

James Millar-Coote

From: Chris Powell [ChrisP@nrc.govt.nz]
Sent: Friday, 12 February 2016 9:39 a.m.
To: Small Passenger Services Review
Cc: Tony Phipps; Anita Child; Sharlene Selkirk; Ian Crayton-Brown; mailroom
Subject: FW: Future of Small Passenger Services - Consultation Paper 2015

Categories: Blue Category

To whom it may concern,

The Northland Regional Council (NRC) would like to thank the Ministry of Transport (MoT) for the opportunity to make a submission on the recently released "Future of Small Passenger Services – Consultation Paper 2015" (SPS Paper).

Whilst the NRC acknowledges the need to better streamline and reduce regulatory costs associated with the present system, the content and 5 Options presented in the SPS Paper do not adequately cover a number of important operational and financial factors that will be faced.

Listed below are the NRC's comments relating to the Small Passenger Services – Consultation Paper 2015:-

- It would appear that the SPS Paper is being rushed through, as very little time has been provided for the affected parties to undertake detailed analysis into the implications of the document and provide a detailed submission;
- The document itself is set at a very high level and does not appear to pay any attention to the more important aspects of the day to day operational and financial implications faced by regulatory authorities and businesses i.e. the management and administration of Total Mobility Schemes (TM Scheme);
- Following on from the above comment, it is noted that there is in fact no mention of the needs and capabilities of TM Scheme clients. These clients suffer both physical and cognitive impairments and are heavily reliant on the Scheme to meet their daily transport needs. In order to provide a such a service, a regional council contracts service providers whose operators are trained in the conveyance of TM clients. A majority of these service providers are taxi companies. The NRC is extremely concerned that the MoT would allow a situation where a TM client was placed in the position of having to negotiate a fare, ensure that the fare being charged is the most economical, check that route is being followed is the shortest and have to try and converse with a driver who is not required to speak the English language.
- At present, when the NRC contracts a service provider onto the TM Scheme, the provision of wheelchair hoist vans for disabled clients form part of the contract. Under the proposed options, clarity needs to be provided as to how these clients transport needs will be met;
- All approved authorities administering the TM Scheme must submit applications to both the NZ Transport Agency (NZTA) and their respective council for financial assistance. This is done every three years through both the National Land Transport Programme and Long Term Plans. The funding applications are based on actual historical data. Failure to provide for this, will result in the approved authorities, and businesses will find it extremely difficult to make accurate budgeting assumptions which could potentially lead to inaccurate funding applications being made, to the detriment of the TM Scheme and its clients;
- The SPS Paper makes provision for there no longer being a requirement 24/7 service coverage. In the smaller urban areas, there is already problems being experienced with late night coverage particularly over weekends. This has the potential to leave the more vulnerable members of the populace without transport when most needed. This provision could also potentially lead to a scenario of operators covering the high demand peak periods only and withdrawing their operations from the off peak periods. The NRC would not like to see such a situation, again when it could have a detrimental effect on TM clients and the vulnerable;
- There appears to be a move toward the reduction in security requirements relating to taxi drivers and their patrons. Based on reports to date of related incidents, the NRC does not support the proposed removal of any of the present security related requirements;

- The NRC questions the inclusion of a provision that allows for the driver not having to be conversant in the English language. This has the potential to lead to misunderstanding, anger and in more severe cases assault between drivers and patrons. In addition, the NRC cannot support any such proposals that would lead to difficulties being experienced by TM clients;
- There would appear to be no details pertaining to how the number of operators will be controlled. Failure to adequately control operators and their movements will have a negative effect on parking/ranking facilities, traffic management and road safety related issues.
- It is stated that the monitoring and enforcement of compliance of the new system will be undertaken by the NZ Transport Agency staff. In many of the regions, there is already a limited number of individuals undertaking this work at present and it is extremely difficult to ascertain how they will be expected to cope with these additional duties. What is also of deep concern, is that if this is to be the case and due to lack of required staff the proposed system put into operation is not properly controlled what the resultant outcome will be.;
- The NRC does acknowledge that by streamlining the present system this will allow for greater public passenger transport opportunities in the more rural areas.

In the event the MoT wishes to implement one of the five Options, The Northland Regional Council would support **Option 4** which would *"Create a new single class system in which operators have responsibility for safety and compliance (reduced regulatory burden).*

Should you have questions or require any further information with regard this submission, please do not hesitate to contact me.

Regards

Chris Powell | Transport Manager
 Northland Regional Council | Te Kaunihera A Rohe O Te Taitokerau
 36 Water Street | Private Bag 9021 | Whāngārei Mail Centre | WHĀNGĀREI 0148
 Freephone: 0800 002 004 | DDI: 09 470 1216 | Fax: 09 470 1202
 Visit us: www.nrc.govt.nz
 Follow us on Twitter: twitter.com/NRCexpress
 Join us on Facebook: www.facebook.co/NorthlandRegionalCouncil



Please think of the environment before printing this email