

Monday, May 5, 2025

Draft Regional Public Transport Plan 2025-2035 Feedback form

Unique ID

RPTP-0547

Contact details

Name:

James Meffan

Organisation (if applicable):

Ministry of Education

Do you wish to speak to your submission at a public hearing?

No

Topic 1: Are we focusing on the right things in the plan?

Topic 2: Should we support community transport services in smaller towns and rural areas?

Our proposal: we are considering the establishment of a subsidised community transport programme providing support for transport services in Otago's smaller towns and rural areas.

What do you think about this proposal?

Topic 3: Should we increase our passenger fares?

Our proposal: we are considering increasing the base fare for adult Bee Card passengers from \$2 to \$2.50. This would effectively increase bus fares for all passengers using Bee Cards by 25%.

What do you think about this proposal?

Topic 4: Should we charge more for longer trips?

Our proposal: we are considering introducing a zone fare system to our bus networks in Dunedin and Queenstown. Under this system, passengers travelling further distances across multiple zones will pay a higher fare than those travelling short distances within one zone.

What do you think about this proposal?

Topic 5: Should we keep our free fares for children (5-12 years)?

Our proposal:

- A. Retain free fares (100% discount) for children (5-12 years), **AND**
- B. Standardise our concession discount for youth (13-18 years) to 40% across both the Dunedin and Queenstown networks. For example, if the adult fare is \$2, youth pay \$1.20, or if the adult fare is \$2.50, youth pay \$1.50.

What do you think about this proposal?

Any other comments?

Let us know if you have any other comments or ideas on the topics discussed in the Draft Regional Public Transport Plan.

Awaiting confirmation on whether a Ministry of Education representative would like to speak to the submission at a public hearing.

2 May 2025

Gretchen Robertson
Chair, Otago Regional Council

Tēnā koe Gretchen

Submission on Otago Regional Council draft Regional Public Transport Plan 2025-35

Thank you for the opportunity to provide feedback on the draft *Public Transport Plan 2025-2035* (RPTP). The Ministry of Education (the Ministry) broadly supports the contents of the draft RPTP, including specific measures to provide public transport services for school students. This submission provides further context on the Ministry's school transport assistance policy and outlines further steps to clarify and rationalise delivery of school transport services in Dunedin and Queenstown-Lakes.

Background

While caregivers are ultimately responsible for getting students to and from school, the Ministry may provide support to students who live a significant distance from their nearest school and do not have access to public transport.

The Ministry is funded to provide school transport assistance based on several longstanding eligibility criteria. Students are eligible if:

- they attend the closest state or state-integrated school where they can enrol
- they live more than a certain distance from school (3.2km for Years 1–8; or 4.8km for Years 9–13)
- there is no public transport available.

Ministry-funded school bus routes are designed around the locations of eligible students and aim to transport as many eligible students as efficiently as possible. Over time, different factors may lead to changes in local school bus routes. These include changes in location and the numbers of eligible students in an area, improvements to public transport networks, changes to enrolment zones and school year classifications, and new schools opening or existing schools closing. Ministry-funded school bus routes are reviewed regularly to comply with our policy and funding parameters.

Interface between Ministry services and public transport

In assessing eligibility for school transport assistance, public transport means any service or journey that:

- travels within 2.4km of the student's home and their school or kura
- does not require the student to start their journey before 7am and gets them to school or kura on time
- collects the student within an hour at the end of the school day
- does not require the student to transfer between services more than once during their journey.

This definition is intended to assess the suitability public transport services in terms of their timeliness and proximity to schools and students' residential addresses. It does not consider other operational factors, such as capacity, fares or demand management.

The Ministry is the provider of last resort for school bus services. Because the Ministry does not provide school transport assistance where there are already public transport services in place, Ministry-funded services run almost exclusively in rural areas. However, Ministry-funded services can overlap with public transport services delivered by Public Transport Authorities, such as Otago Regional Council (ORC), especially in peri-urban areas where public transport networks may have expanded or developed over time. In general, we will cancel school bus services if a public transport option becomes available. In this scenario, we work with PTAs to manage the impact of greater demand for public transport services from students.

The completion of the transition project (Project Takahe) will rationalise school bus provision in the region and develop durable solutions for students.

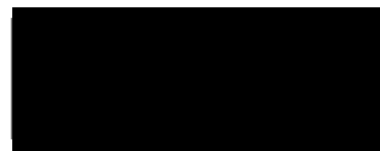
In late 2021, the Ministry commenced discussions with ORC on the need to withdraw Ministry services from several areas in Queenstown-Lakes where public transport is available. ORC presented a proposed transition plan, Project Takahe, in March 2025. We appreciate the steps ORC has taken to provide additional services and capacity to meet demand from students in stage one of the project. We ask that network planning for future stages, in particular Lake Hayes is prioritised to ensure the transition can be fully delivered as soon as possible. This may include securing funding within ORC's 2025/2026 Annual Plan.

We will continue to work closely with the Council on transition planning in areas where changes in public transport networks have led to a decrease in the number of students who are eligible for school transport assistance. This will include joint communication activities, data sharing and aligning route changes to minimise disruption for communities.

More broadly, we see significant benefits in the continued work with your council to rationalise the delivery of school bus services in the region, with a view to minimising potential duplication of service and providing options for students to get to and from school on public transport. We note that, like other PTAs, Otago Regional Council has greater flexibility and discretion to respond to demand and transport disadvantage within local communities. While our services can only carry students and are based on a firm set of eligibility criteria, students who use public transport can be served either by targeted school buses at peak times or by mixed used services that cater for a range of users.

Thank you again for the opportunity to provide comments on the draft RPTP. A table of specific feedback on the draft RPTP is attached to this letter. If you have questions about this submission, please contact [REDACTED]

Nāku noa, nā



James Meffan
Group Manager, School Transport
Te Pae Aronui (Operations and Integration)

RPTP section	Ministry of Education comment
General comment	The Ministry supports the overall vision and objectives within this plan, including specific measures to provide additional services and capacity for school students.
5.2 Targeted services (page 58)	We support the proposal to enhance connector and high-frequency services to serve schools without targeted services and to offer targeted services for students where there is demand that cannot be met through core public transport services.
5.3 Queenstown urban network aspirations (pages 62–63)	The Ministry recommends increasing capacity at peak or school times to high-growth suburbs in Lake Hayes. This may be through provision of additional targeted services or increasing frequency of existing services.
5.2 Integral and Exempt Services (page 69)	<p>We broadly support the proposal that services targeted at school travel should be designed to support travel to students' nearest available school, and note that this aligns with the Ministry's own policy settings and eligibility criteria. It also supports the ongoing viability and efficiency of the state school network.</p> <p>However, we also note that parental choice is a significant factor in the compulsory schooling sector, and actual demand from school students may require additional capacity in other parts of the network.</p>
6.1 Funding (page 83)	<p>We welcome the proposal to support public transport activities and improvements without NZTA co-investment or other central Government funding, including on a trial basis or where there is a clear value-for-money case for additional investment.</p> <p>The Ministry recommends that the Council actively consider demand from school students in making any improvements to core public transport networks without NZTA funding.</p>