

Draft Otago Regional Public Transport Plan 2025-2035

Officers' Hearings report

Prepared by Otago Regional Council Transport staff

May 2025





Table of Contents



1.	Introduction	3
2.	Background	3
3.	Engagement and public consultation	5
4.	Overview of submissions	8
5.	Summary of submissions from key stakeholders	10
6.	Key topics	13
7.	Common feedback themes	23
8.	Other considerations	29
9.	Recommended changes to the draft RPTP	32
10.	Appendix A: Submission topic descriptions	46
11.	Appendix B: Corrected Figure 7: Total Mobility trip funding examples and breakdown	49



1. Introduction

Otago Regional Council (ORC) approved the draft Otago Regional Public Transport Plan (RPTP) 2025-2035 for public consultation on 19 March 2025. The draft RPTP was open for public submissions from 24 March to 2 May 2025.

This report has been prepared by ORC staff to provide the Hearings Panel with:

- An outline of the purpose of the draft RPTP and rationale for the plan review
- A summary of the early engagement and public consultation
- A brief overview of submissions, including submitter demographics
- A summary of the submitters' responses to the five key topics we sought feedback on
- A staff response to submissions received
- Staff recommendations on proposed changes to the draft RPTP to address submission points

The Council appointed Councillors Noone, Weir and Wilson to the Hearings Panel to hear and deliberate on public submissions on the draft RPTP. This report is intended to be used by the Hearings Panel (alongside the full submissions spreadsheet) when considering submissions and making recommendations to Council. It will form the basis of the final report to Council.

2. Background

2.1 Legislative requirements

The Otago Regional Public Transport Plan is the guiding document for the planning and delivery of public transport in Otago.

Under the Land Transport Management Act 2003 (LTMA) <u>Section 117</u>, the purpose of an RPTP is to provide:

- a) A means for encouraging regional councils, territorial authorities, and public transport operators to work together in developing public transport services and infrastructure
- b) an instrument for engaging with the public in the region on the design and operation of the public transport network
- c) a statement of integral public transport services, the policies and procedures applying to those services, and the information and infrastructure that support those services.

More information on the content requirements of an RPTP and the required process of preparing an RPTP can be found in LTMA Sections <u>120</u> and <u>125</u>, respectively.

This RPTP has been developed in accordance with the LTMA and the New Zealand Transport Agency Waka Kotahi's (NZTA's) Development Guidelines for Regional Public Transport Plans (2024).¹

¹ https://www.nzta.govt.nz/assets/resources/guidelines-for-regional-public-transport-plans/docs/2024-development-guidelines-for-regional-public-transport-plans.pdf



2.2 Changes from the Otago Regional Public Transport Plan 2021-2031

Under the LTMA Section <u>126</u>, Council must conduct a review "at the same time as, or as soon as practicable after, the public transport service components of a regional land transport plan are approved or varied."

On 24 July 2024, Council approved the mid-term review of the Otago Southland Regional Land Transport Plan (2021-2031), triggering a renewal or variation of the current RPTP 2021-2031.

The draft RPTP now reflects:

- Changes through the Government Policy Statement on land transport 2024
- The current post Covid-19 operating environment
- Procurement changes triggered by changes to the LTMA 2023 with respect to how services are contracted and delivered
- Changes in NZTA Public Transport Design Guidance²
- The Queenstown Public Transport and Dunedin Fares and Frequencies Business Cases
- New Zealand Transport Agency Waka Kotahi's (NZTA's) Development Guidelines for Regional Public Transport Plans (2024) changes with respect to:
 - fares and pricing policy
 - o private share
 - Total Mobility
 - Motu Move national ticketing solution
- Development of alternative modes of service provision such as on-demand public transport
- The evolution of Rautaki Whakawhanake A-Mua O Otepoti Dunedin Future Development Strategy 2024-2054, and Grow Well Whaiora Queenstown Spatial Plan.

The draft Otago RPTP 2025-2035 was first presented to the Public and Active Transport Committee (PATC) at the 5 March 2025 meeting. The draft differs from the current RPTP in several key policy areas:

Policy area The draft RPTP 2025-2035 establishes policies and action	
Community transport	Research and develop a community transport programme to support non-profit, volunteer-led transport services in Otago's smaller towns and rural areas where people have few options to get around.
Land use policy	Proactively support sustainable land use policy and integrate public transport design with well-functioning urban environments, in line with the National Policy Statement on Urban Development.
Build trust	Adopt an equity-focused approach to decision-making, particularly to support the needs of transport disadvantaged people.

² https://nzta.govt.nz/walking-cycling-and-public-transport/public-transport/public-transport/framework/integrated-planning-and-design/public-transport-design-guidance/



Funding	Actively work to increase private share over time, in line with the
	Government Policy Statement on land transport 2024-2034.

3. Engagement and public consultation

3.1 Early engagement

In developing the draft RPTP, staff undertook an engagement process that followed internal ORC guidelines³. This process meets the consultation requirements in the LTMA Act 2003 (sections 124 and 125), and follows the principles of consultation detailed in the Local Government Act 2002 (section 82). Staff also engaged with mana whenua following He Mahi Rau Rika: Otago Regional Council Significance, Engagement and Māori Participation Policy in recognition of our partnership approach.

Engagement involved a combination of surveys, focus groups and meetings with 52 stakeholder groups across Otago, including partner agencies (NZTA, territorial authorities and public transport operators), workforce, and community groups with an interest in public transport and our mana whenua partners. Staff also worked closely with our partner agencies to review and co-design the draft RPTP to ensure alignment across our organisations.

Staff also involved Otago Regional Councillors throughout this process, holding two Council workshops and providing regular updates to the PATC and Council.

3.2 Public consultation

The public had the opportunity to provide feedback on the draft RPTP over a six-week period from 24 March to 2 May 2025. Although the LTMA requires only one month for public consultation, ORC extended this timeframe to accommodate the public holidays during this period.

Staff took a multifaceted approach to engagement to reach as many people as we could across the district using different mediums and styles of engagement approaches, materials and locations. Our core objective was to ignite a conversation about public transport and encourage a wide range of Otago residents to share their views. Care was taken to try and reach as diverse cross section of our population, including transport disadvantaged groups, such as disabled groups, and communities who currently lack public transport. The table below summarises the methods staff used as well as general feedback on each consultation component.

³ See ORC Engagement Approach: A Guide to Connecting with Community (2024).

5



Methods of consultation	Description	General feedback from staff
Contacting key stakeholders⁴	ORC staff contacted and encouraged key stakeholders to make submissions.	No feedback.
Public drop-in sessions	ORC staff held public drop-in sessions in Dunedin (3), Queenstown (2), Alexandra (1), Ōamaru (2), Wānaka (1) and Cromwell (1). These sessions occurred from 25 March to 17 April and enabled members of the public to speak with staff about the draft RPTP and public transport more generally.	In-person drop-in sessions were crucial to allow the public to ask questions, provide verbal feedback and demonstrate our commitment to open and transparent engagement. Staff visited towns throughout the region, including those without public transport to get a breadth of perspectives, and make it easy for the public to engage. Attendance at drop-in sessions ranged from 3 to 17 people at each session. Attendees included people whom we had previously engaged, people who actively wanted to speak to staff and members of the public passing by. Staff also compiled a spreadsheet reviewing the suitability of each location that can be used to guide consultation for future plans across the organisation.
Advertising campaign	ORC communications team launched a comprehensive advertising campaign to encourage submissions on social media, ORC website, radio, newspapers, posters (on and off the bus), newsletters and the Transit app.	Staff optimised the available budget to more effectively reach target audiences. Messaging was effective and well-executed across multiple channels, and web traffic for the general transport plans website from 24 March to 7 April 2025 was up 560% from the previous two weeks. The result was a 183% increase in submissions compared to the current RPTP.

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⁴ Key stakeholders include mana whenua partners, community groups, workforce and partner agencies who have a significant interest in public transport in Otago.



Library	and a summary documents to 27 libraries throughout	No feedback.
	the region.	



4. Overview of submissions

In total, **548 submissions** were received, of which three full submissions and one amendment to a submission were received late. 48 submitters have request to speak to the Hearings Panel. The total number of submissions is a **183% increase** from the current Otago RPTP 2021-2031, which received 193 submissions.

While most submissions came from individuals, roughly 40 submissions were made on behalf of government agencies and ministries, territorial authorities, community advocacy groups, tourism groups and educational institutions across Otago. The high number and diversity of submitters highlight strong public interest in the draft RPTP and the effectiveness of engagement throughout the development and consultation processes.

4.1 Submitter demographics

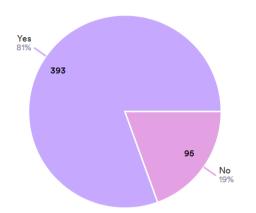
Of the total 548 submissions, 78% of submitters indicated they were from areas currently served by the fixed urban bus network (e.g. Dunedin and Queenstown), while 20% of submitters indicated they came from areas not currently served by public transport (e.g. Ōamaru and Wānaka).

The following charts summarise submitters' demographic data, including ratepayer status, whether they normally reside in Otago, age, and how often they use public transport.



