

19 March 2021

Greater Wellington Regional Council
100 Cuba Street, Te Aro
PO Box 11646,
WELLINGTON 6011

Dear Sir / Madam

REGIONAL PUBLIC TRANSPORT PLAN 2021

Thank you for the opportunity to submit on Regional Public Transport Plan 2021. We would like to make the following comments.

General Comments

1. In general, Kāpiti Coast District Council (Council) supports the proposals contained within the RPTP. We are strengthening our infrastructure to support a wide range of transport options, for example, through our Stride and Ride Kāpiti Coast programme. However, public transport (bus and rail) provide key connections and much needed transport to some of our most vulnerable residents.
2. The Kāpiti Coast has seen significant growth in the last 30 years, and this trend is expected to continue. The Regional Growth Framework (RGF) has signalled substantial growth in the Region (200,000 people), of which around 43% are to be accommodated along the Western Growth Corridor from Tawa to Levin.
3. The Council through our Growth Strategy, will be responding to the RGF National Policy Statement on Urban Development (NPS-UD). A key part of supporting this will be a need to invest in public transport infrastructure that provides for growth in a co-ordinated way to achieve the strategic objectives and transport priorities identified in the RLTP. More detail on this is provided at paragraphs 15 to 26 of this submission.
4. This investment needs to take into account the future patterns of growth such as the Western Growth Corridor, and so must form a key part of our thinking to ensure that that new brownfield and greenfield development, is well connected, supports mode shift, and addresses climate change.

5. Kāpiti Coast District Council considers that the development of public transport services, particularly to the north of our District, will be significant in supporting sustainable growth, giving effect to the NPS and the RGF, and travel patterns.

Public Transport - Bus

6. For many years the public transport system has been identified as an area for improvement by the local community and we consider that there are opportunities to make further improvements. Council has advocated for some time for improved services to the north of our District. This will become increasingly important to support the level of growth identified in the Regional Growth Framework, give effect to the National Policy Statement on Urban Development, and capitalise on the opportunities it presents.
7. Internal connectivity across the District will play a critical part in achieving mode shift both now, and in the future where we will see significant growth. In particular, we are keen to ensure that connectivity is improved both within Ōtaki and from Ōtaki to the north and south, as well as to the railway stations in Ōtaki, Paraparaumu and Waikanae, between the beach communities, and to key destinations. Key destinations will include town centres, areas of employment, tourist attractions, health care facilities, financial and legal services and open space. Kāpiti Coast District Council considers that the development of public transport services, particularly to the north of our District, will be significant in supporting sustainable growth. Unless there are significant and planned public transport improvements, there is a risk that the objectives of the RLTP cannot be met. These improvements could include:
 - New services in growth areas;
 - Taking advantage of opportunities created by the Expressway projects;
 - Improved services to key destinations; and
 - Increased frequency in existing areas.
8. Supporting these improvements will need to include a range of measures such as improved integrated ticketing and more outlets supporting ticket purchase. As an example, currently there are very few options for loading credit on snapper cards in Kapiti, which can create accessibility problems for those without, or unable to use online options. This needs to be addressed both now and in the future. Free bus travel is also available for monthly travel tickets, but this does not support infrequent users. Infrequent users have also been at a disadvantage from having to carry cash to purchase tickets on board trains, since options to purchase tickets at stations are limited or non-existent, except during the COVID-19 pandemic when cashless purchasing became necessary.
9. In considering accessibility and improved services to key destinations the needs of residents with mobility issues needs must form an important part of thinking in service routes and delivery. This includes the ability to board a bus, whether the bus takes them to the right place at the right time, and wayfinding. As an example, every third bus runs from the rail station to Coastlands but this leaves vulnerable users waiting some time for connections in a room not in close proximity to the bus stops.

