



TfNSW Older Persons Transport and Mobility Plan 2018-2022: BusNSW Response

Introduction

Thank you for the opportunity of commenting on TfNSW's draft *Older Persons Transport and Mobility Plan 2018-2022* ("the Plan").

BusNSW is the peak body for the NSW private bus and coach industry. BusNSW's mission is to foster the efficient and sustainable growth of public transport and in doing so, to promote the benefits of bus and coach transport in NSW.

Buses play a vital role in delivering public transport in NSW and each year carry around 332 million passengers, many of them elderly. More passengers are carried by bus in NSW than by any other mode including rail, ferry, light rail, point to point and community transport.

Buses and Elderly Passengers

As noted in the Plan, older people who use public transport most often use buses. Moreover, elderly people who use buses use them regularly (at least once a week). The plan includes a strong focus on Point to Point and Community Transport, with less reference given to buses in terms of industry "partnerships" and the "Better Services" portion of the Plan.

Whilst other transport modes are important, the flexibility offered by buses, their ability to operate at short notice along a myriad of routes and with a minimum of infrastructure spending, and their capacity to carry a variable passenger load (from small buses to high capacity buses) make them an ideal solution to meet a range of transport needs, including options for an aging community.

Moreover, there are opportunities to better utilise bus assets, particularly in rural and regional areas. Bus operators have the local knowledge and operational expertise to move people, including elderly passengers, around our cities and regions each day.

There is a need to analyse the transport requirements of older persons, and to explore options for more frequent bus services, wider network coverage and better integration of services. Improving public transport services, supported by appropriate infrastructure and travel training, will allow older customers to better take part in the community.

BusNSW supports many of the other measures/recommendations made in the Plan. Some of these are commented on in more detail below. In line with the Plan, our comments have been divided into the following four broad categories: *Better Infrastructure and Fleet*, *Better Information and Training*, *Affordable and Safe Transport*, and *Improved Transport Service Options*.

1. Better Infrastructure and Fleet

Low Floor Buses

The bus industry notes that one of the “achievements” outlined in the Plan is TfNSW’s “investment in new, low-floor buses to support easier access for older customers” (p.12), however the industry believes this process can be accelerated for a growing elderly population.

The current maximum age for government contracted vehicles is 25 years and 364 days. Lowering the maximum age of this fleet (for example, to 18 years) would provide significant benefits for the community, particularly elderly customers. Newer buses provide improved accessibility (low floor, priority seating and wheelchair spaces), as well as more general benefits such as reduced emissions (via Euro fuel standards and the introduction of hybrid and electric vehicles) and safety technology (autonomous emergency braking, adaptive cruise control, lane assist, bus fire suppression systems). As a result, BusNSW believes a proposal to transition the government contracted fleet to a lower maximum age over several years is warranted.

CCTV

As part of upgrading the fleet, improving CCTV is critical. BusNSW strongly endorses the Plan’s proposal for the “replacement of CCTV cameras with improved functionality and image quality across rail, bus, light rail and ferries” (p.15). Despite advances in technology, the requirements for approved security camera systems on buses have remained unchanged since 2006, when the *Passenger Transport (Bus Security Camera Systems) Order 2006 (No 1)* was gazetted. A new Order was drafted by TfNSW in 2011 but never published. This means that many of the camera systems currently in use are outdated and can be unreliable even with regular inspection and maintenance by the bus operator. A new Order and accompanying funding are needed to ensure the fleet’s CCTV systems are functional and reliable, to provide security for passengers. TfNSW can also influence the quality of CCTV systems via bus specifications and the procurement panel.

Related Infrastructure

Beyond newer buses there is a need to invest more in bus infrastructure and technology. In this regard, BusNSW supports the Plan’s identified need for TfNSW to work with “local governments to support infrastructure for seniors in local communities relating to key facilities including bus stops.” The industry also supports the Plan’s call for better transport “facilities for older customers, such as toilets, waiting areas and seating” (p.13).

To this effect, BusNSW would recommend that TfNSW work in partnership with BusNSW and local councils to identify and invest in bus stops and other infrastructure, particularly along major corridors. An infrastructure upgrade program should be a recurring budget item linked to an agreed enhancement strategy for the bus network and should include:

- Facilities (including toilets and waiting rooms) at bus interchanges and layovers.
- Real Time Bus Arrival information (Passenger Information Displays)
- Accessible bus shelters and security cameras at major bus stops.

Beyond improvements to bus stops and interchanges, standardised on-board technology needs to be incorporated into all new buses to enable visual and audio customer information. Such measures would enhance customer satisfaction.

