



# **Draft Decisions Report on Submissions to the Draft Regional Public Transport Plan 2023**

**May 2024**



## Introduction

The Land Transport Management Act (2003) (LTMA) requires regional councils to maintain a regional public transport plan (RPTP) if they enter into contracts for the supply of public transport services, or provide financial assistance to operators or users of passenger services.

Three of the West Coast Councils are involved with subsidising public transport: the West Coast Regional Council (WCRC) subsidises the Total Mobility Scheme, and the Buller and Westland District Councils subsidise taxi services in Westport and Hokitika respectively.

The LTMA also requires that RPTPs be renewed. A review of the current Regional Public Transport Plan (RPTP) (2015) commenced in November 2021. The following parties were consulted with during 2022-23 on the preparation of a new draft Plan:

- Active West Coast
- WINZ
- District Councils
- West Coast DHB
- Poutini Ngāi Tahu
- Regional Transport Committee
- NZ Transport Agency
- Every operator of a public transport service in the region
- Every person who has notified the Regional Council of a proposal to operate an exempt service in the Region
- Minister of Education
- Kiwirail
- If there are any specified development projects in the region, for example, Kāinga Ora–Homes and Communities

The Draft RPTP 2023 was publicly notified for submissions on 28 August 2023. At the close of the submission period on 29 September 2023, 10 submissions were received on the Draft Plan, from:

- CCS Disability Action
- Sam Duckor-Jones
- John Caygill
- Rosie McGrath, Active West Coast
- Te Mana Ora
- Jane Neale
- Safer Westland
- Chris Ford, Disabled Persons Assembly
- Glenys Byrne, Road Safety Co-ordinator
- Mike Nolan, West Coast Disability Steering Group

All submissions supported a baseline of continuing the Total Mobility Scheme and subsidised taxi service, and some submissions also sought development of alternative public transport options on the West Coast.

Four submitters indicated they wished to be heard at a Hearing. The Hearing was held on 13 March 2024. Members of the West Coast Regional Council's Resource Management Committee formed the

Hearing Panel. Submitter Sam Duckor-Jones did not attend the hearing, so submitters from three organisations presented their submissions to the Hearing Panel:

- Disabled Persons Assembly New Zealand (Chris Ford)
- Mike Nolan (West Coast Disability Steering Group)
- Active West Coast (Rosie McGrath and Vicki )

Following the submitters' presentations, the Hearing was adjourned and the Panel deliberated on the submissions and staff recommendations. Deliberations were then adjourned in case the Panel needed further clarification of any matters raised in the submissions or at the Hearing and Deliberations.

The Hearing Panel wishes to thank all those who took the time to make submissions on the Draft RPTP, and present them at the Hearing. This Decisions Report reflects the Panel's consideration of matters raised in submissions and at the Hearing. In summary, the Panel accepted, or accepted in part, most of the submission points seeking that Council takes more action to provide better public transport options for transport-disadvantaged people in the Region. The Panel acknowledges these suggestions, however where an activity or investigation will require substantial investigation and funding, the Council cannot commit to adding these to the Draft RPTP as they are a matter that needs to be considered in the Long-Term Plan process. The Draft Plan already includes an Action to explore the potential for investigating on-demand public transport services.

Several other matters were sought by submitters, and for some of these the Panel has not accepted them for various reasons. For other matters, the Panel recommends that the Council undertake several actions outside of the RPTP which involve less resourcing.

On this basis, the Panel decided that no changes need to be made to the Draft RPTP arising from the submissions, except for minor clarification changes to Action 11, clause 5.3 for exempt services, and Appendix A. Note that a number of minor grammatical errors, and out-of-date text have been corrected and updated in the RPTP, and the Actions have been numbered. These changes are not substantive and will not affect submitters or the public.

The Decisions Report and final RPTP will go to the 4 June 2024 Council meeting for their approval, and subject to approval, the Council will then adopt the final RPTP 2024.

A copy of the final RPTP 2024 accompanies this Decisions Report.

