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PTOM Review
Ministry of Transport
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Tēnā koutou

Greater Christchurch Partnership Submission on the Public Transport Operating Model (PTOM) Review, 2021

Introduction

1. Thank you for the opportunity to submit on the PTOM review 2021 by the Ministry of Transport.
2. The Greater Christchurch Partnership is a collaborative partnership of the Councils in the Greater Christchurch area (Christchurch City Council, Environment Canterbury, Selwyn District Council, Waimakariri District Council), Te Rūnanga o Ngāi Tahu, the Canterbury District Health Board, and central government, represented currently by Waka Kotahi (NZ Transport Agency). The Partnership has been in existence since 2007 and is focused on integrated transport, infrastructure, and land use planning in the context of intergenerational wellbeing.
3. Our submission responds to the PTOM in general and to the experience of PTOM in Greater Christchurch.
4. The Partnership is concerned about the coordination across several central government policies and reviews. It is unclear how the policies align and support each other, and in some cases, they may conflict with each other. For example, NPS-UD enablement of out of sequence development conflicts with the need to make better use of infrastructure within budgetary constraints and undermines the ability to protect versatile soils and biodiversity and provide a coherent urban form that can support and is enabled by active and public transport provision. When policies are developed without due consideration of their impact on other policies, it can be difficult to achieve desired outcomes. Integration of relevant policies to achieve holistic outcomes is often left to local councils without sufficient national guidance.

PTOM Objectives

5. The Partnership is committed, through its strategic reset, Greater Christchurch 2050, to improving the intergenerational wellbeing of its communities. The Partnership is very conscious that planning and implementing significant change in how we live and move around is required now to ensure we are able to provide for the wellbeing of our children and grandchildren.

6. The Partnership supports the reintroduction of a focus on the environmental and health impacts of land transport.
7. The Partnership believes the PTOM objectives should more explicitly address the role public transport can (and should play) in providing equity of access to education, employment, and amenities.
8. The Partnership does not believe that the first objective as specified in the review of 'competitors have access to public transport markets' should be an objective of PTOM. It could be one way to achieve the objectives of PTOM, not an objective in of itself.
9. The Partnership notes the rapid evolution of transport systems internationally, and the role of public transport within it. The Partnership would like to see more explicit and regular evaluation of whether the current commercial model continues to provide us with the best overall outcomes.
10. The Partnership believes the importance of public transport in achieving New Zealand's transition to a net zero carbon future should be more explicit and be considered as one of the PTOM objectives. This would enable PTOM to better align with the MOT Green Paper on Emissions and the impending Emissions Reduction Plan. Achieving this objective requires both rapid decarbonisation of the public transport fleet and increasing the uptake of public transport to displace private car use.

PTOM in the context of the Greater Christchurch Partnership's priorities

11. The Partnership seeks clearer understanding of how PTOM can be both more future focused and integrated into wider transport outcomes. In particular, the Partnership would like to understand how PTOM can support the Partnership's appetite to delivering a fully integrated public and active transport system. The Partnership has expressed its desire and commitment to a future focused integrated system in the [Canterbury Regional Public Transport Plan 2018](#) (RPTP).
12. Some of the key directions that the Partnership has committed to are:
 - a. *Moving towards a wider view of public transport* – emerging technology, coupled with environmental and economic factors, are driving public transport (and transport in general) toward becoming a more diverse and multi-modal system once again. Rather than public transport simply referring to a publicly subsidised network of buses, it is evolving toward becoming a system comprised of multiple transport options and modes (rail, light rail, buses, micro-mobility, bicycles etc) – some of which will be provided publicly, and some privately.
 - b. *Integrating land use and public transport planning* – Greater Christchurch faces some significant challenges transitioning from high dependency on private cars and single occupancy vehicles – our urban form is highly dispersed (both in terms of population and employment) and we currently have relatively low levels of congestion, which translates into relatively low public transport patronage.

We have learnt the lessons of other urban centres of the importance of forward planning and lead investment to prevent crises in our urban system.

