

25 May 2021

Regional Public Transport Plan consultation
Otago Regional Council
Private Bag 1954
Dunedin 9054

Tēnā koutou

SUBMISSION ON THE OTAGO REGIONAL COUNCIL'S 2021-31 DRAFT PUBLIC TRANSPORT PLAN

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the Otago Regional Council's 2021-31 draft Regional Public Transport Plan (RPTP).
2. The DCC seeks the transfer of Dunedin's public bus services from the ORC to the DCC to improve transport solutions and further progress Dunedin's ambition to be Zero Carbon by 2030. The DCC seeks immediate discussions over transfer of management of the Dunedin public transport services. The DCC recommends the CEO's of the ORC and DCC meet to discuss the implications of the possible transfer and report back to their respective Councils by December 2021.

Process, Roles and Responsibilities

3. Currently responsibility for providing public transport in Dunedin is shared between the ORC and DCC, with the DCC providing critical infrastructure such as bus stops. To deliver an effective public transport network that enables Dunedin residents to access social and economic opportunities, the DCC and ORC need to work together to deliver an integrated transport network.
4. The draft RPTP emphasises the importance of integrated transport planning and the need for the ORC to work collaboratively with road controlling authorities (including the DCC) on planning mechanisms such as spatial plans and infrastructure provision (e.g. to provide multi modal access at bus stops). The DCC recognises the difficulty in achieving fully integrated and collaborative outcomes and is interested in investigating new approaches.
5. The DCC seeks clarity of the respective roles of the ORC's partners in the implementation of the plan. Table 14 '*Implementation Plan*' on page 66 lists actions to be delivered in the short to long term but does not identify which of these will be delivered by ORC's partners. For example, the Princes Street bus priority, if approved through the 10 year plan process, will be delivered by the DCC. The DCC would like to see a clear outline of roles and responsibilities on the actions committed to by the ORC and partner organisations.

Dunedin context

6. In Section 2 (titled 'Context') of the RPTP, it states that Dunedin city makes up more than half of the Otago region's population. The DCC suggests a greater focus in this section on the role Dunedin plays in the Otago region and the role the public transport network plays in the city. The affordability and accessibility of public transport connections both within and from other towns to Dunedin are important as Dunedin is a major health and education hub for the region.
7. The context section also looks in depth at tourism growth and the COVID-19 impacts on tourism. However, the DCC suggests recognising other benefits that public transport can contribute to the economy. Public transport continues to have an important role enabling people to access employment, health and education services. It can also contribute to improving freight reliability on journeys to Port Otago through reducing congestion on the Dunedin road network.

Fares and Farebox recovery and Funding

8. The DCC strongly supports simple and affordable bus fares and would like to see a continuation of the \$2 flat fares or lower fares beyond the current trial which ends on 30 June 2021. As part of this DCC would encourage ORC to investigate and trial \$1 fares, or free fares to address the issue where short trips are now more expensive than prior to the introduction of the Bee card. Lower fares will encourage mode shift and contribute to Dunedin's goal of being net carbon zero by 2030. The DCC seeks clarity on fares from July 2021 and welcome the opportunity to work collaboratively to ensure affordable fares are maintained.
9. The DCC supports the key priority 'Improve the Customer Experience' with the goal that 'more people choose to use public transport more often' and 'Objective one - contribute to carbon reduction and improved air quality through increased public transport mode share and sustainable fleet options'. DCC sees low fares as a major contributor to achieving these goals. Evidence of this is provided by the Otago Bus Patronage – 2019 vs 2020 figures on page 19, which shows that patronage levels in Dunedin were higher in 2020 than in July and August of the previous year when buses were free. This was achieved despite the continuing effects of the COVID-19 restrictions.
10. The DCC sees the farebox recovery targets of 40% - 50% as contradictory to the key priorities and objective as stated above. Under Waka Kotahi's current guidance, fare policies should be set to achieve the desired objectives and priorities. The draft RPTP states that the purpose of a farebox recovery target is to achieve a fair sharing of costs and to deliver fares that are affordable for both users and communities (Objective five). The DCC is concerned this does not take into account the number of public transport users with low income, and the consequential cost to the Dunedin community as a whole, if mode shift and emission reduction are not achieved.
11. The DCC supports initiatives to encourage regular usage of the public transport system though fare discounts, fare caps and welcomes the ORC's desire to explore new funding opportunities. DCC encourages the ORC to be proactive in providing a funding path for bulk purchasing bus passes for major trip generators such as schools, tertiary institutions, District

Health Boards, and workplaces. The DCC would welcome a collaboration with the ORC on this through its workplace travel planning programme.

