

17 June 2021

PTOM Review  
Ministry of Transport  
PO Box 3175  
Wellington, 6140

By email: PTOMreview@transport.govt.nz

Tēnā koutou

## **SUBMISSION ON THE MINISTRY OF TRANSPORT REVIEW OF THE PUBLIC TRANSPORT OPERATING MODEL**

1. The Dunedin City Council (DCC) welcomes the opportunity to submit to the Ministry of Transport on the review of the Public Transport Operating Model (PTOM).

### **Decarbonisation of the public transport bus fleet**

2. In 2018/19, the transport sector was assessed as Dunedin City's largest source of emissions. The DCC supports the move to decarbonize the public transport bus fleet but would like to see decarbonisation achieved earlier than 2035. In 2019, the DCC declared a climate emergency and set the ambitious goal of making Dunedin city net carbon neutral by 2030. The DCC would like the public transport fleet to be decarbonised by 2030.
3. The DCC supports mandating decarbonisation through legislation and ensuring there is funding support for councils. Amending the Government Policy Statement (GPS) and the Requirements for urban buses may not ensure that all new buses are zero-emission because of the increased cost on councils. In addition, Waka Kotahi trades off different GPS requirements when making funding decisions. In a constrained funding environment, the lack of a legislative mandate could be an impediment to ensure funding is secured through a 10 year plan process and the National Land Transport Programme for zero-emission buses.

### **Roles and relationships in the public transport sector**

4. The DCC would like the Ministry to consider changing the responsibilities of public transport planning, fare setting, procurement and contract administration from the regional council to the City Council. Regional planning of public transport provides limited benefits in Otago. Rather than one public transport network crossing territorial authority boundaries there are two discrete public transport networks with different challenges and characteristics in Dunedin and Queenstown.

5. The DCC believes shifting the planning responsibilities for public transport in Dunedin city to the DCC could improve the ability to integrate public transport with the wider transport system and land use planning, provide better transport choice, and further progress Dunedin's ambition to be Zero Carbon by 2030.

**Concluding remarks**

6. Thank you for the opportunity to submit on the PTOM Review. Please get in contact if you would clarification on any matters raised in this submission.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Aaron Hawkins', with a stylized, flowing script.

Aaron Hawkins  
**MAYOR OF DUNEDIN**