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To Environment Canterbury

Please find attached our submission on the Draft Regional Land Transport Plan 2024–2034

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# Introducing Disabled Persons Assembly

**We work on systemic change for the equity of disabled people**

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People’s Organisation run by and for disabled people.

**We recognise:**

* Māori as Tangata Whenua and [Te Tiriti o Waitangi](https://www.archives.govt.nz/discover-our-stories/the-treaty-of-waitangi) as the founding document of Aotearoa New Zealand;
* disabled people as experts on their own lives;
* the [Social Model of Disability](https://www.odi.govt.nz/guidance-and-resources/guidance-for-policy-makes/) as the guiding principle for interpreting disability and impairment;
* the [United Nations Convention on the Rights of Persons with Disabilities](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html) as the basis for disabled people’s relationship with the State;
* the [New Zealand Disability Strategy](https://www.odi.govt.nz/nz-disability-strategy/) as Government agencies’ guide on disability issues; and
* the [Enabling Good Lives Principles](https://www.enablinggoodlives.co.nz/about-egl/egl-approach/principles/), [Whāia Te Ao Mārama: Māori Disability Action Plan](https://www.health.govt.nz/publication/whaia-te-ao-marama-2018-2022-maori-disability-action-plan), and [Faiva Ora: National Pasifika Disability Disability Plan](https://www.moh.govt.nz/notebook/nbbooks.nsf/0/5E544A3A23BEAECDCC2580FE007F7518/$file/faiva-ora-2016-2021-national-pasifika-disability-plan-feb17.pdf) as avenues to disabled people gaining greater choice and control over their lives and supports.

**We drive systemic change through:**

**Leadership:** reflecting the collective voice of disabled people, locally, nationally and internationally.

**Information and advice:** informing and advising on policies impacting on the lives of disabled people.

**Advocacy:** supporting disabled people to have a voice, including a collective voice, in society.

**Monitoring:** monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

# The submission

Disabled Persons Assembly (DPA) is pleased to provide feedback on Environment Canterbury’s long-term plan for public transport over the next ten years.

DPA notes that there could be further changes made after the anticipated release of the revised National Land Transport Policy Statement by new Transport Minister, Hon. Simeon Brown.

We stress the importance of continuing to recognise the need to develop public and active transport networks.

DPA also would like the new national policy statement to contain provisions around making our transport network more accessible and inclusive for everyone, including disabled people.

We would like the Regional Council to continue to work towards responding and adapting to our country’s changing climate and emissions reductions requirements and, if need be, set higher regional targets which go above and beyond those formulated by the new government.

Transport needs to be both climate friendly and accessible for two reasons:

1) Disabled people, as a population group, are already impacted by the adverse effects of climate change and will continue to be so; and

2) Demand for accessible transport will continue to increase as our population ages.

In this submission, we provide a disability lens on the key proposals contained in this ten-year plan with recommendations on how they can be further enhanced to create an integrated, inclusive and accessible transport system.

We draw Council’s attention to the joint Waka Kotahi/DPA report published in 2022.[[1]](#footnote-2) We will reference the report at relevant points in this submission.

## Issues facing Canterbury’s and the Aotearoa population around accessible transport

The transport experiences report highlights how disabled people are facing challenges when it came to using all modes of transport including Total Mobility, buses, trains, walking, cycling and e-scooters, using private cars and car parking.

In addition, there was a lack of accessibility knowledge within councils when it came to planning for the development of sustainable cities and improving the accessibility of public transport modes.

One of the reasons for this was that transport planners at both central and local government level lacked awareness around disability and that this needs to change.

In stating this, we positively acknowledge Environment Canterbury's engagement with DPA and disabled people in its consultation around public transport accessibility issues, especially in relation to buses.

However, going forwards it there is a need for Environment Canterbury to take an even more holistic approach when it comes to accessible transport and urban planning issues.

With a more holistic approach DPA, disabled people and Disabled People’s Organisations (DPOs) and the wider disability sector would be able to better engage around planning for a more sustainable transport future throughout the motu.

From what DPA can see, Environment Canterbury recognises this, particularly in its recognition of the need to provide inclusive access to public transport and we encourage more to be done to ensure that accessibility is included as a pivotal element in all future transport planning.

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| **Recommendation 1:** that Environment Canterbury take the need for universal accessibility and inclusion fully into account when engaging in all transport and urban planning processes. |

DPA supports the ten-year transport investment priorities laid out in this plan around:

* creating a well-maintained network
* managing risk of exposure to extreme events
* supporting and developing connect public transport and active transport networks
* implementing safer systems (Road to Zero)
* supporting and developing freight systems connecting to sea, air and rail.

Below we concentrate on the first four investment priorities which are all inter-related.

## Creating a well-maintained network

DPA, as noted above, welcomes Environment Canterbury’s ongoing commitment to providing and promoting inclusive access to public transport.

However, more work needs to be done towards creating a fully accessible, inclusive, seamless transport network incorporating all modes across Canterbury.

For disabled people, there are urgent transport access issues which need attention in the short to medium term (1-5 years).

The most important of these concerns centre around the shortage of mobility taxis and disabled people’s consequent ability to access the Total Mobility (TM) scheme.

## Mobility taxi shortage and Total Mobility

Disabled people in both Christchurch and the wider Canterbury region face significant challenges when trying to access mobility taxis, particularly for wheelchair and mobility device users.

In 2023, media reports highlighted how the shortage of mobility taxi van services had reached crisis point nationally. Small passenger service/taxi company providers pointed to the prohibitively [high financial costs involved in converting vehicle fleets to carry wheelchair and mobility device users](https://newsroom.co.nz/2023/06/28/low-uptake-of-wheelchair-fit-out-fund-blamed-on-high-set-up-costs/) as being one of the main reasons for this.

