

Living Streets Aotearoa



www.livingstreets.org.nz

Submission to Waka Kotahi on the Sustainable Public Transport Framework

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Kia ora

Thank you for the opportunity to submit on this important topic.

We support the overall direction, which addresses issues of concern about the PTOM framework, recognising the importance and significance of public transport for New Zealand, and we would make the following specific points:

1. We support the stated outcomes of

- a) reduce environment and health impacts*
- b) support mode shift from private motor vehicle use*
- c) ensure investments are efficient and give value for money*

which should apply to all transport provision, not just public transport.

2. We support the stated principles of

- a) Co-ordinated*
- b) Integrated*
- c) Reliable*
- d) Frequent*
- e) Accessible*
- f) Affordable*
- g) Safe*

and a), b), e) and g) should also include the essential walking connections.

3. Following on from the latter point, we welcome the reference in Appendix B of the consultation document to active modes being part of an integrated public transport system, and we submit that this be made stronger and more explicit with respect to walking. Every

public transport journey begins and ends with walking, and every PT journey with a transfer includes walking as an integral part. Walking is a critical success factor for PT provision.

4. Inter-regional journeys are currently very much a poor relation in PT provision. Current regional boundaries were set based primarily on water catchments, to facilitate integrated freshwater management, and, as a result, in some cases don't work well for keeping communities of interest together or facilitating relatively short journeys by public transport, such as journeys from Masterton to Pahiatua or Waipukurau to Dannevirke being inter-regional, despite the town pairs being in the northern Wairarapa/Hawkes Bay respectively; or in the greater Auckland travel-to-work area. We welcome the recognition in the consultation of such provision being important, but there is still the remaining obstacle of such services being defined as exempt (i.e. unsubsidised). A big failing of PTOM is its over-emphasis on commerciality, which fortunately is being addressed for intra-regional services, but inter-regional services being exempt means that commerciality is still the primary consideration there. As Te Huia and the lower North Island project show, these services are important and need to have no more obstacles put in their way than for intra-regional ones.

5. We agree that demand-responsive transport should be included in the framework (though including it in the rideshare category is misleading, since it is no more or less rideshare than conventional buses) but we would note that DRT has a chequered history in various jurisdictions, and replacing fixed-route buses with DRT can mean a significant downgrade of service at a high cost per passenger (see for example <https://busandtrainuser.com/a-short-history-of-drt/> for a discussion of British examples by a well-respected retired transport professional - "*I've yet to find a [DRT] scheme that works in the interests of passengers and provides a better service than a fixed timetable bus route*"). Therefore we believe the framework should state that DRT is not in general an adequate substitute for a fixed timetable bus route, but may be appropriate to consider where such routes don't currently exist.

Please acknowledge receipt of this submission.

Mike Mellor
on behalf of Living Streets Aotearoa

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.