Response to the National Urban Policy Consultation Draft

July 2024

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1. About the Bus Industry Confederation

The Bus Industry Confederation (BIC) is the national peak body for the Australian Bus and Coach Industry. We represent bus and coach operators, body, chassis and complete bus manufacturers and suppliers, parts and service providers, professional services, and state bus associations on issues of national importance. Our membership is becoming increasingly diverse as key energy and infrastructure partners join as we transition the fleet to low and zero emissions.

Our vision is an innovative and thriving bus and coach industry that moves people safely and sustainably. Our objectives are as follows:

> Encourage investment in public transport infrastructure and services.
> Promote policies and actions that are environmentally responsible.
> Promote the development of a viable and improved bus and coach industry in Australia.
> Foster and promote a viable Australian bus manufacturing industry.
> Protect the business interests of operators, manufacturers, and suppliers.
> Promote public understanding of the contribution made by the bus and coach industry to Australia's economy, society, and environment.
> Ensure the accessibility and mobility needs of Australians are met, regardless of where they live or their circumstances.
> Promote the use of public transport as a viable alternative to the car.
> Coordinate and make more effective existing Federal, State and Local Government policies and programs that relate to passenger transport.
> Ensure that buses and coaches operate safely and effectively.

1.1 About the Bus and Coach Industry

Buses and coaches in Australia travelled 16 billion passenger kilometres(bpkm) in 2022-23. This is significantly higher than rail at 13 bpkm. There are 97,469 registered buses in Australia.

The bus and coach industry is predominantly based around the provision of school bus and public transport (route) services that are provided under state and territory government contractual arrangements. These contracted services are primarily provided by privately owned bus and coach businesses, with a small percentage of bus fleets being government owned and operated.

The industry also provides contracted government services such as special school transport for children with disabilities and coach services to support the rail network. The bus industry is also becoming involved in other emerging markets such as aged care, health and para-transit. The bus and coach industry also provide services, in what might be termed, the 'deregulated' market providing charter, tourism, long distance, mining, correctional services, airline and airport services and specialised services that support other industries.

Our industry, which includes bus operators, bus manufacturers and parts and service suppliers, employs more than 85,000 people nationally. Comprehensive data on the bus industry, the fleet, the suppliers, operators, and their passengers can be found on the bic.asn.au website.

1.2 About this submission

The Bus Industry Confederation welcomes the opportunity to provide feedback on the National Urban Policy Consultation Draft May 2024. As there are no specific questions posed in the draft, we have made a general response and identified some areas where an increased emphasis on public transport is warranted. If you require additional information or wish to discuss our submission please contact Roz Chivers, Executive Director on roz.chivers@bic.asn.au or (02) 6247 5990.

2.   General Comments

We note that the principles suggested by the Urban Policy Forum to guide decision making as it relates to investment in, and policies for, urban development states that "we cannot achieve sustainable urban development through business-as-usual approaches. We need transformational change". It is disappointing therefore that the consultation draft of the National Urban Policy continues to support business as usual and fails to advance any possible actions or suggestions that will make a fundamental change to the key challenges that our cities are facing.

As a nation we are at a tipping point whereby we can improve the quality of life and productivity of our cities now and for the future or we can let them continue to evolve unchecked impacting resilience, wellbeing, productivity, liveability, sustainability and equity. Allowing cities to evolve unchecked will continue the Australian populations reliance on private vehicles for transport for most trips - short and long. We need to shift the dial and get people out of their cars and using active and public transport. The benefits flow beyond a reduction in congestion. There will also be significant reduction in emissions, improvements in health, social cohesion and equity and wellbeing.

We recognise that the importance of public transport is acknowledged in the National Urban Policy, but it is almost as an afterthought. We also recognise that all levels of governments face competing demands for finite resources. However, better bus services deliver better cities. Buses are the closest mode of public transport for most Australians and are often the only readily accessible form of public transport for people living in middle, outer and growth area suburbs.

Buses are the easiest, quickest, and cheapest ways to improve surface transport. While building a new railway, light rail line or road takes years, if not decades better bus services can be delivered in months. Relatively small investment, by the standard of transport spending can deliver significant benefits. The overall cost of providing bus services is 70 to 80 percent less than rail services.

This spending is particularly important in under serviced areas in our capital and regional cities including outer suburbs, new growth areas and areas subject to densification. However, the expenditure is not occurring. For example, Infrastructure Victoria[1] noted that many parts of Melbourne have no access to the city's higher frequency tram and train network, particularly in the suburbs of middle and outer Melbourne, including the growth areas. The only public transport service in many of these locations is the bus with buses playing a vital role in enabling access to employment, education, health, and social opportunities for the community. However, bus services in these areas can be infrequent and have limited operating hours. If the bus service is not convenient, families can be forced into car ownership. This lack of choice adds to the cost of living and contributes to locational transport disadvantage.

