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From: Suzanne Watt [Suzanne.Watt@orc.govt.nz]
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To: Small Passenger Services Review
Subject: Submission - Small Passenger Service Vehicle

Categories: Blue Category

Submission on the Small Passenger Services Review

Otago Regional Council (ORC) staff support the aim of the review- that is to ensure the regulatory environment is fit for purpose and flexible enough to accommodate new technologies. We can support the preferred option 4. However we are concerned about the impact on our total mobility scheme and urban bus services.

Protection is needed for large passenger services which may be undermined financially for example when small passenger services pick up off dedicated bus stops. This issue is difficult to manage under the current regime and a more relaxed approach will potentially make it worse. Where urban services are undermined there should be the ability to manage competition by applying similar criteria to that used in s134 of the LTMA. It is possible changes to the regulatory regime for small passenger service vehicles and the emerging technology it aims to support will undermine the viability of urban bus services which are now contracted for nine years and may also undermine the intent of the public transport operating model and the recognition given to existing operators through exempt services.

As well as regional council's responsibility for managing, contracting for and funding public transport services we also administer and fund the total mobility scheme. Total mobility scheme users are eligible to use the scheme due to having an impairment that prevents them from using public transport. Some types of impairments lead scheme members to be vulnerable- both in terms of their personal safety and or fraud. We recommend the review take proactive steps to ensure the safety of our most vulnerable members of society. We are not sure how the fit and proper, serious compliant/allegations to NZTA and medical fitness will be managed outside of a licensing regime- the report is unclear on this. We agree that the fit and proper assessment and ability to revoke a passenger license based on an assessment that the person is not fit and proper must remain.

We agree that clarity should be provided for services providing for different markets for example carpooling and car sharing schemes serve a different market from that served by taxis and/or limousines- this doesn't have to be a different regulatory regime- perhaps the approach could be tiered.

The review identifies the removal of components of the regulatory regime as the main mechanism for enabling innovation. It seems to be focused on reacting to the emergence of Uber in the New Zealand market and reducing compliance costs for taxis. This may not be a resilient mechanism for managing the balance between innovative services and regulatory requirements in the medium to long term and may have unintended consequences. Thank you for the opportunity to comment on the proposal.

Regards
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pp.

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