March 2024

**To: Otago Regional Council and Southland Regional Council**

Please find attached DPA’s submission on Draft Mid-Term Review Otago Southland Regional Land Transport Plans 2021 - 2031

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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/%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 give feedback on the Draft Mid-Term Review Otago Southland Regional Land Transport Plans (RLTP) 2021 – 2031.

DPA notes the concerning changes recommended in the recent Draft National Land Transport Policy Statement issued by new Minister of Transport, Hon. Simeon Brown, as this consultation was in its closing phase

From an early analysis we have made of the Minister’s plan, it concerns us that there has been minimal focus placed on the need for an accessible, inclusive transport system, an aspect that was included in the previous government’s transport statements.

DPA stresses the need for both central and local government as outlined in the “Transport experiences of disabled people in Aotearoa New Zealand Report” (2022) to jointly develop transport networks enabling accessible journeys through taking a whole of journey approach. [[1]](#footnote-1)

We also support the need for our transport system to meet climate and emissions reductions targets and, for this reason, both regional councils should set higher regional targets which go above and beyond those formulated by the new government.

In our view, transport needs to be both climate friendly and meet accessible journey requirements 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[[2]](#footnote-2); and

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

In this submission, we will elaborate further on these points and make recommendations on how they can be further enhanced to create an integrated, inclusive and accessible transport system.

We will draw on the Transport experiences report as well through referencing it at relevant points in this submission.

**1.Background**

The current Otago-Southland RLTP has the following 30-year Strategic Objectives:

* Road Safety
* Asset condition
* Connectivity and Choice
* Environmental Sustainability
* Future Focus.

Using these objectives, DPA sees that there has been considerable progress made by both regional councils towards making the public transport system and supporting infrastructure more accessible for disabled people and other transport disadvantaged groups.

Over the last three years since the current plan’s adoption in 2021, the following improvements have been made by local councils which have all supported transport accessibility:

* The roll-out of new electric buses beginning in Dunedin that incorporate accessibility features with plans to introduce more.
* A reduction in public transport fares to being only $2 flat fares in Dunedin, Invercargill and Queenstown – a move that has resulted in increased bus patronage.
* Increased contact between Otago Regional Council transport staff, disabled people and disability organisations in the Dunedin, Invercargill and wider region.
* The building of accessible, inclusive new transport/pedestrian infrastructure in the form of shared walking/cycling/traffic spaces in the Dunedin and Invercargill central business districts.
* Supporting the roll out under the previous government of the new Total Mobility scheme user discounts which have gone from covering 50% to 75% of all taxi and small passenger service fares for eligible scheme users.

However, more work remains to be done in the accessible journeys space across Otago and Southland.

This is why we are supportive of the three investment priorities outlined in the mid-term plan of:

* **Priority One:** Optimise an efficient and accessible transport network through enhanced mode choice provision across the regions.
* **Priority Two:** Promote safety and wellbeing outcomes across the regional transport network.
* **Priority Three:** Enhance network maintenance and resilience to ensure community access and connectivity.

DPA will outline the need for both regional councils to continue the path that has been set by the current 2021-31 RLTP while navigating the changes that central government have proposed.

Most importantly, DPA will outline the need for more accessible transport and supporting infrastructure including footpaths, walkways, cycleways (separate but parallel to pedestrian footpaths) to be built in partnership with all road controlling authorities throughout the region.

**2. Regional Disability Demographics**

According to Statistics New Zealand’s 2013 Disability Survey, the Otago-Southland region had the fourth highest disability population rate in the country, with 26 percent identifying as disabled people.[[3]](#footnote-3)

This figure is disproportionately higher than the total percentage of disabled people in New Zealand which stood at 24 percent (n=1,100,000).

If the 2013 disability population numbers are overlain with the estimated 2022 total Otago-Southland population (n=358,500), then there are at least 93,210 disabled people currently residing in the region.

The growing number of disabled people is why all regional councils - including those in Otago and Southland - should plan for the development of fully accessible, inclusive transport options.

