To

Mr. James Cox Chief Executive Officer Independent Pricing and Regulatory Tribunal of NSW PO Box Q290 QVB Post Office NSW 1230 transport@ipart.nsw.gov.au

## Dear Mr Cox

The following is a response to the draft report issued by the Independent Pricing and Regulatory Tribunal of NSW (IPART) on 13th October 2009.

The draft report wishes to reclaim costs incurred by the RTA in providing bus services, through increased ticket prices.

In principle I have no objection to funding road costs to improve bus running times. However for such costs to be passed onto bus passengers, there must be a net measurable benefit. The bus lanes provided by the RTA over recent years have not provided measureable benefits to bus passengers. One example is the bus lanes added in Elizbeth St (Sydney City)

There are three main design criteria for bus lanes to provide benefits to passengers. Bus lanes must:

- 1) Allow buses an uninterrupted path (without traffic in front)
- 2) Be wide enough to allow buses to bypass standstill traffic
- 3) Reduce overall traffic congestion by encouraging people to use bus services

The bus lanes in Elizabeth St do not meet any of the three above criteria.

- 1) Uninterrupted path:
  - The Elizabeth St bus lane is located in the far left lane. The path for buses is interrupted by stopping taxis, left turning traffic especially at traffic lights (awaiting for pedestrians to cross), and also held up by other stopping bus services. Bus lanes should be located in the 2<sup>nd</sup> lane from the left.
- 2) Width:
  - The lanes are too narrow for buses to pass stopped traffic in the RH lanes
- 3) Congestion:

The poor design (as per above points) causes increased congestion. Traffic which had 3-4 lanes now is reduced into 2-3 lanes, but because the bus lane design does not allow for isolation from congestion, the increased congestion directly impacts bus services. The net effect is worse than when there were no bus lanes.

The above statements may be backed up by empirical running times on buses.

Therefore any RTA road modifications should only be reimbursed from bus fares where a measurable improvement to bus running times occurs.

yours sincerely

Ian Fletcher