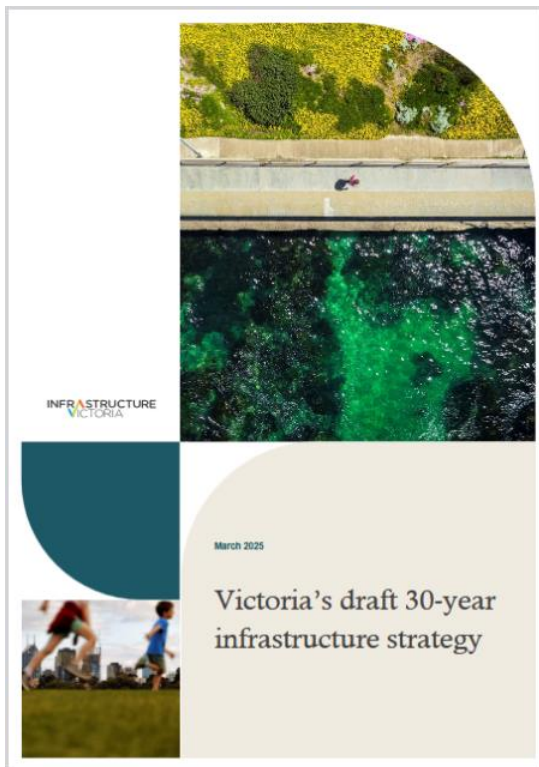




VTAG Submission to the Infrastructure Victoria Draft 30-Year Infrastructure Strategy

April 2025

Victorian Transport Action Group - Submission

The Victorian Transport Action Group (VTAG) congratulates Infrastructure Victoria (IV) on releasing the Draft 30-Year Infrastructure Strategy. The strategy, free of political spin, is a welcome resource that provides a depth of analysis and rigour lacking in the many official plans that outline the Government's policy agenda.

Overall, VTAG supports the strategy as a business-as-usual approach to addressing the state's needs. However, VTAG is concerned that a business-as-usual approach is not an adequate response to the existential threat of climate change.

We urge IV to revise the strategy to explicitly acknowledge infrastructure's critical role in generating GHG emissions during construction and operation. We note that the state's project evaluations do not adequately address Scope 3 emissions, and this is an area of innovation we encourage IV to adopt.

Attachment A compares the draft strategy to our May 2023 submission. We are pleased that our views are aligned with the current strategy. Our concerns are limited to:

- Greater emphasis be placed on creating a strategy to reduce emissions to net zero
- Accessible tram stops should be seen as part of a broader program to reallocate street space in support of urban consolidation
- We do not support further fare reductions until services are adequately funded
- Planning for electrification to Clyde and Kalkallo should be a recommendation and not a future option

Attachment B provides our thoughts on developing a comprehensive, frequent service plan for Melbourne.

We trust that you will be able to incorporate these views in the final strategy. We would also welcome an opportunity to discuss our submission further should you require further evidence in support of these changes.

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Attachment A: Recap of VTAG's May 2023 Submission

The following sections review the Draft Strategy against VTAG's May 2023 submission. The commentary generally highlights area of common agreement but also areas in which VTAG respectfully disagrees.

Since making our submission in May 2023, VTAG has been considering the vexing problem of sharing road space. We note and support IV's Recommendation 6 (Make government infrastructure more accessible), but in our experience, this recommendation doesn't adequately address the problems of access and the sharing of public space.

The program to upgrade tram stops to meet accessible standards has failed. The deferral of the completion deadline masks what has become, in many locations, a wicked problem. In our view, the solution lies in recognising that the accessibility is only one of many demands on public space being driven by urban consolidation.

VTAG is currently campaigning to establish a State/Council taskforce focused on the transformation of Sydney Rd. Sydney Rd typifies the problems of all inner and most middle councils as they balance the competing demands for road space. In this context, accessible tram stops are one demand amongst many. Adopting this multi-layer approach will address the failure of unilateral approaches experienced by the accessible tram stop and safer cycle programs.

The remainder of this attachment focuses VTAG's previously flagged concerns.

Confront long-term challenges - Climate change

VTAG argued in its May 2023 submission that climate change is an existential threat. This is recognised in the State's commitment to achieving net zero. Yet the current draft strategy implicitly fails to acknowledge the important role infrastructure will play in the achievement of net zero. The plan is clearly framed around adaption. Implicitly, the plan is premised on raising temperatures.

