Freepost 1201





2012 Metro Network Consultation

Environment Canterbury PO Box 345 Christchurch 8140

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. How often do you use the bus?			
Daily Weekly	Monthly	Occasionally	Never
. In general, do you support the proposed o	hanges?		
Yes No			
3. Would you use the proposed new services	that were relevant to you?		
More than current services Not sure	Less than current services Not applicable	The same as curre	ent services

Summary

Red Bus strongly supports the continuation of core cross city routes and the Orbiter at a 15 minute frequency where arguably there is no need to provide a scheduled timetable. Background infrastructure such as journey planner and web apps are able to provide the detail travel information that will appeal to and be used by many PT customers.

Red Bus has significant reservations about the refocusing of services beyond the core cross city services onto the retail hubs. While this may attract new customers with a more convenient retail access the multiple transfers are necessary for non retail workers/travellers which in our view will result in patronage loss. Over the longer term transfer delays will disconnect this group of travellers from public transport.

We recognise that ECan is facing a significant revenue shortfall and changes are necessary. We think though there is an opportunity to restructure these services to meet the broader needs to focus on the retail hubs. From experience we know that passengers frustrated by changes or added personal inconvenience on PT services are very difficult to gain back onto PT unless they are truly transport disadvantaged and therefore have no other choice.

While this submission is made on the RPTP the same commentary applies to the 2012 network change request for feedback. The 2012 network is a subset of the RPTP and its associated network review proposal. I.e. consider this as a submission on the 2012 network proposal.

Page 12 - National Context

This section does not accurately reflect Government's dual objectives for the PT system through PTOM which are replicated below:

- Grow the commerciality of public transport services and create incentives for services to become fully commercial; and
- Grow confidence that services are priced efficiently and there is access to public transport markets for competitors.

As this section currently stands it does not provide the emphasis on commercial behavior that is central to government view about the future of public transport.

Recommendation that the above objectives are accurately recorded in the national context section.

Page 13 - CRPS

It is not at all clear how the proposed network changes will accommodate or enable "good alternatives in areas of urban consolidation". This terminology also makes it difficult to assess whether the target PT market includes the broader employment sector or the residential and associated retail centres.

Page 14 - Strategic context - Transport disadvantaged.

The primary focus on transport disadvantaged and KAC's appears to overlook the largest untapped commercial potential for PT in the longer term and that is the employed community in the industrial

and service sectors who could benefit personally by having access to subsidised transport and who if they travelled on PT would lower the transport demand and reduce emissions across Christchurch. Recommend that ECan broaden the focus of this network plan to include the industrial and service sectors with view to growing PT travel across this group in the longer term. In tandem with this bus priority measures will be necessary to ensure that travel times are comparable with that for the private motor car.

Page 15 - Vision & Outcomes

The RLTS objectives recorded on page 15 do not have any equivalent performance measures to measure that they are being achieved. Recommend that system performance objectives be added for each of the RLTS objectives.

Red Bus would like to see the outcome "support earthquake recovery" expanded into something more meaningful and precise. Its current form provides no indication of commitment or direction.

Page 17 - Reliance on passenger transfers

Passenger feedback on the negative impact on transfers was starkly demonstrated during the period where two temporary transfer stations were operating in Bealey Avenue and Harper Avenue. Passengers initially complained and many subsequently ceased using the bus PT network and have not returned. Although these were poor quality facilities and combined with extended waiting times made through travel an unpleasant experience the transfer delays appeared to be the primary factor in passengers leaving the PT network.

Post earthquake the car remains the preferred travel method for the majority of people travelling to work. Easy access and convenience, especially uninterrupted travel journeys are key determinants for a successful public transport network.

The proposed network with a strong reliance on passenger transfers in our view will create an access hurdle for any passenger where they are required to change buses to reach their destination. Safe, comfortable and accessible transfer facilities will reduce this access hurdle to some extent provided that the wait periods do not add significantly to the overall journey. In this context we think that the proposed roadside shelter at Northland will fall well short of the standard necessary with a direct impact on passenger's preparedness to wait there for another service.

Provided the transfer conditions are acceptable we think that passengers will tolerate one transfer, perhaps two transfers if they have no other transport option and at three plus transfers not at all.

Recommendation: Seek sufficient quantitative analysis using existing and potential customers to gauge their needs and expectations on delay or journey breaks to determine the loss ratio associated with these changes.