Public Transport Rail

10. There has been high demand on the Kapiti Line, with patronage steadily increasing, and we have seen evidence of a strong recovery post the 2020 COVID-19 lockdown. This demand is likely to continue, and we support measures to improve rolling stock and infrastructure on the Kapiti Line. However, services in the north of the District are relatively

poor and we note that, whilst there is a business case proposed for improvements to the Manawatū line, implementation is likely to take place in the medium term to 2028.

11. Council considers that the rail network is critical to encourage mode shift, particularly for commuter journeys within our District and into the City. Currently there is heavy reliance on the private car, where over 50% of our workforce commute in a private vehicle or company car and over 30% of our residents travel outside of Kāpiti for work. This contributes to climate change and transport issues within the District and in Wellington City such as parking and congestion.
12. The North Island rail network is electrified from Wellington station to Waikanae, and also from Palmerston North to Te-Rapa north of Hamilton. We consider that there is a strategic opportunity and good reasoning to extend the electrified passenger train network further north in the Region.
13. This is why Council has sought for some time the extension of double tracking and electrification of the rail north of Waikanae, to better serve communities such as Ōtaki in the north of our District. We would like to see this reflected and prioritised in the RPTP and consider that addressing the needs of Ōtaki, and advocating for electrification will go some way to delivering sustainable growth identified in the RGF, as well as supporting the achievement of the RLTP's headline targets. Specifically this relates to the targets of a reduction in transport-generated carbon emissions by 2030, and the increase in active travel and public transport mode share by 2030.
14. With regards to targets, we note that the Climate Change Commission has recently provided advice which may require further thought. In particular the need to more quickly decarbonise transport if we are to achieve net zero emissions by 2050, and the Climate Change assumptions that "walking, cycling and public transport can be increased by 25%, 95% and 120% respectively by 2030".
15. The Council has submitted on the Draft New Zealand Rail plan including:
 - calling for infrastructure improvements and to be implemented more quickly than is envisaged in the plan;
 - supporting investment in the Capital Connect service, and consider that funding for both infrastructure and rolling stock is required to realise service improvements;
 - acknowledging investment proposals for the Kāpiti Line but seeking that these should be recognised as more than just future opportunities;
 - supporting full electrification of the North Island Main Trunk Line;
 - urging that cross border complexities should not disadvantage our community and project delivery; and
 - asking for further detail on the new platform at Waikanae.
16. Unless there are significant and programmed improvements to public transport services between Ōtaki and the rest of the region, there is a risk that the Regional Land Transport Plan (RLTP) Objectives will not be achieved. In particular Objectives 1 (people in the Wellington region have access to good, affordable travel choices;) and 5 (journeys to, from and within the Wellington Region are connected, resilient and reliable). We believe that reliability, accessibility, affordability and journey time are major drivers in attracting public transport use. In considering reliability this should relate to both rail and bus, and the connections between them to support an improved end to end journey experience, and improved connections to regional and international transport hubs such as Wellington Airport.

