

Bus Users Support Group Ōtepoti/Te Roopu Tautoko Kaieke Pahi ki Ōtepoti Submission on DCC 2GP variation 2 (March 2021)

Clause 6 of First Schedule, Resource Management Act 1991

This is a submission on Variation 2 to the Second Generation Dunedin City District Plan (2GP).

Submitter details

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Trade competition

I could NOT gain an advantage in trade competition through this submission

Submission

My submission seeks the following decision from the Council

Accept the change with amendments outlined below

- Add new rule for Residential 2: any new dwelling to be within 400m walking distance of a bus stop with a *regular* service, or 800m walking distance of a bus stop with a *rapid* service; if unable to achieve this, housing density rules for a lower density zone to be applied
- Add new rule for General Residential 1 and Township & Settlement: Any new dwelling to be within 800m of a bus stop or 1200m of a bus stop with a *rapid* service; if unable to achieve this, housing density rules for a lower density zone to be applied
- *Regular* and *rapid* as defined in Otago Regional Council *Regional Public Transport Plan 2014* (but usually *regular* meaning 2 buses per hour on weekdays and 1 in evenings, weekends and holidays, while *rapid* means 4 buses per hour on weekdays and 2 in evenings, weekends and holidays)
- In order to achieve the above standards for walking distances to bus stops, a developer should be allowed to procure an extension of a bus service to bring about a closer distance of a dwelling to a bus stop by direct negotiation with the public transport authority (the Otago Regional Council)
- A developer carrying out a subdivision is able to optimise walking distances to bus stops as part of street and path layouts

- Any walking route included in the above walking distance calculations to be a proper roadside footpath or other path that is paved, safe and accessible to people with disabilities
- Any bus stop involved in the above calculations to be listed in a schedule appended to the District Plan so removal of the bus stop (and therefore removal of the public transport walking distance accessibility it confers on an area) is subject to a planning application
- We oppose rezoning of land to General Residential 1 or General Residential 2 or Township & Settlement unless all new dwellings in the new zones are able to meet the above-mentioned standards for walking distance to bus stops, through optimal walking route layout or bus route extensions

Reasons for my views

Road transport causes 600-700 deaths a year, including due to crashes and air pollution. 1990 and 2018, road transport emissions increased by 100%. Transport makes up 18.5% of New Zealand's annual greenhouse gas emissions. Road Light vehicles used by households/ other produce 41% of transport related greenhouse gases.

Bus transport is demonstrably the safest form of passenger road transport, with one-seventh of the deaths and serious injury rates per person per kilometre of the next best mode of road transport (cars). It is therefore wrong to build car-focussed suburbs, simply because more people will die.

The Dunedin City Council takes great care to ensure that all new houses are connected to clean water and sewerage, but deaths in New Zealand due to drinking contaminated water are a tiny fraction of deaths caused by road transport.

The assessment of areas for bus accessibility is flawed, and only measures the distance from a bus stop to the closest corner of a proposed zone change. This would be like allowing a large greenfield area to be rezoned when it is only known that one corner can be connected to water or sewerage. Waiting until a suburb is fully built up then eventually extending bus services is like allowing a suburb to be built with septic tanks and rainwater collection than adding water and sewerage pipes later.

Dunedin should aspire to having public transport accessibility for new houses that is better than "poor" by the DCC's own assessment criteria. By insisting that all new houses have "very good", "good" access to public transport in Gen res 2 and "very good", "good" or "ok" access to public transport in Gen Res 1 and Town & Settlement, Dunedin is in a position to lead the country as an exemplar of public transport oriented development.

Supporting documents

Information on total road deaths: *EIHNZ.ac.nz Heath burdens of road transport*

In total, road transport was found to be responsible for 650 deaths in 2012 (2.1% of annual mortality): 308 from traffic accidents, 283 as a result of air pollution, and 59 from noise. Together with morbidity, these represent a total burden of disease of 26,610 disability-adjusted life years (DALYs).

Extract from Waka Kotahi NZTA: *Guidelines for public transport infrastructure and facilities: Interim consultation draft April 2014*

"Pedestrian and cycling catchment

Analysis of the pedestrian and cycling catchments for a bus stop will provide an indication of the total pool of potential bus users at the specific bus stop and any major passenger destinations. More frequent service, higher quality services, better bus stop facilities and favourable terrain will increase the distance passengers are willing to travel to reach a bus stop. Generally bus users are comfortable walking approximately 400m maximum to access a bus stop.

DCC Site assessment criteria for public transport

Accessibility – public transport	Objective 2.2.2 Policy 2.6.2.1.c.iii Policy 2.6.2.3.c.ii	Sites were assessed based on their distance to a bus stop.	Very good	400m or less to a high frequency bus stop or 200m or less to any other bus stop.	In relation to potential medium density areas, this criterion also reflects the NPS-UD requirement in Policy 5, which requires consideration of accessibility by active or public transport to commercial services in relation to providing for density of urban form.	
			Good	400-800m to a high frequency bus stop or 200-400m to any other bus stop.		
			Ok	800m-1.2km to a high frequency bus stop or 400-800m to any other bus stop.		

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Criteria being assessed	Relevant objective / policy	How measured and evaluated	Scoring key	Explanation of scoring key	Comment	Options for managing issues that arise
Accessibility - Centres	Objective 2.2.2 Policy 2.6.2.1.c.ii Policy 2.6.2.3.c.ii	Sites were assessed based on their distance to a centre, including the centre hierarchy (e.g. whether a principal centre, suburban centre, or another centre).	Poor	Over 1.2km to a high frequency bus stop and over 800m to any other bus stop.	In relation to potential medium density areas, this criterion also reflects the NPS-UD requirement in Policy 5, which requires consideration of accessibility by active or public transport to	
			Very good	400m or less to a principal/suburban centre or 200 or less to any other centre.		
			Good	400 - 800m to a principal/suburban centre or 200-400m to any other centre.		

Hearings

Do you wish to speak in support of your submission at a hearing

YES

If others make a similar submission, would you consider presenting a joint case at a hearing

YES