

TRAVELSAFE COMMITTEE OF THE 50TH PARLIAMENT

PUBLIC TRANSPORT IN SOUTH EAST QUEENSLAND

CONCLUSIONS AND RECOMMENDATIONS FROM REPORT NO. 38

DECEMBER 2002

INTRODUCTION

This paper outlines the conclusions and recommendations from the Travelsafe Committee's report from its inquiry into public transport in South East Queensland.

TERMS OF REFERENCE FOR THE INQUIRY

During the inquiry the committee considered:

- The importance of public transport to the South East Queensland (SEQ) region;
- The effectiveness and efficiency of the region's existing public transport system;
- Problems with the existing system; and
- Measures for the system's improvement.

CONTEXT FOR THE INQUIRY

SEQ comprises the local government area of Brisbane and 18 surrounding shires. It extends from Noosa in the north, and south to the New South Wales border and west to Toowoomba. SEQ accounts for 1.3 percent of the state's land area, yet houses almost two thirds of its population.

SEQ has grown at a rapid and increasing rate since the 1960s, and is Queensland's fastest growing region. Current trends suggest the region's population of 2.4 million will swell to 3 million by 2011, a 50 percent increase since 1990. The population is also ageing.

Mobility in SEQ is increasing and the predominant mode of travel is the car. With car trips accounting for 4 out of every 5 trips in the region, SEQ is heavily car-dependent.

Coupled to the growth in car dependency, has been the decline in travel by public transport from 40 percent of trips in the 1960s to 6.6 percent in 1997. Without interventions, the proportion of trips is projected to reduce further to 6.3 percent by 2011.

Rapid population growth, accompanying urban sprawl and car dependency pose significant threats to the lifestyle enjoyed by the residents and visitors to the SEQ region. Measures to enhance public transport are vital to reducing car dependency in SEQ.

THE IMPORTANCE OF PUBLIC TRANSPORT TO SEQ

While presently carrying only 7 percent of total trips, evidence gathered by the committee suggests that SEQ public transport is an essential mechanism of equity. For groups without a private vehicle, it provides their principal means of transport. Because of this, public transport is a key to the effective delivery of many government services to the region's communities, whilst supporting economic, environmental and road safety objectives.

Public transport and other alternatives to travel by private cars are vital to the efficiency of the region's transport system and the environment. Cars, however, remain the predominant mode of travel in SEQ.

Public transport is essential for transport-disadvantaged groups. Without it, these groups would not enjoy the same mobility and access to amenities such as education, health and other services as other groups. Members of transport-disadvantaged groups may also enjoy less social contact with other people. This contact is essential to health and well-being. The transport-disadvantaged groups in SEQ include people with disabilities (either permanent or temporary incapacity), people from low socio-economic groups, women, the unemployed, carers, youth and children. Public transport is an important service for visitors to the region.

THE SEQ PUBLIC TRANSPORT SYSTEM

The SEQ region is served by a substantial multi-modal public transport system comprising heavy rail, bus and ferry services, busways and fee for hire taxis. Information contained in the Queensland Transport submission suggests the region's public transport services are reasonably effective and efficient with high fare-box returns and low subsidy levels paid to transit operators compared to other capital city public transport systems. Usage rates in SEQ, however are relatively low. While there has been some recent growth in public transport travel, trips by car have also increased. Overall, SEQ residents are becoming increasingly car dependent.

EFFECTIVENESS AND EFFICIENCY OF THE SYSTEM

Based on 'access to the system', 'accessibility' and 'equity' indicators, the SEQ public transport system appears to be ineffective in meeting the needs of the region's transport-disadvantaged groups. A large proportion of the region's population do not enjoy reasonable access to public transport services. Other data submitted to the committee suggests the system is unattractive to entrenched car users and fails to provide suitable access to services for a substantial proportion of the region's population. The committee concludes that the system is falling well short of its full potential.