2. Better Information and Training

Specific Training on Elderly Passengers

BusNSW is aware of the NSW Government's *First Stop Transport* travel training which promotes the independent and safe use of public transport. Travel training is important for older people who may have anxiety about using public transport, physical or cognitive impairments, or lack recent experience using public transport.

BusNSW supports travel training for individuals or groups, which can involve anything from information sessions, to activities or simulations, to real practice using the NSW public transport network. There are opportunities for private bus operators to become accredited to deliver the *First Stop Transport* travel training.

Contracted metropolitan, outer-metropolitan and large rural and regional operators have passenger relations plans that incorporate travel training for customers. This training could be enhanced via a targeted "give the bus a go" marketing campaign that is developed by Transport for NSW in consultation with BusNSW.

Training of Drivers

There is a good deal of attention paid to bus driver training in the "Information and Training" sections of the Plan. For example, the Plan notes that "*training programs have been developed for bus drivers... in assisting older customers to use their services safely*" (p.15). The Plan's call for improved "*driver training to make boarding and alighting of buses easier and safer for older customers*" (p.14) is supported by BusNSW.

BusNSW has developed its own online driver training programs on assisting elderly passengers and other passengers with special needs, however this has been done at its own initiative and without government funding. BusNSW recommends that government funding be provided for bus driver training, with a focus on driving techniques that consider the needs of older people.

Further to this, BusNSW recommends that a review of TfNSW contract key performance indicators, including punctuality (on-time running), is undertaken to ensure that the needs of older people using bus services are considered. This should be done in conjunction with an analysis of data for slips, trips and falls to identify opportunities to reduce occurrences.

Mobility as a Service

Another Information and Training proposal in the Plan is for "*systems that enable access to mobility as a service (MAAS) for older customers without access to a smart phone or computer*" (p.17). Buses will play an important part in any future *Mobility-as-a-Service* (MaaS) subscription services.

The industry understands a future of open mobility where providers compete, with compelling alternatives to car ownership, to meet community and customer needs. BusNSW seeks better engagement with TfNSW to determine how and where buses for fixed route services and on demand services fit into the MaaS framework, and to develop collaborative solutions that will benefit the community, including our elderly customers.

3. Affordable and Safe Transport

Ticketing and Fares

Regional and rural public transport commuters have endured varying standards of ticketing for decades. The optimal solution is for the entire state to have one ticketing solution, which should include OPAL and the ability to use contactless debit/credit cards. Whilst older people in rural and regional areas have access to the Regional Excursion Daily (RED) ticket, the opportunity to use a Gold Senior/Pensioner Opal card (capped at \$2.50 a day), would improve their travel experience and provide a seamless integration with the Greater Sydney public transport network.

Mobility Devices

BusNSW strongly supports the draft Plan's call for a *"national labelling scheme and safety standards for mobility scooters to encourage their safe use on public transport"* (p. 16). Currently technical requirements for buses under the *Disability Discrimination Act* focus on wheelchair accessibility. Most regular route service buses have space and dedicated seats reserved for the elderly. It is an offence under clause 68 of the *Passenger Transport Regulation 2007* to refuse to give up one of these priority seats to an aged passenger when requested, however currently this is left to the bus driver to enforce. BusNSW therefore also supports the proposed Plan for a *"courtesy campaign targeted at the use of priority seating on transport services"* (p.16).

However, the weak link in terms of elderly bus passengers is mobility scooters and similar devices. Many senior passengers utilise mobility scooters to assist their travel, however currently bus operators and drivers have no formal guidance as to which devices are safe for travel on public transport. The design of some scooters makes them susceptible to tipping over when a bus turns or stops, compromising *"data regarding slips, trips and falls of older customers"* (p.16), while others are of a size that may block aisles and hinder accessibility for other passengers.

As a result, the industry (via its national affiliate, the Bus Industry Confederation) has undertaken bus trials of various mobility types with Australian Standards (AS) to develop a public transport standard for mobility devices. Unfortunately, the Standard developed by Australian Standards, *TS 3695.3 2018 (Blue Label Scheme)* is unsatisfactory for this purpose. We would therefore strongly endorse the Plan's proposal to *"work with the Australian Government to develop a national labelling scheme and safety standards for mobility scooters to encourage their safe use on public transport"* (p.16). A Standard that provides clear guidance is long overdue.

4. Better Services

Expansion of Services outside Operating Hours

As outlined in the Introduction to this submission, there is strong focus given to taxis, Point to Point and Community Transport in terms of improving services for elderly passengers, with less emphasis on the widespread use of buses among elderly citizens.