Planning for Growth

17. With the construction of the Roads of National Significance within the Kāpiti Coast District (Transmission Gully, M2PP, PP2O, and the future Ōtaki to North Levin expressway), Ōtaki is set for high demand for people who work in the region but are seeking more affordable housing. These growth pressures are already being seen in Ōtaki, as house prices and rents rise to meet demand.
18. If we are to support the level of growth indicated in the RGF there needs to be a clear and co-ordinated implementation plan that links the delivery of new development to the delivery of high quality public transport.
19. As identified, the RGF anticipates Kāpiti will provide for a substantial proportion of the expected 200,000 extra people who will need to find homes and jobs across the wider Wellington region, including Horowhenua. It specifically anticipates Ōtaki will be a significant part of that additional housing capacity both through brownfield infill type intensification of existing urban areas, but also greenfield around its fringes. It also signals potential for large greenfield area south of Ōtaki.
20. Kāpiti District is classified in the National Policy Statement on Urban Development (NPS-UD) as a Tier 1 council alongside Wellington City and Porirua. This will need to be carefully considered in the context of a plan change, and we need to make some decisions about how much intensification should occur in Ōtaki. A major criteria is connectivity to public transport and related to that, what's planned for the railway station. To this end, we would find it difficult to encourage or make provision for development if improvements are not implemented in a timely manner, or can be considered to be planned within the context of the NPS.
21. The NPS-UD has a particular focus on urban intensification around what it defines as "rapid transit services/stops". That definition centres around some key terms such as "quick", "reliable", "frequency" and "capacity". It is possible for a stop which doesn't currently meet that definition to still be considered a rapid transit service/stop if sufficient evidence exists it is "planned" to be.
22. The RPTP states that the identification of rapid transit stops will be determined collaboratively with local authorities. As identified, the level of service in Ōtaki is low with only one diesel passenger service to Wellington. We understand this service is provided by another operator which means that, if it ceases to operate, Ōtaki will have no passenger rail service into Wellington unless it is resourced by GWRC. To this end, we support improvements to Manawatū Line including fleet renewal and service increase.
23. We also seek further clarity around what this means, and in order for us to understand if we should consider it to be "planned". In other words are the necessary investments going to be made in the short to medium term that will turn that service/stop into a "quick, reliable, frequent and high capacity" service/stop? .
24. If there is strong evidence for Council to consider Ōtaki to be a "planned" rapid transit stop, this is likely to support higher density of urban development in Ōtaki being enabled through an upcoming change to our district plan. In turn, this should improve future uptake of public transport in Ōtaki as well as assisting council to meet its obligations to provide sufficient development capacity in our district under the NPS-UD.
25. We note that the RLTP strategic objectives include "Journeys to, from and within the Wellington Region are connected, resilient and reliable" and consider that there should be a stronger message in the RLTP around the links between Kāpiti and Horowhenua.

26. These links are likely to strengthen further in the future, and many of our residents look north for services, including healthcare, employment, legal services, education, and economic opportunities. Kāpiti is the gateway to the Wellington Region. This should be supported by transport links that extend beyond road and rail projects and partnership working will be fundamental to its success.
27. We therefore seek that full consideration is given to improving bus services in Kāpiti, particularly the very limited services within Ōtaki, and recognition of the relationship with Horowhenua, and connections between Ōtaki and Levin. To achieve this we consider that cross border working between the relevant District and Regional authorities, KiwiRail and Waka Kotahi will be necessary.
28. In considering the future development along the Western Growth Corridor, and delivering the housing levels identified in the RGF, improvements may also need extend beyond those already identified in the RLTP. In particular, there is a need to address how future development areas may be served, for example, new stations and better connectivity between modes.

Collaboration

29. Given our comments on growth and public transport provision in the north of our District, we wish to see closer partnership working and engagement with Greater Wellington Regional Council when undertaking bus network reviews and developing route changes.
30. Similarly, we would also urge that Greater Wellington Regional Council work with the Council to identify opportunities for areas / opportunities where joint working and funding can support and encourage an increase in public transport use and the further development of multi modal interchanges.
31. As an example, we look forward to working with Greater Wellington Regional Council on the development of Station Access Plans, and strongly advocate for improved public transport services in Kāpiti.
32. Collaborative working should extend beyond the regional boundaries and believe this should be recognised further. As identified in our submission on the Draft New Zealand Rail Plan, cross border complexities should not disadvantage our communities and delivery.
33. Please find below more detailed comments on the RPTP, these are broken down into the relevant sections of the RPTP.