The Integrated Regional Transport Plan for South East Queensland (IRTP) and *Transport 2007* articulate Queensland Transport's long-term objectives and goals for future improvements to the SEQ region's public transport system. Queensland Transport and the Department of Main Roads in their joint submission to the inquiry, qualify that the access and accessibility objectives in the IRTP were never intended to be regional, but applicable only to the region's urban/metropolitan areas. The committee notes that access and accessibility are key issues for transport-disadvantaged residents in SEQ. In bringing this critical point of clarification to the committee's attention, the departments also note that it was not stated in either the IRTP or the *Transport 2007* plan released in 2001. The committee believes such a fundamental point should have been stated for the benefit of the region's transport stakeholders, particularly when it appears at odds with the IRTP's rhetoric. The committee does not know why Queensland Transport did not include clarification in its *Transport 2007* document released in 2001, and questions the purpose of these long term planning documents if it is not to provide clear, unambiguous directions on the future development of the transport system.

The committee believes the region's transport plan must set clear, measurable objectives for public transport access, accessibility and equity for urban/metropolitan and non-urban/metropolitan areas. Without targets and a plan to address access, accessibility and equity issues, the problems confronting transport-disadvantaged residents may not be resolved.

PROBLEMS WITH THE SYSTEM AND POSSIBLE SOLUTIONS

- *Management*

It is apparent that the SEQ public transport system is not integrated. However, it is improving. The current raft of initiatives and reforms introduced by the Beattie Government give the region's public transport operators and patrons a promising opportunity. These initiatives include the establishment of a dedicated division in Queensland Transport to assume regional transit authority functions, and the establishment of a separate operational coordinating body called Citytrans. The committee also notes the political goodwill between key players, the Brisbane City Council, Queensland Rail, private bus operators and the government to reform the regions public transport system.

The committee acknowledges the work at Citytrans to deliver coordinated services and joint ticketing arrangements with the managers of major venues and events in SEQ. These initiatives need to be expanded across SEQ. Public transport needs to become the mode of choice to attend the football, cricket, cultural events and other shows and activities across the region.

When considering the reasons why the region's public transport is under-performing, Queensland Transport, the agency of the government with long-standing, legislated responsibility for the planning and coordination of the region's transport, is an obvious target for blame. However, the department did not establish the historical institutional arrangements (it merely inherited them). The failure to achieve coordination over the past forty years could be ascribed as much to failures of political will or policy of past governments as to failures of the administering organisation. It is pure conjecture to speculate that a regional transit authority operating in the same climate and constraints would or could have achieved a better result.

The committee considered the logistics of forming a new SEQ regional transport authority. As noted above, this would involve significant change to the roles and functions of state and local government agencies causing disruption to agency staff and work output. The committee did not determine a likely cost of this transition, but suggests it would be substantial given the scale of the changes involved. The committee also considered the potential for this change to derail current improvements and undermine the goodwill that exists between governments and operators.

The current management framework in SEQ is not ideal, but represents a sensible compromise for the government to achieve results without incurring the political and logistical costs and difficulties of re-configuring the entire SEQ public transport landscape.

In the committee's view, the best option for the government and the region at this time is not to establish a further transit authority, but to make the current administrative arrangements function properly. This includes providing Queensland Transport with the legislative backing to fulfil its role, ensuring planning and land use are considered in terms of public transport and local government policy, and bringing staff and transport planning expertise from other organisations to the department. The committee suggests that the creation of the new Translink Division within Queensland Transport is an important first step. The committee welcomes the proposed inclusion of staff from Queensland Rail and Brisbane City Council. Staff from other SEQ local governments and other major stakeholders with expertise in non-infrastructure public transport solutions should also be included.

While finding against the arguments for a new regional authority, the committee notes that management of the region's public transport is vulnerable because success is contingent on mutual cooperation and political goodwill among the major players (the state government, local governments particularly the BCC, Queensland Rail and private operators) to work towards common objectives and not individual commercial interests. The success of reforms will ultimately depend on maintaining the current levels of goodwill and cooperation.

- ***Decision-Making Frameworks***

Queensland Transport and the Department of Main Roads use internal decision making tools to guide their investment in major transport projects in SEQ, supplementary to the broad directions provided by the Integrated Regional Transport Plan for South East Queensland released in 1997, and the 2001 mid-term revision, Transport 2007.

The committee welcomes the introduction of decision-making tools Multi-Model Evaluation Framework (MMEF) and Portfolio Prioritisation Framework (PPF) within the transport portfolio, though, notes the inherent weakness of internal decision-making tools that involve arbitrary weightings and subjective assessments. As noted by the Bureau of Transport Economics (BTE) from their study of multi-criteria assessment tools, it is essential that the processes used in the MMEF and PPF be as transparent as possible to ensure that the analysts'

methodology can be fully assessed and understood. It is essential therefore, in the interests of transparency, that the departments publish their assessments of major transport projects using MMEF and PPF when it has been finalised.

