Dear Ms Trenberth,

I am the Clean Air Campaigner for Environment Victoria, Victoria's peak community environment group which represents over 150 affiliate groups as well as about 2,000 individual members and supporters.

Alan Parker from People for Ecologically Sustainable Transport has drawn my attention to the Inquiry and asked me to support his submission. This I do, and hope that I am not too late for my support, and following comments, to be considered.

Of special concern to me, as a clean air campaigner in Melbourne, are:

- a. the franchising of our public transport system with, apparently, inadequate intergration between the hived-off sections and without the provision for long term strategic planning.
- b. the different cost-benefit analyses applied to road and rail investment, and both forms of CB analysis are too limited anyway.
- c. the apparent lack of appreciation about the impact of urban and transport planning on energy and pollution.

I will now briefly elaborate on each of these three points.

a. No integration between franchised public transport sectors.

The Victorian State Government is currently in the process of preparing our public transport system to be sold off as franchises in about March next year.

If a public transport system is to operate effectively it must run as a city wide network in which services and timetables connect. British experience shows that where services compete with each other for patronage, then patronage actually declines. The competition should instead be focused on the efficient provision of services within a centrally established framework that defines minimum frequencies, connect times, fares, concessions, client rights, information and safety.

There is little indication that the Victorian Government knows how to set up this central integrating framework.

One of the potential dangers in this whole process is the lack of adequate benchmarking about what are appropriate services. The Government has promised, in its 12 Guarantees, that the current level of service will be maintained. Yet the Auditor General's Report on our public transport system points out severe inadequacies with the measurement of services.

I believe that the Commonwealth Government could play a role in identifying appropriate benchmarks and integration frameworks.

## b. Cost-benefit analyses.

I represented the environment movement on the Consultative Committee for the EES for the Scoresby Transport Corridor. This Corridor goes from Ringwodd South to Frankston and is a large chunk of the Melbourne orbital ringroad that VicRoads has been planning and wanting for many years.

Unsurprisingly the consultants employed to develop the options have

identified four options, none of which include the development of an integrated public transport system, and are heavily favouring the construction of a major freeway.

The CB analysis for the freeway defines as a benefit any time savings, down to a second, that car travellers may make, and applies a dollar value for this time saved. The Costs exclude ir pollution costs, losses to public transport patronage, and ignore potential benefits from other expenditure of this capital. In contrast, when considering including in the options the extension of the Glen Waverley railway line, the consultants took no consideration of the value of time saved to passengers. They only included the potential additional revenue and concluded that it would not be enough to cover the costs of the railway.

In addition, the modelling made all sorts of assumptions about the economic benefits that a freeway would bring, ignoring the increasingly large body of research that indicates that roads quite often take away economic activity from regions.

I believe that the Commonwelth has a role in establishing much better CB models for rail provision.

c. the apparent lack of appreciation about the impact of urban and transport planning on energy and pollution.

Rail provision, along with other transport provision, can significantly alter the pattern of city sustainability almost overnight. Thus the construction of Melbourne's orbital freeway will quickly turn Melbourne from a mono-central city with a well used radial transport rail system to an edge city with a grossly underused rail system and over used road system. We already drive 70 million km per year and this can only increase dramatically under this scenario. The implications for energy use, global warming gas emissions, air pollution and the physically unhealthy reliance on cars rather than exercise associated with public transport, are horrendous.

If, instead, we extended the Glen Waverley railway line we would be investing in a far more sustainable city shape that reduced energy needs and pollution and would obviate the need for the construction of the Scoresby freeway.

These sorts implications need to be taken into account at all levels of Government, including the Commonwealth, when considering road and rail development.

I hope that these comments are of use to you, and I would be happy to discuss them further with you if you feel the need.

Regards

Bronwen Machin