Section 1: He Kupa Whakarāpopoto: Executive Summary

- 1.1 The Council is supportive of the strategic priorities of mode shift, decarbonising the public transport fleet, and improving the customer experience. Many of the actions supporting these priorities are consistent with the focus areas in Councils own Sustainable Transport Strategy. Councils focus areas include delivering mode shift through supporting partners in delivering mode shift plans, delivering infrastructure to support mode shift, improve connectivity between transport modes, and supporting the development of Station Access Plans.
- 1.2 Similarly, Council is seeking to address climate change, noting that 57% of the District's greenhouse gas emissions are from transport, with the majority of this being from light

vehicles¹. Council will continue to advocate to Central Government to ensure that the right signals, initiatives and legislation are in place to enable emissions targets to be met, as well as advocating with partners for more efficient fleets and environmentally friendly fuel types. Council is also seeking improved accessibility for all, addressing transport poverty, and supporting the delivery of more shelters, electric vehicle charging points, bike parking and facilities at key destinations, including rail stations.

- 1.3 We note that the RPTP identifies Let's Get Wellington Moving, the National Ticketing Solution, and the Wellington Regional Mode Shift Plan, and we are supportive of measures that will improve the transport journey for residents of Kapiti. However, these benefits need to be identified, and improvements in Wellington City should not be at the expense of improvements elsewhere in the region.
- 1.4 We support improved rail frequency and investment on regional rail services, rolling stock and infrastructure. We note, however, that many of the measures identified to provide a high quality, high capacity, high frequency core network on page 13 of the document are Wellington City centric, and we consider that this should not be at the expense of improvements in other parts of the region. This is important, as the document recognises that 75% of the Wellington region's population lives north of the Wellington CBD.
- 1.5 The Kāpiti Coast District Council Sustainable Transport Strategy also sees that integrating transport and land use is a focus area for the future. We believe that, whilst Council can support mode shift by making sure that new development plans for all modes and connects effectively into the existing transport network, this must also be supported by a level of public transport service that encourages use and supports growth. Territorial authorities have a good understanding of future developments that may help shape service planning and improve viability, but decisions in route planning can also inform road design for new developments. As such we look forward to working with Greater Wellington Regional Council to achieve measures to support better public transport use.
- 1.6 We agree that taking a customer centred approach, undertaking early community and customer engagement, and understanding customer needs will ensure that there is a public transport system that better reflects requirements.
- 1.7 The Council considers that it is important for Greater Wellington Regional Council to work with territorial authorities when public transport services are planned to ensure that the needs of our communities are taken into account. To this extent we are pleased that this has been recognised in the document.
- 1.8 By working with territorial authorities a greater understanding of future development locations and metrics, and issues experienced within Districts can be considered and help inform network planning.

Section 2: Ko tō mātou rōpū ā-rohe waka tūmatanui. Our regional public transport network

2.1 We support Metlink's network planning to:

- Plan the network so that it operates efficiently and effectively;

¹ AECOM. 15 May 2020. Kapiti Coast District Greenhouse Gas Inventory.

- Review services to ensure that they are meeting the needs of the community that they serve and providing value for money for users, ratepayers and taxpayers; and
 - Prepare the Wellington Regional Public Transport Plan, which includes identification of the public transport services that are integral to the public transport network; the policies and procedures that apply to those services; and the information and infrastructure that support those services.
- 2.2 In reviewing these services we urge that the end to end user experience and journey time is taken into account both in terms of accessibility and ticketing, as this is key to ensuring greater use of public transport for a wide range of journeys such as work and to access to medical care.
- 2.3 When looking at accessibility an issue experienced in Kāpiti, for example, is that people find it difficult or are unable to attend appointments in Wellington hospital by public transport. This is because the public transport services do not exist or are not sufficiently integrated to allow people to attend appointments on time and return home easily. In part this is about service improvements, but multi modal integrated ticketing approaches are also important. It also needs to be recognised that residents in the north of Kāpiti look north for services, such as health, and jobs, therefore joint working with regional partners is fundamental. We do not consider that authority boundaries should be a limit on supporting our communities and the delivery of key outcomes.
- 2.4 We agree that fares, ticketing, customer service and information is an important part of encouraging public transport use, and consider that ensuring affordability is also key to achieving this. Our Sustainable Transport Strategy supports working in partnership to deliver affordable public transport for all, and seeking opportunities to align development and funding. To this end we are pleased that the fare and ticketing changes in 2018 have resulted in more affordable fares and increased Snapper card use as a way of standardising payment options. However, there remains a proportion people that are transport disadvantaged and are unable to access opportunities as a result of a mobility issues, their location and income.
- 2.5 Many Kapiti residents are on fixed incomes, and affordability has become a significant issue in the District. Demographics can influence travel patterns and the District has a large population of older residents, a relatively high number of people who are not in the labour force and/or are on fixed incomes, and several areas of high deprivation. This can lead to a reliance on the private car if affordable and effective public transport options are not made available².
- 2.6 We understand that the RPTP acknowledges that for some communities there are limited public transport services and lack of proximity to bus stops, but we seek further information on what is meant by “this is something we are working to improve”.
- 2.7 This section of the RPTP recognises that the Kāpiti Line is electrified, while the Wairarapa Line is not electrified beyond Upper Hutt. However, the RPTP does not identify that the Manawatū Line which serves the northern part of the region is not

