving traffic, which contributes significantly to street amenity. Any proposal to expand the use of 'clearways' in order to facilitate public transport priority must take this into account.

Section 6.1.2

It is noted that policies that encourage more cycling generally have the feedback effect of lowering casualty rates among cyclists. We also endorse the discussion of cycling incentives in [2].

Section 6.1.3.1

The PTUA strongly endorses the opportunity described in this section. It may also be argued that tram priority at intersections is not only a more effective way of speeding up tram travel

than deleting stops, but also allows tram platform stops to be smaller (thus cheaper and less intrusive), since they don't have to cater for queues of trams.

On the more general issue of on-street running of trams, we are largely in agreement with the experts' assessment in [1]. The operation of trams in major shopping streets throughout Melbourne's inner suburbs is a paradigm example of transport and land-use integration, and of transit-oriented urban design (albeit having come about more by historical accident than by design). Planning objectives are therefore better satisfied by retaining trams in these streets and giving them priority over private cars than (for example) by removing them to separate rights-of-way, or by permitting trams to be delayed at traffic signals that favour cars. The need for tram priority and for disability access should take priority over the movement of private cars on streets where trams run.

Section 6.2

We note that Vancouver's Liveable Region Strategy places an order of priority on transport modes almost identical to the order listed in the second sentence of this section, with the exception that public transport and commercial vehicles are placed before private motorists. It is assumed that the list here is not intended to imply any order of priority.

Section 6.2.3.1

In the context of inadequate State support for development of parking precinct plans, it may be emphasised that State planning frameworks are focussing on achievement of higher urban densities without addressing the prerequisites for transport mode shift required as an adjunct to higher-density development. Such prerequisites include high-quality public transport services and active transport facilities. It may be noted that Los Angeles has an urban density that is quite high by the standards of American cities. See also our comments on Section 7.1.4 below.

Section 6.3

The PTUA supports the rationalisation of the bus network in the CBD so that fewer CBD streets are used by trunk routes from the suburbs, and also supports priority for buses at intersections, and other measures such as bus lanes where these do not infringe on local amenity. It is also noted that construction of a train line to Doncaster and reorganisation of bus routes along the lines suggested by the PTUA would remove the need for many buses to run into the CBD, and accordingly any revisions to road hierarchy or other measures to accommodate CBD buses should be reviewed as needs change. Some CBD bus routes will likely always be necessary to link the city with nearby suburbs such as West Melbourne, Port Melbourne and the dock area. Under our preferred evidence-based planning approach, the various options for providing these services (including the specific routes and type of vehicles used) would be assessed on their merits against liveability criteria and the ultimate decision would involve the public to a greater extent than currently.

Section 7

We submit that the focus of good urban planning is to *improve access* with reduced *travel* (especially by private car).

Section 7.1.3

We strongly endorse the proposal to replace minimum car parking requirements with maximum car parking, following best practice in overseas cities. However, the wording ("maximising car parking") is ambiguous. There is anecdotal evidence that the provision of car parking in new developments in excess of residents' needs is undermining the effectiveness of the CBD parking levy by encouraging residents to rent parking spaces to commuters on an *ad hoc* basis.

Section 7.1.4

We strongly endorse the proposal to expand parking limitation measures to local areas in the City of Melbourne: see comments to Section 5.4.3.

We do not agree with the view that urban density is a causative factor in public transport use; rather it is a correlation arising from the fact that high-density cities have been forced to provide high-quality public transport out of necessity, while many lower-density cities have been content to allow public transport to decay in favour of car use. Even high-density developments will not promote public transport as an alternative to car use if the public transport is uncompetitive with car travel. The Hoffman Brickworks development in Brunswick is one example of this principle operating in Melbourne.

Section 8

Recommendation 32: Please refer to comments on Section 4.2.1.

Recommendation 42: Strongly supported. Note however that there has been a tendency for platform stops to be over-engineered, reducing the number that can be constructed for a given budget. Our joint position statement with disability groups calls for the use of economical platform stops with a smaller footprint, in order that more can be provided in less time and with less impact on the street.

Recommendation 53: We support the development of park-and-ride facilities at railway stations outside activity centres, in order that commercial redevelopment can displace car parking at stations within activity centres. We do not support any net increase in car parking at railway stations: in the 1990s Toronto had five times as many train passengers as Melbourne despite having only half as many car parking spaces at stations. We instead support the overhaul of suburban bus services to function as effective feeders into the rail system, because it is only in this way that the large passenger volumes envisaged under the 20% by 2020 goal will be able to access stations in a convenient and cost-effective manner.

Appendix 2

Connex: Connex is the suburban *heavy* rail network operator.

Yarra Trams: We take issue with Yarra Trams' portrayal of its superstop work and the implication that there is community resistance to DDA compliance, rather than to tram stop removals as occurred in Collins Street.

VicTrack: The PTUA would want to be assured that developments around public transport facilities do not detract from the capacity to expand public transport in future.

References

Copies of the peer review reports on Melbourne's Future Transport Options are available as Appendices to the Draft Transport Strategy and can be found in the documents for the February 2006 meeting of Council's Planning and Environment Committee.

[1] Dr Jan Scheurer, Prof Peter Newman and Prof Jeff Kenworthy. *Melbourne's Future Transport Options: A review for the City of Melbourne*, December 2005.

[2] Dr Paul Mees. *Melbourne's Future Transport Options: A report to the Melbourne City Council*, December 2005.

[3] Professor Graham Currie. *Melbourne Future Transport Options: Final Report*, December 2005.