June 2024

**To Greater Wellington Regional Council**

Please find attached DPA’s submission on the Regional Land Transport Plan 2021-31 Mid Term Review

For any further inquiries, please contact:

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# Introducing Disabled Persons Assembly NZ

**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/%24file/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:**

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

**Pārongo me te tohutohu / Information and advice**: informing and advising on policies impacting on the lives of disabled people.

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

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

# The Submission

DPA welcomes this opportunity to feedback on the Greater Wellington Regional Council’s (GWRC’s) Long-Term Plan (LTP) Mid-Term Review. We recognise that the GWRC has engaged with disabled people as part of preparing this review.

Our submission makes recommendations around further changes to ensure that the region’s transport network is inclusive, safe and accessible for all.

DPA was pleased to hear from our Wellington members about the successful roll out of the audio and visual announcements making buses and trains more accessible

DPA supports the proposed $15.4 million spend on public transport network accessibility infrastructure improvements over the next three years and we urge the GWRC to continue implementing its Public Transport Accessibility Action Plan.

DPA has been involved in constructive dialogue with GWRC on the transport needs of disabled people in the Wellington region and implementation of the accessibility plan. However, there is more work to be done around ensuring that the needs of disabled people are met, especially when it comes to ensuring accessible public transport and more inclusion in the climate change space.

DPA acknowledges the challenges that have faced the transport sector over the last three years, including Covid-19 and the North Island weather events of 2023 .

These changes have significantly impacted on disabled people in terms of increased difficulties in accessing transport due to the Covid-induced closure of some mobility transport services, bus fare increases and a diminished focus from central government on improving transport accessibility.

One of the barriers identified by DPA members is that while audio announcements have been successfully rolled out, there are still some people who cannot access information or navigate the environment entirely meaning that transport journeys can still be inaccessible.

An example of this is the Tawa on-demand shuttle service where even though there are wheelchair user friendly spaces, many people in the disabled and older people’s communities still struggle to use the service app due to digital barriers to accessing it. DPA recommends that phone booking is also made an option for the Tawa on-demand service.

## Transport priority weightings

DPA notes that the GWRC has had to fit its own strategic objectives to sit with the new Government’s Transport Policy Statement priorities and outcomes.

DPA welcomes GWRC’s own continued focus on building public transport capacity, travel choice, strategic access, safety and resilience as this will all contribute towards building a more accessible, inclusive, safe and environmentally friendly transport system, at least in the Wellington region.

It is difficult for us to give priority weightings to transport investment, but we give greater weighting to building public transport capacity, travel choice, safety and resilience and less to strategic access.

We outline our reasons for doing so below.

## Priority improvement activities – more investment in public/active transport needed, not more roads

**On public transport capacity,** ongoing investment in the resilience of the rail network, especially in terms of completing the Metro Rail resilience and capacity programme as well as developing and enabling the future capacity of Metro Rail is vital.

DPA recommends that investment continue to be made into every aspect of the regional rail network including in making carriages, train stations and stops fully accessible to disabled people.

DPA recommends that investment continue to be made into every aspect of the Wellington Rapid Transit Bus network including in making all depots and buses fully accessible.

**Around travel choice,** DPA supports the Te Wai Takamori o Te Awa Kairangi - Riverlink improvement programme. DPA is a member of one of the advisory groups feeding into the project planning process.

DPA recommends continuing to prioritise the Te Wai Takamori o Te Awa Kairangi - Riverlink project as it enters the next phase. We believe that its completion will contain the increased flood risk from the Hutt River and creating greater accessibility within the area.

**Regarding the Regional Cycle Network,** we have been hearing concerns from the local disabled community about the placement of some new cycleways in the Wellington region terms of these being a safety risk.

Disabled people either on foot or on a mobility device (i.e., wheelchair or mobility walker) as well as blind and low vision people have experienced near misses from cyclists or encountered difficulty in finding mobility carparks due to their being removed to make way for cycle ways.

DPA is supportive of cycling as an active transport mode and views it as an environmentally friendly and healthy activity engaged in by a wide range of people, including disabled people. Needing to balance the needs of both pedestrians, including disabled pedestrians and cyclists is a real issue as both groups are forced into competing with one another due to the dominance of roading in our transport infrastructure.

DPA only recently heard that there was a disability community representative on the cycleway design group advising the Wellington City Council on the placement of cycleways there, something that we had not been aware of previously and would have appreciated knowing about sooner.

DPA recommends that more disabled people are involved in the design of all proposed cycle ways at a cross-regional level.

Through ensuring that cycleways are designed to ensure safety for everyone, including disabled people, and that they are placed parallel to but separate from any pedestrian footpath, it will mean that the proposed $331.23 million investment in walking and cycling improvements can produce a win-win for cyclists, pedestrians and the environment.