The Victorian Government will need to use its infrastructure to overcome some major challenges over the next 30 years. Victorians will need infrastructure to work in a warmer, drier climate and withstand more extreme weather events. And as Victoria's population grows and changes, more Victorians will need to use many types of infrastructure. The shape of Victoria's cities affects how quickly the government can provide this infrastructure. It is often more expensive to deliver infrastructure in new suburbs on the outskirts of Victoria's cities, compared to upgrading existing infrastructure in established suburbs. (Draft Strategy, p.4)

The strategy acknowledges the Government’s net zero targets but fails to offer any advice as to how infrastructure should be evaluated and prioritised in support of this policy. IV’s evaluations follow business-as-usual evaluation methodologies, where GHG is treated as one factor amongst many. This approach effectively allows net zero ambitions to be traded off against other considerations such as travel time and convenience.

We urge IV to re-read our original submission.

Manage Urban Change

IV 2021 Recommendation	VTAG May 2023 Comment	VTAG Response to IV’s Draft Strategy
33. Publish Victoria’s transport plan	We note the Auditor General’s findings that “DoT and its predecessors have not, over the past decade, demonstrably integrated transport planning and are yet to meet the Act’s requirements for the transport plan”. We note that DoT contends that they meet the requirements of the act through the preparation of multiple, disjointed plans. We would therefore propose that IV strengthen this recommendation by providing advice on the minimum requirements in terms of scope and content expected within a state transport plan as per Section 63 of the State’s Transport Integration Act 2010.	DR 35. Prepare and publish infrastructure sector plans to shape Victoria’s cities The lack of open and transparent planning by the Department of Transport and Planning (in defiance of the Transport Integration Act) continues to be a problem for Victoria. We support this recommendation.
42. Redesign tram routes	We support this recommendation and refer IV to our previous submission to the draft 2021 Strategy ¹ .	DR 8 Extend Melbourne’s trams to encourage more new homes nearby We note IV’s support for tram extensions and, importantly, for service upgrades to support the state’s housing strategy.

¹ Mike Reece, 18th October, 2016, *Draft 30 Year Infrastructure Strategy Submission*, Victorian Transport Action Group
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		We support this recommendation.
43. Active urban renewal with new trams links: Fishermans Bend	We note that the implementation of this project is now overdue, and it is an important example of the integrated land use and transport development needed to address Melbourne's housing short through infill development.	We note that need for tram extensions into Fishermans Bend has been acknowledged in DR 8 (above).
46. Reduce bus and trams fares	VTAG does not support reductions in fares while there is continuing under-investment in public transport services. Public transport is already solidly subsidised especially for pensioners, seniors, students and disabled, and this is considered appropriate while there is ongoing overt and subvert public financial and regulatory support for private mobility. We would urge IV to address improvements to service quality and coverage as the priority for funding. VTAG does not support the introduction of mode-specific pricing as the multimodal fare structure is an attractive feature of Melbourne's public transport network.	DR 13 Make off-peak public transport cheaper and simplify regional fare zones Our previous concerns have not been addressed in the draft strategy.
48.Appoint an independent transport pricing advisor	IV has not demonstrated that the appointment of an independent advisor would bring any benefits. There may be merit in an independent advisor with a broader remit to investigate service deficiencies, investment decisions and equity in accordance with metropolitan and regional planning policies. .	We support the withdrawal of this 2021 recommendation from the strategy.

Harness infrastructure of productivity and growth

IV 2021 Recommendation	VTAG Comment	VTAG Response to IV's Draft Strategy
57. Reshape the metropolitan bus network and introduce 'next generation' bus services	We draw IV's attention to our submission on the IV's bus study ² and note that the needed bus improvements are more extensive than reflected in IV's 2021 recommendation.	DR 9 Run faster bus services, more often, in Victoria's largest cities DR 10 Build a new bus rapid transit network We support these recommendations
66. Construct an outer metropolitan road and rail corridor	Construction of the outer metropolitan road corridor will further lock in the auto-dependency of the outer north and west. This recommendation must be reviewed and assessed, including any induced land use changes, against the imperative of reducing transport-related greenhouse gas emissions.	DR 43 Create and preserve opportunities for future major infrastructure projects We noted that IV no longer supports OMR as a project for construction.