## Decisions on submissions

Submissions on definitions	
Te Mana Ora (S5.1)	Te Mana Ora supports the explanation of transport disadvantaged provided, however seek that it is expanded to acknowledge that people who overcome a lack of transport choice by paying more than they can reasonably afford are also transport disadvantaged. For example, people may be forced to own a car or pay for a taxi that they cannot afford. This amendment aligns with the explanation of transport disadvantaged in Aotearoa New Zealand's first emissions reduction plan.

### Decision – Te Mana Ora (S5.1)

Reject

#### Reasons

The Panel acknowledges that Te Mana Ora's points are correct, however, we do not support the changes sought. The RPTP has been drafted under the provisions of the Land Transport Management Act (LMTA) and it is the definition in this Act that the RPTP definition must be consistent with, as it currently is. The Panel also considers that the wording should be consistent with the wording that NZTA/Waka Kotahi uses.

Submissions on overall draft objectives and policies	
CCS Disability Action (S1.1)	Needs to be more emphasis on walking and biking Need for cycle routes protected from vehicle traffic by physical barriers
Sam Duckor-Jones (S2.1)	The West Coast needs a public transport system if it wants to be part of a modern, fair, thriving, and healthy society. The population is sufficient for public transport, as per daily traffic movements between Hokitika and Greymouth. 'If you build it, they will come' thinking and not short-term thinking is required. Providing public transport is a moral as well as statutory responsibility. Public transport is necessary to cope with resurgence in tourism
John Caygill (S3.1)	Objectives and policies are appropriate but there are further actions required

### Decision – CCS Disability Action (S1.1)

Reject

#### Reasons

With respect to the CCS Disability Action submission point, the Panel agrees that walking and cycling are an important aspect of land transport. However, the Panel cannot accept the submission point and make the changes sought to the Draft Plan as walking and cycling are not included in the definition of public transport. Strategic development of walking and cycling is provided for in *The West Coast Regional Walking and Cycling Strategy 2009*.

### Decisions - Sam Duckor-Jones (S2.1), John Caygill (S3.1)

Reject

#### Reasons

Regarding Sam Duckor-Jones' submission point S2.1, and John Caygill's submission point S3.1, at the Hearing, the Panel was made more aware of the issues facing transport-disadvantaged people, and the value in working with agencies involved with transport for disabled people. The Action to implement

Policy 1 of Objective 3 of the Plan is to explore the potential for investigating on-demand passenger transport services. The Panel will recommend to Council to consider, subject to sufficient resourcing, being part of a working group with other agencies supporting public transport to do initial scoping of whether an on-demand passenger transport service may be feasible for the West Coast, as suggested by Active West Coast at the Hearing.

However, the Panel cannot commit in the Draft RPTP to going further than a scoping stage for on-demand services. This is a matter that would need to be considered in the Council’s Long Term Plan process.

The Panel therefore does not accept submissions which seek that a more comprehensive public transport system is established or at least investigated for the West Coast. The prevailing view is that funding limitations and a small population spread over a large area makes public transport in the form of buses and trains unviable on the West Coast, and this is still likely the case.

The Panel assumes that the submission points by Sam Duckor-Jones (S2.1) and John Caygill (S3.1) seek an increased or improved public transport system, although it is unclear what scale of improvement they seek, and whether it would be consistent with Policy 1 of Objective 3 in terms of being within available funding and sustainability of services. These submission points are therefore rejected.

<b>Submissions on specific objectives and policies</b>	
<i>Objective 1: To consider the needs of the transport disadvantaged and maintain accessibility for mobility-impaired persons</i>	
Te Mana Ora (S5.2)	Support the objective, however those who are not eligible for the scheme (including due to where they live) are further disadvantaged
Disabled Person’s Assembly (S8.1)	Submits that the Total Mobility System (TMS) is inadequate and expensive. Seeks that Council undertakes full, targeted consultation focused on changes to TMS with disabled people and disability organisations throughout the West Coast before approving the transport plan.
Disabled Person’s Assembly (S8. (S2)	Submits that interregional transport is difficult for disabled people also, largely due to guidance for users being issued only for routes within cities and regions. Seeks that Council collaborates with the West Coast’s disabled community to lobby central government to strengthen transport accessibility standards so that they apply to all city, regional and inter-regional services and make other public transport platforms accessible nationwide including inter-regional bus and train services.
Michael Nolan (West Coast Disability Steering Group) (S10.1)	Transport needs for the disabled and impaired on the West Coast are not being met and taking onboard the 820 west coast members signed to the Total Mobility Scheme should not be considered an accurate gauge on the number of disabilities or impairments that could potentially utilise public and mobility services transport should adequate services be available.
Michael Nolan (West Coast Disability Steering Group) (S10.3)	Bus transport providers e.g. Intercity, Atomic Shuttles, Coast to Coast Shuttle, have not done enough to cater for the disabled on any coaches travelling up and down, to and from the West Coast.

