

Before the Independent Hearings Panel
at Waimakariri District Council

under: the Resource Management Act 1991

in the matter of: Proposed private plan change RCP31 to the Operative
Waimakariri District Plan

and: **Rolleston Industrial Developments Limited**
Applicant

Summary of evidence of Simon Nicholas Milner

Dated: 3 August 2023

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SUMMARY OF EVIDENCE OF SIMON NICHOLAS MILNER

- 1 My full name is Simon Nicholas Milner.
- 2 I hold a Bachelor of Arts (Economics, 1991) from the University of Essex, United Kingdom and a Master of Arts (Transport Economics, 1993) from the University of Leeds, United Kingdom.
- 3 I have over 25-years' experience delivering transportation design solutions to a range of public and private sector clients.
- 4 I am currently the public transport subject matter expert for PTM Consultants, providing public and private sector advice to clients on their public transport planning requirements and public transport design requirements.

SUMMARY

- 5 My evidence has reviewed existing public transport services in the immediate Ōhoka area. These are limited to Ministry of Education funded school services, serving Ōhoka Primary School and Kaiapoi High School.
- 6 Bus services provided, or planned, in the wider Waimakariri area have then been reviewed, in relation to their proximity to Ōhoka and the PC31 site – it is my conclusion that the existing services are all too distant to be accessed on foot or by other non-motorised means.
- 7 I have undertaken a high-level analysis of potential public transport demand from the PC31 and wider Ōhoka area. The conclusion of this analysis is that total demand will be low, given the future scale of the development if PC31 is approved, but also that the demand trip matrix will be varied – it is not all about peak period commuting to Christchurch. This conclusion has implications for the type of public transport service solution that best supports a demand profile such as this.
- 8 I have also assessed a range of potential public transport service responses in terms of how appropriate and feasible they would likely be in terms of supporting the PC31 site with effective and enduring public transport.
- 9 Generally, the diversion of existing / proposed bus services is unlikely to be a viable solution, for a variety of reasons. I also consider that there is unlikely to be sufficient demand within the Ōhoka area, even with PC31 in place, to sustain an all-day fixed route bus service.

- 10 However, I have considered a new peak period express bus service linked to a future Ōhoka Park and Ride site delivered as part of PC31. I consider it is feasible to extend the existing Route 92 Kaiapoi Park and Ride service to a new terminus at Ōhoka. Whether all Route 92 services need to be extended is questionable, given that this would only be part of an overall public transport solution for Ōhoka – this service on its own would only provide a commuter link to Christchurch destinations or connective trips during peak periods to Kaiapoi and Rangiora.
- 11 The potential to provide a form of on-demand public transport service has been set out in my evidence. This includes a discussion of two other schemes that have recently converted low patronage fixed bus routes to an on-demand model. It is my opinion that the Ōhoka area, given its demand potential, may be best suited to this type of scalable service product. It is also my opinion that an on-demand service linking Ōhoka to both Rangiora and Kaiapoi could remove the need for the proposed future fixed route bus service along Flaxton Road.

RESPONSE TO SUBMITTER EVIDENCE

- 12 The evidence of three submitters responds to matters raised in my public transport evidence submission on behalf of the applicant – Submitter 507 Leonard Fleete (Environment Canterbury), Submitter 507 Joanne Mitten (Environment Canterbury) and Submitter 216 Andrew Methereil (Waimakariri District Council).
- 13 My responses to substantive points raised are as follows.

Submitter 507 Statement of Evidence of Leonard Fleete (Environment Canterbury)

- 14 In paragraph 42, Mr Fleete references the current rural public transport rating of \$25 per household and discusses what this might “purchase” in terms of public transport services. This is the rate applied to areas of Waimakariri District that have no direct access to public transport. A key theme throughout my evidence is that if PC31 was approved, it needs to have public transport service. If it did, then it is more likely that the urban rate (of just under \$200 per household) would be applicable. The higher rating would provide at least \$200,000 per annum to support public transport operations.
- 15 In paragraph 45, Mr Fleete questions whether Ōhoka has the “stand alone demand and rating base to support the necessary level of service to make public transport attractive”. My evidence has indicated that this is unlikely to be the case, but it further states that Ōhoka does not have to “stand alone” in terms of a public transport service – a service designed to support Ōhoka would offer benefits to those in the wider

Mandeville area and also in western Kaiapoi and western Rangiora as a minimum. As noted earlier, this could negate the need for the proposed new fixed route service running along Flaxton Road.

- 16 Paragraphs 50-54 question the ability to serve trips effectively. Mr Fleete will be aware that on-demand services are not “on immediate demand” – that is a private car). An on-demand system for this part of North Canterbury would not operate with a single vehicle – the number of vehicles required is a function of the system design and the economics and demand of the area that is being served. Mr Fleete’s comments regarding the need for additional vehicles in Timaru is testament to the fact that this form of public transport is performing well in terms of actually providing a public transport service that is useful for a wider range of trips. It is accepted that this comes at a higher cost, but it is still viewed as positive – taking car trips off the road, improving accessibility and generally making public transport more relevant. It is my opinion that a higher cost service that is actually used is likely to be viewed more favourably than a lower cost one that largely runs empty.
- 17 Paragraphs 55-62 discuss the proposed extension of Route 92 to a new Park and Ride at Ōhoka. One of the key problems for on-demand operations is their ability to meet peak period demand. It may be the case that only a couple of Route 92 services (at the height of the peak) are needed to supplement an on-demand feeder service. Mr Fleete notes that existing services on Route 92 are performing well, which is at odds with the evidence of Mr Binder, who indicated that the Park and Rides are not well used. The deviation for Ōhoka customers to the central Kaiapoi Park and Ride site is noted, but for most residents of PC31, they would be able to leave the car at home and walk to the proposed Park and Ride station in Ōhoka township. Once on board, it is likely that the short deviation will likely not be noticed.
- 18 Paragraphs 63-65 discuss the evidence of Dr Gabrielle Wall in relation to school travel options. The issue raised by Mr Fleete regarding Ministry of Education services being an “either/or” arrangement is accepted. An on-demand service could support school travel to Kaiapoi High School and also onward connections to schools further afield – via connection in Kaiapoi. In many ways, this is no different from being dropped off by a parent as per many current arrangements from the area that put students onto school buses. In due course there would need to be a conversation between the Ministry of Education and Environment Canterbury regarding this boundary issue – this is something that all councils across New Zealand face, as areas become more urbanised.
- 19 Mr Fleete’s concluding comments in paragraphs 68 and 69 go to the core of the matter in question in terms of public transport matters for southern Waimakariri. The evidence from Mr Fleete suggests that Ōhoka needs to do its own thing and be self-sustaining. My evidence