² Victorian Transport Action Group, 2023, *Get on board: Making the most of Melbourne's buses. Submission to Infrastructure Victoria*.
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72. Prioritise and oversee infrastructure delivery in growing communities	This recommendation should be expanded to address the lack of public transport in growth areas. Consideration should be given to shift responsibility for growth in transport to the agencies responsible for land use development to ensure public transport services parallel development in the same way that water, power, sewage and roads are integrated with development. At the same time, the governance of growth area development to date is out of step with more recent strategic policy such as 20-minute neighbourhoods. IV should review governance arrangements that will ensure that growth area development can only proceed when residents can be guaranteed that 20-minute neighbourhood accessibility to the needs of daily life will be available from their first day. Furthermore, governance arrangements for growth area developments should ensure that implementation of PSPs meets the requirements outlined by VTAG to ensure emissions reduction relative to Business As Usual is achieved.	FO Extend metropolitan trains to growth areas in Melbourne's north and south-east With respect, we assume this recommendation has been labelled a Future Option in error. Urban development around Clyde and Kalkallo is already well advanced. We appreciated that these projects may need to be sequenced, mindful of other urban priorities but planning for these projects must happen now if construction is to start around 2030. We urge IV to revise this recommendation to make clear that "Planning to commence for electrification to Clyde and Kalkallo".
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New – develop an integrated transport and land use plan for Melbourne’s Western and Northern Regions, with a focus on realising the potential already identified in strategic plans for centres such as Sunshine and Broadmeadows, etc.	Following the logic of VTAG’s proposal for a new approach to assessment of infrastructure planning proposals and projects, we draw IV’s attention to the urgent need to review planning for the Western and Northern metropolitan regions. These two regions are the focus of Melbourne’s current and future growth yet planning for them as cohesive urban regions able to meet the aims of even recent updates to <i>Plan Melbourne</i>, let alone more ambitious (but needed) plans premised on meeting the challenge of human-induced climate change has not been undertaken. We urge IV to establish a broad-ranging review of these regions’ planning and governance frameworks with a view to implementing new approaches designed to ensure development that will produce net zero urbanism in existing as well as the brand-new communities that will form the majority of the built environment by 2050. In accordance with the above, we draw IV’s attention to VTAG’s recent report on the potential for Sunshine to be developed into a major CBD to bring productivity and job growth to the Western region. Sunshine is currently the focus of numerous but disjointed strategies (NEIC, Airport Rail Link, Western Rail Plan, MM2 and station redevelopment) which requires an integrated approach to urban planning, infrastructure design and development premised on achieving net zero as advocated above. In a similar manner, Broadmeadows has long been identified as a CBD but has yet to receive the right kind of attention for its potential to be realised in relation to the northern region	DR11 Extend metropolitan trains and run more services in Melbourne’s west We support this recommendation.
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Attachment B: Achieving a frequent public transport network

Noting the need to serve a growing population and the limits the state is hitting on new infrastructure construction, we observe that a general theme is making the best use of existing fixed assets. For public transport this is only possible if we also maximise usage of moving assets, i.e. the train, tram and bus fleet.

Accordingly we propose, as a new recommendation, the following:

Plan, operate and promote a core frequent public transport network with 7 day service every 10 minutes or better

The core frequent public transport network would include main metropolitan train lines, all tram routes and key bus corridors. Peak frequencies on most are already better than every 10 minutes so implementation is largely a matter of working existing infrastructure and assets harder; a key IV interest.

A proper multi-modal network vision based on a network wide frequency and hierarchy should include **a program to increase in the number of interchange points** as a major objective. This capacity to connect more readily across the network at major interchange points is supported by our effective myki multi-modal ticketing system.

