



25 May 2020

**Sydney Business Chamber**

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Sue Baker Finch  
Transport NSW  
Point to Point Transport Independent Review

Email: [pointtopoint@transport.nsw.gov.au](mailto:pointtopoint@transport.nsw.gov.au)

Dear Sue

Please find attached a submission from the Sydney Business Chamber to the Transport NSW Point to Point Independent Review 2020.

Point to Point Transport is a critical component of the transport system and its integration and advancement is vital to support the economic growth of Sydney.

Should you have any questions please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "K. O'Regan".

**Executive Director**  
**Sydney Business Chamber**

## Point to Point Transport Independent Review 2020

The Sydney Business Chamber is pleased to provide a submission to the Transport NSW Point to Point Transport Independent Review 2020. The submission outlines structural changes and improvements to enable this important sector to develop, thrive and meet the needs of our rapidly growing city – particularly in the post-Covid era.

Sydney Business Chamber applauds the recent announcement of \$12.6 million from the NSW Government assistance program. While this financial support is significant to the 3,500 taxi owners to get through the downturn in customers due to the Covid crisis, there are other structural and regulatory changes required for the future growth and success of the point to point transport industry and the growth of Greater Sydney.

The importance of point to point transport, including providing a vital first mile - last mile option, cannot be overstated. Business productivity and functionality depends on having a fast, reliable, and well-run point to point service to meet the growing marketplace of business and the broader community. This will be particularly important as congestion on our roads and public transport returns as the Covid-19 restrictions continue to be eased, people return to the workplace and mobility patterns shift.

A flourishing and successful point to point transport service, provided by taxis and ride hail services, is a vital component of a fully functioning and integrated transport system to support business, jobs, and economic growth. Enabling accessible and efficient mobility modes in our vast and spread-out city is more and more necessary as our population and economy continues to grow - and post the Covid-19 crisis, serve a population that potentially further geographically disperses.

In addition, our recent paper, *Night Shift – Moving Sydney to a 24 Hour City*<sup>1</sup>, we identified that now is the time to rethink how we can maximise the value of the night time economy right across Greater Sydney, so that it becomes as valuable as the daytime one. That by capitalising on the restructuring of businesses and operations from the outdated 9-5 model and instead create opportunities for people to safely participate in both work and social activities across all hours of the day and night, significant economic benefits can be derived right across Greater Sydney.

This economic uplift cannot be achieved without a shift in transport. We understand that it would be prohibitively expensive to run our full public transport system 24 hours a day. Even our most dynamic competitor Cities, like London, Singapore, and New York, do not do this. However, if we could offer connectivity between main late-night precincts - a night-train or bus on the hour, workers, shoppers, and those seeking entertainment, would have some options which could get them at least most of the way home. The last mile of their trip could then be met with a shorter, and affordable, point to point transport.

Where fully and seamlessly integrated into the overall transport system through technology leveraging mobility as a service and infrastructure such as local pick up and drop off points there is the opportunity for point to point transport to provide whole of trip options to support growth in the working night time economy.

As we move inexorably toward a vibrant, safe and diverse night time economy and eventually a 24 hour one right across the city, we need to ensure 24/7 mobility across Greater Sydney is both safe and easily accessible at a reasonable cost, to allow the development of this move to work and life after dark. A seamless point to point transport system is a critical enabler of the full potential of the City.

Business and economic growth requires a point to point transport system that operates on a level playing field.

The taxi sector has valid issues in relation to taxi licence values that have plummeted since the arrival of ride hail services like Uber. They will require ongoing compensation measures to keep current operators engaged and future ones attracted to the industry.

Also, while ride hail services might be perceived by some as divided into two different and separate markets, in fact they are part of the same one and the taxi sector deserves it to be operating in a more level playing field in order to survive and prosper.

While taxis and ride share operators may target different customer segments, taxis targeting the corporate/business market more so than ride hail for example, the general perception and expectation across users is of a single and valuable market shared between providers.

A level playing field is therefore critical for all players in the market and currently some structural changes are needed to make it fairer to taxis.

