April 2024

To Greater Wellington Regional Council

Please find attached DPA’s submission on Long Term Plan 2024 - 2034

For any further inquiries, please contact:

Chris Ford

Regional Policy Advisor (Southern and Central)

policy@dpa.org.nz

# 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:

* **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

DPA welcomes this opportunity to feedback on the Greater Wellington Regional Council’s (GWRC’s) Long-Term Plan (LTP) 2024–2034.

DPA sees much to commend in this programme from a disability perspective. However, there is always more work to be done around ensuring that the needs of disabled people of all ages are met, especially when it comes to ensuring accessible public transport and more inclusion in the climate change space.

We see that the GWRC is aiming to deliver on its vision around the four cross cutting focuses of:

* Environment
* Climate Change
* Partnerships
* Equitable Access

DPA acknowledges the GWRC’s commitment to each of these focuses, especially when it comes to involving disabled people as partners over the implementation of the Accessibility Action Plan.

This submission outlines recommendations around further change which is needed as well as commending progress made.

## Control of Public Transport Assets

DPA supports GWRC’s proposal to increase control over Greater Wellington’s public transport assets. DPA believes this is just one means of preventing the chaos that unfolded across the region’s bus network some years ago.

Creating a more integrated public transport system will mean that the Accessibility Action Plan for public transport can be more readily implemented across the region through ensuring greater uniformity of services and standards.

For example, this will lead to better, more accessible transport infrastructure including bus terminals and buses, something that will benefit everyone including disabled people**.** DPA supports the proposed spend on new transport infrastructure as outlined in the LTP.

## Public transport fares

DPA is concerned by the proposal to increase public transport fares by 10% in the first year of the LTP.

We acknowledge that these fare increases are being made to cover inflationary costs that have been incurred in recent years and to offset proposed rate increases, but increasing fares at a time when there is high cost of living pressures also coincides at the same time as many public sector workers are being made redundant in Wellington City, a significant proportion of whom will be disabled people.

This proposal also comes at a time when much more needs to be done around mitigating climate change through incentivising the shift to public transport.

Other regions, such as Otago, has introduced the successful measure of having very low, flat $2 fares, a move that has seen bus patronage substantially increase in Dunedin and Queenstown.

DPA recommends that the option of low, flat fares be investigated by the GWRC as a means of increasing public transport usage in the region alongside other initiatives.

However, we note that the ‘Community Connect’ scheme is being retained along with other fare concessions and discounts and we welcome that too.

In the longer term, our preference is for low flat fares so that everyone, regardless of their socioeconomic status, background or location can access affordable public transport and, subsequently, move away from using private vehicular transport as much as possible.

|  |
| --- |
| **Recommendation 1:** that the GWRC investigate introducing low flat fares for all public transport users. |

## Total Mobility

Disabled people throughout the Wellington region and elsewhere in Aotearoa continue to face significant challenges in being able to exercise transport choice, especially when it comes to accessing mobility taxis/small passenger vehicle services aimed at people using wheelchairs and mobility devices.

DPA understands that this has reached crisis point in Wellington, exemplified by the very popular Ice Travel mobility service closing only two years ago. Other concerns include the 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 cover 24/7 services.

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 who expressed his frustrations on this subject. In the same story, small passenger service/taxi company providers pointed to prohibitively high set up costs[[1]](#footnote-2) 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 small passenger service vehicle mobility conversions had not had much uptake as small passenger service providers claimed that the amount available did not fully cover the costs involved in vehicle conversion. The GWRC needs to work with Waka Kotahi to see that realistic funding is available for potential mobility taxi providers.

During this renewed crisis for the mobility transport system, Waka Kotahi announced a highly anticipated review of the Total Mobility (TM) Scheme[[2]](#footnote-3) to consider these and other issues that have surfaced around the scheme 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 will still need access to affordable, accessible public transport options.

DPA recommends that the 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 so that potential passenger service operators (who often have minimal capital) do not have to carry the cost.

The best way to do this would be through Council increasing its maximum contributions for vehicle conversions to a level that would (alongside the Waka Kotahi contribution) enable potential providers to fully cover the costs of conversions, allowing them to put more vehicles (preferably electrical or low carbon) on the road sooner.

Additionally, GWRC and Waka Kotahi need to consider raising the amount that mobility drivers get per customer, in line with other countries. For example, Melbourne gives a $50 loading fee, but we give only $10. Transporting disabled people can take time, through loading and unloading.

Otherwise, GWRC should await the outcome of the Total Mobility before proceeding with any changes.

|  |
| --- |
| **Recommendation 2:** GWRC and Waka Kotahi need to consider raising the amount that mobility drivers get per customer, in line with other countries for both loading and unloading. |

|  |
| --- |
| **Recommendation 3:** that the GWRC 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 and consider a higher mobility taxi loading fee. |
| **Recommendation 4:** that GWRC await the outcome of the Total Mobility review before proceeding with any further changes. |

## Getting buses moving faster

DPA notes that the GWRC is working alongside NZ Transport Agency and Wellington City Council on how to get Wellington City’s buses moving faster.

While we applaud the initiative and the proposed budget of $88 million over the next ten years to facilitate this move, the disabled community needs to be assured that this will not come at the expense of the safety and comfort of disabled bus users.

In the disabled community, it is not uncommon to hear stories of bus drivers who start or stop buses too quickly before disabled or older passengers either have time to sit down or get up, refuse to load a wheelchair or mobility device user or permit a person with an assistance animal to board, all due to the fear that these factors will slow down their service.

|  |
| --- |
| **Recommendation 5:** that the Accessibility Action Plan be adhered to around the need for continued driver education to ensure safe and accessible bus services for everyone, including disabled people, while seeking to increase service efficiency. |
| **Recommendation 6:** that disabled people (including disabled bus patrons) are involved in discussions around how to improve bus service efficiency without compromising safety and accessibility. |

## Climate change

As we have pointed out in past submissions to this Council and others around Aotearoa, disabled people will be – and already are – one of the most at risk groups from climate change impacts.

