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27 June 2025

Hon Tom Koutsantonis MP
Minister for Infrastructure and Transport
GPO Box 1533
Adelaide SA 5001

Emailed: Minister.Koutsantonis@sa.gov.au

Dear Minister

Public Transport Strategy - submission

Firstly, I commend you on the March 2025 release of the first State Transport Strategy for South Australia. LGA made a submission to the consultation on that Strategy which is available on our website¹. The State Transport Strategy is an essential blueprint to ensure we have a collective and clear generational vision of how to move people and goods in and around our communities, while making thriving places and spaces where we can all live, work and relax.

Now, with this further consultation to develop a Public Transport Strategy (the Strategy), there is an opportunity to ensure that a key pillar within the broader transport context is prioritised and addressed.

LGA welcomes the opportunity to provide a submission on the development of the Strategy and Regional Review for South Australia.

As the peak body proudly representing 68 councils across the state and the Anangu Pitjantjatjara Yankunytjatjara, we advocate on behalf of local government and aim to make a difference in the lives of South Australian communities. Our members have an interest in increasing the focus and investment in public transport to improve the lives of the communities they represent.

Our members are at the forefront of realising the strategic vision of both the State Transport Strategy, and now this new Strategy, focussing on public transport. Collectively, South Australian councils manage 11 per cent, or 75,000km, of the nation's local road network as

¹ [DIT State Transport Strategy - LGA submission - December 2024](#)

well as being a key enabler of the statutory planning function which shapes how our communities are formed and provided for into the future.

LGA and our members are committed to working with the State Government to unlock the rapid growth needed for the state, while ensuring we are sustainably growing in the right areas and providing the services and connections that people need and want. Our sector knows getting this right will support the state's growth and prosperity over the coming generation.

Many of the strategic outcomes referenced in the 'Public Transport Strategy and Regional Review Snapshot'² are sound and likely to be supported by our members. However, the vision needs to be more ambitious and elevated to the next level to move beyond basic network efficiency and augmentation to service growing communities.

While these are no doubt important factors to be improved, these would be more fitting in a shorter term planning cycle. This Strategy needs a loftier outlook and vision for the next generation and must necessarily be more aspiring.

It is critical that the Strategy re-emphasise the importance of a strong and resilient public transport network that can both service the current and future needs of the state, while being innovative, forward thinking and adaptable to emerging trends.

Some key aspects must be addressed in the Strategy as follows.

Metropolitan Adelaide

The Strategy must support better connection for metropolitan locations and centres, ensuring that as greenfield and peri-urban development expands, public transport is embedded as a centrepiece policy priority.

This must be undertaken upfront as part of all new residential planning otherwise there will be a significant mode shift opportunity loss as the network will continue to struggle with ongoing and increasing car dependency, potential social isolation, and congestion in and around Adelaide.

This also means looking at service area, dependability, high frequency and cost of the services, along with adequate active first and last mile connectivity planning in integrated ways.

² [Public Transport Strategy and Regional Review - snapshot](#), a fact sheet prepared by the Department for Infrastructure and Transport that was released as part of the current open consultation on a Public Transport Strategy for South Australia.

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Many of our metropolitan member councils have integrated transport plans, including active transport, which aids development of enabling infrastructure supporting active and healthy communities. The Department for Infrastructure and Transport (DIT) Active Travel Design Guide³ (the Guide) released in September 2024 is a substantial practical resource for extending outcomes in this area, which we hope to see being actively used across the state. It would be great for DIT to follow up by publicising case study examples from both state and local government where this Guide has been used to unlock connectivity either as a stand-alone practice, or within the first and last mile to public transport nodes.

Recommendation 1: Embed public transport access and provision as a primary policy priority within all newly planned metropolitan and peri urban developments, as well as improving integration across both planning and transport portfolios.

Regions

For regions, the prime concern is in urgently addressing the long term inadequate financial investment in regional public transport connectivity. This funding deficit is experienced in all areas outside the identified metrocard system and is particularly dire when considering areas where there is forecasted high growth, or where there has been significant recent growth. While many of our regions are affected by this chronic underspend, particular examples include Mount Gambier and the Southern Hills and Fleurieu region.

A February 2022 paper from the University of Sydney, 'Investigation of Regional Public Transport Spend in Australia'⁴, shows evidence that South Australia is lagging significantly behind other mainland states in both metropolitan and regional per capita spending on public transport, with a regional spend for South Australia being \$40 per head (including rail). This compares poorly with regional public transport funding in all other states. For comparison in regions, Tasmania spends \$74 per head, while WA sits at \$133 per head and Victoria's investment is a staggering \$692 per head!

