

Living Streets Aotearoa



Submission from Living Streets Aotearoa to the Ministry of Transport on the Public Transport Operating Model proposals

Contact person: **Mike Mellor**
Email: **mmellor1@gmail.com**
Phone: **027 684 1213**
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About Living Streets

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking-friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- ! to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- ! to promote the social and economic benefits of pedestrian-friendly communities
- ! to work for improved access and conditions for walkers, pedestrians and runners, including walking surfaces, traffic flows, speed and safety
- ! to advocate for greater representation of pedestrian concerns in national, regional and urban land-use and transport planning.

For more information, please see: www.livingstreets.org.nz

Our submission

Public transport and walking are inextricably linked, with public transport trips nearly always involving a walking trip at each end. Our submission therefore addresses these walking links and public transport from a passenger point of view. While we understand that this consultation is limited to bus and ferry transport, the same principles should apply to rail transport, too.

Our responses to the questions posed in the discussion paper at <https://www.transport.govt.nz/assets/Uploads/Paper/PTOMDiscussionSummarydocument.pdf> are as follows.

New overarching objectives for PTOM

1. How much do you agree or disagree with the new objectives?

Strongly agree.

What was the reason for your rating? Do you have any other comments?

The current objectives, with their obsession with commerciality and cost, completely ignore the substantial value and benefits of public transport. We fully support all the proposed objectives, except the first one, which, if included, should be a secondary one – competition and the market form one means to an end, not the end in itself. Markets can fail to provide the desired result, as is being seen in Wellington at the moment, and it is important that regional councils can address this in a timely and effective way. We therefore suggest removing this objective from the list of overarching ones, allowing regional councils to pursue the best options without emphasising one particular line of economic thought that has been demonstrated not to fit all circumstances.

Implementing the 2025 Zero Emission Bus Mandate

2. How much do you agree or disagree with the proposed design of the Mandate?

Strongly support.

What was the reason for your rating? Do you have any other comments?

We support this, but it could be stronger. For instance, all emissions should be included, not just tailpipe ones, since technologies like battery manufacture and hydrogen production can have significant carbon footprints. The tailpipe is just part of the emissions profile, and it is the complete picture that is important. Similar complete Mandates should also be applied to other forms of transport, both public and private.

Bus fleet ownership

3. Which of the following options for bus fleet ownership do you think would best support accelerated decarbonisation of the bus fleet?

We have no particular view on this, and see no reason why all these options should not be available to regional councils.

Depot ownership

4. Which of the following options for depot and infrastructure do you think would best support accelerated decarbonisation of the bus fleet?

We suggest that critical infrastructure such as depots should preferably be publicly owned. This should also include other operational infrastructure such as EV chargers, including en-route facilities, which should be available to all operators.

Funding and financing

5. *Which of the following options for funding and financing do you think would best support accelerated decarbonisation of the bus fleet?*

We see no reasons why all the proposed options should not be available to regional councils.

Roles, responsibilities and relationships in the public transport system

6. *How much do you agree or disagree that changes are needed to improve/strengthen cooperation between regional and local councils in the planning and delivery of public transport services and infrastructure?*

Strongly agree.

What is the reason for your rating? If you think changes are necessary, what changes should be made?

Inter-council co-operation has been sadly lacking in the recent past, for example with infrastructure required to meet proposed service patterns and frequencies being provided late, or not at all. Wellington's late, poorly designed (and some ultimately unnecessary) bus hubs and continuing absence of bus priority – no significant changes in the last 10 years – are significant examples of this failure and the need to improve. This must also include access to and from all forms of public transport, including ferries and trains, to include such things as waymarking, step-free access, safe and convenient walking routes, shelter and information.

There also needs to be improved co-operation between regional councils, since the water-catchment basis of regional council boundaries is not necessarily relevant to transport. Inter-regional services have significant value, but are largely unrecognised by the current setup.

Regional councils and bus/ferry operators

7. *How much do you agree or disagree that changes are necessary to strengthen or improve the relationship between councils and bus/ferry operators?*

Strongly agree.

What is the reason for your rating? If you think changes are necessary, what changes should be made?

These partnerships are a key part of public transport provision, and it should be a formal requirement that they be facilitated. (The same should also apply to rail operators.)

Waka Kotahi and regional councils

8. *How much do you agree or disagree that changes are necessary to strengthen Waka Kotahi's role to encourage greater national consistency?*

Strongly agree.

What is the reason for your rating? If you think changes are necessary, what changes should be made?

Waka Kotahi should be encouraging best practice across the whole public transport network (all modes, and including accessing the network) so that the passenger experience is consistent. This should include such things as wayfaring, information provision (both on- and off-board, including any tones used on board) and ticketing. There are significant variations in all these items, both within and between regions.

Labour market in the public transport bus sector

9. Which of the following three options do you think would best protect bus driver wages and conditions in future contracting?

We think it unfair that employees should bear any part of the cost of a change of operator: their terms and conditions of employment should not be on the line. We have no view as to which of the proposed options would be the best way to address this.

Public transport services operated outside of PTOM

10. How much do you agree or disagree with the current criteria to bring an exempt service under PTOM?

Strongly disagree.

What is the reason for your rating? If you disagree with the criteria, what should the criteria be?

From a passenger point of view the particular way a service is funded should be immaterial, with the same standards applying to all public transport to give a consistent passenger experience, so all such services, by whatever mode, should be included in PTOM (or whatever replaces it).

As an aside, it is interesting that the paper quotes the example of Auckland's SkyBus but not Wellington's similarly exempt (and now defunct) Airport Flyer, where failure of the current system as implemented is contributing to the capital being without an airport bus for well over a year.

On-demand services

11. Which of the following three options do you prefer for the treatment of ondemand public transport services?

For the same reasons as previous answers, as part of the overall public transport network all on-demand services (whether or not subsidised) should be treated in the same way as other public transport, i.e. within PTOM (or whatever replaces it).