

Make Submission

Consultee	Adrienne Noon (77621)
Email Address	noonma@gmail.com
Company / Organisation	Noon A
Address	3 Blarney Place Christchurch 8051
Event Name	Long-Term Plan 2018-28 Consultation
Submission by	Noon A (Adrienne Noon - 77621)
Submission ID	2018-28 LTP -1238
Response Date	25/03/18 9:48 PM
Consultation Point	Public Transport Options (View)
Status	Submitted
Submission Type	Web
Version	0.1

Public Transport Options

Public Transport is one of the programmes in the Transport and Urban Development portfolio. For the first year of the Long-Term Plan 2018-28 we are proposing changes to the Public Transport programme as outlined in the **Consultation Document**.(on page 14)

To make comment on the Public Transport proposed changes please complete the selection panel below.

To make comment on the the whole Transport and Urban Development portfolio, please use the tab on the left.

Please review the options in the Consultation Document and indicate which option you support: Option 4 – none of the above. (Please provide comment/ideas for an alternative solution)

Public Transport Comments

Please provide any comments.

As a resident of Blarney Place, Harewood, my family and I strongly oppose the proposals to discontinue the 107 & 108 bus services.

We are strongly committed to the provision of a sustainable transport system and see public transport services as an integral part of that. The proposals to remove the bus services in our area will create a significant gap in service coverage and provide no option for my family (which includes pre-school children) to use public transport. If these proposals are to go ahead, we would be faced with a walk in excess of 1.8 kilometres to our nearest bus service. For access to a direct service into the City (via the B line), this would be a 2.3km walk and require us to traverse Main North Road, which with child in a push chair, would be undesirable and unsafe.

With regard to this submission, I would like to make the following points:

- 1 The provision and management of public transport in New Zealand, and more specifically Canterbury, is under the Land Transport Management Act 2003. Of particular note is Part 5, Regulation of Public Transport which, among its relevant clauses, specifically requires under section 115 (Principles):

(1) All persons exercising powers or performing functions under this Part in relation to public transport services must be guided by each of the following principles to the extent relevant to the particular power or function:

(a) regional councils and public transport operators should work in partnership and collaborate with territorial authorities to deliver the regional public transport services and infrastructure necessary to meet the needs of passengers:

(b) the provision of public transport services should be coordinated with the aim of achieving the levels of integration, reliability, frequency, and coverage necessary to encourage passenger growth:

(c) competitors should have access to regional public transport markets to increase confidence that public transport services are priced efficiently:

(d) incentives should exist to reduce reliance on public subsidies to cover the cost of providing public transport services:

(e) the planning and procurement of public transport services should be transparent.

The legislation is quite clear in requiring the Regional Council and those who are exercising powers or performing functions under this act, to *inter alia*, coordinate services with the aim of achieving the levels of integration, reliability, frequency and coverage necessary to encourage passenger growth. The removal of the proposed services, and in particular the 107 & 108, with no provision for an alternative service provision, will clearly not support the requirement to encourage passenger growth and be in contravention of this legislation.

- 1 The current Canterbury Regional Public Transport Plan 2014 sets out ECAN's objectives and policies for delivering public transport in Canterbury. The proposal to discontinue routes 107 & 108 is in further direct contravention of the policies and objectives of this plan including:

Policy Area 1: Network of Services - Objective 1a: People in the Greater Christchurch and Timaru urban areas have the choice of using public transport services to access major employment, shopping, medical, entertainment, recreational and education facilities.

POLICY 1.1

Provide a network of scheduled services in the Greater Christchurch urban area consistent with policies 1.2-1.5, so that:

- 1 *a) most households are within reasonable walking distance of a bus stop (generally within 500 metres); b) services are routed, as appropriate, to provide access to major shopping, education, employment, entertainment, recreational and medical facilities;*
- 2 *c) a connected network structure is provided with frequent services linking key activity and employment centres to the central city, integrated with connector and local services to expand the coverage of the network. to provide access to major employment, shopping, medical, entertainment, recreational and education facilities.*

As stated above, from our home in Blarney Place we would be forced to walk over 1.8 km to access our nearest inbound bus service. That is clearly not a reasonable walking distance. Within the explanation of this policy, it states that *all parts of the Greater Christchurch urban area have reasonable access to key activities using public transport*. Under these proposals, our part of the Greater Christchurch Urban Area will NOT have reasonable access to ANY activities using public transport, let alone key activities.