The City of Mount Gambier succinctly highlighted the issue in its March 2021 review of the Mount Gambier Public Bus Service⁵. Concerningly, the findings of the report demonstrated that the services offered in the City of Mount Gambier (population of 27,000 and cross border population of 130,000) did not meet the service provision benchmark for a town with a population size of 3,000 to 6,000 people. This example of need remains unmet over a substantial time and through more than one regional transport service review undertaken. It disincentivises regional housing growth and fails to respond to, or support, regional

³ [Active Travel Design Guide - Department for Infrastructure and Transport - South Australia](#)

⁴ [An Investigation of Regional Public Transport Spend in Australia](#) (February 2022)

⁵ [Mount Gambier submission to SAPTA Regional Public Transport Review](#) (March 2021)

population increases. We have heard from our members that this unmet need in Mount Gambier is not unique across the state.

For regions, what is needed is bold steps to address the existing and ongoing unmet need, including consideration of:

- Business cases for other locations for trial/pilot services, such as the recently funded permanent Keoride on-demand service in Mount Barker⁶.
- Expanding services to make them viable alternatives for regional transportation purposes for a range of needs, including to access employment, local and regional services, and recreational activities.
- Establish fair standards for public transport service delivery for regional South Australians.
- Provide adequate funding to ensure that operators are suitably incentivised to provide much needed regional services. The government made a meaningful cost of living announcement for metropolitan families through the 2025-26 Budget Measures Statement⁷. This entailed a 28-day student pass fare reduction under the metrocard, reducing the cost of trips to and from school to \$0.25 per trip. Consideration must now be given to similar easing of cost of living pressures for regional students to provide equity to all our young people across the state.

LGA acknowledges the significant positive steps taken to get to this point in both developing the Strategy and undertaking a Regional Review, with DIT holding 12 regional in person sessions across the state. However, some of our members noted concerns with this process, including:

- Potential for regional consumers to be confused by the overlapping processes to both determine the 30-year Strategy and review enduring regional service deficiencies.
- Limited council notification being given by the consultants engaged by DIT to run the community consultation. This reduced councils' ability to actively engage with local communities to get strong attendance to the sessions, noting that those with most interest in this topic are already likely disadvantaged in terms of accessing public transport to attend the sessions.
- Some of the sites identified to hold sessions were not suitable as they were not near public transport options and were held at times when public transport services did not operate.

⁶ [Infrastructure, Roads & Transport | State Budget 2025-26](#)

⁷ [Budget Papers | State Budget 2025-26](#) – Budget Paper 5: Budget Measures Statement, page 52

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- That the online survey provided was focussed primarily on metropolitan services and provided little opportunity to differentiate regional experiences.

I highlight these issues to ensure that the risks identified above do not lead to the possibility of inaccurate interpretation of the data collected from this current regional review and to allow future opportunity for improvement in designing and implementing engagement processes, particularly in regional areas.

Recommendation 2: Significantly increase the focus on and investment in public transport options into regional areas, particularly those identified for high growth over the coming generation.

Health outcomes

The Strategy must link with other community focussed outcomes, such as health and connectedness. For example, it is well established that:

- Transport access is a key determinant of health that has significant impact on the overall wellbeing of individuals and communities. A lack of reliable and safe transport can limit a person's ability to meet their own basic needs, for example, by inhibiting access to essential services such as health care, employment and social opportunities and education.
- Adequate access to public transport supports inclusivity and connectivity of vulnerable people, including older people and people with disability, who otherwise would not be able to get around without assistance. Accessible transport increases independence, social connectivity, and quality of life for individuals within our communities.

The Strategy must both acknowledge these significant strategic factors as well as seek active ways, through delivery targets and funding commitments, to provide for these needs and support ongoing social cohesion.

Recommendation 3: The Strategy needs to ensure strong and measurable linkages to health outcomes for South Australians through the provision and use of public transport.

Parliamentary inquiry

When drafting the Strategy, I strongly urge you and DIT to consider the recommendations made by the Select Committee on Public and Active Transport⁸. The Select Committee was convened in May 2022 to inquire on this matter and handed down its report in February 2023 making recommendations to the State Government to review policy settings to improve public transport services and infrastructure.

⁸ [SA Parliament Committees](#) (Public and Active Transport – Select Committee of the Legislative Council)

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A few of the recommendations of the Select Committee relate directly to issues of equity and investment across the state, which I have discussed in this letter.

Recommendation 4: Review the findings of the Select Committee in 2023 relating to public and active transport and particularly their recommendations 1 – 6.

I welcome the opportunity to discuss the above comments and recommendations with you. If you have any questions, please contact Ms Sarah Wozniak, Senior Policy Advisor at sarah.wozniak@lga.sa.gov.au or by phone on 8224 2000.

LGA looks forward to working with you and the Department on this important matter and making positive contributions to the Public Transport Strategy for all South Australians.

Yours sincerely



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