Firstly, the taxi industry needs laws to change so they can grow their vehicle numbers to meet increased demand. The current cap on taxi licence numbers should be changed to an 'on request' model, allowing the market to dictate how many taxis are required to meet the growing demand, rather than having the government continue setting a mandatory cap on numbers.

Currently ride hail providers can increase their number of vehicles as they choose, in a market driven model that operates to the detriment of the taxi sector being able to add to their fleets to respond to growing demand as well. The cost of entry to the point to point sector is also very much in favour of ride hail, along with some restrictions on taxi licensing that do not apply to them.

So regulatory changes are required to make a seemingly inequitable situation where ride hail operators enjoy at no cost, an unrestricted ability to add vehicles to their fleet while taxi companies cannot, stopping them responding to changes in the market and grow their business in response to increased demand.

Likewise, ride hail services should have access to use taxi stands and bus lanes in order to allow them to function better by moving and picking-up customers more quickly, safely and efficiently. Not only will this facilitate a more equitable playing field for both providers, but it will maximise the return on investment of infrastructure, facilitate better social outcomes and improve local amenity. A case study outlining further details is provided below.

Businesses and workers expect to have access to safe, affordable, and reliable modes of transport that supports efficient mobility. Whether supplying whole or part of an overall trip, whether on demand or booked in advance, whether a nurse commencing a shift or a patron returning home, point to point transport is critical to the overall capacity and performance of the Sydney transportation network.

To give workers and businesses choice and enable the sector to proactively meet and adapt to the rapidly changing needs and expectations of passengers there must be a regulatory environment that transitions to a more level playing field, supports innovation and prioritises economic growth.

## Case Study – Double Bay Commercial Centre

The Double Bay Commercial Centre is the economic hub of the Woollahra Local Government area. The Centre is a vibrant mix of retail, hospitality, health, and service-related businesses with surrounding residential mix of apartments and single-family homes. The Centre is located with five kilometres from the Sydney CBD and is served by public transport - train via Edgecliff Station, ferry from Double Bay and bus services.

In 2016 there was significant community concern in relation to the congestion and dispersal of patrons from hospitality venues in Bay Street, Double Bay particularly on Friday and Saturday nights. These community concerns were exacerbated by the lock out laws imposed in the nearby Kings Cross precinct potentially leading to a movement of anti-social behaviour to the Double Bay area.

The local Chamber of Commerce worked with the local businesses, Council, and police command to identify options to enhance management of patrons arriving and departing from the area to mitigate the potential for anti-social behaviour. A trial incorporating changes to traffic flow, temporary road closures and establishment of pick up and drop off points was undertaken.

A key challenge in developing and delivering this trial was the regulatory and operational delineation between taxi and ride share services. To accommodate the regulatory and operational divide two different pick up/drop off points had to be established, one for taxi's and one for ride share. Further, this separation of services meant that there were two different pathways for approval (Council approve locations of taxi ranks but not ride share), additional local infrastructure were required to establish two pick up/drop off points and additional personnel (Police and Council) costs were required to manage patrons on the night.

The trial was discontinued after six weeks as the ongoing costs of managing were too prohibitive. It was also evident that patrons using ride share at the time were not accustomed to using a designated pick up/drop off zone making compliance levels low.

Further details on the trial is available through Woollahra Municipal Council and media reports.<sup>ii</sup>

Sydney Business Chamber is dedicated to creating, advocating and promoting Sydney as a City of Opportunity – a global city to Invest, Work, Live and Visit.

A division of the Business NSW (formerly NSW Business Chamber) Sydney Business Chamber represents Sydney's leading organisations from the corporate, public and not-for-profit sectors.

Our program is based around the key issues of city building, business transformation and innovation.

[Visit us here](#)

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<sup>i</sup> Night Shift – Moving Sydney to a 24-Hour City, Sydney Business Chamber, May 2020

<https://www.thechamber.com.au/Media/COVID-Crisis-Creates-Opportunity-for-Sydney-to-Eme>

<sup>ii</sup> <https://www.dailytelegraph.com.au/newslocal/wentworth-courier/green-light-for-trial-on-night-traffic-ban-to-reduce-congestion-in-double-bay/news-story/db4615c56ac9ac22eea3b8c2c2379e5b>