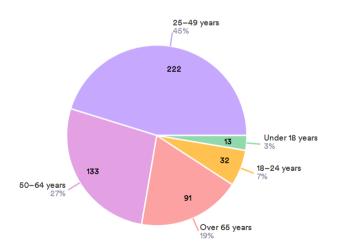
Are you an ORC ratepayer?

488 Responses- 60 Empty



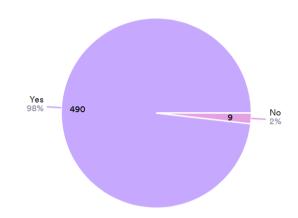
What is your age?

491 Responses- 57 Empty



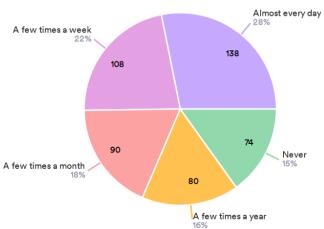
Do you reside in Otago?

499 Responses- 49 Empty



How often do you use public transport? (select one)

490 Responses- 58 Empty





5. Summary of submissions from key stakeholders

In preparing the draft RPTP, LTMA section 125 requires ORC to draft the RPTP in collaboration with the regionals' territory authorities. The draft RPT reflects the shared working sessions and input from Dunedin City Council, Queenstown-Lakes District Council, Central Otago District Council, Clutha District Council and Waitaki District Council transport staff. Building and maintaining collaborative working relationships with these stakeholders is crucial to delivering a well-functioning and integrated public transport system.

Further the LTMA lists key entities Council must consult with in preparing the draft RPTP. This section provides a summary of submissions received from key stakeholders.

Dunedin City Council

The submission from Dunedin City Council (DCC) (Submission RPTP-0478) was broadly supportive of the draft RPTP and acknowledged the collaborative approach ORC has taken in developing the document alongside other territorial authorities across Otago.

DCC identified four aspects for greater emphasis in the draft RPTP:

- 1. A stronger focus on network and service planning, including a request to review the current bus network, Dunedin Bus Hub, integration of schools in the bus network and consideration of a new bus depot.
- 2. Additional emphasis on promotion and marketing, including further collaboration between ORC and DCC about sustainable travel initiatives, such as school travel planning.
- 3. More options to reduce emissions by introducing new bus services (e.g. commuter services to Dunedin from Balclutha and Ōamaru, a Dunedin airport service and improved services to the Edgar Centre) and encouraging ORC involvement in pre-application and consent processes for major subdivisions and developments to maximise potential integration with the public transport network.
- 4. A request for a Central City Loop bus and increased frequency of service to the North Coast in planned network changes.

DCC agreed to the following:

- The focus areas within the draft RPTP capture Otago's transport priorities.
- ORC should have a role in supporting regional community transport services.
- ORC should retain free fares for children ages 5-12 years and standardise the concession discount for youth ages 13-18 years.

DCC did not take a stance on increasing fares or introducing a zone fare structure. However, they acknowledged the importance of working with ORC to keep fares low and encourage more people to take public transport rather than private cars.



Clutha District Council

The submission from Clutha District Council (CDC) (Submission RPTP-0262) was generally supportive of the draft RPTP. They were encouraged to see inter-regional transport as a top priority and were keen to collaborate to promote community transport and fixed-route bus services connecting Gore, Balclutha, Milton and Dunedin. They also mentioned the need for 'right-sized' public transport services that are regular, affordable, coordinated and suited to commuters.

CDC did not support increasing fares or introducing a zone fare structure, though they mentioned free fares within highly populated areas should be considered.

Waitaki District Council

The Waitaki District Council (WDC) submission (Submission RPTP-0479) acknowledged that there has been progress in public transport in recent years, including through Total Mobility and the Dunedin to Palmerston bus service.

WDC requested more public transport in the area, including community transport to improve access to the Dunedin hospital, daily bus services between Ōamaru and Dunedin, a fixed-route bus service between Weston and Ōamaru and an on-demand bus service within Ōamaru.

WDC also outlined suggestions for minor wording changes to the draft RPTP's focus areas.

Queenstown-Lakes District Council

The Queenstown-Lakes District Council (QLDC) submission (Submission RPTP-0546) acknowledged the value of the early engagement undertaken by ORC staff in developing the RPTP and related work. QLDC was also encouraged to see proposed improvements to routes and frequencies to achieve mode shift goals.

The submission comprised two overarching points:

- The draft RPTP should further recognise resident and visitor growth in the Queenstown-Lakes district, which significantly impacts the ability of the transport network to operate efficiently and effectively.
- QLDC encourages increasing private share and increases fares by a minimal amount but opposes the introduction of a zone fare structure.

New Zealand Transport Agency

The submission from NZTA (Submission RPTP-0539) commended ORC councillors and staff for the quality of the draft RPTP.

NZTA opposes free fares for children as they contradict the Government Policy Statement (GPS) on land transport's requirement to increase private share. They also indicated they are unlikely to financially contribute to support free fares for children and suggested that child concessions should be more closely aligned with that of other Public Transport Authorities.



NZTA agrees that the adult Bee card fare should be increased to \$2.50 and that this base fare level should be reviewed annually, in accordance with the draft RPTP policy F P6 (p. 85 of the draft RPTP).

NZTA's submission also noted that due to delays in the Queenstown Arterials stages 2 and 3, it is worthwhile to re-examine ORC's Queenstown Public Transport Business Case to test if the original business case assumptions still apply.

NZTA also attached a table containing roughly 70 lines of feedback and requests for wording changes on individual paragraphs in the draft RPTP.

Ministry of Education

The submission from the Ministry of Education (Submission RPTP-0547) broadly supported the contents of the draft RPTP, including specific measures to provide public transport services for school students.

The Ministry of Education provided further context on school transport assistance policy and outlined steps to clarify and rationalise the delivery of school transport services in Dunedin and Queenstown-Lakes. The Ministry of Education appreciated the steps ORC has taken to provide additional services and capacity to meet student travel demand, highlighting the benefits of ongoing collaboration.

They also provided a table suggesting minor comments to sections of the draft RPTP related to targeted services, the Queenstown urban network aspirations, integral and exempt services and funding.

University of Otago

The submission from the University of Otago (Submission RPTP-0489) acknowledged the importance of collaboration in improving public transport and welcomed the intention to strengthen collaborative working relationships with ORC, both operationally and in terms of research. The University also noted that bus services in Dunedin have improved over the past few years, including the rollout of electric buses, which is important for staff and students.

The University highlighted several key areas that could be improved, including more direct bus routes to the University, an airport bus service and routes connecting Balclutha and Ōamaru with Dunedin. They also expressed interest in collaborating to invest in South Island passenger rail services for students at certain times of the year, such as the beginning and end of semesters.

The University had concerns about a zone fare structure and encouraged ORC to model the potential negative emissions impact of increasing public transport for longer journeys against potential revenue gains.



6. Key topics

Submitters were asked to provide feedback on five topics in the draft RPTP. This section provides a summary of the feedback on these submission topics, staff's responses and recommendations.

6.1 Topic 1: Focus areas

Are we focusing on the right things in the plan?

Topic 1 invited submitters to provide feedback on the draft RPTP's focus areas and objectives, which shape ORC's policies and actions for the design and delivery of public transport services. The question aimed to understand submitters' alignment with how the draft RPTP proposes ORC spend time and effort on public transport, as well as the draft RPTP's overall structure.

Summary of submissions

487 submitters responded to this question, with 61 choosing not to respond.

78% of submitters (379) agreed that these focus areas accurately capture Otago's public transport priorities. 22% of submitters (108) did not agree.

Responses from submitters generally supported the chosen focus areas and objectives and acknowledged they were appropriate high-level goals for this document. However, some submitters expressed concerns about achieving these focus areas and objectives in practice.

Several submitters wanted issues that were particularly important to them, such as safety, reducing the reliance on private vehicles and affordability for passengers to be featured more prominently in the focus areas and content.

Several submitters also proposed alternative wording for the focus areas objectives to improve them while maintaining the original sentiment.

As this was the first question of the survey, many submitters responded to this question by commenting on general issues related to public transport that were not specifically related to the focus areas or objectives.

Staff response to submissions

It was not unexpected that many responses to this topic did not focus on providing feedback on the focus areas and objectives. This was largely because it was the first open-ended question, and it appears many submitters wanted their broader opinions about public transport at the front of their submission.



Staff acknowledge submitters' concerns about achieving the focus areas and objectives in practice. These concerns are not directly linked with the focus areas and objectives in the draft RPTP but are a more general sentiment that they may be too aspiration and our ability to deliver them constrained.

Staff recognise that submitters want particular issues (e.g. safety, private car dependency and affordability for passengers) to feature more prominently in the focus areas and objectives. The draft RPTP is a strategic document, and the focus areas and objectives were designed to be broad enough to encompass many public transport issues.

In most cases, the issues that submitters wanted more prominently featured are reflected in subsections under the focus areas. For example, safety is discussed on page 22 of the draft RPTP and is explicitly mentioned in the 'Passenger Experience' focus area and objective. Similarly, affordability for passengers is discussed on page 84 of the draft RPTP under the 'Value for Money' focus area. Staff agree that it would be good to incorporate wording to reducing reliance on private vehicles more specifically within the draft RPTP.

