

12 February 2016

Ministry of Transport
Small Passenger Service Review Submissions
PO Box 3175
Wellington 6140

Good afternoon

Small Passenger Service Vehicle (SPSV)

On 13 January, Horizons Regional Council co-ordinated a conversation to address the impact of potential changes to the regulatory framework on Small Passenger Service Vehicles (SPSVs). More specifically, conversation addressed the Ministry of Transport's "Future of small passenger services" consultation paper. The conference call included members from Environment Canterbury, Hawkes Bay Regional Council, Taranaki Regional Council, Northland Regional Council and Local Government New Zealand.

After the 28 January meeting, LGNZ circulated a summary of options, concerns and potential solutions that arose from the meeting for further comment from the local government sector, and received clarification and feedback from Environment Canterbury and Otago Regional Council. The following summarises the notes from the initial meeting and follow-on comments. Comments reflect, in some cases, general concerns about impact on the market place as a result of change in the regulatory environment. The local government sector sees this submittal as opportunity to ensure the change doesn't negatively affect existing transport transactions and ancillary components including appropriate safety and security, effective communication and adequate infrastructure.

Option Choice –

A clear majority of councils prefer Option 4. No other preference options were noted.

Concerns –

Security issues

Any issues involving patron or service provider security must be addressed, including:

- a. price security - assurance price charged is that quoted. See Language/Communication below; and
- b. personal security - effective execution of monitoring with cameras and/or individuals.

Loss of service

As the market environment may change, concern was elicited over a potential loss of existing taxi services that provide 24/7 operation. There is belief by some that providers will service at any opportunity (even if demand is very low) may be overstated.

Impact on existing services

One council has highlighted that requirement or protection may be needed for large passenger services which may be undermined by the expanding use of SPSV. For example, using small passenger vehicles picking up customers at dedicated bus stops, which could undermine urban bus services (currently contracted for nearly a decade) and the intent of the public transport operating model.

Compliance and Response to Complaints

There is uncertainty by more than one council as to how required compliance will be resourced and executed. Further, there is interest in having an independent organisation – not NZTA or service providers - handle complaints. For example, it should be easy for a patron or service provider to log a complaint, but the outline for how that may occur is unclear at this time.

Uncertainty and Trials

There is no hard evidence presented of this type of programme working in other countries, so no lessons learned or examples have been shared. It may be prudent to trial the programme at a location to work through unexpected outcomes or streamline implementation.

Language/Communication

There was concern by a few that without meters or registered fares, negotiation is an important component of this activity. As such, a common or agreed transaction language may be essential to ensure understanding and an effective transaction.

Total Mobility

Though it is understood that the Ministry is working on separate total mobility issues, it is important to ensure this issue is not forgotten in the analysis process. Some with disability may have a difficult time negotiating a fare without a meter, and could potentially be vulnerable to fraud.

Infrastructure

There was some inquiry about the sufficiency of existing infrastructure to handle a change in service vehicles. For example, that stacking area in airport queues or other locations might not be sufficient. If not, an alternatives analysis or approach should be created and evaluated.

Budget management. An important point is how councils or business may anticipate costs and expenditure of resources associated with proposed changes. More specifically, what changes will be required and what are the associated costs and timing of implementation? Currently proposed changes create uncertainty in planning an annual or 3-year budget.

Who's
putting local
issues on
the national
agenda?

**We are.
LGNZ.**

Potential Solutions –

As the above-noted concerns were discussed, potential solutions were also identified. They include:

1. **Security.** Required branding on vehicles may provide some transparency in tracking and ensuring some security and comfort by patrons. Retaining requirements for In-vehicle security cameras and
2. **Cameras.** Planning for strategic placement of cameras may ensure rule compliance and patron security.
3. **Trials.** Possible trials at selected locations to measure change and impact of new SPSV regulations and to accurately assess lessons learned for expanded implementation.

Please don't hesitate to call if you have any questions.

Kindest Regards,



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