- ***Policy Coordination***

The committee supports the SEQ 2021 plan for the SEQ region. SEQ 2021 provides an opportunity for the state government and SEQ local governments to ensure alignment of land use and public transport objectives.

The Integrated Planning Act 1997 should be amended to give Queensland Transport concurrence agency status in regard to developments impacting on public transport. Section 145 of the Transport Operations (Passenger Transport) Act 1994 and s 148 of the Transport Infrastructure Act 1994 should be used as the basis for new transport impact assessment provisions under the Integrated Planning Act 1997.

In transferring these provisions to the Integrated Planning Act 1997, the committee notes that it will be necessary to examine and clarify their scope. Queensland Transport's role will need to include assessment of transport system impacts such as:

- major developments that would impose unreasonable impacts on the provision of transport infrastructure and where the accessibility of a range of transport modes needs to be considered;
- major developments likely to require public transport-related infrastructure;
- development adjacent to rail corridors that may have secondary impact on the safety of the transport system by, for example, significantly increasing the use of a level crossings; and increased legal and illegal pedestrian movements through the corridor;
- significant development requiring a functional hierarchy of roads, cycle ways and pedestrian pathways; and
- development requiring cycling and pedestrian end-user facilities.

Queensland Transport has produced excellent guidelines on transport-friendly urban design called Shaping Up. Developers, councils urban designers and others involved in urban planning should be encouraged to abide by the principles in the guidelines.

All levels of government impact on urban transport. It follows that effective alignment of policies across all levels of government is crucial to maximise the returns from urban transport investments by all levels of government. A national urban transport policy statement

with clear objectives and targets for sustainability is needed to assist state and territory governments and local governments in their forward transport planning, coordination and investment decisions. The committee recommends that the Minister for Transport lobby the Commonwealth Government through the Australian Transport Council to develop such a national urban transport policy.

- ***Monitoring public transport performance***

Mechanisms to make state and local government agencies and public transport operators more accountable for achieving regional system objectives and to make management decisions more transparent are essential to maintain momentum, regardless of political circumstances. The mechanisms to improve accountability and transparency will need to include:

- Queensland Transport clearly articulating its transport objectives and transport planning philosophies for the region in detail;
- all agencies giving their commitment to an implementation timetable and meeting milestones in the timetable;
- a meaningful, public reporting mechanism of achievements and progress; and
- regular reporting of the health of the transport system using performance indicators that reflect service quality, accessibility, security, social and economic efficiency concerns.

The committee welcomes commitments by Queensland Transport to report annually on the implementation of transport reforms in SEQ against revised objectives. The committee concludes that separate annual reporting by the committee on the implementation of Transport 2007 reforms is unnecessary.

- ***Public transport services***

There is a disparity between the levels of public transport services available to SEQ residents across the region. The SEQ public transport system offers frequent services to the inner Brisbane city, less frequent services to outer Brisbane and infrequent or non-existent services to other areas. In areas of Brisbane, there appears to be incongruence between the need for public transport services and the standard of services that are provided. Services in Brisbane are predominantly radial services running to and from the CBD. There are few cross-town, city-circle or suburb to suburb services.

It is vital that public transport services be extended in terms of frequency and coverage to transport-disadvantaged areas, as a priority. The committee

welcomes the service expansion initiatives planned by Queensland Transport over the next five years under Transport 2007. These initiatives should be prioritised according to need, and implemented as soon as possible.

The committee notes the Hinterlink service trial in the Mudgeeraba area by the Surfside Bus Company. The committee recommends that, subject to a positive evaluation, similar initiatives be trialled in other transport-disadvantaged areas of SEQ.

Queensland Transport should refine their current minimum service levels by including standards that are matched to population thresholds to take into account the population growth in urban and regional centres across SEQ.

It is important that public transport accommodate cyclists. The committee welcomes commitments from the Brisbane City Council to trial bicycle racks on buses and its commitment to explore end of trip facilities at public transport interchanges. Queensland Rail should review the adequacy of end of trip facilities and the provision of bicycle lockers at Citytrain stations. The committee welcomes Citytrain's bicycle parking initiatives and recommends that bicycle lockers be installed at all bus and rail interchanges in the region as a long-term goal. The committee further recommends that local governments be encouraged to provide walking and cycle paths to bus and rail interchanges to encourage non-motorised transport options.