There is a high level of interrelationship between focus areas and in preparing the draft RPTP, staff tried alternative wording and structure to the focus areas and content within each area. Staff consider that the focus areas and objectives accurately capture where ORC needs to place its time and effort and set out how it will achieve these.

Staff appreciated some proposed alternative wording for the focus area objectives while still maintaining the original sentiment.

Financial considerations

There are no financial implications.

Staff recommendations

As a result of submissions, staff recommend several modifications to the focus areas and objectives.

We recommend a wording change to the 'Passenger Experience' objective statement (see p.17 of the draft RPTP) from:

'Provide useful public transport services that respect the safety and well-being of passengers, particularly for transport-disadvantaged people' to:

'Provide useful public transport services that promote social inclusion and respect the safety and wellbeing of all passengers'

This wording change prioritises social inclusion and serving all passengers, rather than emphasising priority on transport-disadvantaged people only.



Staff also recommend the wording of the 'Environmental Sustainability' objective statement (see p. 17 of the draft RPTP) from:

'Invest in a public transport system that promotes positive outcomes regarding greenhouse gas emissions, pollutants and land use' to:

'Invest in a public transport system that reduces reliance on private vehicles, promotes positive environmental outcomes and supports sustainable urban planning and development.

This incorporates the aspiration to reduce reliance on private vehicles, and elevates the importance of sustainable urban planning and development. While reducing private vehicle reliance is discussed throughout the draft RPTP, adding it to the focus areas would further emphasise it as the future vision for Otago. Staff also support the change in wording which makes the objective stronger.

Additionally, we recommend that the 'Value for Money' introduction (p.80 of the draft RPTP) could be strengthened by adding a 'benefits of public transport' sub-heading. Currently, this focus area emphasises the cost of public transport but not the value it adds to our communities, environment and economy.

Staff considered whether safety should be its own unique focus area and objective, but felt safety was accurately captured under the 'Passenger Experience' focus area. The topic of safety has been weaved throughout each of the focus areas for ease of reading and avoidance of duplication.

Staff recommend making no other focus area-related changes to the draft RPTP.

6.2 Topic 2: Community transport

Should we support community transport in smaller towns and rural areas?

Topic 2 invited submitters to provide feedback on whether ORC should consider establishing a subsidised programme that provides support for 'community transport' services in Otago's smaller towns and rural areas.

Summary of submissions

492 submitters responded to this question, with 56 choosing not to respond.

92% of submitters (454) agreed that ORC should support community transport in smaller towns and rural areas. 8% of submitters (38) did not agree.

Many submitters recognised the lack of transport options in Otago's smaller towns and rural areas and understood community transport to be a potential solution.

Submitters who supported community transport cited the potential for the services to help elderly people living in rural areas to access opportunities, such as health care appointments in Dunedin.



They also cited the St. Johns health shuttles as an example of an existing community transport service that positively impacts communities.

Submitters who did not support community transport cited concerns about cost, high reliance on volunteers, and risk of resources being diverted from urban services. Several submitters mentioned that community transport would be helpful in the Upper Clutha area, but that a fixed route bus service or passenger rail might better meet the region's growing transport demand.

Staff response

Staff endorse the community's support of the community transport concept and its role to provide transport options in smaller communities where a fixed route service(s) are not feasible.

Staff also acknowledge submitters' concerns about the cost to ratepayers for supporting community transport services. As a strategic document, the draft RPTP does not specify how community transport may be funded. Page 37 of the draft RPTP outlines the criteria for ORC supporting community transport services and notes that support is conditional on funding availability.

Staff also recognise submitters' requests for ORC to support a fixed route bus service or passenger rail to meet travel demands between smaller towns and rural areas. Pages 49 and 52 of the draft RPTP state that ORC will design the public transport network and services in a 'mode-neutral' way that uses the most appropriate mode (e.g. bus, ferry, train, etc.) to meet demand, purpose, community need and value for money. Community transport is a potential transport solution that presents excellent value for money and could significantly increase the connectivity of people living in Otago's smaller towns and rural communities. ORC's potential support for community transport does not exclude support for other forms of public transport in the future. For example, pages 59-61 of the draft RPTP highlight plans to improve regional connectivity through the establishment of bus services over the next 30 years.

Financial considerations

ORC support for community transport will require additional funding and/or resourcing. It is unlikely that NZTA will provide financial support for community transport at this stage, as it does not align with the current GPS's strategic priorities.

Should the Hearing Panel accept submissions on community transport, the timing and scale of a future community transport programme will need to be determined following direction from Council and taking into account funding processes including the NLTF and LTP.

Staff recommendations

We do not recommend any changes to the community transport section of the draft RPTP as a result of submissions.



Submitters did not raise concerns that would warrant changes to the community transport section (pp. 37-38) of the draft RPTP. As it is currently written, the section establishes strategic goals and provides guidance on community transport while allowing Council the flexibility to determine specific implementation details.

6.3 Topic 3: Base fare increase

Should we increase our passenger fares?

The decision of a base fare increase is formally beyond the scope of the RPTP. However, Council requested it be included in the 2025 draft RPTP's submission form due to its relationship with private share and the other RPTP policies being reset following the GPS. An alignment of the RPTP process with the Annual Plan process (which sets fares) is required to ensure one informs the other, and all impacts are properly considered.

The submission request intended to gauge public support for a proposed base fare increase from \$2 to \$2.50, which represents a 25% change. This fare change would not only increase the adult Bee Card fare, but will also impact concession fares due to them being calculated as percent discounts off the base fare.

This question was prefaced against the current funding environment. The draft RPTP summary document provided an overview of central government's expectation for public transport authorities to increase the private share of public transport funding. We asked submitters to consider raising fares to enable us to work towards achieving compliance with this expectation and maintain and improve our services.

Summary of submissions

483 submitters responded to this question, with 65 choosing not to respond.

47% of submitters (226) agreed that ORC should increase the adult Bee Card fare. 53% of submitters (257) did not agree.

Of the 47% of submitters that agreed with increasing fares, there was general consensus that \$2.50 was an appropriate increase. There was no other clear fare price common in the submissions received.

Submitters supporting an increase in the adult Bee Card base fares cited that the increase may be necessary to maintain and improve services. Some submitters also mentioned that a \$0.50 increase was affordable for them. Other submitters offered conditional support if the adult Bee Card base fare increases were paired with service improvements, maintaining free child fares and the implementation of fare capping.

Submitters opposing a base fare increase cited the potential for higher fares to negatively impact patronage, as people may be more inclined to drive private vehicles, leading to worse



environmental outcomes and less revenue. Some submitters stated that the higher fares would make public transport unaffordable for them.

Some submitters mentioned that fares should be free for all, and conversely some thought bus travel should be fully user pays.

Staff response

Staff were appreciative of the thoughtful feedback received. Submitters, whether supporting or opposing a fare increase, were able to understand nuances and link this question to other parts of fare policy such as private share, zones and concessions, and to other PT issues such as service levels.

Many submitters conditioned support (or reluctant acceptance) of fare increases on improving or maintaining service levels, or on other aspects of fare policy. In Queenstown, a base fare increase would coincide with service improvements in accordance with the Queenstown Public Transport Business Case. In Dunedin, there would be no link with immediate improvement in service levels, but staff are satisfied that a 25% increase in fares is proportionate and reasonable noting that this aligns with inflationary factors.

Overall, the response to this question gives staff satisfaction that on balance our community do not want to see a fare increase, however support long-term passenger affordability, while complying with NZTA direction and continuity of our services. A fare increase is in line with inflation since 2020 and our product will continue to be affordable to users.

Clearly, an increase in fares will have a negative impact on patronage (all else being equal). Modelling undertaken to understand the impact of fare increases on patronage and private share, indicates that a 25% fare increase would have a negative initial impact on patronage, estimated to be a reduction of 373,000 passenger trips per year (6.5% of patronage). Over a 10 year period, the negative impact of 25% higher fares would be around 10% of patronage. However, it should be noted that:

- Patronage would still grow overall just not quite as far. In the modelling, only the first year saw a decrease in patronage, as other drivers of growth such as population growth would remain
- The revenue generated by higher fares could, if re-invested, recover a significant part of this patronage loss.

Financial considerations

While a 25% fare increase would have a negative impact on patronage, the impact on fare revenue would be positive. All else being equal, Stantec modelling indicates an initial increase in revenue of \$1.07million per year (13.5%). Over ten years, higher long-term elasticity would reduce the scale of benefit; with a \$7.1million dollars of increased revenue over 10 years (6.7%).



The financial benefits of going beyond a 25% fare increase, meanwhile, are marginal in the Stantec modelling. A 50% increase generates only \$1.8million extra over 10 years, relative to 25%; and a 75% increase generates less revenue than a 50% increase, and a 100% increase generates less revenue than a 25% increase. As such, the Stantec modelling shows that, under standard elasticity assumptions, there is a strong case that a \$2.50 fare is a good balance between generating revenue and maintaining affordability. This means staff consider a \$2.50 fare an appropriate response to requirements to increase private share.