Michael Nolan (West Coast Disability Steering Group) (\$10.5)	Decision makers [should] come to the table, to invite disability advocates and those with the lived experience of disabilities into the discussion to support the provision of suitable, fit for purpose transport solutions.
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**Decision – Te Mana Ora (\$5.2)**

Accept in part

**Reasons**

The Panel accepts the part of the Te Mana Ora submission that supports Objective 1 of the Draft Plan. The Panel further agrees with Te Mana Ora’s point, as there will be a number of West Coast people who live further away and are therefore not eligible for the Total Mobility transport assistance. These people are more disadvantaged. The Panel considered whether the geographical boundaries set in the Total Mobility eligibility criteria should be reviewed, as the eligibility criteria has not been reviewed as part of this Plan review. However, there is no current resource to do this work in the short term. Such a piece of work would take considerable time to investigate and needs to be well-resourced. It would also involve substantial consultation with disabled people, organisations and the public. The Panel cannot commit to this level of funding in the Draft RPTP. Budgetting for this would need to be considered in the Council’s Long-Term Plan process.

**Decisions – Disabled Person’s Assembly (\$8.1 and \$8.2) & Mike Nolan (\$10.1, 10.3, 10.5)**

Accept in part

**Reasons**

The Panel accepts the parts of these submission points seeking that the Council consults with disabled people and disability organisations to scope if it is feasible to investigate alternative public transport options for the transport disadvantaged whose transport needs are not currently being met. At the Hearing, the Panel was made more aware of the issues facing transport-disadvantaged people, and the value in working with agencies involved with transport for disabled people. The Actions to implement Policy 1 of Objective 3 of the Plan include to explore the potential for investigating on-demand passenger transport services. The Panel will recommend to Council to consider being part of a working group with other agencies supporting public transport to do initial scoping of whether an on-demand passenger transport service may be feasible for the West Coast, as suggested by Active West Coast at the Hearing.

Other parts of these submission points seek that Council advocate for increased accessibility for the transport disadvantaged to public transport services such as regional and inter-regional bus and train services. The Panel considers that the Council can advocate for appropriate access to public transport for disabled people in its role on the South Island Regional Transport Committee Chairs Group. This is an action that is outside of the Draft Plan, and it does not need to be added to the Draft RPTP as the Draft Regional Land Transport Plan covers it in a new Objective 5, for “Improved advocacy for regional transport needs”.

Furthermore, the Panel cannot commit, in the Draft RPTP, to DPA’s specific initiative, to lobby central government to strengthen inter-regional bus and train transport accessibility standards. Although accessibility requirements are provided for in the 2022 *Requirements for Urban Buses in New Zealand*, the requirements of interregional transport are less clear.

<i>Policy 1: Understand and monitor demand for services to meet the needs of the transport disadvantaged.</i>	
Te Mana Ora (S5.3)	Supports the policy. Suggests that the Council works with the community and organisations already consulting with the local community. For example, Tākiwa Poutini have consulted and collected information with communities and whānau to understand how to improve wellbeing in Te Tai o Poutini and have found that transport is a barrier to improving wellbeing.

### **Decision – Te Mana Ora (S5.3)**

Accept

#### **Reasons**

The Panel accepts Te Mana Ora’s support for Policy 1 of the Draft Plan, and considers that their suggestion is a sensible one. At the Hearing, the Panel was made more aware of the issues facing transport-disadvantaged people, and the value in working with agencies involved with transport for disabled people. The Actions to implement Policy 1 of Objective 3 of the Plan include to explore the potential for investigating on-demand passenger transport services. The Panel will recommend to Council to consider being part of a working group with other agencies supporting public transport to do initial scoping of whether an on-demand passenger transport service may be feasible for the West Coast, as suggested by Active West Coast at the Hearing.