² According to the 2018 Census, the median age in the Kāpiti Coast District is 47.9 which is 2% higher than it was in 2013; 40% of residents are not in the labour force compared to 31% nationally; estimates suggest close to 40% receive income from New Zealand superannuation or Work and Income, compared to approximately 25% in the wider Wellington Region; and the median income is the 2nd lowest in the Wellington region (\$29,700 compared to \$36,100 for the entire region).

<https://www.metlink.org.nz/assets/Network-maps/untitled.pdf>

electrified. While there is a Programme Business Case relating to this, Council would like to see it moved forward because the limited services from Ōtaki are not supporting residents and future growth, and have the effect of creating parking issues in Waikanae as commuters from the north seek to access the more frequent service from Waikanae.

- 2.8 We agree that “getting people out of cars” by increasing the share of travel by public transport, walking and cycling (mode shift), has a critical role to play in improving our wellbeing by shaping a more accessible, safe and sustainable transport system”. Our focus areas in the Kāpiti Coast District Council Sustainable Transport Strategy is consistent in this desire.

Section 3. Ko ngā tutukinga mahi mai i te tau 2014 What we have achieved since 2014

- 3.1 We note the changes that have already been made to the public transport network and associated infrastructure, such as bike facilities at Paraparaumu. We are also pleased to see that the patronage post lockdown has seen sustained patronage growth and recovery. We consider that this demonstrates a high desire to use public transport that should be supported by providing high frequency and high quality services.

Section 4: Ko te pikitia nui: Ko tō mātou aronga rautaki The big picture: Our strategic direction

- 4.1 Kāpiti Coast District Council note the recognition of the influence the National Policy Statement for Urban Development will have on urban planning in the Wellington Region. We look forward to working with Greater Wellington Regional Council to further define rapid transit corridors including which individual train stations on the rail corridors are access points to rapid transit. In supporting the integration of transport and land use, it is right that both the transport and planning parts of Council work together to implement the requirements of the National Planning Statement on Urban Development.

Section 5: He aha tā mātou e whai ana What we want to achieve

- 5.1 We have made general comments on some of the initiatives identified in section 5.1 of the RPTP in the general comments of this submission. We support these initiatives, such as a ten minute rail frequency. However, more detailed comments section 5 are identified below.
- 5.2 We support the target to achieve mode shift and the need to increase integration between modes. There should, however, be recognition of the role that Territorial Authorities have had in supporting the development of the Wellington Region Mode Shift Plan as well as implementing some of the measures identified in the table on pages 71 and 72. Working together will be integral to the success of achieving mode shift, especially with regards to shaping urban form and delivering infrastructure to support cycling and walking.
- 5.3 The document recognises at page 74 only one of the key opportunities for mode shift in Kāpiti when there are more shown in the Wellington Region Mode Shift Plan, and these should be identified to be consistent with the level of information provided for other Districts. These improvements include:
- Higher density centre development;
 - Nodal development and improved multi-modal access to train stations, rail improvements;
 - Walking/cycling improvements in Paraparaumu;
 - Kāpiti Road, Rimu Road, town centres; and