For this reason, climate change, the need to mitigate it and ensure that there are effective responses to climate emergencies that incorporate disabled people at all levels is one of DPA’s top priorities.

A recent article published by the journal ‘Nature Climate Change’*[[3]](#footnote-4)* highlighted that governments werefailing to take disability inclusive climate action and disabled people are disproportionately more at risk of higher mortality rates in climate emergencies.

This is underpinned by the fact that disabled people have been accorded lower priority in climate emergencies or other disasters and systemically excluded from receiving emergency healthcare and humanitarian support as a result.

The article also highlighted that slow onset climate change, including sea-level rise, more damaging weather events, as well as rising water and food scarcity will all exacerbate the existing inequities experienced by disabled people.

Michael Stein, in a Harvard University Center for the Environment (2023)[[4]](#footnote-5) interview elaborated about the impact of climate change on disabled people:

*“*Climate change amplifies the marginalization experienced by persons with disabilities negatively affecting health, reducing access to healthcare services, food, water, and accessible infrastructure. People with psychosocial disabilities have triple the rate of mortality in heatwaves.*”*

DPA has been inspired by the model provided by the Bristol Disabled People’s Forum in the UK where the local council in that city has engaged (and continues to engage in) climate change planning and dialogue with their local disabled community through the forum. The city council co-developed a plan with the Disability Equality Forum (a Bristol-based disabled people’s organisation that is cross-impairment based like DPA) around climate change and its impact on disabled people.

DPA views the use of deliberative, decision-making structures like the Bristol Disabled People’s Forum as one means through which Wellington’s disabled community could dialogue with both the GWRC and other local councils on the development of disability responsive climate change plans.

DPA also recommends that emergency responsiveness plans for the Wellington region accommodate the needs of disabled people, especially in relation to both seismic and climate related emergencies. This should be undertaken in a co-design partnership between local disabled people and emergency management bodies.

|  |
| --- |
| **Recommendation 7:** that the GWRC and other local councils dialogue with the Wellington disabled community (including DPA) to discuss ways in which a closer partnership can be forged around climate resilience and emergency preparedness. |
| **Recommendation 8:** that emergency responsiveness plans for the Wellington region accommodate the needs of disabled people, especially in relation to both seismic and climate related emergencies and are developed as part of a co-design partnership between disabled people and emergency management bodies. |

## Flood protection work and Riverlink

We support all efforts by Council to analyse, monitor and manage natural hazard risks across the province, including through flood prevention work that is being undertaken throughout the Greater Wellington Region.

Natural hazards prevention work is important for everyone, and this includes for disabled people.

Disabled people, especially those who live with mobility and other impairments, face a great shortage of accessible housing, which is difficult to access even at the best of times, let alone after a natural disaster.

Following last year’s North Island storms there were stories about disabled people who could not return to their homes for many months afterwards, and some disabled people (as we heard earlier this year) are still living in inaccessible housing over a year later.

DPA wishes to express its continued support for the RiverLink project, which we have had fed back on and advised on how best to appoint disabled community representatives to the reference group.

We see RiverLink as one way in which to address the risk of increased flooding, in this case to the Hutt Valley area, while incorporating accessibility into the development.

**DPA supports the proposals contained this LTP to raise the level of spending on critical flood protection work throughout the region.**

## Lower North Island Rail Integrated Network

DPA notes that the GWRC is proposing to run a business case on the future of rail services in Wairarapa and the Manawatū.

DPA supports the funding for this business case contained in the LTP as the creation of a rail service in this part of the Greater Wellington region will benefit disabled people, especially if it recommends the extension of passenger rail services to this area which is currently under-served.

|  |
| --- |
| **Recommendation 9:** that disabled people, particularly those living in the Manawatū/Wairarapa areas, are consulted as part of the business case on integrated rail services. |

1. <https://www.rnz.co.nz/national/programmes/checkpoint/audio/2018920173/money-set-aside-for-wheelchair-taxis-not-being-spent> [↑](#footnote-ref-2)
2. Te Manatū Waka Ministry of Transport Total Mobility Scheme Review (n.d.) <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/review-of-the-total-mobility-scheme/> [↑](#footnote-ref-3)
3. Stein, J.S., Stein, M., Groce, N. & Kett, M. (2023). The role of the scientific community in strengthening disability-inclusive climate resilience. *Nature Climate Change 13*, 108-109. [https://www.nature.com/articles/s41558-022-01564-6.epdf?](https://www.nature.com/articles/s41558-022-01564-6.epdf?sharing_token=WG7FDIwxm9EdrpxLpip75tRgN0jAjWel9jnR3ZoTv0OlD0JgJ93tTQjFULmdry3BVlmuGxD5onmsJt996nkMEGAr2tCBsveYWZXhgtd709bHCKwbcstWptPivtOz4U34R-phYAWEgIDvEDGs0fzjPHcHM0ng8l0DWIje7vQzL10%3D) [↑](#footnote-ref-4)
4. Harvard University Center for the Environment. (2023, January 19). *Disability in a Time of Climate Disaster*. Retrieved from [https://environment.harvard.edu/news/disability-time-climate-disaster#](https://environment.harvard.edu/news/disability-time-climate-disaster#:~:text=Climate%20change%20amplifies%20the%20marginalization,rate%20of%20mortality%20in%20heatwaves) [↑](#footnote-ref-5)