<i>Action 1: Undertake investigation as to the demand for alternative transport options for consideration in the future.</i>	
Te Mana Ora (S5.4)	Recommends Council considers how their proposed investigation of transport demand can reach the transport disadvantaged. People who face barriers to using transport might also face barriers to engaging in consultation, for example, they may lack time, literacy skills, access to the internet, and confidence to engage in the process. It is important that people who are affected by decisions are empowered to have input into decision making.

### **Decision – Te Mana Ora (S5.4)**

Accept

#### **Reasons**

The Panel accepts this Te Mana Ora submission point as it makes another helpful suggestion in terms of making sure the views of transport disadvantaged groups are heard in consultation. At the Hearing, the Panel was made more aware of the issues facing transport-disadvantaged people, and the value in working with agencies involved with transport for disabled people. The Action to implement Policy 1 of Objective 3 of the Plan is to explore the potential for investigating on-demand passenger transport services. The Panel will recommend to Council to consider being part of a working group with other agencies supporting public transport to do initial scoping of whether an on-demand passenger transport service may be feasible for the West Coast, as suggested by Active West Coast at the Hearing.

<i>Policy 2: Maintain and expand, where practicable, support for services to meet the needs of the transport disadvantaged who meet the Total Mobility eligibility criteria</i>	
Te Mana Ora (S5.5)	Supports the policy because this service provides people with mobility and health issues with a transport option.
Active West Coast (S4.1)	Supports the policy. Believes the service is essential for people who would otherwise be reliant on family, friends or community organisations for travel and social participation. Conscious that many people do not benefit from the services because they don’t meet the required criteria or because of geographical location



## Decisions – Te Mana Ora (S5.5) and Active West Coast (S4.1)

Accept

### Reasons

The support from Te Mana Ora and Active West Coast (AWC) for Policy 2 is accepted and acknowledged. Refer to the reasons given under Te Mana Ora’s submission points S5.3 and S5.4, which apply to these two submission points on Policy 2 of the Plan.

<i>Action 2: Continue to support and fund the Total Mobility Scheme, including: 2(a): Contracting taxi and shuttle services to provide targeted services; 2(c): In eligible cases, assisting with accessing funding for the installation of hoists in specialist vehicles so that wheelchairs can be carried;</i>	
Te Mana Ora (S5.6)	Supports the action 2(c) to assist funding access for hoists in specialist vehicles to allow wheelchairs to be carried because this will improve accessibility for people who use wheelchairs.
Active West Coast (S4.2)	Supports the extra subsidy (Action 2(c)) to enable services to carry wheelchair users. However, Westport Taxis is the only service that operates an on-demand service for people in wheelchairs. Hokitika offers this service although the passenger needs to book a day in advance to allow the operator to prepare the vehicle. Taxis in Greymouth are not wheelchair capable.
Active West Coast (S4.3)	Action 2(a): Seeks that Council advocates strongly for continued investment in the TMS in light of its current review by Waka Kotahi.
Disabled Persons’ Assembly (S8.3)	Seek that Council transition all TMS users to a card-based system by agreeing to phase out the current voucher-based system as soon as possible.
Michael Nolan (West Coast Disability Steering Group) (S10.4)	The majority of regions in New Zealand issue a magnetic type swipe card (the West Coast Regional Council still provides a paper voucher system – one of only two regions in New Zealand still doing this. The paper voucher system requires a large amount of explaining with the taxi company, and again with the driver, in order for the driver to accept the details and process the transaction.

## Decisions – Te Mana Ora (S5.6) and Active West Coast (S4.2 & S4.3)

Accept in part

### Reasons

The Panel accepts the parts of the submissions from Te Mana Ora and Active West Coast which support Action 2(c), regarding accessing funding for installation of hoists for wheelchair access to specialist vehicles. The support is acknowledged, and the Panel shares Active West Coast’s concern that there is currently no hoist service available for Total Mobility wheelchair passengers in Greymouth.