In order to achieve a transport system which supports sustainability and accessibility, we need to focus on integrating transport planning with land use/growth planning so we can better align and coordinate policy and investment tools to improve overall sustainability of our urban form. A fully integrated public and active transport system is the only way to meet the challenge of reliance on private cars and particularly the single occupancy vehicle, which is also the biggest threat to reducing the environmental and health impact of land transport.

- c. *Embracing emerging technology* – disruptive technologies have already arrived and are changing the way people travel. New technology is also presenting better ways to operate our transport system by optimising use of our assets, managing the network efficiently, and gathering useful data about problems and opportunities across the network. The Regional Land Transport Plan (RLTP) sets out the strong appetite from the partner councils to be open to new technologies, proactively seek out opportunities and constantly look to implement the best solution including through the use of trials.

Decarbonisation

13. The Partnership would like to acknowledge the recent Climate Change Commission advice ‘Ināia tonu nei: a low emissions future for Aotearoa’, particularly on reducing reliance on cars and increasing other modes of transport, including public, shared and active transport options; and request that the PTOM review look to better respond to this advice.
14. The Partnership would like to see more explicit recognition of how public transport, as part of a wider transport and urban system, can contribute to a zero net carbon future, such as:
 - a. Decarbonisation of the public transport fleet
 - b. Improved accessibility to public and active transport options for more people
 - c. Initiatives to improve uptake of public transport to displace private car use
 - d. Urban planning which integrates and encourages active modes of transport and provides good access to public transport
15. It will be critical in our view, that there is suitable procurement, asset ownership and financial mechanisms in place that enable and support acceleration of decarbonisation.
16. The Partnership would like to see more explicit consideration of different models for procurement and/or ownership within PTOM to better deliver wellbeing and environmental outcomes, including consideration of bulk procurement of low/zero emission vehicles and innovative technologies and local procurement and ownership.
17. The current construct of asset ownership along with contract tenures that do not align with asset lifecycles is a significant constraint on councils and central government’s ability to fund and facilitate this accelerated transition.
18. The current combination of LTMA and PTOM restrictions must be changed to support and enable investment in what are essentially strategic assets that will support and underline the transport response to climate change.

19. We note that Ministry of Transport has explored several different scenarios or models for ownership and financing of public transport assets. While each has its underlying pros and cons, there is significant merit as noted by Ministry of Transport, in addressing the asset ownership and financial mechanisms available to councils. Without these changes, the price premium and cost risk of the current model, will limit our ability to grow and improve public transport services in support of mode-shift, while at the same time investing in decarbonisation.

An integrated approach

20. At a local level, we have seen the value of a strongly collaborative approach to planning and investing in our transport system. The Greater Christchurch joint PT committee (made up of Waka Kotahi, Waimakariri and Selwyn District Councils, the Christchurch City Council and Environment Canterbury) was formed to collaborate on developing the Regional Public Transport Plan 2018, and more recently the comprehensive business cases required to move toward implementation. The Greater Christchurch joint PT committee has been disestablished, having achieved its objectives, and its functions have been transferred to the Greater Christchurch Partnership Committee.

On-demand and transport innovation

21. The Partnership supports the expansion of the definition associated with public transport within the current PTOM framework to include on-demand based services but suggest this is taken wider to account for evolution and innovation in the public transport space.
22. The current restrictive definition, focused on fixed route, timetabled services does not enable or support a nimble or innovative response to addressing the transport challenges faced by both our urban and rural communities.
23. Flexible and responsive service delivery models are critical in making public transport offerings more competitive and attractive to our communities and to improve access by enabling public transport to reach more people.
24. The broadening of the definition of funding support for public transport forms an underlying part of a responsive, innovative and progressive transport environment. Transport Policy and Legislation should be an enabler of integrated delivery between public and private delivery.

Thank you for the opportunity to provide this submission. For any clarification on points within this submission please contact our secretariat at secretariat@greaterchristchurch.org.nz.

Nāku, nā



Jim Palmer

GCP Independent Chair