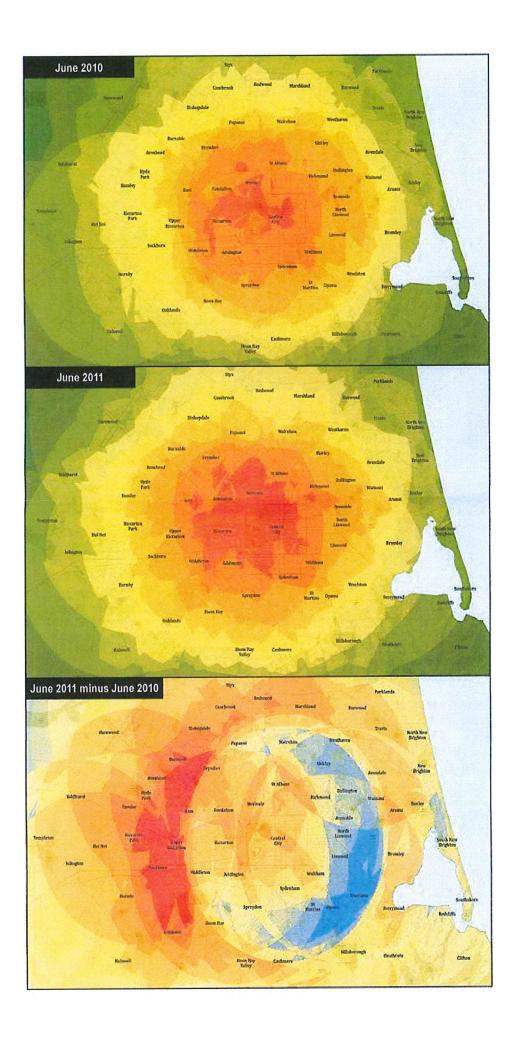
Page 18 - New Network Concept

Reading through this section it is not at all apparent on what data were used to determine these new route structures. In the presentations to operators there was reference to the patronage changes on the pre-existing network combined with the deleterious financial effects from the loss of passengers post earthquake. The earthquakes have clearly caused significant disruption to travel

patterns with the loss of the central city and residential damage. The Red Bus view is that this data on current services alone is not sufficient to quantity the post earthquake demand for PT today.

Post earthquake both Orbiter and Metrostar services remained well patronised by providing a cross city access outside the central city core. Orbiter is being retained under the new scheme but not Metrostar which carries currently the 2nd largest passenger annual volume at 940,000. There is no obvious replacement or alternative for the 940,000 passengers on Metrostar in the new network that provides a direct connection. A significant drop in patronage is expected if passengers are required to transfer one of more times. Recommendation: To leave in place the core of the Metrostar service with the highest patronage and adjust the timetable so that the travel is more time effective for passengers than the current timetable.

Similarly from traffic observations Idris/Straven Road and Graham/Curletts Road are the new transport channels feeding into relocated offices/businesses in the Riccarton, Blenheim, Lincoln roads and Tower Junction area. On the basis of this activity it seems surprising that the new structure does not attempt to meet this demand by way of proposing services along these routes connecting residential areas to the new work sectors. Given the volume of personnel transport now on these routes bus lanes would assist in creating demand for PT services here. The following cell phone map pre and post 22 Feb provides some insights into the quantum shift in work places post quake. No doubt there is other data that if not already included needs to be incorporated into determining the shape of the PT network to test that this proposition meets the current and potential customers transport needs.



Reliance on data solely from within the previous and existing network to inform the development of these route proposals will inevitably lead to the wrong conclusions about demand with the potential to shrink current PT usage and undermine PT utilization in the decades to come.

One weakness of the proposed change is that future service will focus PT services on the retail and associated sectors to a much higher degree than the industrial/business sector when the long term growth from the industrial/business sector looks to be a larger market. The increased number of transfers needed for those from the industrial/business sector using PT is in our view likely to lead to immediate patronage reductions. The potential here is that reduced costs through implementation of this model with transfers causes customer flight leaving the network worse off financially before and limited customer base for future growth. Not a scenario that we think will achieve a net cost benefit or support Canterbury's recovery.

If finances are driving this proposal rather than a strategic recovery plan we would suggest a re-examination of service hours and some routes. For example the current 28 route services Lyttelton and Rapaki. The Rapaki leg almost doubles the travel distance for a tiny population base that is not expected to grow significantly in the future. This resource would more efficiently be applied into an Idris/Straven road service supporting the recovery of Christchurch in an area with real growth potential. Service hours continue late into the evenings and weekends where there is little real demand. The cost of running the service when there are few customers vastly outweighs the small opportunity cost associated with having a bus available. We suggest reducing the extended hours as an effective cost reduction strategy in the short term focusing resources on the primary travel times.

Page 18- Timed connections/Interchanges

In the current road network the infrastructure repairs combined with variable traffic flows in our view actively works against timed connection being practically achieved. If there were bus priority solutions in place that allow buses to remain on time this concept could work. Unfortunately there is no clear commitment for this to happen. It has been suggested that the connecting bus could wait however this impacts on the customers already on the bus who have an expectation that the bus will leave at a certain time to get them to their destination on time. The onward bus also somehow needs to be aware that an incoming passenger is on their way. The logistics and making these connections outweighs any apparent benefit that would accrue for the travelling public. Recommendation that timed connection be abandoned outside of areas where integrated bus priority can ensure timetables are consistently achieved.