However, the Panel cannot commit in the Draft RTP to specifically fund hoists for people in wheelchairs. Any funding from Council for wheelchair-capable vehicles would need to be considered through the Council’s Long Term Plan process. The Panel notes that Action 2(c) in the Draft Plan is to assist with accessing funding, not necessarily for the Council to provide funding. The Panel will/can recommend to Council, as an action outside of the Draft Plan, to investigate alternative sources of

funding outside of the Council. Both of these options would need support from NZTA/Waka Kotahi as they co-fund Total Mobility wheelchair hoists, and the taxi provider.

Active West Coast’s submission on Action 2(a) of the Plan, seeking that Council advocates for continued Central Government investment in the Total Mobility Scheme, is also accepted in part. The Panel agrees in principle with the action sought by the submitter, but considers it does not need to be added to the Draft RPTP. A new Objective 5 in the Draft Regional Land Transport Plan covers this, for “Improved advocacy for regional transport needs”, so the matter does not need to be repeated in the Draft RPTP.

**Decisions – Disabled Person’s Assembly (S8.3) and Michael Nolan (S10.4)**

Accept in part

**Reasons**

The Panel accepts the parts of these submissions, and agrees in principle with the concept of what these submitters seek, that the West Coast needs to consider changing from the current paper voucher system for Total Mobility (TM) subsidised taxi fares, to a swipe card system the same as what most other regions use. At the Hearing, the Panel heard how TM users from outside the Region cannot use their swipe card in the West Coast, and West Coast TM users must pre-organise their trips to use their paper vouchers in other regions. However, the Panel considers it is not appropriate or necessary to add this as a new activity in the Draft Plan. The Panel cannot commit in the Draft RPTP to funding changing to a swipe card system as this would need to be considered in the Council’s Long Term Plan process. The logistics and costs of changing to a swipe card system for the West Coast need to be firstly investigated, and this can be done by current resourcing.

<i>Action 7: Continue to improve the administration of the scheme where practicable, and to meet any Waka Kotahi NZ Transport Agency requirements;</i>	
Jane Neale (S6.1)	Supports this action. Suggests investigating ways it can be made more efficient so more people can benefit, such as working with the Greymouth Hospital to timetable people from the same location for appointments at the same time

**Decision – Jane Neale (S6.1)**

Accept in part

**Reasons**

The Panel accepts the part of the submission which supports No 7 of the Policy 2 Actions. The support is acknowledged. The Panel agree in principle with Jane Neale’s suggestion of investigating working with the Greymouth Hospital to try and timetable hospital appointments for TM users from the same location, so their transport can be shared and costs reduced. However, the Panel does not support adding this to the Draft Plan as Council cannot commit to doing this work at present. It would be a considerable logistical task, and would be part of scoping a larger investigation for on-demand services. It also likely would need expert assistance, and would need to be considered in the Council’s Long Term Plan process.

<i>Policy (of objective 3): Support the provision of other passenger transport services where there is demand, taking into account funding availability and the sustainability of services.</i>	
Te Mana Ora (S5.7)	Supports the policy. Recommends Council engages with communities who operate community van services already to understand transport demand, as well as how the Council can support them to operate these services.
Active West	The Plan acknowledges that various communities provide transport options through community van services, but it also says that ‘Council has no direct involvement in these