suggests that this is not how public transport operates and that if PC31 is approved, it will become part of a public transport solution for the wider area. Public transport operates as a system, not as a series of individual elements that all have to perform well in their own right. An on-demand feeder bus model could provide a better performing operational model for this area, with traditional bus services becoming restricted to “mainline” operations between Rangiora, Kaiapoi and Christchurch.

**Submitter 507 Statement of Evidence of Joanne Mitten
(Environment Canterbury)**

- 20 Paragraphs 115 and 116 of Ms Mitten’s evidence form a view, based upon the evidence supplied by Mr Fleete, that an on-demand public bus service would not provide an appropriate public transport solution to support PC31. For the reasons outlined in the preceding paragraphs, my opinion is that the intent and form of the proposed service has not been fully understood by the submitter. The proposed service would not be a single vehicle, paid for and solely used by residents of Ōhoka, but rather part of a changed operational model for how local and feeder bus services are provided in this part of North Canterbury.

**Submitter 216 Statement of Evidence of Andrew Metherell
(Waimakariri District Council)**

- 21 Paragraph 62 of Mr Metherell’s evidence contends that on-demand public transport solutions, due to their higher costs, are better suited to urban fringe areas that are not served by traditional fixed route buses and not to rural areas. I consider that for Ōhoka, the trip distances to local destinations and connection into the main public transport network are not a significant barrier to the implementation of this type of service model. On-demand services are typically a replacement for existing, poor performing bus services or an extension of the public transport network into areas that are not currently served.
- 22 As discussed in my response to points raised by Mr Fleete, my opinion is that this type of service model could both serve the modest demand potential to/from Ōhoka, but also better serve parts of Rangiora and Kaiapoi and also negate the need for most, if not all, of the future proposed fixed route bus service that is planned for Flaxton Road.
- 23 Whilst most applications of the delivery model in a New Zealand context to date have been in urban areas, this is not the only application. For example, Auckland Transport is currently consulting on its proposed Regional Public Transport Plan 2023-2031. The document proposes 9 areas that are emerging or existing, low density residential suburbs for consideration of on-demand style operations. Some of these are semi-rural or urban fringe – e.g. Karaka Lakes to the west of Papakura and around Drury. Some areas are conversion of existing fixed bus routes to on-demand operations and some are on-demand services for emerging residential areas.

- 24 It is a reasonable conclusion that this type of service delivery model is not appropriate for very rural settlements – in terms of linking them to major centres – but Ōhoka is not “very rural” as is the case for other parts of Canterbury such as Leeston, Darfield and Oxford.

CONCLUSION

- 25 It is my opinion that the PC31 site and wider Ōhoka and Mandeville community can be provided with appropriate public transport services to link them to Rangiora, Kaiapoi and beyond to onward destinations in Christchurch. It is also my opinion that what is appropriate for this setting will require a change in service delivery approach from contracting authorities in Canterbury.
- 26 Such a shift away from fixed route, big bus services is already happening in the case of Timaru and elsewhere across New Zealand to better support lower density areas.
- 27 It is accepted that on-demand public transport services have a higher cost structure than traditional bus services, but there is evidence (from Timaru) that this is a price worth paying as it actually provides public transport services that are useful to a wider segment of local residents and ratepayers, as opposed to a basic level of provision that still costs money but is very lightly used and only relevant to a few. The higher quality product also potentially gives contracting authorities the opportunity to charge higher fares and higher rates to support it – there is a strong likelihood that users and ratepayers will be more accepting of paying for a product that is effective and that they are more likely to actually use.
- 28 It has been noted in my evidence that the applicant is supportive of these initiatives and is willing to deliver both capital items and ongoing operational cost support for a period of time to trial services, so that they can be adjusted to work as best as they can in the longer term. This will, however, require a change of approach from contracting authorities to embrace this in the wider Rangiora / Kaiapoi / Woodend / Pegasus area.
- 29 If PC31 is approved, it needs to have public transport services to support it. Whilst this is not currently in any plans or future funding programmes, this is because PC31 does not exist and the current Ōhoka community is not of a scale or density that would be able to support any form of viable all-day public transport operation.
- 30 It is my belief that PC31 and the proposed capital investment and potential initial operational funding support from the applicant would give local authorities the financial support to trial and then embed innovative public transport solutions to support this type of semirural community. This service could also support residents in west Rangiora, west Kaiapoi and potentially further afield, with a

better form of public transport than their current low frequency,
fixed route bus services.

Dated: 3 August 2023

Simon Nicholas Milner