

6 January 2015

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Dear Mike

Thank you for the opportunity to comment on this review. We have canvassed members and offer the following comments.

Transport Policy for the Transport Disadvantage

A number of BusNSW Members are involved in Transport Working Groups which involve Regional Transport Coordinators (RTCs). Information provided to members during 2014 suggests that TfNSW are well advanced in the development of plans relating to the work of RTCs and the transport disadvantaged (refer below). BusNSW is concerned that many of these plans have taken place without consultation with the NSW bus industry which operates services in many of the affected areas.

BusNSW is further concerned that there is a lack of definitive and coordinated information on the provision of services for the transport disadvantaged in NSW. There are, instead, a wide range of policy documents and initiatives at various stages of development//implementation/completion, that impact on having a robust framework for integrating services in the RTC regions. These include:

- A TfNSW working paper which discusses the development of RR transport servicing principles – this has not been made available to BusNSW.
- RTCs have submitted draft annual plans for approval – BusNSW does not have access to these plans.
- TfNSW is developing a Community Transport Agreements Strategic Plan – BusNSW is not involved in the development of this plan.
- The Community Transport Agreements Branch is developing a new “business plan” to refocus goals - BusNSW is not involved in the development of this plan.

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- The NSW Government has developed the Long Term Transport Master Plan and the Regional Transport Plans.
- Changes to the NSW Passenger Transport Act and Regulations will impact on contracts, accreditation and the ability to operate without contracts. It is not clear what accreditation standards community organisations and local councils will need to meet and how this may impact on their ability to provide services to the transport disadvantaged.
- New Rural and Regional Bus Service Contracts are being developed in isolation of service planning guidelines and consideration of opportunities to utilise existing resources to service the transport disadvantaged.
- Procurement of Trainlink services has been undertaken prior to the abovementioned plans being finalised.
- TfNSW have put out fact sheets indicating that CT operators “*will be able to bid for bus service contracts to be put to tender*”. This suggests that TfNSW has pre-conceived ideas in regard to the future role of community transport.
- TfNSW have advised BusNSW regarding service variations that “*any person or organisation including the contracted bus operator, can propose a change to passenger-carrying services*”. It is unclear how such proposals would be made or be assessed by TfNSW.
- The second five year review of the Disability Standards for Accessible Transport is currently underway.
- The National Disability Insurance Scheme is soon to be implemented in NSW.
- The NSW Government’s broader response to the review of inter-regional transport in NSW is still being assessed.
- TfNSW’s proposed expansion of 131500 facilities into regional areas is not clear.
- TfNSW is reforming SSTS application and administration systems in regional NSW.

Clearly, many if not all of the above plans impact on the transport disadvantaged and the rural and regional areas where some of that disadvantage is most pronounced. Any review into the role of RTCs needs to take all of these proposals into account. Can you please clarify if there is a clear position on servicing the needs of the transport disadvantaged so that BusNSW can make a more informed comment on the current RTC review? The role of RTCs should be considered once a clear policy framework exists that integrates the various initiatives mentioned above.

Service Procurement and Provision

Currently, it is unclear how transport for the transport disadvantaged is going to be procured and what policy and procedures will be adopted.

Critically, it is also unclear exactly how persons are to be assessed as being “transport disadvantaged”. BusNSW considers that a clear definition of “transport disadvantaged” is needed at the outset of the review. BusNSW understands transport disadvantaged to mean: persons with limited or no access to private transport, and who have difficulty accessing conventional public transport. However, without a clear definition of “transport disadvantaged” agreed by all parties, the review of RTC operations may be less productive.

BusNSW understands that the intent of the community transport program is to coordinate and provide for a more efficient use of transport resources that exist in local communities. In that context, the new Rural and Regional Bus Service Contract funding model currently being developed by TfNSW, should include a mechanism that facilitates operators using existing fleet resources to provide alternative transport to the disadvantaged where a need is identified and the local RR contract operator is best placed to provide the service. Many RTCs do not appear to consider RR contract holders for providing transport services outside their contracts.

Role of Transport Coordinators

The feedback received from BusNSW members, indicates a wide variation in the level of satisfaction with RTCs, highlighting inconsistencies in approach and a lack of willingness to facilitate/consider existing RR contract holders when looking to meet certain transport needs. While it would appear from some of the documents outlined earlier, that decisions have already been made in terms of community transport and RTCs, BusNSW would nevertheless offer the following general comments on the role of RTCs:

- RTCs are generally able to identify gaps in their regions, however a clear and transparent policy framework is needed to dictate how those gaps are met.
- RTCs should be able to provide input into developing appropriate strategies if a clear policy framework is provided.
- RTCs can play a part in facilitating consultation with stakeholders but this must include consultation with bus contract holders. It would appear that some RTCs have a strong focus on community transport and avoid consultation with bus operators in their region.
- Working in conjunction with Ability Links and the regional Linkers should be of benefit to the local communities.

In short, there is an enormous amount taking place in the community transport space, at the local, commonwealth and particularly state level. Any review into the role of RTCs needs to take all of these proposals into account. Furthermore, meaningful consultation between TfNSW and the bus industry needs to take place at a holistic policy level, rather than in relation to transport reviews such as the current one, in isolation of other broader policy changes.

We would welcome the opportunity to discuss these matters further in person.

Yours sincerely



Darryl J Mellish
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