There are also secondary benefits to this decision. Stronger revenue will put ORC in a better position for future funding processes, as NZTA evaluate value for money in their investment decisions.

Staff recommendations

As a result of submissions, staff recommend an increase in the base adult fare level to \$2.50, to be implemented within the next six months.

6.4 Topic 4: Zone fare structure

Should we charge more for longer trips?

Topic 4 invited submitters to provide feedback on a proposal to replace the current flat fare structure with a zone fare structure for the urban bus networks in Dunedin and Queenstown. This would allow ORC to charge a higher fare for longer-distance trips. The proposed three to four zone structure would be simpler than previous more granular zonal systems in place before 2020.

Summary of submissions

481 submitters responded to this question, with 67 choosing not to respond.

44% of submitters (211) agreed that ORC should charge more for longer trips (i.e. move from a flat fare structure to a zone fare structure). 56% of submitters (270) did not agree.

Many submitters cited fairness around cost distribution as a core reason for their support, that it is unfair for people travelling a short distance to pay the same fares as someone travelling much farther. On the other hand, many submitters raised concerns that charging higher fares for people living farther away would increase household expenditure for people in those communities. Although the proposed zone fare maps were provided as attachments to the draft RPTP and the summary document, few submitters directly provided feedback on the zone boundaries.

Regardless of submitters' support or opposition to a zone fare structure, submitters were mostly concerned about two main factors: fare price and accessibility.

Submitters did not want the fares in farther zones to be increased to a point where driving personal vehicles was cheaper than taking public transport. Additionally, submitters wanted the zones to be accessible, transparent and easy to understand. Submitters were concerned that



zones might be too complex and confusing, as was the case with the zones previously used in Dunedin.

Staff response

The draft RPTP Fare policy F P2 (page 84) sets out what type of fare structure would be used to set our fares. Staff are exploring the option to move to a zone fare structure that balances the simplicity of a flat fare by retaining large zones in the urban centres with the ability to charge a higher fare to outer zones to recognise the additional cost of operating these services. This is in line with NZTA funding and fares policies to recover a greater share of operating costs from fares.

Staff support the points of many submissions for and against zonal structures including accessibility, transparency, fairness, and greater environmental impact of longer trips. Another important consideration is managing public transport's role in operating and providing transport options for outer suburbs that promotes positive environmental outcomes and supports sustainable urban planning and development. The draft RPTP gives weight to land use considerations which support focusing investment in areas where public transport performs well (Appendix E).

Financial considerations

Modelling work to understand the financial implications of the proposed zone fare structure has not yet been undertaken.

Staff recommendation

As a result of submissions, staff recommend that:

- no changes are required to the draft RPTP policy on fare structure and fare zones remain unchanged
- the exact details of fare zones (relative fare levels etc) will be subject to further modelling and analysis outside of the scope of this plan
- final decisions on multi-zone fares will be made through the 2026 Annual Plan process, with the potential to be implemented with the National Ticketing System in 2026.

6.5 Topic 5: Fare concessions

Should we keep our free fares for children (5-12 years) and standardise our concession discount for youth (13-18 years) to 40% across both the Dunedin and Queenstown networks?

Topic 5 invited submitters to provide feedback on how we manage child and youth fare discounts/concessions. PTAs must align with NZTA's fare concession requirements and set pricing as a discount off the base fare. Youth (5-18 years) concession discount value is set by the region, but must align with NZTA fares and funding policy direction to be eligible for co-funding.



ORC currently split youth passengers (5-18 years) into two separate concession categories, with 100% discount for children 5-12 year olds across both urban networks, while youth (13-18 years) receive a 40% discount in Dunedin and 25% discount in Queenstown.

Summary of submissions

Retaining free fares for children

500 submitters responded to this question, with 48 choosing not to respond.

89% of submitters (446) agreed that ORC should retain free fares (100% discount) for children (5-12 years). 11% of submitters (54) did not agree.

Submitters who supported retaining free fares for children highlighted concerns about the potential increased financial strain on families, particularly given children's increased reliance on public transport in response to the reduction of dedicated school bus services. Submitters also mentioned that free fares for children would normalise their use of public transport, foster independence and encourage them to use public transport as adults.

Most submitters who opposed retaining free fares for children noted that child fares should be very cheap but not free, around \$1. Some submitters took contrary views that all users should pay the same.

Standardising concession discounts for youth in Dunedin and Queenstown

467 submitters responded to this question, with 81 choosing not to respond.

84% of submitters (390) agreed that ORC should standardise concession discounts for youth (13-18 years) to 40% across both the Dunedin and Queenstown networks. 16% of submitters (77) did not agree.

Submitters who supported standardising concessions for youth mentioned that doing so would make fares easier to understand and promote fairness and consistency across the region.

Several submitters mentioned that the discount should not be standardised due to the income difference between residents in Dunedin and Queenstown.

Many submitters who either supported or opposed standardising concessions did so on the basis that fares should be free for everyone, or free for people under 18 years old. Other common requests included increasing the youth concession from 40% to 50% and introducing student concessions.

The submission of NZTA states, with regards to 5-12 free fares, that:

The NZTA does not support free fares (that is, a 100% concession) because:

• it is contrary to the Government Policy Statement (GPS) requirement to increase private share;



- the Crown has previously decided not to fund the same concession as part of Community Connect and it would be incongruous for a Crown entity to do so; and
- it would be inequitable for NZTA to support free fares for 5 to 12 year olds in Otago when it does not do so with almost all other public transport authorities (PTAs).

The NZTA submission notes that the revenue foregone with the free concession is approximately \$436,000, half of which could be expected to be met by NZTA. Given the lack of alignment with the GPS and in equitability with other councils, there is a high chance that NZTA would adjust funding at least to the point where the revenue forgone from the concession is fully borne by ratepayers as is currently the case; this is without considering the impact on private share targets which could also result in adverse funding decisions in the next National Land Transport Funding (NLTF) round.

Staff response

Retaining free fares for children

Staff note the strong public support for free fares for children; this was the question on which the balance of public opinion was strongest. However, the submission of NZTA as co-funders must be given significant weight, in terms of articulating the potential negative impacts of retaining free fares. Staff advise that, given the likely and possible consequences of this policy, the risks that free 5-12 year old fares would impose on ORC's co-funding from NZTA is too great, relative to the benefits as expressed by submitters

Standardising concession discounts for youth in Dunedin and Queenstown

Staff expected that submitters would support standardising concession discounts for youth in Dunedin and Queenstown and note the benefits of such. Although there is a potential case for differentiating based on the different socio-economic profiles of Queenstown and Dunedin, this was not raised by a large number of submitters and we recommend the simpler approach of the draft RPTP is maintained.

Financial considerations

The potential negative impacts of retaining free fares for 5-12 year olds are threefold:

- 1. **Revenue foregone:** this is the revenue missed out on due to the 5-12 year old free fares
- 2. **No NZTA co-funding for child passengers:** more than doubles of the first impact due to misalignment with NZTA funding and fares policy
- 3. **Potential impact on long-term funding due to weaker private share performance:** beyond the above two costs, retaining free 5 12 year old fares would also reduce private share performance. Otago has much-needed improvements in Dunedin, Queenstown, and regionally, and poor private share could significantly reduce the chances of receiving co-investment for these improvements in future funding rounds.



The financial impact of amending the youth concession in Queenstown from 25% to 40% is minor. It would essentially cancel out the recommended base fare increase, keeping Queenstown youth fares at \$1.50, while Dunedin youth fares would increase from \$1.20 to \$1.50.

Staff recommendations

Staff recommend the removal of free fares for 5-12 year olds and a concession from the adult base fare be calculated and introduced within the next six months in line with a base fare increase. Staff recommend that the 5-12 year old age group has the same fare concession as the 13-18 year old group - a 40% discount on the full adult fare standardised across both networks. This equates to a child fare (for 5-18 year olds) of \$1.50.

7. Common feedback themes

This section highlights five common themes that emerged from submissions, separate from the five topics outlined above. These themes reflect common transport issues raised by Otago residents and provide insight into potential priority areas for service improvements.

7.1 Network design and levels of service

Most submitters want improvements to our public transport services.

Service reliability, punctuality, frequency, timetables and routes were the most common themes raised by submitters. The draft RPTP speaks to reliability and punctuality in Section 2.7 and frequency, timetables and routes in Sections 5.1 and 5.2.

Feedback included requests for buses not to run early, more frequent bus services, extended service hours, and network changes/alterations to bus routes. These submission points illustrate that most submitters value a convenient and well-designed public transport service.

The following table outlines staff recommended changes to the draft RPTP in response to this feedback and reasons behind those changes.