Subsequent policy and objective requirements are therefore moot e.g., Policy 1.3 regarding connector or local services, as we will not have any service.

If this proposal to discontinue service is adopted, will Council also confirm that it will not be extending services to any new areas of urban development? As extending to new areas, which will also require the residents to support the provision of a such a service, should only occur after the same question is asked of those areas who have had services removed under this proposal.

If, as identified in the consultation documents, demand is too low for the continuation of these services, can the Council please confirm how demand responsive services have been considered for the area as per Policy 1.10. In a number of cities in the United States, the transportation authority has entered into agreements with rideshare companies such as UBER for the first/last mile portion of the trips, we will be afforded this same service to achieve the aims and objectives of the RPTP?

Furthermore, under the RPTP, ECan is required to consider the needs of the transport disadvantaged and with the Bishopdale/Casebrook/Harewood area. As these areas also have a higher representation of these groups compared to the Christchurch average, particularly with regard to the elderly proportion of the population, the removal of the 107 & 108 services will have a significant impact on these groups which needs accounting for.

On a wider note, Section 82 of the Local Government Act relates to the Principles of Consultation that ECan must be in accordance with. Clause (1) (e) states '*that the views presented to the local authority should be received by the local authority with an open mind and should be given by the local authority, in making a decision, due consideration*'. As each of the three proposed options included the discontinuation of the six routes, it does not appear that ECan is demonstrating the open mindedness required. The New Zealand Government's Office of the Auditor-General restates this obligation and notes that '*The party obliged to consult must keep an open and be ready to change and even start afresh, ... (https://www.oag.govt.nz/1998/public-consultation/part1.htm)*'.

It is the strongest terms that we request you reconsider the proposals to discontinue the 107 & 108 routes. If a decision has already been made to discontinue these service, we request that ECan evidence how it reached this decision and also its openmindedness to change.

Within the online submission process, but not within the printed information provided to all households, it requests ideas for an alternative solution. I would propose that this 'alternative solution' includes a full review of the hub and spoke operational model as implemented in Christchurch. While there were post-earthquake reasons for a system re-design to reflect the changed travel patterns immediately after the earthquakes, after seven years and noting the increasing return of employment to the CBD this model needs reviewing. The Hub & Spoke model of PT service provision was developed for large, dispersed urban areas that are quite different to those found in Christchurch. While we are users of the Christchurch metro system, our ability to use the system is constrained by the poor service options provided, the high time penalty for using the services as well as the low cost of driving and parking with the central city.

Prior to the earthquakes, the patronage generated from the Bishopdale, Casebrook and Harewood areas was significantly greater than at present. With the return of the CBD as a major employment, entertainment and retail area, it can be seen that there is increasing travel demand to this area. However, due to the significantly reduced service levels and the requirement to transfer services at Northlands Mall, additional ridership penalties have been imposed upon the user which is not conducive to increasing patronage (or farebox revenue). Addressing these failings should be the first priority of ECan rather than discontinuing the services and doing a disservice to the residents and ratepayers of this area.

It is disappointing that a local government body feels it is appropriate to put out a consultation document that does not meet the basic obligations for local government consultation requirements. It is not true consultation where there is only one option presented - your decision has clearly already been taken by not providing viable alternative options, and in my view this is detrimental to your organisation's reputation.

By removing the proposed six bus routes you are proposing an inequitable public transport system which can only be detrimental for our city for residents and also visitors. 21st century cities have reliable, integrated public transport services to meet the needs of residents and visitors. Our current provision is failing to meet the basic needs of both residents and visitors. Your proposal to remove these services will further impede the regeneration of our city.

Visitors need to be able to understand our public transport system quickly and for it to meet their needs to traverse our city. The process to secure a metro card, as a visitor to our city, is currently overly complicated and restricting meaning visitors choose alternative transport options and the hub and spoke model does not support patronage.

Removing these bus services will also mean that one of our city's award winning attractions, Willowbank, will not be accessible via public transport.

As stated a better alternative would be to review the hub and spoke model which is clearly not meeting the needs of the people of Christchurch.

Yours sincerely

Adrienne Noon