The committee welcomes Queensland Transport's reforms to operator contracts. These reforms will improve the department's capacity to procure quality public transport services, and ensure conformance by operators with specific performance criteria. The elimination of current area monopolies for operators through Generation 3 contracts will encourage cooperation between operators and result in improved public transport services to the travelling public. It is also important that operators are offered incentives to coordinate their services. Queensland Transport needs to establish trials of innovative approaches to providing public transport services.

- ***Community and school transport***

The committee notes the importance of community transport services to transport-disadvantaged groups in SEQ. Community transport initiatives provide invaluable services to disadvantaged groups by improving access to essential services and recreational activities for quality of life. It also notes the apparent ad hoc nature of the community transport sector arrangements and the need for Queensland Transport to

act as a coordinating authority. The committee concludes that community transport needs to be managed as a transport resource that is complementary to public transport. To best achieve this end, the committee recommends a review to determine the feasibility of transferring administrative responsibility to Queensland Transport.

The committee notes the potential for community transport and school buses to be used to provide services for transport-disadvantaged groups in areas of SEQ that cannot support normal public transport services. These opportunities need to be explored.

- ***Integrated ticketing***

A fully integrated ticketing system for SEQ is essential to make the region's public transport simpler to use. It is important that integrated ticketing be operating as soon as possible. The committee welcomes the recent announcement by the government of the introduction of smart card ticketing and an interim paper-based system for the region over the next four years.

There is significant and justifiable public scepticism about Queensland Transport's ability to deliver this essential public transport reform to the region without further delays. The committee believes it is sufficiently important to warrant close monitoring by the Minister for Transport at each milestone, and regular progress reports by the Minister to Parliament.

The committee acknowledges that Queensland Transport has made significant progress on integrating the system's business rules. This is necessary, preliminary work to achieve the integrated ticketing system proposed. The committee believes the department should implement the revised zones, fares and operating rules affecting concessions in the interim.

The committee notes the proposed integrated ticketing system will not cover all services in the region. The committee believes the department should examine the feasibility, costs and benefits of doing so.

The committee notes the key role the advisory board for the integrated ticketing project will play in the delivery of integrated ticketing to the region's public transport system. The committee suggests that representatives of public transport users should be included on the advisory board to ensure the system meets the needs of all interested parties - departments, operators and users.

- ***Concessions***

Public transport fares and concessions vary across modes and operators in SEQ. The committee welcomes the establishment of a common fares and concessions

policy as part of the integrated ticketing project. This policy will exclude the unemployed and carers from fares concessions.

A working group established by the Queensland Government's Jobs Policy Council examined the justification for concessions for the unemployed in 1998. There has been no study of the case for concessions for carers.

The committee considers there is sufficient justification to warrant an independent study of the feasibility, benefits and costs of providing public transport fares concessions for both groups in Queensland. This study should occur prior to the implementation of the interim paper-based ticketing system in July 2004. This study should consult stakeholder and community groups and review the concession regimes of other states and territories.

- ***Data on travel behaviour in SEQ***

In the absence of integrated ticketing, SEQ data on the travel behaviour of residents and visitors remains incomplete and difficult to gather. In the absence of better data, Queensland Transport has based their transport planning for SEQ on periodic household travel surveys. These surveys offer a limited and dated picture of the travel behaviour of the region's residents and visitors. This travel data is losing usefulness as the SEQ region experiences rapid population and urban growth. The absence of accurate and recent travel data also makes it difficult for the department to objectively evaluate their transport policies and projects.

Queensland Transport, in conjunction with the Brisbane City Council and Queensland Rail, have commissioned a series of surveys over the next four years to supplement their data on travel for the region. The committee supports this initiative. The committee recommends that this data be supplemented by studies of travel behaviour to and from major trip generators across the region such as airports, hospitals, universities and TAFE colleges and shopping centres, and of travel-disadvantaged groups and captive riders.

The committee acknowledges that the government's Integrated Ticketing Project will yield high-quality and extremely useful trip data for SEQ public transport users. A program is needed for the collection of vehicle occupancy data for the region.