The NSW Bus Industry Taskforce[2] highlighted that in large parts of west and south-west Sydney buses are the only available form of public transport –and service coverage and frequency are poor. Further, these areas have the highest levels of socioeconomic disadvantage in Greater Sydney and even the state. Groups disproportionately impacted include people with disabilities, Aboriginal and Torres Strait Islanders, people from culturally and linguistically diverse (CALD) backgrounds, people who are unemployed, single parent households and a growing number of people in the private rental market. The Taskforces second report[3] revealed that the Bus Priority Infrastructure Program (BPIP) of $20M per annum recurrent funding is the only constant funding source for bus priority and it has remained the same for some 20 years, not increasing with inflation and failing to keep up with the rising cost of infrastructure projects. The report also revealed that just 2.6% of capital expenditure in transport was bus related between 2019-2027 (forward

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[1] Infrastructure Victoria (2022) Get on Board. Making the most of Melbourne's buses – discussion paper.
[2] NSW Bus Industry Taskforce (2023) First Report
[3] NSW Bus Taskforce)2023) Second Report

estimates) despite buses carrying more than 40% of passengers.

This situation must change. For sustainable, vibrant and productive cities, we need to increase patronage on buses and raise buses mode share. We can only do this by ensuring that buses are an attractive alternative to the car for most people – the transport mode of choice. To achieve this means that the state and territory governments must:

Make buses more frequent. Passengers on major urban (trunk and connector) routes should be able to turn up and go without needing to refer to a timetable with services operating every five to 10 minutes throughout the day. For places away from main route feeder services, using conventional buses or smaller vehicles, can boost the frequency of connections to the major routes with integrated ticketing. In low-density areas including nascent greenfield sites and at low-demand times of day, demand responsive vehicles can provide much higher levels of service than conventional fixed bus routes. Frequency targets should be set for bus route categories, such as trunk and connector routes. This will ensure the investment in frequency matches and supports each route's function as part of the wider transport network.

Make buses faster and more reliable: Buses must have greater priority on city roads. Giving buses priority over other traffic both increases speed and reliability while reducing the convenience of private transport. Given the value that passengers attach to service speed, frequency and reliability, this has the potential to increase ridership and contribute to a virtuous cycle of greater demand, raising revenue and service provision while simultaneously reducing the number of cars on the road.

The governments must invest in Bus Rapid Transit (BRT)rather than simply more road infrastructure designed to carry more and more private vehicles. BRT is a high-capacity bus-based transit system that delivers fast, reliable, high quality, safe, and cost-effective services at relatively low cost, metro-level capacities. It achieves that through dedicated bus lanes that are median aligned, off-board fare collection, level boarding, bus priority at intersections, and fast and frequent operations. Because BRT contains features similar to light rail or metro systems, it is much more reliable, convenient and faster than regular bus services. The three main delays facing public transport are 1) boarding and alighting, 2) intersections, and 3) traffic congestion. BRT solves for all three. With the right features, BRT can avoid the causes of delay that typically slow regular bus services, while also improving service quality, safety and security, and passenger experience.

There needs to be more investment in rapid routes and frequent routes that provide fast and reliable connections between people, jobs, and activity centres. These simple, direct routes will connect more passengers with key destinations and reduce travel times thereby making buses more appealing. Governments need to prioritise competitive travel times over coverage for most routes, utilising different technologies such as on demand travel, smaller buses and community transport to ensure coverage. Research has demonstrated people will walk further to a more frequent bus service.

Make buses more convenient. Making transport by bus more convenient raises the probability that it will be chosen over other transport modes and can raise overall public transport demand. Convenience is one of the strongest attractions of the private car for passenger transport. To improve convenience, it is vital that more services operate in the evenings, weekends, and at night as well as more frequent services during weekdays. Limited hours of operation dissuade potential travellers from using bus services. If travellers cannot get home after making their trip on public transport because services stop early, they will use alternative modes such as private cars.

Buses also need to be integrated with the wider network so passengers can transfer easily between walking, cycling, private vehicles, car sharing (e.g. Uber), ferries, trains and other buses.

People with disability, parents with prams and the elderly must be able to use bus services as easily as other passengers. Making buses more accessible (not just the vehicles themselves, but also bus stops and bus stations) will benefit all passengers.

Make buses more comfortable: Comfortable, modern buses will help make using the bus more appealing. Buses should offer WIFI and charging as standard – allowing people to work and interact online whilst they travel and make better use of their time. They should be easily accessible and provide ample space for prams, luggage and wheelchairs so everyone can ride with confidence.

