

19 March 2021

Greater Wellington Regional Council  
Via email: publictransportplan2021@gw.govt.nz

## **Submission on the Draft Regional Public Transport Plan**

Thank you for the opportunity to provide feedback on the draft Regional Public Transport Plan 2021-2031 (the Plan).

The general direction of the Plan is well aligned with Wellington City Council's policies, strategies and plans. We therefore support the vision and direction set out for public transport in the region as set out in the Plan. We support the three strategic areas of focus: fleet decarbonisation, customer experience, and mode shift. We agree that working with Let's Get Wellington Moving (LGWM) to deliver mass rapid transit and implement the Bus Priority Action Plan are critical to achieving a high quality, high capacity, high frequency, more reliable core network. We wish to reiterate that infrastructure changes to enable these step changes in service levels need to be executed with full recognition of the multimodal needs of the corridors, and that good levels of placemaking must be appropriately incorporated in final plans.

We are looking forward to a fare review which addresses the Council's fairness concerns. We note the Plan states "*simplify fare products in the lead up to the integrated ticketing*" and "*review fares and use customer insights to ensure the current fare structure and pricing approach is fit for purpose and promotes fairness and affordability for customers, ratepayers and funding partners*" (page 123). We note that the plan states that the period covered by the Plan, GWRC will continue working to improve fares and deliver integrated ticketing for all public transport travel. We support these statements and a fare review to promote fairness and affordability for customers, and also to consider how fares contribute to increased ridership and regional mode shift targets set out in the Regional Land Transport Plan. Further to the Council's submission to the Public Transport Fare Review 2017, we remain concerned that the current fare zone boundaries are fundamentally unfair and result in Wellington City customers paying more for equivalent length journeys taken elsewhere in the region. We request that this matter is given further consideration when the fare system is reviewed in the lead-up to implementing the national ticketing solution mid-decade., and we reiterate our offer to work collaboratively with you during that review.

We support the proposal to establish a unit to provide a targeted service from Wellington Station to Wellington Airport, and request that the service design allows for the service to be frequent, reliable and rapid.

We would like to further understand the breakdown of the 40 percent increase in mode shift to public transport and active modes by 2030, in order to understand the relative contributions from rail, Wellington bus services and other services. We understand that this stretch target has been signalled in the draft regional Land Transport Plan and that achieving it is highly contingent upon making real progress with the signalled investments in mass rapid transit, bus priority and the rail network.

The following points of clarification are sought to ensure the final Plan is well aligned with the legislative requirements, Regional Land Transport Plan (RLTP) and LGWM.

Page 67 para 5 states:

*Metlink will work with the Territorial Authorities in our region to further define rapid transit corridors including to define which individual train stations on the rail corridors are access points to rapid transit. These access points will be at stations where there is already significant urban development. Metlink will work with its local and central government partners to communicate and discuss any proposed network policy change to communities on the core public transport network. Ultimately, any urban planning decisions relating to intensification are subject to each Territorial Authority's district planning process.*

We support the general message of this paragraph, but the first and second sentences (as highlighted) are different from the National Policy Statement on Urban Development (NPS-UD) and the earlier paragraphs in the Plan. The first sentence says there is work to "*further define*" rapid transit corridors, but above it already states that rapid transit corridors include the Kāpiti, Hutt, Melling and Johnsonville rail corridors, and the LGWM future rapid transit corridor. We wonder if the Plan may have meant to reference investigating if any high frequency bus routes qualify as rapid transit

corridors? The second sentence is inconsistent with the NPS-UD definition: “*rapid transit stop means a place where people can enter or exit a rapid transit service, whether existing or planned.*” Whether there is “*significant urban development*” is not definitive.

We suggest a better way to phrase these highlighted sentences could be something like: Metlink will work with the Territorial Authorities in our region and central government partners to adopt a consistent approach to describing rapid transit corridors, and which rail stations and stops provide access to rapid transit services. This will ensure transport and land-use planning around rapid transit stops is done in an integrated and iterative way. This will ensure that any up zoning required under the NPS-UD that is being considered in a Resource Management Act hearing will be able to consistently refer to rapid transit services and surrounding urban issues across the region.

Pages 75 – 79: Talks about the Smarter Connections Strategy (about Park and Ride areas) but misses an opportunity about enabling transit-oriented development (TOD) there, following the existing TOD directions in pages 67 and 84. It’s mentioned under Effective Design, but deserves more discussion given Wellington’s housing crisis and this Plan’s content on TOD. This is also consistent with the GPS on Transport and on Urban Development that generally promotes TOD. We suggest expanding to four key principles by adding:

- **Transit-oriented development**  
Wellington has a significant shortage of housing. Some Park and Ride areas next to train stations could be suitable for apartments over the car parks, either as public-led affordable housing developments, or by selling or leasing air rights above the parks. The Park and Ride areas would need to be zoned for medium or high density development, and should be free of hindering designations. Car parking for train users could still be provided. Greater Wellington, Territorial Authorities and KiwiRail will work together to investigate whether certain Park and Ride facilities are suitable for residential development and how that development could occur to optimise transit-oriented development.

For completeness, we suggest adding a bullet point reflecting this point into f) in the table on page 120, e.g.: Investigate with Territorial Authorities and KiwiRail whether certain existing Park and Ride facilities could be developed for housing above car parks.

We look forward to continuing to work collaboratively with GWRC on these matters to achieve our mutual goals.

We do not wish to be heard in support of this submission.

Should you require any further clarification, please contact:  
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Yours sincerely



**Barbara McKerrow**  
**CHIEF EXECUTIVE**