Red Bus thinks it is critical that the interchanges are comfortable, safe and well lit and in place prior to beginning any new services requiring transfers to ensure that customers are impacted to the least extent possible.

Page 30 - Policy area 4 Branding

Red Bus supports the proposal to reduce advertising restrictions provided it does not impact on the existing use currently in place.

ECan will be aware that the current Red Bus brand is important to the company and we seek confirmation from ECan that there is no intention within these clauses to make changes to the branding arrangements that will impact on the Red Bus Brand as currently implemented on our fleet.

Page 34 - RUB Compliance

Specifying bus standards beyond the nationally accepted Urban Bus standards set by NZTA will add additional cost to service contracts which seems contrary to the desire to reduce delivery costs wherever practicable. The RUB standard came about as a national and industry commitment to standardise the bus build requirements and reduce overall PT network costs. Recommendation: that this section be deleted to save costs.

Page 36 - Policy 2.4 Explanation

Existing contracts do not include an obligation on operators to provide a contingency service as described here. The RPTP public consultation process is not an appropriate mechanism to introduce new contractual requirements. We strongly advise that this explanation be deleted.

Page 38 - Policy area 3 Fares

We think serious consideration should be given to installation of tag on tag off capability and transitioning to a km based fare system. The impacts of this change is more accurate data on travel journeys which over time should result in more accurately targeted and costed services and no further need for a transfer period. The capital cost of tag on tag off is understood to be \$800k.

There is currently no agreement between Red Bus and ECan that transfer tickets will be available on any of our commercial services whether the customer pays by cash or Metrocard i.e. this section is not correct.

Under the explanation section it states fares will not be used as a tool to maximise overall fare revenue. This note effectively prevents additional value services being implemented that could achieve a commercial recovery. Recommend this section be at least modified to have effect only on the core service standard and associated costs. Alternatively if a more commercial model were adopted to maximise recovery value rather than the somewhat arbitrary 50% and better long term cost recovery may be achievable.

Page 40 - Marketing of new services

While not mentioned explicitly in the RPTP it is our understanding that there are very limited resources available to market these major service changes. In our view strong and comprehensive marketing of any new services is critical to ensure that customers understand that there is a change and the impact of these changes. We recommend that the implementation of changes is supported by a comprehensive marketing campaign.

Red Bus strongly supports the ongoing provision Real time of information, journey planner and mobile real time access. Increasing use of these tools rather than timetables is likely to form the future interaction between customers and services.

Page 74 - Appendix 5

Bullet Point 2 refers to "unit —a grouping of routes that serve a similar market" which is the model being applied in Auckland and Wellington after extensive consultation with the industry and local operators. We contend that ECan's focus on KAC's is inconsistent with the approach agreed through the industry working consequently the units described through this document are not equivalent to the unit approach defacto approved by the government via the working group.

Bullet Point 3 In addition to the incumbency and dominance criteria a further criterion of equivalence is necessary. By way of example the Metrostar service is not equivalent to multiple smaller services. The cost and operational structures of both are significantly different.

Bullet Point 6 Recommendation that the current service contracts expire at the end of their present terms and are tendered at regular intervals thereafter to test for best value. Exceptions to this should only be granted where new fleet such as small buses are being sought that do not have operational value in other New Zealand PT fleets.

Bullet Point 7 While not described in this material the current "PTOM" contracts contain more stick than carrot without any substantive incentive for growing patronage or improving efficiency which is at a core ministerial principle underlying the new engagement model between providers and procurers. The current contracts remain *instructive and controlling in nature* that does not enable the "shared responsibility between Council and Operator for growing the business" as recorded on page 14. Recommendation revise the current contracts to reflect the PTOM as adopted by Auckland Transport.

Bullet Point 8 There is no rationale offered for the 75% threshold or any information about the nature of the revenue sharing arrangement.

Bullet Point 9 Patronage shrinkage and consequent service reduction combined with equitable reductions across the three operators has produced a less cost efficient market than prior to the earthquakes. It therefore seems illogical to negotiate contract extensions when these large contracts have been in place for a longer period than originally provided when first tendered and a tender process is likely to create a more efficient market delivery than before. In our view contracts must be retendered when their current contract term ends. By way of background the sole reason this process exists in the Auckland/Wellington is to allow a negotiated change to enable the transfer of commercial services held by operators prior to the establishment and implementation of the new unit structure. In Canterbury there were no commercial services accommodated in this way. All the services were tendered and should therefore be tendered at contract end.

Bullet Point 10 The structure of ECan' current contract model is in our view inconsistent with the principles of PTOM agreed with the national work party. Consequently an attempt to include any commercial service within the current model would be considered as "contracting over" which would be challenged accordingly. Recommendation delete this bullet point.