- ***Funding for public transport***

Sustained, increased funding is needed for public transport infrastructure and services in SEQ.

The committee supports the development by Queensland Transport of a long-term infrastructure plan for public transport in SEQ. This will assist state government agencies, local governments and private operators to align and plan their future investment decisions.

Current approaches to transport funding and user charging promote inefficiencies and inequities in the use of resources, and promote greater car dependency in SEQ.

Alternative models of funding and charging should be explored. Irrespective of changes to how the state government approaches its funding obligations, it is imperative that alternative sources and mechanisms of funding for SEQ public transport infrastructure be explored.

Options used in other jurisdictions that should be considered include: public-private sector partnerships; build, own, operate and transfer (BOOT) schemes for major infrastructure; commercial exploitation of transport corridor development opportunities and benefits, and alternative transport user charging regimes.

The committee welcomes reforms that reflect competitive pricing of all transport modes, but not at the expense of a vital transport funding base. The committee recommends that the Queensland Government, with the support of other states and territories, continue to lobby the federal government through the ATC to fully fund the maintenance and development of the national highway network.

The Commonwealth and local governments need to contribute to the costs of operating and maintaining urban public transport systems. Other SEQ local governments should follow the lead of the BCC.

- *Transport subsidies and concessions*

The Commonwealth Government's taxation policies promote travel by cars and discourage public transport travel. These policies have reduced the costs of purchasing and owning cars and offer generous FBT concessions for employer-provided company cars, while levying full-rate GST on public transport fares.

The committee recommends that the Minister for Transport continue to lobby the Commonwealth Government through the Australian Transport Council to adopt taxation policies that support sustainable transport options, such as public transport, and discourage car dependency.

The committee recommends that the Queensland Government investigate the feasibility of offering government employees green transport choices and

incentives for the private sector to do the same. These choices should include car pooling, secure cycle parking, subsidising public transport fares, negotiating improvements to bus services and reward schemes for green commuting.

To fund these initiatives, the government should review its policies on vehicles provided to staff for home garaging and private use in SEQ, and parking provided to staff. As the largest employer in the state, the Queensland Government is poised to lead the move towards sustainable work-related travel choices by employees.

- *Travel demand management*

The committee welcomes the development of a travel demand management strategy for SEQ by Queensland Transport and other stakeholders.

The committee notes the success of the recent Brisbane pilot of the TravelSmart Program in the Windsor/Grange district, and recommends that Queensland Transport apply the program across other parts of SEQ where public transport services are available but under-utilised.