Sub-topic	Staff recommendation	Staff reasoning
Reliability	No changes to RPTP – noting and/or operational	The importance of reliable buses is captured in the draft RPTP's passenger experience focus area (Section 2.7). Good timetable design is a core principle of the network design chapter of the draft RPTP (Section 5). However, some level of early and late running is unavoidable.
Frequency	No changes to RPTP - noting	General: Our plan emphasises enhancing our service's frequencies where required over time. However, the current funding environment limits our ability to make any of these frequency improvements in the short-term. Queenstown: Service improvements recommended in the Queenstown Public Transport Business case are included in the draft RPTP and funded; we are seeking to implement these improvements.
		Dunedin: The draft RPTP gives emphasis to improving frequencies in line with the Dunedin Fares and Frequencies Business Case. However, the current funding constraints limit our ability to move forward with these in the short-term.
Timetables	No changes to RPTP - noting	Our timetable design policies capture much of the timetable related feedback in the draft RPTP (Section 5.2). These include policies to enable seamless transfers and accurate running times, where possible.
		For feedback requesting service hour extensions, we state longer service hours as a target in the draft RPTP, however we caution that we are limited in what we can achieve in this area in the immediate future due to funding constraints.
Routes	No changes to RPTP - noting and/or operational	Most route-related feedback will be noted and passed to network planning and operational processes, but none will result in changes to the draft RPTP.
		The next three years of route changes are largely determined and funded, and therefore already included in the draft RPTP (Section 5.2). Many requested route changes are included as 3+ year aspirational, or unfunded, changes. While route changes not currently in the draft RPTP have the possibility of being implemented in 3+ years, we will not alter our network aspiration maps to include them.



7.2 Regional connectivity

People want public transport for Otago's smaller towns and rural areas.

Many submitters advocated for ORC to provide public transport services to Otago's smaller towns and rural areas.

This sentiment is captured throughout the draft RPTP, for example, in the opening statement (p. 4), in the community transport section (pp. 37 and 38) and in the maps illustrating network aspirations for rural areas (p. 59).

Locations that garnered the strongest demand for new services include the Dunedin Airport, Wānaka/Upper Clutha and Ōamaru. Demand was often justified with the following reasoning:

- Submitters often cited that the Dunedin Airport is the only major-city airport in the country not served by public transport. This is not true, however, as the Hamilton airport is not currently served by public transport.
- Submitters requested public transport services connecting Wānaka and Upper Clutha towns, including a Wānaka to Queenstown bus service.
- Most submitters mentioning Ōamaru requested a bus service from Ōamaru to Dunedin, primarily to access hospital appointments. Some submitters requested public transport within Ōamaru, including an on-demand service.

Other locations that received notable demand for public transport include Balclutha, Central Otago and Outram.

Some submitters requested that Otago's smaller towns and rural areas be connected by passenger rail.

Topic	Staff recommendation and reasoning	Staff reasoning
Dunedin Airport	No changes to RPTP - noting	A Dunedin to Balclutha service is included as an integral service in the draft RPTP and would serve the airport, but is not currently funded.
Wānaka/Upper Clutha	No changes to RPTP - noting	Public transport links between Wānaka and Queenstown are outlined in the draft RPTP for improving regional connectivity, however currently sits in the 10-30 year horizon due to lack of funding and alignment with central government priorities.
Ōamaru	Change to RPTP	A local Ōamaru service was left off integral services table in error (a Dunedin to Ōamaru service was



		included) The local Ōamaru service was signalled in the RLTP but was not funded. Future funding and timing to implement this service is currently unclear.	
Rail and ferries	No changes to RPTP - noting	We do not currently have the evidence base to support regional rail and other non-bus transport modes, but staff acknowledge that there is community support to look for alternative ways to improve connectivity and access for smaller towns.	

7.3 School services

Submitters want assurance that students will have reliable public transport options.

Submitters frequently requested that public transport accommodate school children on their commutes to and from school. They cited affordability, safety and reliability as key issues for school children.

While some submitters raised concerns about who would provide public transport services (Ministry of Education or ORC), most submitters cared more that the service was being delivered reliably and affordably.

Some submitters requested school services be separate from the public transport services, such as Ministry of Education services, while others requested more public services be added. Common areas of concern were students commuting around the Otago Peninsula and South Dunedin, as well as the high-growth areas of Queenstown.

Staff think that submissions related to school services may have been driven by the recent removal of the Ministry of Education dedicated school transport services on the Otago Peninsula and the Ministry's current review of school bus services in the Whakatipu basin. ORC staff have been working collaboratively with the Ministry of Education to coordinate an effective transition for students onto the ORC network where possible when removal of these services is programmed.

Staff recommendation	Staff reasoning Staff reasoning
No changes to RPTP - noting	The draft RPTP includes a new policy with regards to targeted services such as school buses. Although we aim to serve trips on our integrated all-day services where possible, targeted services may be provided where they serve trips that cannot reasonably be made through other regular services.
	Ministry of Education services are not regulated by ORC, but we acknowledge they form an important part of the public transport system; the removal of such services is a risk across our networks,



especially in Queenstown; and could also be a risk to ambitions for a local Ōamaru service.

In Queenstown, planned improvements to frequencies under the Queenstown Business Case will improve services for many users, including primary school students, noting the improvements are not dedicated bus services, but public transport services that intend to provide additional capacity for all passengers.

In Dunedin, there are many factors that influence existing timetables and we cannot meet all needs perfectly. School travel is a significant part of the demand for travel, and staff acknowledge that there are some issues with capacity which are continuously being assessed.

7.4 Electric Buses

Electric buses are popular, with some reservations.

Electric buses were a common feedback topic in submissions. Most comments on electric buses were positive, with submitters praising the environmental sustainability and comfort of the buses. A small number of submitters criticised the transition to electric buses, however, citing the environmental implications of sourcing the vehicle batteries.

Sections in the draft RPTP related to electric buses include Section 2.7 (Service and vehicle quality standards) and 4.2 (Decarbonising our bus fleet and related infrastructure).

Staff recommendation	Staff reasoning
No changes to RPTP - noting	While public transport fleet decarbonisation aligns with the ORC Strategic Direction's climate aspirations and goals, it is also required by central government.: The NZTA Requirements for Urban Buses (RUB) allows only zero-emission public transport buses to be purchased from 1 July 2025. Although there remain some open questions, the best information currently available points to battery-electric buses as the best way to serve our current needs in most cases. Submitters also raised cost as an issue. Our recent experience does not support this; new electric-bus contracts are increasingly cost-competitive.

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⁵ https://www.nzta.govt.nz/assets/resources/requirements-for-urban-buses/docs/requirements-for-urban-buses-2024.pdf



Environmental impact: NZTA's Zero emission bus economics study⁶ indicates that intensively used battery-electric buses perform best on a whole-of-life emissions basis, including embedded carbon.

Safety: we have no evidence of significant concerns about the safety of electric buses compared to diesel buses.

Electrical grid capacity: we do not currently have any major concerns

7.5 Vehicle size

Many people believe our services would benefit from using smaller buses.

Many submitters suggested that ORC introduce smaller buses during off-peak hours to cut operation costs and improve manoeuvrability on narrow roads.

Staff recommendation	Explainer	
Change to draft RPTP	What about using smaller buses?	
To address this common submission theme, we recommend adding an explainer on small buses to Focus area 4 of the draft RPTP.	One common suggestion is to use smaller buses during offpeak hours in Dunedin and Queenstown. Smaller buses could be helpful in hilly areas or on routes that have low patronage. However, there are some barriers to introducing smaller buses in Otago: 1. Smaller buses are often not more cost-effective: The largest expense in public transport is driver wages. While smaller buses may save money due to lower fuel consumption, those savings are offset by the fixed cost of driver wages, as drivers must be paid regardless of the size of the bus. Smaller buses also accommodate fewer passengers, which means less fare revenue. Additionally, investing in a new fleet of smaller buses would be costly and inefficient, as many of our current buses would sit idle and unused. 2. Smaller buses won't meet our future growth demands: In 2024, we had a record-breaking number of people taking public transport in Otago, and we hope to build on these successes moving forward. As our region grows, smaller buses might struggle to accommodate higher passenger demand and contribute to overcrowding on our services.	
	We want to use the right tools for the job	

⁶ https://www.nzta.govt.nz/resources/research/reports/718/



Bus size isn't a black and white issue—it's a question of finding a good balance. We want public transport to empower people to travel to many places in a reasonable amount of time and at a low cost. To achieve this goal, we'll choose the fleet that's right for the job.

In July 2025, we will introduce smaller buses in Mosgiel to replace routes 80 and 81. These buses will be part of an 'ondemand' bus service that uses a small, 30-person capacity, wheelchair accessible electric bus to pick people up and drop them off within a designated area in Mosgiel. People can book the bus by calling a phone number or through an app.

This initiative is just one example of how we are using the best transport option to meet community needs.

8. Other considerations

8.1 SuperGold

At the 5 March 2025 PATC, Council recommended that the SuperGold Bee Card concession continue to apply on the 3:35PM City—Palmerston service and the 3:40PM City—Warrington service with a final decision to be made as part of decisions on the new Otago Regional Council RPTP. This recommendation can be found as Resolution PAT25-105.

Six submissions on the draft RPTP provided feedback about the SuperGold concession.

Staff response

SuperGold is a national scheme with free travel between off-peak periods set by NZTA. If we were to recommend extending free travel periods for SuperGold users, this would not attract co-funding or align with our requirements to increase private share. Therefore this is not something staff consider they can support.