- Expressway cycle routes.
- 5.4 We agree that Park and Ride needs to be developed in a more integrated manner, and as stated previously, we support integrated ticketing as well as supporting the need to provide access for all including active modes.
- 5.5 We welcome the station access hierarchy and working with Greater Wellington Regional Council on the development of Station Access Plans, and improving multi modal access to public transport. The opportunities provided through the revocation of State Highway 1 will help to achieve this outcome.
- 5.6 We are pleased that the document recognises that Waikanae is a high demand Park and Ride area and advocate that, whilst initiatives such as carpooling are useful, a key part of the solution to address demand at Waikanae is improved services to the north of the District. As some of the Kapiti's growth will be in Otaki, and we are seeking improved public transport services in the north of Kapiti, it should be recognised that parking demand may increase at Otaki rail station. This needs to be carefully considered within the development of Station Access Plans, and addressed in the RPTP.
- 5.7 We support the projects identified in the Wellington Regional Rail Plan and have been advocating for improved services on the Manawatū Line for some time, as this will improve accessibility for residents in Ōtaki and management of parking pressure at Waikanae, and support growth in our District. However, we note that these seem to be longer term plans, and Council submits that these improvements should be brought forward.
- 5.8 We note proposals for procuring the electric multiple unit fleet, and that the document recognises the need to electrify infrastructure to the Capital Connect train line. We are pleased that Greater Wellington Regional Council is working with Waka Kotahi to advance these plans and funding for a business case for this work has been committed.
- 5.9 We support the view from the Regional Growth Framework that, if development is to take place along transport corridors, elimination of the single track section between Pukerua Bay and Paekakariki and service improvements north of Waikanae need to be key focus areas.
- 5.10 We support the proposals to decarbonise the public transport fleet. Addressing climate change is a focus area in the Kāpiti Coast District Council Sustainable Transport Strategy, particularly as the Kāpiti Coast District Council has declared a climate change emergency. Transport is one of the biggest contributors to greenhouse emissions so decarbonising a significant transport fleet in the Wellington Region is a positive step in the right direction to achieving carbon reduction targets.
- 5.11 We understand that the overarching recommendations from a Bus Network Review included:
- Improving the experience of transferring from bus to train (or bus to bus) and vice versa
 - Increase the span and frequency of services so that public transport is available earlier and later in the day and on Sundays and at peak periods; and
 - Review route coverage in light of residential growth.
- 5.12 We support these recommendations, and advocate for them to be implemented as quickly as possible.

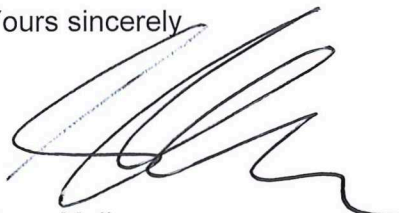
- 5.13 We agree with page 94 of the document that consistent and convenient connections between rail and bus can be difficult to achieve in Kāpiti and support the measures to address these issues. However, we would like there to be a stronger commitment to achieve these measures, than only confirming that this will occur when and where possible.
- 5.14 On page 95 of the document it is identified that Metlink will consider if there is sufficient demand to operate Sunday services where there are Saturday services, and provide bus timetables that offer more travel options for the journey to work in Kāpiti. In considering this sufficient demand, we would suggest that this should take account of future growth plans and whether in offering better and more frequent services more demand would be created.
- 5.15 The tables on pages 95 and 96 identify minor route change that have been recommended for consideration. Council seeks the earliest implementation of these changes.
- 5.16 Section 5.7 (Integrated Fares and Ticketing), of the document identifies integrated fares and ticketing. This seems to largely relate to the collection of fares, but it is unclear if this also provides for end to end journeys. As an example would a commuter in Kāpiti get on a bus in Kāpiti, then move to the train and finally use a bus in Wellington to reach their final destination on one fare? Is this what is meant by “integrate fares so that the cost of a journey is independent of the number of modes or services involved” in the table on page 123?