RECOMMENDATIONS

1. That Queensland Transport, through Citytrans, expands joint ticketing arrangements in conjunction with other departments and the management of major sporting and entertainment facilities across South East Queensland.
2. That Queensland Transport and the Department of Main Roads publish their analyses for major transport investments using their Multi-Modal Evaluation Framework and Portfolio Prioritisation Framework.
3. That the Department of Premier and Cabinet amend the Cabinet Handbook to include Queensland Transport and the Department of Main Roads within the range of agencies with standing consultation requirements in regard to Cabinet submissions. And further, that the Department of Premier and Cabinet consider introducing a transport impact assessment process for submissions to Cabinet.
4. That Queensland Transport establishes a protocol between the state government and the Local Government Association of Queensland to ensure developers, councils and other stakeholders in urban developments abide by the guidelines in Queensland Transport's 1998 Shaping Up guidelines to improve the integration of transport and land use in South East Queensland.
5. That the Integrated Planning Act 1997 be amended to give Queensland Transport concurrence agency status in regard to assessment and control of the public transport implications of development applications, consistent with the status of the Department of Main Roads for roads impacts. Section 145 of the Transport Operations (Passenger Transport) Act 1994 and s 148 of the Transport Infrastructure Act 1994 should be used as the basis of these new transport impact provisions with clarification of their scope.
6. That the Minister for Transport and Minister for Main Roads lobby the Commonwealth Government through the Australian Transport Council to develop a national policy on urban transport.
7. That Queensland Transport's annual reporting on the implementation of Transport 2007 be expanded to include reporting on the indicators: average trip length; the proportion of the region's population within 400 metres of an access point to regular scheduled public transport services; per capita vehicle kilometres travelled; per capita fuel consumption; and urban travel time per kilometre.
8. That Queensland Transport publish a two-tiered system of public transport service standards for SEQ based on population and urban density. The standards should provide for half-hourly minimum services in built up areas and hourly services with earlier finishing times in the lower-density fringe and small towns.
9. That Queensland Transport and Queensland Rail install bicycle lockers at all bus and rail interchanges in the region as a long-term goal.
10. That Queensland Transport and Queensland Rail investigate the feasibility of carrying bicycles on buses and trains during peak hour traffic. This investigation should include a study of best practice approaches used by other railways and recommend design modifications for Citytrain carriages.
11. That Queensland Transport evaluates innovative service solutions like the Gold Coast Hinterlink bus service pilot and, subject to the evaluation findings, consider supporting similar pilot services in other transport-disadvantaged areas.
12. That Queensland Transport, in conjunction with the Department of Families, investigates the feasibility of transferring responsibility for administration of community transport to Queensland Transport.
13. That Queensland Transport explores opportunities to use community and school buses to deliver cost-effective public transport services in areas where full-services are not viable.
14. That paper-based and smart card integrated ticketing systems be fully implemented for the South East Queensland public transport system by 2006 and, in the interim, that standardised fares and concessions be introduced across all services by July 2004. The minister should report to Parliament on the achievement of significant milestones for the project.
15. That Queensland Transport examines the feasibility, costs and benefits of extending the proposed integrated ticketing project to give the widest coverage of South East Queensland areas and services.
16. That representatives of public transport users be appointed to Queensland Transport's integrated ticketing project advisory board.
17. That Queensland Transport commission an independent study of the feasibility, benefits and costs of providing public transport fares concessions for:
 - (a) the unemployed to assist in their pursuit of work; and
 - (b) registered carers while attending to people in their care who are unable to travel unaided.
18. That Queensland Transport, in consultation with transport-disadvantaged groups, collect travel behaviour data in connection with major trip generators across the region such as airports, hospitals, universities, TAFE colleges and shopping centres to supplement data collected through household travel surveys.

RECOMMENDATIONS (CONTINUED)

19. *That Queensland Transport implements a program to collect vehicle occupancy data for the South East Queensland region.*
20. *That Queensland Transport and Main Roads continue to explore alternative sources of funding to supplement funding available from consolidated revenue.*
21. *That the Queensland Government, with the support of other states and territories, continue to lobby the federal government through the Australian Transport Council to fully fund the maintenance and development of the national highway network.*
22. *That the Minister for Transport and Minister for Main Roads lobby the federal government through the Australian Transport Council to adopt taxation policies that support public transport and other sustainable transport choices including the exemption of public transport fares from goods and services tax (GST) and fringe benefits tax (FBT) concessions for employer-provided public transport fares.*
23. *That the Public Service Commissioner, in conjunction with Queensland Transport and Queensland Treasury, reviews policies on the provision of government vehicles to staff for home garaging and private use in South East Queensland, and parking provided to staff, to identify options to minimise adverse impacts on travel demand in South East Queensland*
24. *That Queensland Treasury examines options to better target the State Fuel Subsidy Scheme to achieve optimal outcomes for the South East Queensland transport system.*
25. *That Queensland Transport extends its TravelSmart program to areas of South East Queensland where public transport services are available but underutilised.*

THE TRAVELSAFE COMMITTEE

The Travelsafe Committee is a select committee of the 50th Parliament established by a resolution of the House on 2 May 2001. The Parliament appointed the committee to inquire into and report on all aspects of road safety and public transport in Queensland, in particular:

- issues affecting road safety including the causes of road crashes and measures aimed at reducing deaths, injuries and economic costs to the community;
- the safety of passenger transport services, and measures aimed at reducing the incidence of related deaths and injuries; and
- measures for the enhancement of public transport in Queensland and reducing dependence on private motor vehicles as the predominant mode of transport.

COMMITTEE MEMBERS

- Mr Jim Pearce MP, (Chair) (Fitzroy)
- Hon Vince Lester, MP (Deputy Chair) (Keppel)
- Ms Rosa Lee Long, MP (Tablelands)
- Ms Carolyn Male, MP (Glass House)
- Mrs Dianne Reilly, MP (Mudgeeraba)
- Miss Elisa Roberts, MP (Gympie)
- Mrs Christine Scott, MP (Charters Towers)

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