Benefits of a frequent network

Benefits of a 7 day frequent network include the following:

- Bring public transport service standards in Melbourne to match those of comparable cities like Toronto and Sydney, which already have substantial 'turn up and go' networks operating from early morning to late night all week (Melbourne's waits are currently double at key times and our timetables don't meet modern travel needs)
- Support tourism and Melbourne's growth as a world-status major events capital (as many major events are held at night or on weekends)
- Add vitality to the CBD by increasing night and weekend visitation while broadening the labour pool for employers as jobs become more accessible 7 days
- Cost of living relief by making car ownership an option rather than a necessity, especially for evening and weekend workers
- Relieve parking and traffic congestion by making public transport useful for more trips, thus enabling mode shift

- Maximise returns from the government's investment in 'Big Build' infrastructure projects including level crossing removals, new station builds and the Metro Tunnel
- Provide added incentive to simplify and reform bus services, thus facilitating cross-suburban and feeder travel to major suburban destinations (needed as the current rate of work with bus network reform in Melbourne is slower than it should be)
- Give effect to the intention of the current Principal Public Transport Network, i.e. to provide a template to drive land use planning decisions such as more intensive housing and activity centre development
- Provide the service levels necessary to justify transit-supportive parking, road space allocation and pricing policies in main city and suburban centres
- Support for mode-shift that enables transport decarbonisation and more active transport
- Potential to be staged over a five or ten year period, with regular announceables, the main constraint being the recruitment of drivers and associated maintenance staff
- Faster to implement with lower risk of budget blow-outs when compared to major infrastructure projects

Consistency with other strategies

A multimodal frequent network every 10 minutes would well complement IV's draft's Recommendation 9, which suggests that:

by 2030, 80% of people in Melbourne, Geelong, Ballarat, and Bendigo live within 800 metres of a public transport service that arrives at least every 20 minutes

While a substantial gain that VTAG strongly supports, a 20 minute seven day service is still insufficient to support major mode shift to public transport, higher housing densities or various transport/land use policy changes. Hence the need for a 10 minute turn-up-and-go service on selected high patronage potential corridors.

Both the 10 and 20 minute service tiers could form a harmonised frequency hierarchy with timed connections. This aligns with the multimodal frequency hierarchy in the Network Development Plan (Metropolitan Rail) December 2012 (Fig 5-5 below).

Figure 5-5: Service areas and tiers of coordination

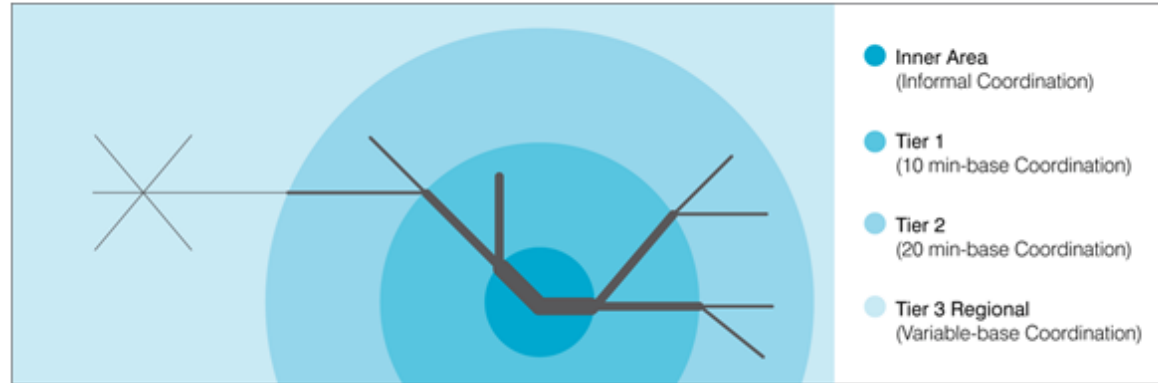
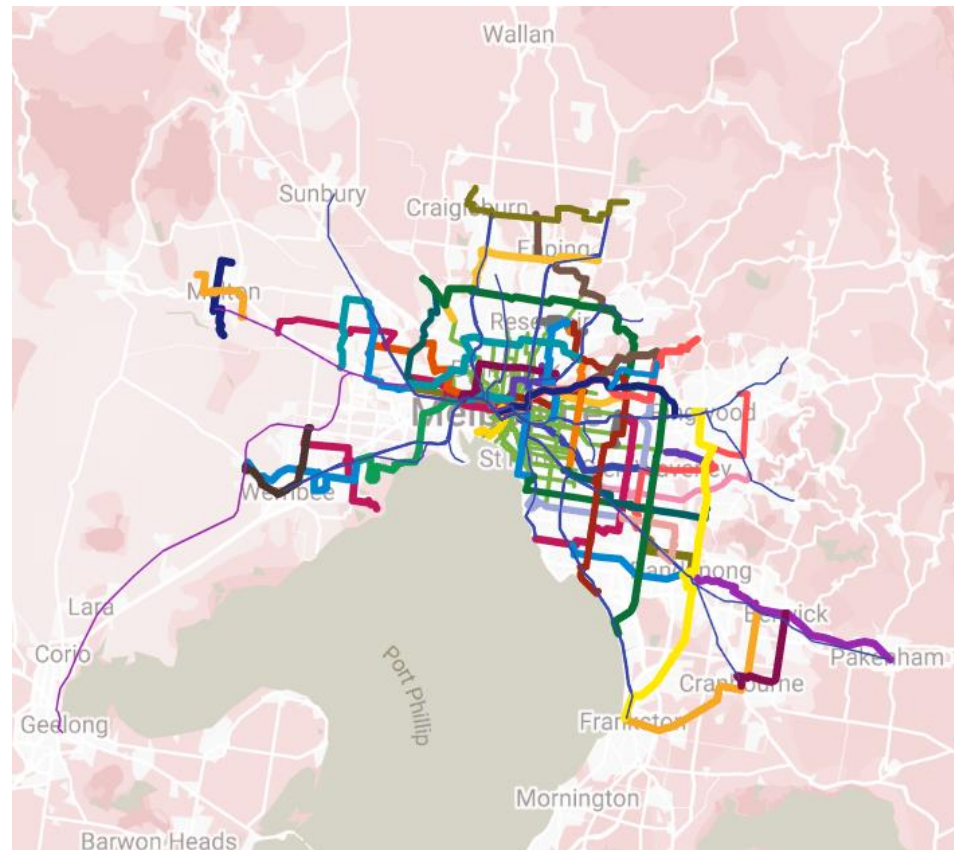


