



Submission to Greater Wellington Regional Council Thursday 1 October 2026

Ōwhiro Bay Residents Association (OBRA) supports investment in public transport. But OBRA has significant concerns about the process by which you are being asked to make decisions today and the information before you.

Fundamentally, we ask that this process considers properly the options for where to put a bus depot before coming back to the Council with an IBC.

Certainly, the Council should not be being asked to expend money on consenting for one site, over all other options, when a final decision on the best option has yet to be made.

In short, this process is not objective, and you do not have enough information to make a sound strategic decision today.

We will very briefly cover some key concerns we have with the material before you and then sum up what we want.

1. Strategic Case – The problem is not defined

The Initial Business Case (IBC) does not adequately define the problem. It refers to “substantial non-revenue movements,” “higher operating costs,” and “greater emissions,” but provides no quantified evidence.

There are no costs associated with the existing depot, nor of the options that are being considered.

Under the Better Business Case (BBC) framework, if the problem cannot be measured by the authors, councillors cannot compare options or assess value for money. You are being asked to endorse a direction without a clear, evidence-based problem definition.

To restate: The IBC does not set out clearly what is wrong with the current depot (why is earthquake strengthening not possible, why is the lease not an option, what is actually wrong with the location given proximity to most bus routes), and what the future weakness in the system is and what is the most sensible financial decision.

2. Alternatives Assessment – The critical gap

This is key and something we raised earlier in the process and which frankly has been only in the last month or so tacked onto this process.

The alternatives assessment has not met BBC requirements.

Under the MCA, the presently functioning Kilbirnie depot received the lowest score, yet the IBC provides no evidence explaining why it performed so poorly. A working, operational depot should not score last without transparent, objective justification — and none has been provided — the existing Kilbirnie site is not even included as an option.

The IBC also stated that the problem definition used for the MCA was refined during development. But this was after the Landfill Road site was already purchased, and highlights that this paper is arguably biased in favour of the preferred option (and site that has been purchased before a proper assessment of alternatives was undertaken).

Until a full alternatives assessment is completed, the process risks continuing with a predetermined bias toward the Landfill Road site including through obtaining resource consents.

3. Economic Case – mandatory legal information is missing

The procurement process is still underway, and the IBC itself states that procurement outcomes will provide critical information on depot requirements, fleet deployment, commercial arrangements, and operational risks — none of which is available yet. (Para 10).

That information is mandatory at this stage for this council to make a legally sound decision. It should not be being asked to make any decision on this IBC until that assessment has been clearly and openly assessed and quantified.

The risks and benefits are weak. Long-term operational impacts — early-morning and late-night bus movements, staff traffic, lighting, noise, and servicing activity — have also not been assessed to the level expected at the IBC stage for any of the options.

And no indicative cost ranges have been provided. Even at concept stage, the BBC model expects indicative costs, key cost drivers, and geotechnical risks. Without this, councillors cannot meaningfully assess value for money.

Goes to what we are asking, which is not to make a decision today to give a green light to resource consents over one site but rather for a proper in-depth consideration of alternatives including with the existing site, and after the information from the procurement process.

4. Management Case – Bias concerns

Several features create credible bias concerns:

- The Landfill Road site was purchased before the options assessment. And the options only included after we (OBRA) raised it, and included in the last month or so.

Now consents are being sought, again in advance of options being selected. This process is legally unsound.

- The strategic problem was also refined after the site was already in hand.
- MCA scoring favours Landfill Road while penalising other options for uncertainty.
- Kilbirnie was excluded from the options considered without transparent justification.
- Multiple references to 2028 in the IBC and decision paper create a false sense of urgency without evidence that a southern depot must be operational by that date. Noting that Kilbirnie is operating until 2029 at least. Why is this being rushed it is a significant decision for the city not just Ōwhiro Bay.

These factors mean the process is unfortunately not objective, legally unsound and should be done properly rather than risking continuing down this flawed pathway.

5. Our request

For these reasons, we respectfully ask councillors **not to approve the IBC proceeding to the Detailed Business Case, until these gaps are filled.**

We ask that the Initial Business Case be revisited once:

- Procurement outcomes are known.
- Market insights are incorporated.
- The strategic problem is clearly defined and quantified.
- Operational impacts are properly assessed.
- Community feedback is transparently reported.
- Indicative costs are independently estimated.

- A full assessment of all alternatives — including Kilbirnie — is redone.

This is not a request to halt public transport investment. It is a request to ensure decisions are legally robust, evidence-based, transparent, and consistent with the Treasury Better Business Case framework.

As noted in para 11. This decision matters. If this process proceeds, the Council officers will lodge land use consents for Landfill Road. This directly contradicts other parts of the report such as para 9 that indicate more information on options is required for the options to be properly considered. This highlights the process has not been objective. Why is so much time, effort, money, and even consenting, being sought over one site, when according to the Councils own paper, a decision on options is still being made.