NZTA Development guidelines for regional public transport plans 2024 states that "PTAs must ensure any regionally defined concessions (including SuperGold) do not duplicate or conflict with a nationally-defined fare concession. This is to ensure an enhanced and consistent experience for customers and reduce administrative costs".

To extend the hours in which we offer SuperGold concessions would contravene this policy, not attach co-funding and put our relationship and funding support from NZTA at risk.

Further it is not good practice to have one-off policies for certain services. If we are to extend the hours of SuperGold concession on these services, we would need to make this consistent across all services leaving the city at a similar time.



Staff recommendations

Staff do not recommend Council extending free travel period for SuperGold users on the 3:35PM City—Palmerston service and the 3:40PM City—Warrington service or any other service.

8.2 Private share targets

A Private share of operating costs paper was presented to Council at the 19 February 2025 meeting. Council resolved that Council:

- 1. Approves advising NZTA Waka Kotahi that fare changes, including changes to adult fares or the introduction of fare zones will be consulted on as part of the RPTP, and formal reporting of private share targets and projections will be provided to NZTA by 30 June 2025, after the RPTP process has concluded. [Resolution CM25-114]
- 2. Notes the requirement to increase private share funding of public transport services and the initial private share targets advised by staff to NZTA officials, which are to be confirmed through the RPTP process. [Resolution CM25-115]

The submission from NZTA was the only submission that mentioned private targets.

Staff response

Given the technical nature of setting and agreeing private share targets, it is unsurprising that few submitters engaged on this topic.

The implications of RPTP decisions on private share are discussed throughout this document.

What is becoming apparent is the ability to grow private share in a linear fashion will be challenging. Fare mechanisms and efficacy of spending are still the main levers we have to influence private share. Growing fare paying patronage will have the greatest impact on our ability to meet our proposed private share target which aligns with the RPTP.

Staff recommendations

While submissions give little reason to amend the targets, staff have considered a range of factors in determining recommendations to the Panel.

Bringing together the other aspects consulted on as part of the RPTP including increasing the Bee Card fare to \$2.50 and Child concession to \$1.50, staff recommend as follows:

- NZTA proposed targets were 24% for 2024/25, 30% for 2025/26 and 42% for 2026/27
- Agreed staff level proposed targets for inclusion in the RPTP were 20% for 2024/25, 25% for 2025/26 and 30% for 2026/27
- Based on modelling to reflect the increase in revenue from proposed fares increases to adult \$2.50 + child fares of \$1.50, staff estimate private share of 19.7% for 2024/25, 22% for 2026/27 and 23.8% for 27/28
- Therefore staff recommend amending the private share targets to 20%, 23% and 25% respectively.



- This is based on the assumption of using fares as our only certain means to influence private share in the short term
- We note further that achieving these targets relies on decisions on the use of a future zonal fare structure and realising advertising and commercial revenue opportunities.



9. Recommended changes to the draft RPTP

9.1 Recommended changes in response to submissions

The table below outlines the recommended changes to the draft RPTP in response to submissions received.

ID	Page no. (Designed document)	Topic	Summary of feedback/request	Current draft RPTP content	Proposed change
01	12	General	pg 12, 1.4: This section should be amended to reflect the following (especially that NZTA has a role to oversee PT nationally and how significant NZTA's investment is): The NZTA is required to contribute to an efficient, effective and safe land transport system in the public interest (section 95 (1) (a), Land Transport Management Act 2003 [LTMA]). Our functions include: • overseeing the planning, operation, implementation, and delivery of public transport (including issuing guidelines for regional public transport plans; section 95 (1) (i), LTMA); and • managing funding of the land transport system (section 95 (1) (j), LTMA). In this regard, NZTA is the largest single investor in public transport in Otago alongside its partner Council; ORC. In the 2024/27 period, ORC will rate its community \$58.2m to invest in public transport and in partnership, NZTA will co-invest about \$60m.	At a national level, NZTA invests in public transport services and infrastructure through the NLTP and shapes the transport system through strategic frameworks and the GPS on land transport.	Change last paragraph of text on pg 12 to 'At a national level, NZTA shapes the transport system through strategic frameworks and the GPS. They also oversee the planning, operation, implementation, and delivery of public transport (including issuing guidelines for regional public transport plans and managing funding of the land transport system).'
02	22	Bus drivers	pg 22, 2.2: Emphasise the importance of driver safety and working conditions, including how ORC may want to use driver fund to support driver safety and working conditions.	collaboration with service operators to ensure the highest standard of passenger and driver safety on board vehicles (see Section 2.7).	Pg22 2.2 amend last bullet point of first column to read "collaboration with service operators to ensure the highest standard of



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					passenger and driver safety, and driver working conditions
03	23	Bikes on buses	pg 23, 2.3, Footnote 3: Delete the second sentence as this issue has been resolved.	Non-foldable bikes can be attached to the bike racks fitted on the front of buses. In 2024, NZTA implemented a temporary restriction on bike racks on buses. Visit orc.govt.nz/orbus/ for the latest information about using bike racks on buses.	Remove reference to temporary restriction of bike racks on buses.
04	17, 19	Focus areas	(Focus area) Passenger experience: Provide public transport services that promote social inclusion and respect the safety and wellbeing of all passengers.	Focus area 1: Passenger experience Objective: Provide useful public transport services that respect the safety and wellbeing of passengers, particularly for transport- disadvantaged people.	Change Objective 1: Passenger experience to 'Provide useful public transport services that promote social inclusion and respect the safety and wellbeing of all passengers" Change needed on Pg 17, and 19. Remove the definition of 'transport disadvantaged' from the last bullet points on pg 19.
05	17, 45	Focus areas	(Focus area): Environmental sustainability: Invest in a public transport system that reduces reliance on private vehicles, promotes positive environmental outcomes and supports sustainable urban planning and development	Focus area 3: Environmental sustainability Objective: Invest in a public transport system that promotes the best possible environmental outcomes regarding greenhouse gas emissions, pollutants and land use.	Change Objective 3: Environmental sustainability to: Invest in a public transport system that reduces reliance on private vehicles, promotes positive environmental outcomes and supports sustainable urban planning and development. Changed needed on pg 17 and 45
06	17, 45	Focus areas	More focus on making it easy to live without a car	Focus area 3: Environmental sustainability Objective: Invest in a public transport system that promotes the best possible environmental outcomes regarding greenhouse gas emissions, pollutants and land use.	Change Objective 3: Environmental sustainability to: Invest in a public transport system that reduces reliance on private vehicles, promotes positive environmental outcomes and supports sustainable urban planning and development. Changed needed on pg 17 and 45
07	24	Customer service	pg 24, 2.3, CS A4: Support the policy but suggest the inclusion of the words "(of NZTA standard)" are superfluous (the survey is a requirement of the NZTA Procurement Manual) and may limit	CS A4 Undertake a public transport customer satisfaction survey (of NZTA standard) on an annual basis.	Remove (of NZTA standard) from CS A4



			Council undertaking a more comprehensive survey.		
08	27	Funding	pg 27, 2.6, Case study: Use of the phrase "financially viable for ORC" suggests that the fare revenue generated covers the costs of the additional services. If not, remove the reference.	The success of our cruise ship-targeted services highlights the potential for special event travel to bring positive social outcomes to the community while being financially viable for ORC.	pg27 Case study. Change last paragraph to read: 'The success of our cruise ship-targeted services highlights the potential for special event travel to bring positive social outcomes to the community.'
09	34	Accessibility	pg 34, 2.8, Table 2, ORC interpretation: Oppose the interpretation that "steps 2 and 4 will be interpreted in light of a person's ability to board a kneeling bus from ground that is the same height as the ground under the bus." The current ORC interpretation seems to assess the ability of a customer to step up in to a bus (which RUB Requires to have a flat floor), making no allowance that buses have front entry ramps that can be extended to footpaths. It also means anyone in a wheelchair is automatically eligible for TM. The RUB requires vehicles to have sufficient ground clearance to permit the body of the vehicle to pass over a Kassel kerb without making contact with the kerb (these kerbs are 180mm high above the road) and the kneel height at the front door is to be between 245–280mm. At most therefore, a customer would be required to step up 100mm if no ramp was deployed.	When applied to mobility impairments, steps 2 and 4 will be interpreted in light of a person's ability to board a kneeling bus from ground that is the same height as the ground under the bus.	Remove last paragraph of text in the General Eligibility box - ORC interpretation pg34