Coast (S4.4)	services', although it maintains a schedule of these services. We believe this provides an opportunity for Council to formally link with communities to gauge how it can offer support in the operation of the vans. This community facility may also be an opportunity to expand the Total Mobility Scheme into communities outside the three main towns.
Te Mana Ora (5.8)	The Regional Public Transport Plan is an opportunity to create a comprehensive public transport system that services the communities' needs now and in the future. Although the region has a small and dispersed population, there is anecdotal evidence that more people are moving to the West Coast, as highlighted in the Plan. Providing public transport will make the West Coast an even more attractive place to live.
Active West Coast (S4.5)	Supports the policy. Argues strongly there is sufficient evidence to indicate that investigation into developing a public transport system should be given high priority within the Regional Public Transport Plan.
Sam Duckor-Jones (S2.2)	Investment in a modern public transport system is an imperative. Train rides should not be a luxury item. Ease of movement is a human right. At a minimum, a bus service should be put on twice a day between our larger towns- all of which are small and flat- ie walkable and cycle friendly.
Sam Duckor-Jones (S2.3)	Please have courage. Please do something valuable and morally good that will benefit our community for years to come. Please think long-term. Please be a part of the solution rather than plugging your ears and kicking the can down the road- this will only lead to bigger costs, bigger losses, bigger clean up. The West Coast deserves better. Better than what? Better than four taxis.
Safer Westland (S7.1)	Submits that a regional public transport system should be given high priority to enable access to services, education, employment opportunities, health, sport and social services, particularly for the aging population
Safer Westland (S7.2)	West Coast has a high deprivation index. An appropriate public transport system could help address this. For a number of years, WCRC have ignored studies carried out across the West Coast that have identified transport issues and transport barriers. WCRC have a responsibility to highlight public transport as an immediate concern for the West Coast.
John Caygill (S3.2)	As you have noted, the West Coast does not have a comprehensive public transport network. This further disadvantages those who are already disadvantaged by not owning or not being able to drive a car. The proportion of West Coast residents in this category is higher than the national average (higher median age, higher proportion of disabled, and significantly lower median household income). Furthermore, fuel costs and their daily expenses are expected to keep rising.
Jane Neale (S6.2)	The Regional Public Transport Plan needs to give high priority to ensuring an accessible and affordable public transport system that meets the needs of all, especially the elderly, the rural, the disability sector, and the lower socio-economic demographic. Also, those that wish to limit their carbon footprint. This needs to happen sooner not later.
Safer Westland (S7.3)	Seeks that a public transport system is highlighted now as a necessity, not in 2033.
Te Mana Ora (S5.9)	Seeks that Council considers an on-demand public transport service, such as MyWay in Timaru, to respond to passengers' pre-booked pick-up locations and destinations instead of having fixed route services.
Disabled persons' assembly (S8.4)	Consult on the possibility of providing funding to support the establishment of other community-based mobility services on the Coast.
Michael Nolan (West Coast Disability Steering	More needs to be done about the availability of public transport for the disabled. A consolidated effort must be made to ensure the availability of public transport that is accessible including subsidies for private operators to adequately offer mobility transport options for our disabled community members. The Total Mobility Scheme should extend into the tools and vehicles required to fully support all inclusive transport options.

Group) (S10.2)	
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**Decisions - Te Mana Ora (S5.7) and Active West Coast (S4.4, 4.5), Disabled Persons Assembly (S8.4), Michael Nolan (S10.2)**

Accept in part

**Decisions – Te Mana Ora (S5.8, S5.9), Sam Duckor-Jones (S2.2), Safer Westland (S7.1, 7.2, 7.3), Jane Neale (S6.2)**

Reject

**Decisions - Sam Duckor-Jones (S2.3), John Caygill (S3.2)**

Reject

**Reasons**

The support from Te Mana Ora and Active West Coast for Policy 1 of Objective 3 is accepted and acknowledged.

The Panel agrees in principle with the parts of submissions seeking that Council engages with communities and investigates on-demand transport options such as community van services. At the Hearing, the Panel was made more aware of the issues facing transport-disadvantaged people, and the value in working with agencies involved with transport for disabled people. The Action to implement Policy 1 of Objective 3 of the Plan is to explore the potential for investigating on-demand passenger transport services. The Panel will recommend to Council to consider, subject to sufficient resourcing, being part of a working group with other agencies supporting public transport to do initial scoping of whether an on-demand passenger transport service may be feasible for the West Coast, as suggested by Active West Coast at the Hearing.

However, the Panel cannot commit in the Draft RPTP to going further than an investigation stage for on-demand services. This is a matter that would need to be considered in the Council’s Long Term Plan process.

The Panel does not accept submissions which seek that a more comprehensive public transport system is established or at least investigated for the West Coast. The prevailing view is that funding limitations and a small population spread over a large area makes public transport in the form of buses and trains unviable on the West Coast, and this is still likely the case.

The Draft Plan commits to a level of investigation of on-demand services and, pending reasonable Central Government funding, this is likely to be the best option for increasing public transport options on the West Coast. The Plan does, however, leave the door open to other options, pending a strong business case demonstrating demand, sustainability, and funding availability. Such a business case is outside the scope of this Draft Plan, and the commitment towards exploring the potential for investigating on-demand services is seen as an appropriate first step toward development of the West Coast public transport system at this point.