The Plan calls for continued *“partnerships between community transport providers, taxi companies and other point to point providers to meet community needs outside of operating hours”* (p.19). However, buses also provide an important resource in this space. BusNSW has long argued for better utilisation of the bus fleet, particularly in rural and regional NSW where, outside the am and pm peaks, some buses sit idle. These buses can be utilised to fill different transport needs, whether this be *“on demand”*, community based or other services.

Rural and Regional Customers

The Plan makes further recommendations to *“improve access to off-peak services”* (p.14) and *“following the trials of flexible transport in Western NSW, investigate opportunities to expand public transport options for isolated and disadvantaged communities”* (p.20). However, current public transport options need to be improved concurrently with any proposal to introduce flexible transport options in rural and regional NSW.

Currently, public transport availability in many large regional towns is marginal. Some towns, for example, have no bus services on Sunday, limited bus services (till midday) on Saturday and no night services on weekdays. There is a need to better analyse the changing needs of towns, and respond with more frequent bus services, wider network coverage and better integration of services. A commitment to service planning via bus network reviews in large regional towns would help to clearly identify where rural and regional bus services can be improved.

As part of such a strategy, BusNSW would seek a commitment in future Government budgets to improved service frequency and span of hours in regional towns. BusNSW recommends that the span of operating hours for major regional towns be at least 7am to 6pm Monday to Friday, and 8am to 6pm Saturday and Sunday. Major regional towns would include Albury, Bathurst, Broken Hill, Coffs Harbour, Dubbo, Nowra-Bomaderry, Orange, Port Macquarie, Queanbeyan, Tamworth, Tweed Heads-Coolangatta and Wagga Wagga. This could be accompanied by a marketing campaign promoting bus travel in these areas.

As mentioned above, utilising the rural and regional contract bus fleet for other community-based services would also facilitate public transport in low population locations and could improve the link between smaller towns and regional centres. Such transport services have social inclusion benefits from allowing older customers and other groups to better take part in the community.

Services to public transport hubs

Two further proposals focus on improving services to public transport hubs. The Plan calls for the *“development of new service options that overcome barriers associated with the long distance to the bus stop or train station and poor pedestrian accessibility”* and for the introduction of *“more on-demand services to and from public transport hubs, to encourage older customers to use public transport services”* (p.20). However, there is a broader policy dimension to such proposals.

BusNSW has long argued for a congestion management and road allocation strategy for Sydney, in which buses are prioritised, and feeder bus services are integrated with the rail network. Congestion in Sydney has now extended beyond weekdays to weekends. Therefore, beyond such individual initiatives, BusNSW believes there is a need for a more comprehensive

congestion management and road allocation strategy in Sydney, in which buses and shared vehicles are prioritised. As is demonstrated in many European cities, congestion management requires an integrated approach in which public and active transport are critical components.

As part of this integrated strategy, local and suburban feeder bus services should be planned *concurrently* with rail projects and implemented with the commencement of new rail services. Encouraging people on to trains via convenient and reliable bus feeder services will enable people to access their nearest work area and bring the “30 Minute City”, outlined in the Government’s *Future Transport Strategy 2056*, closer to reality.

BusNSW would encourage the NSW Government to consider the costs and benefits of increasing the frequency of local and suburban bus services, before building car parks at train stations. Alternatively, the introduction of restricted access policies and/or parking fees could be used to incentivise commuters to use bus services when connecting with the rail system. At the very least, bus / rail interchange facilities (and increased local bus frequency) should be incorporated into rail station upgrades. The introduction of road pricing reform (where those who contribute to congestion pay for it) or public transport tax concessions could also assist elderly commuters to leave their cars at home and use public transport for first and last mile journeys.

Conclusion

BusNSW welcomes many of the initiatives outlined in the draft *Older Persons Transport and Mobility Plan 2018-2022*, however rather than introducing such measures in isolation, BusNSW calls on TfNSW to engage with the industry to utilise existing resources to meet future needs, whether this be off-peak services, services to transport hubs or Mobility as a Service. BusNSW is critically aware of the public transport challenges faced by elderly citizens; after all, our members currently transport a large majority of them.

The bus and coach industry have had around 75 years of experience in adapting to change and has the operational expertise to meet future transport needs. We would call on Government to work in close partnership with the industry to implement the draft Plan’s recommendations and to ensure that services grow to meet our customers’ (including our elderly customers’) needs and expectations.

If you would like to discuss these issues further, please do not hesitate to contact me on (02) 8839 9500.

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