	uncn				
10	35	Funding	pg 35, 2.8, Examples: The funding splits shown in the examples are wrong, generally over-stating the local share contribution.	Example 1: The trip's face is 800 (under the subdisty ago) To detail select. So 20 Leading South So	Update figure 7 with edits provided in Section 11 of this report
11	36	Accessibility	pg 33, Total Mobility: The RPTP guidelines require the RPTP to "as a minimum include policies specifying: • any regional fare caps and their process for review (couldn't see anything about how fare caps will be reviewed) • policy for enabling hoist-equipped vehicles (contained in TM P5) • eligibility requirements for admitting or removing transport providers from participating in the Total Mobility Scheme." (Plan seemed silent on this.)	TM P3 Operator and agency eligibility: develop standardised frameworks to assess the eligibility of potential and existing transport operators and mobility agencies in a way that serves disabled people with a diverse range of needs and maintains good value for money. TM P4 Affordability: investigate potential barriers to Total Mobility's affordability for passengers, including the \$37.50 fare subsidy cap, subject to financial viability and the outcome of the central government's Total Mobility review. TM A1 Ensure that reasonable and actionable measures are taken to ensure operators and agencies meet their contractual obligations, including comprehensive auditing of vehicles, training, and health and safety. TM A2 Develop an operator and agency contract procurement process to reduce barriers to entry, promote transparency and resourcing,	Amend TM P4 Affordability (pg36) to remove the words 'for passengers' so it reads: Affordability: investigate potential barriers to Total Mobility's affordability, including the \$37.50 fare subsidy cap, subject to financial viability and the outcome of the central government's Total Mobility review. Delete Action TM A5 and replace with: 'Review Total Mobility fare subsidies periodically in line with Annual Plan and Long Term Plan processes'. Amend TM P3 to read: Procurement: Total Mobility will be procured in accordance with the NZTA Procurement Manual and ORC's Transport Activities Procurement strategy, and adhering to guidance set out in NZTA 'Total Mobility Scheme: a guide to local authorities, with a focus on access and value for money. Amend TM A1 to read: Take reasonable and actionable measures to ensure operators meet their eligibility and contractual obligations, including comprehensively auditing of vehicles, claims, training and health and



				and enable wider geographic coverage for eligible operators and agencies. TM A5 Review the current \$37.50 fare subsidy cap as a potential barrier to accessibility. Collaborate with other regions to understand the impacts on user behaviour and expenditure a higher fare	safety. Amend TM A2 to read: develop a standardised operator and agency contract procurement process to reduce barriers to entry, promote transparency, and resourcing in a way that serves disabled people with a diverse range of needs while maintaining good value for money.
12	36	Funding	pg 36, 2.8, TM A5: Suggest ORC should look at its fare cap not just from the perspective of it being a barriers, but also how ORC can make the scheme more financially sustainable.	cap would have. TM A5 Review the current \$37.50 fare subsidy cap as a potential barrier to accessibility. Collaborate with other regions to understand the impacts on user behaviour and expenditure a higher fare cap would have.	Update TM A5 to 'Review Total Mobility fare subsidies periodically in line with Annual Plan and Long Term Plan processes'
13	40	n/a	pg 40, 3.1, Equity principle 3: Is disinvestment the correct word as opposed to "under-investment" or "a lack of investment"? Disinvestment suggests there has been a withdrawal or reduction of an investment (which isn't the case).	3. Address historical disinvestment:	Pg 40. Change the third principle to 'Address lack of under-investment'
14	41, 60, 61, 122	Oamaru service	Request for a local public transport service in Oamaru, particularly so students can travel to school more easily.	n/a	Add a local Oamaru service to the integral services in the plan
15	42	Rail and ferries	p.42 Engage in open and regular dialogue with our partner agencies and key stakeholders to align expectations, identify and address inefficiencies and new transport opportunities and optimise the operation of our services	E A1 Engage in meaningful dialogue with diverse stakeholders interested in public transport to understand their transport needs.	Rephrase E A1 to slightly shortened version of submitter request: "Engage in open and regular dialogue with our partner agencies and key stakeholders to align expectations, identify and address inefficiencies and opportunities, and optimise the operation of our services."
16	44	Collaboration with institutions	pg 44, Partner agencies: In recent years, ORC, DCC and NZTA have successfully collaborated to deliver significant improvements around	In recent years, ORC and Dunedin City Council have successfully collaborated to deliver	Amend pg 44 first column last bullet point to: In recent years, ORC, DCC and NZTA have successfully collaborated



			Dunedin, such as Mosgiel Express services and improved Mosgiel peak services.	significant improvements around Dunedin, such as: • improving the safety and accessibility of bus stops in key locations including Princes Street, Dunedin Hospital, the tertiary area and Cargill's Corner • increasing the frequency of buses to Dunedin Hospital • enhancing bus route efficiency by implementing a primary bus corridor from Dunedin Bus Hub to South Dunedin.	Add bullet ' Mosgiel Express services and improved Mosgiel peak services'
17	52	General	pg 52, SD P4: This policy may not meet the requirements of the RPTP Guidelines which state: "Where a PTA provides, or intends to provide, ondemand public transport services, it must include objectives and policies within its regional public transport plan that: • outline the use cases for which a PTA may deploy on-demand public transport • the accessibility standards that will apply to the scheme and vehicles utilised within the scheme • signal how on-demand public transport schemes may be adjusted in response to changing customer demand to promote good customer experience. This may include replacing the service or adjusting: - fares and payment methods - operating catchment - operating mode - hours of operation - eligibility to utilise the service" (section 4.2.8).	On-demand services: in areas where fixed-route services are inefficient at providing coverage, on-demand services should be considered as an alternative. The following principles should apply to the use of on-demand services: • The value of on-demand services should be evaluated on a like-for-like basis with cost-equivalent fixed-route alternatives. • Except when highly targeted in nature, on-demand services should be integrated, as much as practical, into Orbus branding, fare payment and fare structures. • The impact of on-demand services on commercial small-vehicle markets should be considered in decisions to implement on-demand, especially with regards to Total Mobility operators.	add the following bullet points to SD P6: • Ondemand services should be operated with fleet that comply with the Requirements for Urban Buses • Changes to on-demand services are based on the same principles as fixed-route services (see SD P4 above)
18	52	Rail and ferries	p.52 Mode neutrality: public transport will be delivered using the most appropriate mode (e.g. bus, ferry, tram, ropeway, etc.) to meet demand, purpose, community need and value for money	Mode neutrality: public transport will be delivered using the most appropriate mode (e.g. bus, ferry, tram, etc.) to meet demand, purpose, community need and value for money.	Add "cable/rope technologies" to examples of alternative modes in SD P5



19	58	Vehicles smaller	Would like to see smaller, electric vehicles in Whakatipu.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
20	58	Vehicles smaller	Kevin Heights services should have smaller buses running more frequently	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report
21	58	Vehicles smaller	Use smaller buses at increased frequencies when expanding services into smaller towns	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
22	58	Vehicles smaller	Submitter mentions that the buses are too big relative to the size of the roads, and that buses often run empty. They want smaller buses for lower patronage routes, such as the ridge runner	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
23	58	Vehicles smaller	Request to use smaller buses on less popular routes and at off peak times to lower costs.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
24	58	Vehicles smaller	Wants more frequent and smaller buses, including to the Peninsula.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
25	58	Vehicles smaller	Reduce bus sizes in off-peak times	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
26	58	Vehicles smaller	Consider smaller buses	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.



27	58	Vehicles smaller	Request to run smaller buses on under-utilised routes.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
28	58	Vehicles smaller	Submitter thinks running smaller buses with low passenger numbers will be cheaper	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
29	58	Vehicles smaller	Submitter requests potentially using smaller buses and on-demand services during off-peak hours	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
30	58	Vehicles smaller	Suggests looking into some smaller buses for around Dunedin.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
31	58	Vehicles smaller	Request to run smaller buses more frequently.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
32	58	Vehicles smaller	Submitter thinks smaller buses would be better	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
33	58	Vehicles smaller	Suggests switching to smaller vans instead of buses for community transport but timetable them like buses.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
34	58	Vehicles smaller	Submitter requests smaller and more frequent buses in the upper Whakatipu	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.



35	58	Vehicles smaller	Focus on electric and smaller buses - less energy and lower costs.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
36	58	Vehicles smaller	Instead of increasing fares, run smaller buses more frequently at peak times. They are also easier to get around and turn.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
37	58	Vehicles smaller	Request for smaller buses to run at off-peak hours.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.)
38	58	Vehicles smaller	Submitter supported community transport, but had questions about smaller fleet options such as vans and minibuses	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
39	58	Vehicles smaller	Request for buses to be smaller.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
40	58	Vehicles smaller	Submitter wants small buses to be used in off- peak hours due to environmental issues	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
41	58	Vehicles smaller	Submitter wants smaller buses at different times of the day, thinking it may reduce emissions	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
42	58	Vehicles smaller	Supports smaller buses running with an increased service.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.