**On strategic access,**

DPA is concerned about the Government’s prioritisation on building roads of national significance over transport infrastructure that Wellington residents want. In stating this, we acknowledge that the traffic congestion/blockages which occur around Mount Victoria and in the Hutt Valley region are significant.

DPA in its submission on the Government’s Draft Policy Statement on Land Transport 2024 critiqued the need to build more roads as a means of tackling congestion on the basis that it creates an endless cycle of more vehicles leading to the need for even more roads.

This cycle must be broken through meaningful investment in public transport, walking and cycling and safety improvements, which DPA urges the GWRC to keep investing in as it has done.

**When it comes to safety,** while investing in highway/motorway safety is necessary, it is equally important that there is investment put into making the region’s streets, footpaths, cycleways and rural roads safer too.

In DPA’s submission on the Government’s land transport statement, we criticised the failure to invest making safety improvements to our roads and footpaths as well as around plans to end speed restrictions on parts of the roading network.

It is now up to the GWRC and various local road controlling authorities throughout the region to do what they can to improve safety for everyone using our roading network, including disabled people.

DPA recommends that the GWRC and other local road controlling authorities place an equal amount of investment into making safety improvements to streets, footpaths, cycleways and rural roads to match that given to highways.

## Total Mobility

Total Mobility services has reached crisis point in Wellington, exemplified by the very popular Ice Travel mobility service closing only two years ago. There continues to be an ongoing struggle to access mobility taxis during peak morning and afternoon periods when many providers are engaged in Ministry of Education-funded school runs with disabled children as well as after-hours due to the lack of qualified drivers.

Basically, there are not enough mobility taxis to provide 24/7 services with disabled people being required to pre-book this service.

In 2023, media reports highlighted how the shortage of mobility taxi van services had reached crisis point nationally, and this included a Radio New Zealand website article featuring Auckland-based wheelchair user Barney Koneferenisi[[1]](#footnote-2) who expressed his frustrations on this subject.

In the same story, small passenger service/taxi company providers pointed to prohibitively high set up costs as being one of the main reasons for this.

At the same time the Waka Kotahi fund (jointly administered with regional councils) which subsidises small passenger service vehicle mobility conversions had not had much uptake as small passenger service providers say that the amount available does not cover the costs involved in vehicle conversion.

DPA is keen for the GWRC needs to work with Waka Kotahi to ensure that realistic (ie 100% of the conversion costs) funding is made available for potential mobility taxi providers.

Waka Kotahi previously announced a highly anticipated review of the Total Mobility (TM) Scheme[[2]](#footnote-3) to consider these and other issues that have surfaced around it over the last decade. The review is supposed to have a second round of consultation, but we have not been informed about this .

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 Wellington urgently need access to affordable, accessible public transport options.

DPA recommends that GWRC set aside additional funding for the next two financial years (2024/25 and 2025/26) to enable more mobility vehicle fit outs to be undertaken in the region so that potential passenger service operators (who often have minimal capital) do not have to carry the cost.

DPA also recommends that GWRC and Waka Kotahi raise the amount that mobility drivers get per customer, in line with other countries. For example, Melbourne gives a $50 loading fee, but Wellington gives only $10. Transporting disabled people can take significantly extra driving time, through loading and unloading wheelchairs and taking extra care to drive smoothly.

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| **Recommendation 1:** that investment continue to be made into every aspect of the regional rail network including in making carriages, train stations and stops fully accessible to disabled people. |
| **Recommendation 2:** that investment continue to be made into every aspect of the Wellington Rapid Transit Bus network including in making all depots and buses fully accessible. |
| **Recommendation 3:** that funding for the Te Wai Takamori o Te Awa Kairangi - Riverlink project is prioritised as it enters the next phase. |
| **Recommendation 4:** that disabled people are involved in the design of all proposed cycle ways at a cross-regional level. |
| **Recommendation 5:** that the GWRC and other local road controlling authorities place an equal amount of investment into making safety improvements to streets, footpaths, cycleways and rural roads to match that given to highways. |
| **Recommendation 6:** that phone booking is also made an option for the Tawa on-demand service. |
| **Recommendation 7:** that GWRC 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 region. |
| **Recommendation 8:** that GWRC and Waka Kotahi raise the amount that mobility drivers get per customer, in line with other countries. |

1. <https://www.rnz.co.nz/national/programmes/checkpoint/audio/2018920173/money-set-aside-for-wheelchair-taxis-not-being-spent> [↑](#footnote-ref-2)
2. <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/review-of-the-total-mobility-scheme> [↑](#footnote-ref-3)