

Friday, May 2, 2025

Draft Regional Public Transport Plan 2025-2035 Feedback form

Unique ID

RPTP-0525

Contact details

Name:

Alex Macmillan

Organisation (if applicable):

Cosy Homes Charitable Trust/ Otago Housing Alliance

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

Yes

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

Do you agree that these focus areas capture Otago's public transport priorities?

Yes

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?

Do you agree with ORC having a role in supporting community transport services?

Yes

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?

Should Council increase the adult Bee Card fare?

No

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?

Should Council charge more for longer trips?

No

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?

Should Council retain free fares (100% discount) for children (5-12 years)?

Yes

Any other comments?

Kia ora tatou,

We welcome the opportunity to submit on the draft Otago Regional Public Transport Plan 2025-2035.

Background

The Cosy Homes Trust is a not-for-profit organisation dedicated to enhancing the well-being of Otago residents by assisting them in making their homes warmer and healthier. Our recent work has centred on supporting EECA's Warmer Kiwi Homes scheme, which provides insulation and heating subsidies across the Otago region.

We also constitute the Otago Housing Alliance (OHA), a regional network of housing stakeholders that includes local government, local rūnaka, NGOs, community housing providers, public health agencies, and central government representatives. OHA collaborates to address housing supply, quality, and accessibility issues across Otago through shared research, advocacy, and innovation efforts.

We support the Dunedin City Council's Housing Action Plan, particularly its emphasis on improving outcomes for those at the most vulnerable end of the housing continuum.

Why are we submitting?

Housing and transport are deeply interconnected. Housing affordability and accessibility cannot be addressed in isolation from transport systems. This is because:

1. Effective public transport enables residents to live further from high-cost urban centres while still having fair access to employment, education, and essential services.
2. Housing developments can be more cost-effective and space-efficient when they don't have to include expensive parking infrastructure. This is only feasible with strong public and active transit options nearby.
3. Transport is often the second-highest expense for low-income households after rent or mortgage payments. Public transport can reduce this financial pressure on the most disadvantaged householders.

Endorsements and Recommendations:

As an organisation, we strongly endorse multiple elements within this plan. First, we commend the Otago Regional Council (ORC) for its commitment to equity and for prioritising equity in public transport decision-making (EQ P1, p. 40). The connections between housing and transport affordability mean an equity-first approach will deliver tangible benefits to those at the most vulnerable end of the housing continuum.

We also strongly support ORC's inclusion of integrated land use planning policies (Section 4.1). In particular, we endorse the Plan's emphasis on promoting dense, mixed-use development that supports walking, cycling, and public transport access. This is a significant

step forward in recognising ORC's important role in advocating for land use patterns that enable sustainable and inclusive communities.

We encourage ORC to ensure that this new direction is supported by adequate staffing and resourcing, enabling proactive collaboration with developers, community housing providers and territorial authorities so that transport and housing planning are aligned from the outset of development projects.

We also have some recommendations that we hope could strengthen the links between ORC's commitment to equity and its commitment to integrated land use planning.

Recommendation 1: Reconsider LU P2 – Limiting services to developments inconsistent with urban form factors.

We urge ORC to reconsider the current wording of LU P2, which states that public transport services sufficient to enable well-functioning urban environments will not be extended to new developments that do not align with the urban form factors outlined in Appendix E.

While we support planning for compact, efficient urban form, we must acknowledge the historical development patterns in Otago. Affordable housing is often built on the urban periphery, where land is cheapest, but where density is lower and access to services is more limited.

As it stands, LU P2 risks penalising low-income households and communities, particularly if public or affordable housing is developed in locations that do not meet Appendix E's criteria. This could inadvertently undermine ORC's equity goals by limiting service access to those communities that would most benefit from public transport. In addition, we are concerned that this provision could penalise iwi and hapū who have the aspiration or plans to develop affordable papakāinga housing, where marae and land still under iwi control is on the urban periphery.

We recommend amending LU P2 to allow for flexibility where equity considerations justify service provision to developments that may not meet all urban form criteria.

Recommendation 2: Include affordability and accessibility in Appendix E urban form factors.

We also recommend that housing affordability and accessibility be explicitly added to the urban form factors listed in Appendix E (Table 12). While the appendix notes that the list is not exhaustive, the absence of housing affordability as a named factor may weaken its influence in decision-making.

Including housing affordability as a specific consideration would ensure that equity is embedded in decisions about where and how to extend or improve public transport services. It would also help address the concerns outlined in Recommendation 1.

Recommendation 3: Do not eliminate the use of cash payment or make cash fares higher.

Section 6.2 (FP2) states that ORC will eliminate the use of cash payments following the implementation of bank card payments with NTS and until then, make cash fares higher. This is adversely impact rough sleepers who often don't have access to traditional banking services and people who don't have access to online banking services. This policy is counter to ORC's equity-focused approach.

Conclusion

We thank the Otago Regional Council for the opportunity to provide feedback on the draft Regional Public Transport Plan 2025-2035. As an organisation committed to equitable housing outcomes, we see strong alignment between this Plan's goals and ours. With the recommendations above, we believe the Plan can further advance ORC's commitment to building a fairer, more connected Otago.

We would like the opportunity to speak to our submission.

Naku noa, nā

[Redacted signature block]