**Section 6: Ko te whakatutuki i ā mātou whāinga: paetae, kaupapa here me ngā mahinga
Achieving our goals: objectives, policies and actions**

- 6.1 We are pleased that the RPTP recognises the need to improve access to affordable public transport for those most dependent on public transport and the transport disadvantaged. We have previously submitted that the groups that would most benefit from concession fares are likely to be the elderly, children, tertiary students, low income earners and the accessibility challenged. Concession fares to targeted groups, to increase access to affordable services for transport disadvantaged who are most dependent on public transport, is important for Kāpiti. To this end we would question whether a 25% tertiary concessionary fare is sufficient. There is also no mention of the level of concession for children, other than identifying that there should be one in the table on page 123. It is also disappointing that a year's notice is required to support changes to school bus timetables. School rolls can change, and the COVID-19 pandemic has identified the need to be flexible in approach.
- 6.2 With regards to design, this relates also to the design of new development and the need to ensure that this aids the delivery of bus services. This also relates to the need to work with local authorities to identify future growth and areas that will meet the criteria shown in the table on page 113 in that there is a need for appropriate density and land use required to support service viability.
- 6.3 The table on page 113 also identifies the need to improve the efficiency of key transport spines, and we support the measures shown in item f) of the table on page 120, and looking forward to working collaboratively to achieve this.
- 6.4 With regards to the brand experience we consider that it is important that vehicles that are part of the Wellington Region Metlink group of services are recognised as such to support initiatives such as integrated ticketing.

- 6.5 We understand the purpose of developing and implementing a prioritised programme the core public transport network. However, this should not be at the expense of other services, and targeted express services that miss stops should not create a lower level of service for transport users.
- 6.6 We are particularly supportive of objectives e) and f) under Part B of the policies to “enhance multi modal access to the public transport network” and “Plan, provide and manage park and ride facilities as part of an integrated strategy to enhance access to the public transport network” through initiatives such as Station Access Plans. We look forward to working with Greater Wellington Regional Council on developing Station Access Plans and commenting on the Park and Ride Strategy that will be developed alongside the RPTP. We consider that these Station Access Plans could encompass a wide range of measures to encourage travel choice to the station, including safety measures such as improved lighting.
- 6.7 In addition, whilst the SuperGold Programme is supporting travel for our older population on page 123, very often the services at these times are less frequent which impacts on the ability for customers to, for example, attend appointments in Wellington. This needs to be considered more carefully in the consideration of and response to customer needs. As an example, there are some parts of our community that cannot take advantage of the SuperGold hours in both directions as timing between buses means that they are unable to travel to their destination and back within these hours.
- 6.8 We support the need to provide for people with accessibility needs. This has been recognised as an issue in the Council’s Sustainable Transport Strategy. Council, therefore, advocates for the maintenance and improvements of services to support people, such as patient transfer and shuttle transport services. In addressing transport disadvantage and encouraging the use of public transport in areas where this is traditionally low or difficult to achieve, we would also like to see consideration given to the further development of demand responsive services.
- 6.9 We understand that that an on-demand, mini-bus is being trialled in Timaru (see MyWay by Metro). The key features are it:
- uses mini-buses rather than large diesels – as a response to relatively low vehicle occupancy and to reduce emissions per passenger kilometre
 - introduces additional ‘informal’ bus stops that can be booked for pick-ups/drop-offs via new on-demand functionality (bookings via mobile app or landline).
 - runs on smaller vehicles that may be more cost-effective to purchase electric vehicles / replace the fleet with electric vehicles over time.

Yours sincerely



Sean Mallon
Acting Chief Executive