This factor exacerbated a driver shortage as many passenger service operators could not be persuaded into providing these services. And all this at the same time as the Waka Kotahi fund (jointly administered with regional councils) [to subsidise passenger service mobility vehicle conversions still had unspent money waiting to be taken up but not being uplifted as](https://www.rnz.co.nz/national/programmes/checkpoint/audio/2018920173/money-set-aside-for-wheelchair-taxis-not-being-spent) taxi companies and other providers claimed that the amount available did not fully cover the costs involved in vehicle conversion.

During this renewed crisis for the mobility transport system, Waka Kotahi announced [a review of the Total Mobility (TM) scheme](https://www.transport.govt.nz/area-of-interest/strategy-and-direction/review-of-the-total-mobility-scheme/) which will consider these and other issues that have surfaced around the scheme over the last decade.

However, the review could take around a year to deliver recommendations and then possibly a further year after that to begin implementing any changes. During that time, disabled people in Canterbury will still need access to affordable, accessible public transport options.

That is why we recommend that Council set aside additional funding for the first two financial years of the plan (2024/25 and 2025/26) to enable more mobility vehicle fit outs to be undertaken in the Environment Canterbury region.

The rate for vehicle conversions should be at a level that would (alongside the Waka Kotahi contribution) enable potential providers to fully cover the costs of conversions, enabling them to put more vehicles on the road sooner in this region.

After that period, central government (via Waka Kotahi/NZ Transport Agency) and local government (regional councils) might then be able to agree on a more viable funding model for mobility vehicle conversions.

Otherwise, DPA recommends that Council await the outcomes of the national TM review before implementing any further changes.

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| **Recommendation 2:** that Environment Canterbury set aside additional funding (over and above the Waka Kotahi contribution) for the first two years of the RLTP to cover the full costs of all mobility passenger service van fit outs in the region. |
| **Recommendation 3:** that Environment Canterbury await the outcome of the Total Mobility review before proceeding with any further changes. |

## Managing risk of exposure to extreme events

DPA supports the need for transport networks to be effectively managed around their risk of exposure to extreme events.

These extreme events include climate change related impacts including storms and sea level rise as well as geological events including earthquakes.

Like any other population group, disabled people need access to good, reliable transport networks, especially in times of emergency and natural disaster. The need to provide safe evacuation routes, the maintenance of essential services including power as well as enabling family/whānau and emergency responders to come through in times of emergency are all very important for our disabled community.

Environment Canterbury should work with central government and other stakeholders to ensure that transport networks remain as effective and operational as possible in a time when more extreme events, including climate change related storms, are expected to become more common.

## Timely fixing of our roads and transport networks

More investment needs to be undertaken to enable the timely, efficient fixing of Canterbury’s roads and other transport network infrastructure wherever safety issues are identified.

This would ensure that everyone, including disabled drivers, passengers and users of the region’s roads, cycleways and footpaths are able to be better protected from injury or even death.

Environment Canterbury should collaborate with Waka Kotahi to set much firmer timeframes within which any urgent roading issues should be fixed, with an emphasis on dramatically reducing the time taken to do so.

Similar rules should also apply to fixing urgent safety issues on cycleways, footpaths and other active, climate-friendly transport infrastructure.

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| **Recommendation 4:** that Environment Canterbury and Waka Kotahi set much firmer and quicker timeframes within which roads and other active transport infrastructure should be fixed wherever safety issues are identified. |

## Support and develop connected public transport and active transport networks

DPA is strongly supportive of the need to develop well connected public transport and active transport networks in the Canterbury region.

One of the most important plans in this respect is that for a Mass Rapid Transit (MRT) system to serve Greater Christchurch residents and visitors in the future.

In our submission on the Greater Christchurch Spatial Plan in 2023, we welcomed the proposal to introduce MRT to the region, on the basis that it was inclusive and fully accessible for everyone, including disabled people.

The proposed MRT should also be complemented by a system of both inter-regional and regional passenger rail networks in the medium to long term.

DPA welcomes Environment Canterbury’s support ongoing support for the creation of walking, cycling and other micromobility options. This should be undertaken on the proviso that what we have laid out in previous submissions regarding need for separate but parallel spaces for pedestrians and cyclists/micromobility users.

## Transitioning to low emission vehicles

DPA is fully supportive of the transition to low carbon transport modes, including low emission vehicles like electric vehicles (EVs) and hybrid cars.

Using EVs and hybrids are just two of the ways in which all people, including disabled people can connect within their communities in an environmentally friendly way.

Environment Canterbury should work alongside relevant stakeholders to ensure that all EV charging stations in the region are accessible for everyone, including for disabled motorists by working to ensure that national standards around charging stations include accessibility as a key component.

However, there is a downside to EV usage in terms of the risk of fires and explosions produced by the lithium batteries that power them.

EV battery fires present a great risk to everyone within proximity of them, especially for disabled people who find it more difficult to get away from fires.

DPA recommends that Environment Canterbury work with key stakeholders including Fire and Emergency New Zealand, Whaikaha – Ministry of Disabled People, Waka Kotahi, local councils, vehicle manufacturers and disabled people to raise awareness of the risks to disabled people and non-disabled people of lithium battery fires and how to avoid them.

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| **Recommendation 5:** that Environment Canterbury work with both disabled people and non-disabled people and relevant stakeholders to raise awareness of the risk of lithium battery fires and how to avoid them. |

1. <https://www.nzta.govt.nz/resources/research/reports/690/> [↑](#footnote-ref-2)