

Andy Foster  
c/o Wellington City Council  
PO Box 2199  
[Andy.foster@wcc.govt.nz](mailto:Andy.foster@wcc.govt.nz)  
Ph 0274 883 524

Anthony Cross  
Manager – Transport Service Design  
Greater Wellington Regional Council  
PO Box 11646  
Wellington

**Subject: Metlink fare structure submissions**

Thank you for the opportunity to make a submission. I would welcome the opportunity to discuss the issues raised in my submission further with you, either in a formal submission process, or through the QPA, or just to discuss together.

#### **Fare Zone Boundary Structure**

I agree with the proposed changes to the fare zone boundaries. It is sensible to arrange zone boundaries such that distances travelled per zone are reasonably equitable.

However I submit that the choice of zone boundaries is something that should be further considered. I suggest that boundaries should where possible be at destination points, for example suburban centres, rather than placed between them. This would be most useful if the proposed boundaries are close to suburban centres. I don't know where the proposed boundaries are placed, but am aware of some negative feedback about the earlier decision to place a section boundary half way up Ngaio Gorge, rather than at a more popular destination point. Having boundaries 'in the middle of nowhere' of course means that patrons will inevitably use only part of a section on a high proportion of trips. I would expect that is factored into pricing. However it does mean that a section often doesn't really mean a section.

#### **Scale of Fare Increases – must not reduce patronage**

I understand the need for fare increases. However I am deeply concerned about the proposed scale of them.

In a strategic context it is critical that any increases do not have the impact of choking off what appears to be a useful and significant positive shifts from use of private motor vehicles to public transport.

This should be avoided.

Regional Council will I am sure monitor very closely the impacts on patronage of any fare increase. If there is adverse impact of any significance then I would strongly suggest that the Council needs to reconsider the fare levels.

### **Concessions – approach is incorrect and needs to be more creative**

In my view the approach to concessions is wrong.

I can understand the rationale for reduced fares for under 18s. However the rationale for a discount for over 65s on the basis simply of age is really questionable. Is there any evidence that those over 65 are less able to pay than those under 65 simply on the basis of age ? Clearly many have commitments such as health, but equally likely many will not have commitments that younger people have (mortgages, student loans, and families for starters)

Similarly there are many people over 65 who have incomes and wealth of at least equivalent levels to those under 65. Consequently a discount on an age basis alone seems unjustified and inequitable. In human rights terms one could argue it is potentially discriminatory, if discounting applies purely on the basis of age.

Given the rapidly increasing proportion of the population that are and will be over 65, I'd also question whether the proposal for an age based discount is sustainable. I suggest that rectifying a current anomaly by creating a bigger one will simply pass on a problem for future decision makers.

I also submit that it does not fit well with the Council's focus on transport rather than social objectives. Transport in my experience usually has a focus on travel to work or education. Furthermore giving a discount based on age to a cohort that is less likely to be travelling for work and education purposes, is clearly having the effect of increasing costs to other users. This is a significant problem with the approach being proposed for Metlink fares.

My suggestion is that if a discount is deemed necessary, it be targeted and only be available for persons over 65 who hold some appropriate evidence of lack of reasonable means to pay full fares. Holding a Community Services Card may be appropriate.

The other comment I would make which is relevant to both under 18s and those over 65, is that Council should look to limiting discounts to times after the morning peak.

There is ample evidence that patronage growth is placing significant pressure on peak services. My view is that pricing should be used to incentivise those who could travel outside the peak to do so.

There is a further anomaly that this incentive applies for all ages outside of the peak on trains, but not on buses.

It would be easy to apply a discount outside peak times IF Council determines that an (income based) age discount should apply for over 65s.

For under 18s I submit that Council could significantly reduce pressure on peak public transport use, and in all probability on pressure on peak road use, by allowing a discount after the morning peak. Council should limit the times at which the discount can apply. Moving the time at which schools operate by just 20 minutes would make a

huge difference to the pressure on morning peak services, and would reduce the cost of the service as a whole. Council should stop being soft on this, and be very clear with the schools that as it is offering a significant benefit to school pupils, and that a quid pro quo should be offered in terms of a modest change in times of operation.

**Subsidy to operators**

The final comment I would like to make is that I trust that the Council is convinced that it is paying an appropriate level of subsidy to the operators, Toll and Stagecoach. Obviously if the level of subsidy is too high then a part of that cost will fall on ratepayers, and a part on passenger transport users.

If there is an opportunity to be heard, I would welcome that.

Yours sincerely,

Andy Foster