Carbon Zero by 2030

12. In 2018/19, the Transport sector was assessed as the city's largest source of emissions, accounting for 39% of total gross emissions. Within the transport sector, the largest emissions category is land transport (petrol and diesel, on- and off-road), accounting for 64% of transport emissions. The DCC strongly supports policies to reduce the carbon emissions produced from the transport network to support Dunedin's goal of being net carbon zero by 2030.
13. The DCC therefore supports a shift to electric buses and/or alternative fuel buses. The DCC has actively promoted uptake of electric vehicles (EVs) in Dunedin since 2015, recognising the importance of EVs in reducing emissions. The DCC recommends a prompt conversion of the bus fleet to enable further emission reductions in the Transport sector.
14. The DCC encourages the ORC to explore commuter rail as a low carbon transport mode, including investigations on whether the express rail service can be delivered from Mosgiel to Dunedin. Feedback on the DCC's draft 10 year plan 2021-31 showed support for commuter rail from Mosgiel to Dunedin.

Technology and Innovation

15. The DCC supports using technology and innovation to improve public transport. The DCC supports the ORC improving the quality and access to information and encourages the ORC to work with the DCC on improving the usage of data and technology. DCC urges ORC to integrate real time information into the displays at the bus hubs, and displays at future Super Stops.
16. The DCC looks forward to working with the ORC to utilise improved data about service performance and usage to improve supporting infrastructure and to review the scheduled length of services to provide reliable services for commuters.
17. The DCC is supportive of utilising technology to facilitate demand-responsive transport services in areas of low demand. DCC looks forward to working with ORC on implementing Mobility as a Service platforms to enable mode shift.
18. Alongside technology, the DCC supports the focus on multi-modal access to bus stops, carrying bikes on buses and investigating options to increase bike storage on buses.

The Dunedin Network

19. Dunedin's public transport network was last reviewed in 2014. Population growth and major projects that are likely to have an impact on the road network, such as the George Street redevelopment and the Hospital rebuild, provide a case for review.
20. Table 4 'Dunedin Network Key Opportunities' lists re-enforcement of the central spine of the network along George Street as a strategic response. This needs to take the current George

Street redevelopment project, into consideration as it may result in road network changes affecting bus routes travelling through the CBD. The DCC would like to actively work with the ORC to articulate a vision for the future of public transport in Dunedin's central city.

21. The DCC recommends a review of the bus frequencies, timetables and operating hours of all services to increase levels of services to encourage mode shift and provide for shift workers. As part of this DCC would like to see express services at peak times on longer routes to areas like Mosgiel and Port Chalmers.
22. Table 5 'Dunedin Network Key Projects' on page 30 includes investigating 'alternative frequencies and operating hours to ensure they are simple, legible and meet customer requirements as best as possible within available funding'. The DCC is concerned about the wording of 'as best as possible within available funding' as it could conflict with the goals to drive mode shift and having a customer focus if funding becomes an issue.
23. DCC would like to see opportunities to trial services connecting townships such as Middlesmarch and Outram identified in the RPTP.
24. The DCC recommends bus number 1 (route Palmerston-Dunedin) increase its frequency and operating hours, achieved in the form of a demand-responsive service or a regular service. Submitters on the DCC's draft 10 year plan sought improvements to the span of service and requested the introduction of weekend services.
25. The DCC recommends a free City Centre Loop Bus be trialled to improve access around the CBD. The DCC requests that the ORC includes a trial unit in the draft RPTP which could provide for a City Centre Loop Bus in Dunedin.