43	58	Vehicles smaller	Match bus size to passenger numbers.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
44	58	Vehicles smaller	Request to use different sizes of buses at different times of day (e.g. peak vs. off-peak) as a means of reducing operating costs.	n/a	Add the recommended explainer on small buses to the draft RPTP's Focus area 4 (such as at the bottom of page 58, after Table 4.) See the explainer in Section 7.5 of this report.
45	64	Rail and ferries	pg 64, 6-30 years: Didn't the ORC PT Business case discount a ferry to Homestead Bay?	Potential ferry to Homestead Bay.	Remove Homestead Bay leg from 6-30 year map. We don't currently have a case for this.
46	71	Active transport	pg 71, MM A4: Given policy MM A3, why is it Council's role to provide cycle parking (which has historically been a TA/RCA role)? Surely the provision of cycle parking is addressed by the previous policy.	MM A4 Provide cycle parking at strategic locations where there is evidence of demand to support greater access to the public transport network by alternative modes.	Remove MM A4
47	80	Focus areas	Thinks the Value for Money section does not adequately consider the wider community benefits of public transport	n/a	Add a 'Benefits' heading before the last three paragraphs of pg 80.
48	82	Funding	pg 82, Figure 13: Replace "Grants" with "NLTF/Crown". This will be more transparent and make it clear to the reader where the funding actually comes from.	Otago public transport funding 2024/25 Other revenue \$569,911 Total operating funding \$41.7m Grants \$11,896,100 Figure 13: The distribution of public and private funding for ORC's 2024/25 public transport operation.	Figure 13 Pg 82. Change the label 'Grants' to 'NLTF/Crown'



49	TBD	Active transport	Link regional services to bike trail hubs	n/a	Check if any policies could be amended to reference this explicitly?
50	TBD	Collaboration with institutions	Request for increasing parking fees and introducing road user fees to subsidise public transport and induce mode shift.	FS A2 Collaborate with our partner agencies to coordinate and align parking strategies and other travel-demand management tools to improve the value of public transport and achieve wider regional carbon-reduction and mode-shift outcomes.	Improve language or policies around congestion pricing [details to determine]



9.2 Minor editorial changes

The table below outlines recommended minor editorial changes to the draft RPTP, such as typographical errors, grammatical corrections and design/layout that have been picked up since the draft RPTP was approved for consultation. These changes do not alter the meaning or substance of the content, and we propose that these changes be made as required without the need for further review.

ID	Page no. (Designed document)	Section	Proposed change
51	12	1.4	Last paragraph. End the paragraph with GPS , removing 'on land transport'. GPS is the acronym for the full document.
52	20	2.1	Exempt service info paragraph - end of second sentence. Inter C ity needs a capital C.
53	29	2.7	Text in paragraph at top of second column. Add the word 'the' to read 'roadworks or at certain times of the year"
54	30	SQ A2	Remove the word 'In' from the beginning of the Action and add the word 'to' so it reads 'Work with service operators to implement the following"
55	30	SQ A4	Check capitalisation of bullet points. Should these ones be lower case, similar to SQ A1?
56	31	2.7	In "They focus on ensuring public transport vehicles are" Change "they" to " The RUB ".
57	35	2.8	Correct Figure 7 (Total Mobility trip funding examples and breakdown). See corrected figure in Appendix B of this report.
58	40	2. Access	Principle box number 2 in the middle. Should the r in residents be a capital R? I think I see why it is in lower case, but it looks funny when ORC is capitalised in the other two boxes.
59	56	Table 4	Urban Rapid service Key Characteristics box, third bullet point - change to 'Travel times competitive or even faster than private car.'
60	57	Table 4	Regional service types box/Our current services/4th bullet point - Inter C ity should be capital C not lower case.



61	62	5.2	Change "No direct route from Queenstown to Arrowtown" to "Queenstown to Arrowtown connection via Frankton only"
62	64	5.2	Change "Missing road connections such as Quail Rise are filled in, allowing more direct routes" to "Missing road connections such as Quail Rise western access road are filled in, allowing more direct routes"
63	68	NF P2	Fourth bullet point beginning 'urban and regional This sentence should not be bullet pointed, it is a paragraph and the two final bullet points sit under it. Please remove the bullet point, indent and start with a capital U
64	68	NF P4	The text in this box is duplicated with NF P5. Please correct NF P4 to: 'Exempt services: Exempt service applications will be assessed and LTMA requirements followed. ORC will not support the registration of services that would undermine the performance of an existing contracted service. ORC will support the development of exempt services that deliver a part of the regional network not currently operated by contracted services. ORC may, in coordination with operators, promote exempt services that contribute to the region's public transport network'.
65	70	NF A6	Should the bullet points in this policy be lower case to be consistent with convention through the document?
66	77	IN P1	End of first sentence refers to Table 9. This should be Table 8 . While the final paragraph refers to Table 9, this is correct.
67	78	IN P5	Should the bullet points in this policy be lower case to be consistent with convention through the document?
68	79	5.5	Fourth paragraph needs to end with 'especially in Queenstown." And the last sentence in this paragraph (Parking is complex) needs to be at the start of the 5th paragraph.
69	83	FS P4	Should the D in 'Develop' after Third-party funding: be lower case to be consistent with formatting of bullet points throughout?
70	105	Appendix E	"These stories will play a crucial role in shaping the policies and actions that form the foundation of the ORC Regional Public Transport Plan 2025-2035." Change 'ORC' to ' Otago' : "the foundation of the Otago Regional Public Transport Plan 2025-2035."



71	117	2nd row	Second Column change Intercity / Great Sights to Inter C ity with a capital C.
72	122	Glossary	Add after 6:30pm to off-peak hours definition so it reads " Weekdays 9am to 3pm and after 6:30pm, weekends and public holidays."
73		Throughout	Check use of hyphen in Queenstown-Lakes District. Hyphen seems to be missing throughout the document but it was my understanding that Queenstown-Lakes should have a hyphen.



10. Appendix A: Submission topic descriptions

Staff have categorised all submission points by topic for ease of the panel's review and decision-making. The topics are defined as follows:

Active transport: requests to integrate public and active transport networks at the local and regional scale.

Bikes on buses: requests to reinstate bike rack use on buses in response to the nation-wide ban from November 2024 to April/May 2025.

Bus drivers: all feedback, positive and negative, related to public transport driver behaviour, such as driving practices, customer service, etc.

Bus priority: requests to implement bus priority infrastructure, such as bus lanes. This would require collaboration with territorial authorities.

Bus stop infrastructure: feedback on bus stop infrastructure, such as requests for shelters at stops.

Capacity: feedback related to at- or over-capacity services.

Central Otago service: requests for public transport (beyond community transport) in Central Otago.

Clutha service: requests for public transport (beyond community transport) in Clutha.

Collaboration with institutions: requests related to collaborating with partner agencies and institutions to improve public transport and roading networks. This includes territorial authorities, road controlling authorities, hospitals, large employers, etc.

Community transport: feedback related to ORC playing a role in supporting community transport services (prompted by a question in the submission form).

Dunedin Airport service: requests for public transport to the Dunedin Airport.

Dunedin bus hub: feedback related to the Dunedin bus hub. Main concerns include safety and infrastructure.

Fares base fare: feedback related to the proposed base fare increase to \$2.50 (prompted by a question in the submission form).

Fares concessions: feedback related to concession fares. Main concerns include the proposed child and youth fare concessions (prompted by a question in the submission form).

Fares local/tourists: a wide variety of requests to change fare structure to enable locals and visitors to pay different fares.

Fares zones: feedback related to the proposed zone fare structure (prompted by a question in the submission form) and general commentary on zone fares.



Focus areas: feedback on the draft RPTP's proposed focus areas and priorities (prompted by a question in the submission form).

Frequency: requests to change service frequency, mainly to increase it.

Funding: feedback on funding strategies and sources to meet the cost of public transport and the central government's private share targets.

General: miscellaneous or multi-topic feedback, including praise.

Marketing, promotion, engagement: feedback on ways to market, promote, and engage on our services with the public and key communities.

N/A: Used to note submitters that just answered the survey questions.

Oamaru service: requests for public transport (beyond community transport) in Oamaru, including a Dunedin-Oamaru service.

Operations: operational feedback not meaningfully relevant to the draft RPTP.

Pets on buses: requests to reduce, maintain and increase the ability for passengers to travel with pets.

Public information: feedback on the public information for public transport services, including exempt services (e.g. Intercity). Moderate overlap with the marketing, promotion, engagement category.

Rail and ferries: requests to utilise other transport modes, mainly rail and ferries, for our current and future services.

Regional services: feedback related to public transport services (beyond community transport) being introduced to areas beyond Dunedin and Queenstown. For feedback related to the most high-demand areas for new services - Central Otago, Clutha, Dunedin Airport, Oamaru and Upper Clutha - see their specific category.

Reliability: feedback related to reliability, punctuality.

Routes: feedback related to altering routes and stop locations.

Safety: feedback related to safety and security concerns, overlap with the Dunedin bus hub and school services categories.

School services: feedback involving public transport for school children, including Ministry of Education buses, separate public transport services for schools, altering routes for better school service, etc.

SuperGold: feedback related to SuperGold concessions

Ticketing system: feedback involving the current Bee Card and future Motu Move ticketing system, including payment and top-up options.

Timetables: feedback involving timetables, including the extension of service hours and shortening/lengthening timetables to improve service.



Upper Clutha service: requests for public transport (beyond community transport) in Wanaka/Upper Clutha, including a Wanaka-Queenstown service.

Vehicles electric: feedback related to electric buses.

Vehicles smaller: feedback involving smaller buses. Often discussed alongside increasing frequency and electrifying buses.

Wayfinding: feedback involving wayfinding, including real-time tracking, the Transit app and public information at bus stops. Overlaps with the public information category.



11. Appendix B: Corrected Figure 7: Total Mobility trip funding examples and breakdown

Total mobility trip funding examples