Table 5-1: Service areas - description

Service area	Trunk routes	Feeder routes
Inner	Inner train and tram corridors with very high (5 min) service levels	Not applicable
Tier 1	Train, tram and SmartBus corridors where demand and infrastructure will support 10 min headways	All non-trunk tram and bus services which intersect Tier 1 trunk services
Tier 2	Train, tram and SmartBus corridors not included in Tier 1	All non-trunk bus services which intersect Tier 2 trunk services
Tier 3	Regional train corridors with 30 to 60 min services	Regional coach lines Selected suburban bus routes in regional areas

A concept frequent network

A concept future frequent network for Melbourne, with all thick lines operating every 10 minutes or better all week, might look like the map below.



The routes are concepts only, so VTAG does not necessarily endorse them. But what is notable is the dozens of connection points where 7 day frequent routes intersect. These multiply the number of trip combinations possible, making public transport more versatile for more trips, especially between suburbs.

It compares to now (where there are almost no reliable suburban connection points due to mismatched operating hours or infrequent services) or after the completion of the Suburban Rail Loop East (which, provided Metro rail frequencies are improved), will create six connection points (at approximately \$6b each).

Good public transport in Melbourne requires many more connection points. Low cost per point added is required to affordably deliver the number needed to be nearer to what cities like Toronto and even Sydney have.

All week high frequency service with good interchange points is the most cost-effective way of delivering a versatile, connected network across suburban Melbourne. This is why we consider it worthy of a specific recommendation in IV's 30 year strategy.

Promotion to maximise usage

A 7 day 10 minute service currently exists on only a few corridors in Melbourne. Spreading to more lines and routes would constitute a substantial service uplift. Hence we recommend promotion of the 'frequent network' to get Melburnians used to using public transport for more of the week and for a greater variety of trips. This is especially at locations where services have been upgraded such that frequent trains now intersect with frequent buses.

Implementation

Transition of Melbourne's public transport from a commuter peak to an all-day focus requires significant additional service kilometres per week. This in turn requires attention to matters like rostering, driver numbers, maintenance and, in some cases, route and timetable reform.

VTAG advocates a phased approach to implementing a frequent network, starting with the highest patronage potential, highest needs or most economic lines. More on this in our service frequency paper, available here: https://drive.google.com/file/d/1cNigYizJBc2-c_P1S7b5J0u0Atolzwn6/view