The introduction of Zero Emission Buses (ZEBs) presents an opportunity to dramatically shift passenger experience and community perception by reducing the most frequent complaints about external impacts including exhaust fumes and noise.

> **Recommendations to government to improve bus services and achieve mode shift**
> - Increase the frequency of bus services, beginning with outer and growth area suburbs
> - Optimise the bus network through bus rapid transit and fast, direct routes
> - Speed up buses through on-road priority and smarter technology
> - Extend operating hours to match passenger demand and improve timetable integration
> - Improve onboard comfort by modernising the fleet
> - Improve the bus stop and interchange experience
> - Give bus transport an attractive identity by using slick and intelligent public relations campaigns

3. Specific comments

3.1.1 Key goals

Liveable (p17)– Access to Transport (active, public and private) should be explicitly stated in the factors that determine liveability rather than the use of the generic term "connectivity". Digital connectivity is explicitly recognised but transport connectivity isn't. Congestion and lack of accessibility have a direct impact on liveability. "Connectivity to community places and employment centres" should be broadened to include education.

Equitable (p17-18) – should explicitly recognise access to public transport as transport poverty in outer metropolitan issues is a significant equity issue.

3.2.1 Australian Government Objectives

Objective 1– no-one and no place left behind.

This objective should explicitly recognise access to public transport rather than just transport per se. If we are to shift the dial governments need to invest in public transport rather than solely roads.

We note that the discussion highlights the importance of housing affordability generally consider to be the cost of purchasing and renting a house. The issue in many cities in Australia is affordable living. Many people move to areas with lower mortgages and rents, only to find that they are paying significantly more to travel to and from work and other activities. This may necessitate the purchase of additional private vehicles. This needs to be recognised in the policy – as does the role of affordable, accessible, fast, and convenient public transport in addressing this issue.

The paragraph commencing our cities on page 23 should be expanded to recognise that public transport is an essential service.

Public transport in this section is portrayed as a service only for the vulnerable in the community (paragraph commencing Certain groups). If our desired outcome is better cities, we need to change this

mindset so that public transport becomes the transport option of choice for all people – not just people who cannot afford a private vehicle or cannot hold a licence. As the former mayor of Bogotá, Enrique Peñalosa, said in 2012 "An advanced city is not one where the poor can get around by car, but one where even the rich use public transportation."

The actions in this sector such be amended as follows: Invest in supporting infrastructure, such as- social infrastructure, **public** transport and services.

Objective 2 – All people belong and are welcome.

We support the "possible action" to ensure that public spaces are safe, practical and accessible with access to public transport, attracting a diverse range of people to access arts and cultural facilities. The intent of this action should also extend to tourism, heritage, and sports facilities. Further the "possible action" aimed at enhancing the visitor experience of our tourist and sports precinct should specifically encompass public transport infrastructure such as bus and coach parking and layover zones. In 2019 BIC published a 10-year strategy policy document for driving land transport tourism. Two of the 9 key areas to increase travel by coach to generate dispersal of tourists from major cities and attractions to regional Australia and grow Australia's tourism economy relate to the provision of Coach infrastructure in Australian cities and major regional towns and airport infrastructure and access.

Objective 3 – Our urban areas are safe.

We note that this objective highlights the National Roads Safety Strategy and 2021-30. Given the emphasis of our submission on mode shift it is opportune to note that public transport is the safest mode of transport of any other form of road travel, based on crash exposure risk[4].

We support the statement in the discussion (p 29) that "future investment should also seek to make public and active transport into more attractive modes of travel. This means the delivery of public and active transport infrastructure needs to be well-planned for safety". This needs to be broader than just built transport infrastructure such as bus, train and light rail stops and station. Antisocial behaviour is impacting the perceived and actual safety of passengers on public transport and consequently impacting its activeness as an alternative to private vehicles. This is an issue requiring urgent action from governments.

Later in this paragraph on public space and road safety it says "addressing this challenge requires a shift from traditional road design to a focus on designing streets to maximised safe access for shared use. We are supportive of this but again note the importance of enabling timely bus movements.

The possible actions for this objective should include a public transport related action.

Objective 4 Our urban areas are sustainable.

We welcome the recognition in the discussion for this objective of the important role that public transport and modal shift has on lowering emissions in our cities and support the assertion that "coordinated leadership from government and industry on emissions reduction actions will be key to achieving effective climate action in our major cities".

However, cities must do more than simply "promote" sustainable transport they must actively incentivise the use of sustainable transport and shift priorities to fund and develop mass transit options including bus rapid transit which can take advantage of existing road infrastructure. Governments current preoccupation with decarbonising private vehicles rather than mode shift maintains the status quo ideal, perpetuating the

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4 Australian Transport Assessment and Planning Guidelines, M4 Active Travel (2016). Transport and Infrastructure Council. Canberra.

notion that cars are supreme, despite their negative externalities such as congestion and impacts on health.