**3. Building accessible, integrated connected and safe regional transport networks**

**a.) Mobility taxi shortage and Total Mobility (TM)**

Disabled people throughout the Otago-Southland region 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.

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 prohibitively high set up costs[[4]](#footnote-4) 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.

During this renewed crisis for the mobility transport system, Waka Kotahi announced a highly anticipated review of the Total Mobility (TM) Scheme[[5]](#footnote-5) to consider these and other issues that have surfaced around it 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 Otago-Southland will still need access to affordable, accessible public transport options.

That is why we recommend that both Councils set aside additional funding for the next two financial years of the plan (2024/25 and 2025/26) by maximising their respective contributions (over and above the Waka Kotahi contribution) to enable more mobility vehicle fit outs to be undertaken throughout the region so that potential passenger service operators (who often have minimal capital) do not have to carry any cost.

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Doing so would 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.

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

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

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| **Recommendation 1:** that Environment Southland and the Otago Regional Council maximise its contribution (over and above the Waka Kotahi contribution) to the cost of fitting out all new mobility service passenger vehicles through increased funding for this purpose. |

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| **Recommendation 2:** that Environment Southland and the Otago Regional Council await the outcome of the Total Mobility review before proceeding with any further changes. |

**b.) Urban bus services**

As noted above, DPA is pleased with the progress that has been made in terms of rolling out new, accessible bus services in both Dunedin and Invercargill.

Additionally, we have heard reports from disabled people around their being some improvement in the responsiveness of frontline staff, including bus drivers, towards disabled people. This has occurred through, for example, more drivers knowing when to lower bus ramps and kneel at the curb.

We attribute this to the increased roll out of disability responsiveness and awareness training for all bus drivers and hope to see this continued during the remainder of the RLTP and beyond.

However, DPA is concerned about other developments originating from central government which could impact on public transport provision.

One of these concerns the previous government’s free transport for children and young people policy which will see these age groups charged full fares again as of May 1.

We are also concerned about plans signalled in the Draft National Transport Policy Statement around de-prioritising investment in public transport and requiring greater fare box recovery from bus users.

This will probably result in higher fares that will particularly impact upon a considerable number of people, including disabled people.

DPA recommends that both the Otago and Southland Regional Councils invest in keeping fares as low as possible, at the current flat rate of $2, to ensure that people have continued access to affordable, accessible public transport on urban bus services across both regions.

The Transport Experiences of Disabled People report also elaborated on the lack of accessible interregional transport options for disabled people in the form of bus and coach services like Intercity and Atomic Shuttles, which are currently inaccessible to wheelchair and mobility aid users.

This issue is pertinent in the small rural communities of the Otago-Southland region. This creates barriers to disabled people living within them to accessing not only their own communities but healthcare and other important appointments in major centres including Dunedin and Invercargill.

One of the ways in which this has been managed have been through the establishment of small-scale door-to-door passenger services (including health shuttles), but these are not always accessible either as privately owned buses or shuttles very rarely incorporate wheelchair loading mechanisms including hoists.

For these and other reasons, DPA recommends that both regional councils in their review of interregional and alternative transport options investigate the development of accessible transport services that would be inclusive of everyone, including disabled people across the whole region.

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| **Recommendation 3:** that Environment Southland and Otago Regional Council invest in keeping urban bus fares as low as possible. |

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| **Recommendation 4:** that Environment Southland and Otago Regional Council investigate the development of interregional and alternative accessible transport services that would be inclusive of everyone, including disabled people. |

**c.) Rail**

We note that there is much discussion in this document about having more freight moved via rail to take pressure off existing road networks and that is a positive.

However, the need for rail to move people too for environmental, social and economic reasons should be given equal consideration. We see the potential for a re-established passenger rail service to provide greater access for disabled travellers. Already, the Te Huia commuter rail service that runs between Hamilton and Auckland is well patronised and has accessibility features built into its carriages for the benefit of disabled passengers.

