

Waka Kotahi's Public Transport Design Guidance

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Waka Kotahi's *Public Transport Design Guidance*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

Comments

4. NMH is supportive of the design principles of the guidelines in regards to being accessible, safe and supporting mode shift and positive urban design. NMH notes, however that the design principles do not specific state "supporting a transition to a low carbon transport system". A low carbon, safe and healthy land transport system is clearly articulated within Waka Kotahi's *Toitū Te Taiao Sustainability Plan*¹ with work streams relating to "investment for sustainable outcomes", and "leading by example". Therefore NMH recommends that the vision from Toitū Te Taiao is replicated within *Public Transport Design Guidance*.
5. The new *Requirements for Urban Buses* in New Zealand has been released as of August 2021. These guidelines and the new requirements interlink. NMH was disappointed to see that the new requirements only state that bike racks as optional (at the discretion of Councils). NMH does not believe that this aligns with the Strategic Priorities of the Government Position Statement on Transport where "Better Travel Choice" which "requires all parts of the transport system, be it roads, rail, public transport, and walking and cycling routes, to work together"². NMH continues to advocate for bicycle racks to be requirement for all new urban buses.
6. **Driver Facilities:** NMH supports the overall content of the function and features section regarding Driver Facilities. NMH does note that the provision of toilets is only given a "recommended" status rather than "mandatory" status for short term breaks. NMH disagrees with this approach. It is important that drivers can have safe and easy access to toilets in their rest breaks. Therefore NMH recommends that toilets for short-term breaks are mandatory.

¹ [Toitū Te Taiao - Our Sustainability Action Plan | Waka Kotahi NZ Transport Agency \(nzta.govt.nz\)](https://www.transport.govt.nz/assets/Import/Uploads/Our-Work/Documents/GPS2021.pdf)

² <https://www.transport.govt.nz/assets/Import/Uploads/Our-Work/Documents/GPS2021.pdf>

7. In our initial feedback in 2019, NMH advocated for driver facilities to include opportunities for physical activity i.e. gym equipment. We note that this approach has not been included in the draft guidelines. Research has shown that bus drivers were sedentary for more than 12 hours a day on workdays which is three hours greater than typical office workers, UK research³ showed that 74% of bus drivers in the study were overweight or obese, and at increased risk of cardiovascular disease. Provision of exercise equipment in breakrooms may improve overall health of bus drivers therefore NMH recommends gym equipment is included into driver facilities.
8. **Getting to and from public transport - Car Connections:** NMH supports the wording in this section but notes that limited mobility areas are not mentioned. Consideration has been given to drop off/pick up zones and NMH endorses that, but there is no mention of parking for those with limited mobility. A greater number of limited mobility carparks at park and rides would provide people with further transport options. In addition, 'age-friendly' parking spaces (similar to parent and baby spaces) could also be installed. These parks are wider than standard parks and have good access to public seating and toilets, and be well-lit and easily accessible. Normal parking rules would apply but the public are encouraged to leave 'age friendly' spaces free as a courtesy to older people in the community. The installation of 'age-friendly' parking spaces has worked successfully in Ireland with the number of spaces allocated increasing yearly.⁴
9. **Getting to and from public transport – Walking:** NMH supports the breadth of detail that Waka Kotahi have added in terms of the sections on getting to and from public transport. The information is clear and concise. NMH is pleased to see that the importance of safety and accessibility have been highlighted within this Walking section. NMH endorses the use of Crime Prevention Through Environmental Design (CPTED audits) as a tool.
10. NMH does note concerns, however, about the Case Study in this section regarding the strategic placement of fewer bus stops to reducing bus travel times. The argument presented gives no consideration of the demographics of the affected area. Within a community, there will be a percentage of people who will have mobility issues, such as those who are over 75, have a disability, or have young children. These people may not be able to travel longer distances to bus stops and therefore removal of a bus stop may mean they won't use public transport. This case study needs to articulate that there may be an opportunity cost for those with mobility issues should bus stops be removed.

³ <https://www.sciencedaily.com/releases/2016/03/160310112101.htm>

⁴ https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/AF_PublicRealm_online-1.pdf

11. Getting to and from public transport: The first and last mile connections are vitally important and the consultation material discusses this in-depth. One matter that is overlooked is the role bus stops can have to encourage active play and incorporate play into normal daily routines. Bus stop designs could integrate play equipment such as swings, or hopscotch. Such additions would encourage people an opportunity to be active and also be an attractive destination which would encourage people to use public transport. This has worked successfully around the world.^{5,6} A playful design may even inspire community pride and civic trust.

Conclusion

12. NMH thanks Waka Kotahi for the opportunity to comment on the Waka Kotahi's *Public Transport Design Guidance*.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lexie O'Shea', written in a cursive style.

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⁵ [Texas Border City Turns Bus Stop into Fun Play Place \(playgroundprofessionals.com\)](http://playgroundprofessionals.com)

⁶ [For Family-Friendly Cities, Build Play Beyond the Playground \(nextcity.org\)](http://nextcity.org)