Impacts on lower socio-economic residents

26. The DCC seeks clarity on how the policies set out under 'considering the needs to the transport disadvantaged' will support lower socio-economic demographic groups. Policies about affordability, such as retention of low flat fares or specific concessions for these groups, are currently not included.
27. The proposed removal of cash on buses can have a disproportionate impact on some groups who are already at risk of transport disadvantage. The impact of removing cash will need to be offset by offering cash top-up facilities near bus stops across a higher number of locations than at present.
28. In section 2.6.1.4 (Increasing Transport Access) the DCC notes that deprivation is not only an issue in rural parts of the region. There are parts of Dunedin where deprivation is also an issue. Dunedin has the lowest median income in the region, due in large part to groups within the city on low incomes.
29. In section 2.6.1.6 (Improving Quality and Access to Information) the DCC suggests the ORC consider including 'providing information in accessible formats for people with disabilities' in the key opportunities.

Other matters

30. In addition to the points raised above there are other various matters where the DCC seeks clarification or expresses support for.

- *Section 1.3: Reviewing the RPTP, bullet point 4) Assist in various projects delivered by Connecting Dunedin partnership*
The DCC recommends making it clearer DCC, ORC and Waka Kotahi are the three partner organisations who deliver the various projects. The current wording suggests the Connecting Dunedin Partnership group itself has decision making and delivery functions, which is not the case.
- *Table 1: Otago's Urban Centres*
The DCC would like to point out that Palmerston is not part of Dunedin, but Waitaki District Council.
- *Section 2.6.1.2: Regional Connectivity*
The DCC seeks a correction in this section as Palmerston is a rural community and is connected to Dunedin by bus.
- *Section 2.6.1.2: Intra-regional Travel*
The DCC supports linking Clutha District with Dunedin with consideration given to the timing of services. Many people from Clutha District travel to Dunedin to access healthcare services. Having public transport connections that help meet this demand will need to be an important consideration in service design.
The DCC seeks clarity on what is intended by the collaborative development of rideshare and community transport options to support smaller communities and whether these will be demand responsive transport services.
- *Section 3.6.2: Ferry*
Reference is made to Dunedin having opportunities for future ferry services to be considered. The plan should mention that there are tourism/recreational focused ferry services already operating on the Otago Harbour (e.g. the Port Chalmers to Portobello ferry).
- *Figure 9: Accessibility to Frequent Bus Services in Dunedin and Mosgiel*
This figure is very low resolution, but there appears to be gaps in coverage in South Dunedin and Mosgiel. The DCC seeks clarity on whether this is an error, or if there are areas of poor coverage in parts of Dunedin. If there are gaps in access to services, the DCC would urge the ORC to review the network in these areas to ensure adequate coverage for these communities.
- *Section 5.4.1 Physical infrastructure*
The RPTP notes that targeted services will not require bus stops, which is concerning as bus number 1 to Palmerston is classified as a targeted service and utilises bus stops. Demand responsive services may also be classified as targeted services in the future, and these may need bus stops as well, depending on how the service will be run. The DCC suggests that the wording is changed to 'may not require bus stops' to accommodate the potential need for bus stops in targeted services.

- *Section 2.6.2 Dunedin Network*
The Strategic Response on the first item 'ease and convenience of driving leading to high private vehicle mode share' looks to be an error. The DCC suggests that it should be changed to read 'to improve public transport, through attractive fares, longer span of services and reliable frequencies'.
- *Section 5.4.2 Service Reliability*
The DCC supports the policy action 'Develop effective service timetables that support reliable journey times and refine these based on network performance data' and the introduction of performance monitoring. The DCC is interested in utilising the data and working with the ORC to improve the reliability and punctuality of services.
- *Section 5.4.6 Customer Engagement*
This duplicates section 5.4.5 customer information, and therefore the DCC suggests removing this section.
- *Section 5.4.3 Vehicle Capacity*
The DCC recommends including a policy in this section that states frequency will be increased if demand exceeds capacity over a certain period of time.
- *Section 5.3.4. Events*
The DCC supports provision of public transport access to major events as this will help to reduce congestion, increase access and encourage mode shift.

Concluding remarks

31. Thank you for the opportunity to submit on the Otago draft 2021-31 RPTP.
32. The DCC wishes to speak to this submission.
33. If the ORC would like to clarify any of these issues raised in the submission, please do not hesitate to get in touch.

Yours faithfully,



Aaron Hawkins
MAYOR OF DUNEDIN