Large reductions in emissions per passenger is already available. Public transport, even at moderately low levels of patronage, has an inherently low energy and emissions footprint per passenger relative to cars even when the system operates uses fossil-fuel. At a moderate loading of 40 passengers, a diesel bus generates emissions of 22g CO_2-e per passenger-km: one-sixth that of an electric car with a peak-time average occupancy of 1.1 passengers on the 2020 power grid and less than one-third that of an electric car in the hypothetical all-electric-by-2030 scenario. Even at a low loading of 10 passengers an electric bus involves around one-third the energy and emissions per passenger compared with an electric car carrying 1.1 passengers, the two supplied from the same power grid[5].

Halving Australia's transport carbon emissions in a 2030-time frame is eminently achievable—but only if there is a substantial shift away from low-occupancy car transport (however fuelled). Measures like establishing mode share targets are essential to create cleaner and more sustainable cities.

The following possible action should be strengthened – promoting greater use of active and public transport by improving safety, connectivity and convenience of walking and cycling infrastructure and of electrified public transport options. It should cover all public transport options not only those that are electrified. It should address the factors that are outlined at the beginning of our submission to achieve greater mode shift.

Objective 5 Our urban environments and communities promote health and wellbeing.

This section should also acknowledge the role that public transport has in promoting health and wellbeing. The Centre for Health Advancement of the New South Wales (NSW) Ministry of Health found in 2012 that a range of 8–33 additional minutes of walking was identified for public transport users. A significant proportion (30%) of public transport users met all their recommended levels of physical activity just from their transport walking, and public transport users were 3.5 times more likely to be sufficiently active compared with car drivers. Lower weight was a major health benefit associated with additional minutes of walking associated with public transport use.

People who live or work in communities with high quality public transport tend to drive significantly less and rely more on alternative modes (walking, bicycling and public transit) than they otherwise would. This reduces traffic crashes and pollution emissions, increases physical fitness and mental health, and provides access to medical care and healthy food. These impacts are significant in magnitude compared with other planning objectives but are often overlooked or undervalued in conventional transport planning[6].

Consequently, this section should also include a public transport related "possible action".

Objective 6 – Our urban areas promote productivity.

This objective specifically needs to recognise public transport/mass transit from a productivity perspective. Transport networks that simply funnel more private vehicles onto roads do not improve productivity outcomes. One full city bus can take more than 50 cars of the road, a large articulated public BRT bus such as the Brisbane Metro can carry 150 people (and 170 in event mode), replacing over 100 cars.

Buses, unlike radial light and heavy rail, can penetrate deep into suburbs (horizontal and vertical penetration). In most Australian cities, the distance between radial light and heavy rail lines and stations grows with distance from the central business district, so often the only viable transport choices for residents are either to drive or take a local bus. Local bus routes in many jurisdictions are designed for

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[5] Public Transport Users Association (June 2024) Myth: Getting people out of cars distracts from the main priority for reducing transport emissions—electrifying the cars. https://www.ptua.org.au/myths/electrify/
[6] Litman, T (2020) Evaluating Public Transportation Health Benefits. Victoria Transport Policy Institute For The American Public Transportation Association

coverage purposes (e.g. local routes) or a combination of coverage and patronage (neighbour routes, connector routes or trunk routes) rather than solely for patronage (bus rapid transit, shuttle routes). Light and heavy rail alternatively is designed for patronage. Governments need to ensure that bus services and associated infrastructure prioritising patronage are adequately funded and are reliable, frequent, direct and have a wide service span.

The discussion notes that efficient, low-cost, accessible and reliable transport networks are essential for connecting people. Buses are that transport network. The NSW Bus Taskforce calculated that the cost to government of carrying passengers by bus is $6.12. In comparison the cost per passenger by train is $16.59 and metro $21.50.

The enduring inadequacy of funding and low prioritisation of investment into bus services in every jurisdiction has given rise to a disconnect in the level and quality of services most communities including those experiencing growth, those with changing needs and those experiencing economic and social disadvantage. The possible actions in this section of the policy should be amended to include the following: Increase investment in bus services to enhance reliability, convenience, frequency, speed and span of operation.

4. Conclusion

Buses are the easiest, quickest, and cheapest ways to improve surface transport and connectivity in cities. While building a new railway, light rail line or road takes years, if not decades, whereas better bus services can be delivered in months. Relatively small investment, by the standard of transport spending can deliver significant benefits.

BETTER BUSES = BETTER CITIES