DPA outlined the multiple benefits of passenger rail for disabled people in our submission to the Parliamentary Inquiry into Interregional Rail Services run by the previous Parliament’s Transport Select Committee in 2023.[[6]](#footnote-6) Disappointingly, the committee’s recommendations around the need to re-establish a nationwide passenger rail network were rejected by the former government.

In the absence of any central government action in this space (which looks set to continue with the new government) both regional councils should fund feasibility studies into the development of locally based commuter rail services to illustrate what could be possible if there was more central government investment in rail.

A feasibility study could investigate whether, for example, whether the re-establishment of a fully accessible, modernised Southerner passenger rail service (axed in 2002) running between Christchurch, Dunedin and Invercargill would be viable, and the investment levels required for it to be so.

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| **Recommendation 6:** that Environment Southland and the Otago Regional Council (alongside other interested parties) fund a feasibility study into passenger rail services in both regions as part of the next phase of the RLTP. |

**d.) Walking, cycling and micromobility**

DPA welcomes the ongoing commitment of both regional councils to supporting the creation of walking, cycling and other micromobility options.

However, we note with concern that the new government’s proposed draft National Land Transport Policy Statement gives lesser priority to the development of active transport options.

If the government’s draft policy statement is adopted in its current form, this will mean less funding from Waka Kotahi being available for the building of the accessible walkways, cycleways and places where micromobility vehicles can go which are all necessary if we are to further reduce carbon emissions as a country.

DPA recommends that both regional councils (alongside other local authorities) continue to invest in safe, accessible and inclusive walking, cycling and micromobility options to the maximum extent possible.

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| **Recommendation 7:** that Environment Southland and the Otago Regional Council (alongside other local authorities) continue investing in safe, accessible and inclusive walking, cycling and micromobility options. |

## **e.) Maintaining safe networks: lowering 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 and landslides.

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.

Both Environment Southland and the Otago Regional Council 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.

## **e.) Maintaining safe networks: timely fixing of our roads**

More investment needs to be undertaken to enable the timely, efficient fixing of Otago and Southland’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.

Both regional councils 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 by contractors.

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 8:** that Environment Southland-Otago Regional Council 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. |

## **f.) Maintaining safe networks: road safety**

DPA notes that the Government’s Draft National Land Transport Policy Statement will permit road controlling authorities to reverse blanket speed restrictions where it is safe to do so*.*

Speeding traffic is a deterrent to pedestrians - including for the many disabled people who mobilise this way - and reversing the speed management plans that have been implemented around schools and high-risk traffic areas will be counterproductive and a waste of the resources invested in this beneficial work.

Speeding traffic is a strong deterrent to pedestrians and presents safety issues, factors that will lead more people to no longer choose either walking or cycling. In the long-term, these moves will negatively impact on population health – including that of disabled people - and slow down (or even reverse) emissions reductions.

The best way in which to address this risk would be through both regional councils working with all RCAs in the Otago/Southland region to conduct cost/benefit analyses of any proposals to raise speed limits and that these take account of the costs of reduced walking and cycling activity.

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| **Recommendation 9:** that Environment Southland and Otago Regional Council work with all RCAs in the Otago/Southland region to conduct cost/benefit analyses of any proposals to raise speed limits. |

1. Doran, B., Crossland, K., Brown, P., & Stafford, L. (2022). Transport experiences of disabled people in Aotearoa New Zealand (Waka Kotahi NZ Transport Agency research report 690). Retrieved from <https://www.nzta.govt.nz/resources/research/reports/690> [↑](#footnote-ref-1)
2. 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#:~:text=Climate%20change%20amplifies%20the%20marginalization,rate%20of%20mortality%20in%20heatwaves>. [↑](#footnote-ref-2)
3. [↑](#footnote-ref-3)
4. <https://www.rnz.co.nz/national/programmes/checkpoint/audio/2018920173/money-set-aside-for-wheelchair-taxis-not-being-spent>

 [↑](#footnote-ref-4)
5. <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/total-mobility-scheme/>

 [↑](#footnote-ref-5)
6. <https://www.dpa.org.nz/page/71/AllSubmissions.html> [↑](#footnote-ref-6)