As discussed previously, public transport systems these days don’t necessarily need to be based on trains and buses, and modern on-demand systems do offer potential for further development of public transport opportunities.

The submission points seeking the establishment of a comprehensive public transport system beyond what is proposed in the Draft Plan are therefore recommended to be rejected in favour of the proposed initial scoping of an investigation into on-demand public transport.

The Panel assumes that the submission points by Sam Duckor-Jones (S2.3) and John Caygill (S3.2) seek an increased or improved public transport system, although it is unclear what scale of improvement they seek, and whether it would be consistent with Policy 1 of Objective 3 in terms of being within available funding and sustainability of services. These submission points are therefore rejected.

<i>Action 10: Explore the potential for undertaking investigation for on-demand services through the 2024-2034 Long-term Plan</i>	
John Caygill (S3.3)	The action is too diffident- the potential to investigate shouldn't be explored, the investigation should just be carried out.
Te Mana Ora (S5.10)	Supports the action in part, but recommends Council commits to undertaking an investigation of on-demand services, rather than exploring the potential to investigate.
Active West Coast (S4.6)	Believe the action falls short of Council's obligations to meet its objectives within the Plan and that the information provided with their submission justifies a comprehensive investigation into the development of a public transport service that provides for the needs of the region's communities.
Jane Neale (S6.3)	Submits that the sentence does not give her any confidence that change will happen

**Decisions – John Caygill (S3.3), Te Mana Ora (S5.10), Active West Coast (S4.6), Jane Neale (S6.3)**  
 Accept in part

**Reasons**

The Panel accepts in part these submissions on Action 10 for Objective 3, as the Panel will recommend to Council's Resource Management Committee to consider, subject to sufficient resourcing, being part of a working group with other agencies supporting public transport to do initial scoping of whether an on-demand passenger transport service may be feasible for the West Coast, as suggested by Active West Coast at the Hearing.

The Panel does not accept parts of submissions seeking that the Council launches straight into a comprehensive investigation of an on-demand public transport service for the West Coast. The fact remains that even the investigatory stages of such developments entail reasonable cost, particularly given the importance of an accurate business case in what is an uncertain market. It is possible that Central Government funding may be available for this work, however, there is uncertainty around how much funding there would be. Furthermore, the Panel cannot commit in the Draft RPTP to doing straight away an investigation of on-demand services. Developing a strong business case is also outside the scope of this Draft Plan. These are matters that would need to be considered in the Council's Long Term Plan process. The commitment towards exploring the potential for investigating on-demand services is seen as an appropriate first step toward development of the West Coast public transport system at this point.

<i>Action 11: Maintain a schedule of exempt services</i>	
Jane Neale (S6.4)	Submits that it would be more effective to maintain a schedule of compliant rather than exempt services

**Decision – Jane Neale (S6.4)**  
 Accept in part

## Reasons

The Panel cannot accept the change sought by the submitter, to replace “exempt services” in Action 11 with “compliant services”. This is because the Council is required to maintain a schedule of exempt public transport services under section 131 of the Land Transport Management Act (2003).

However, the Panel accepts in part that changes are needed to references to “exempt services” in Action 11 and clause 5.3 of the Draft Plan. Clause 5.3 is unclear about what “exempt services” means, and this may be part of the confusion over the terms referred to in the submission point.

During deliberations, the Panel sought clarification of “exempt services”, these are public transport services, mainly inter-regional bus services, that are exempt from:

- a) being registered with the Regional Council;
- b) getting a subsidy from the Regional Council and NZTA/Waka Kotahi – NZ Transport Agency for public transport; and
- c) having their fares regulated.

While Council recognises these transport services as important in the Region, they are exempt because Council does not have the resources to subsidise public travel on them by way of contracts with the providers. To operate an exempt service, it must be registered with the Regional Council as per sections 130 and 146 of the Land Transport Management Act, so that public transport networks can be planned and delivered in an integrated manner. Listing exempt services in the Draft Plan is the appropriate document to record their exemption from being subsidised services.

The Panel considers that other changes and corrections are needed as follows:

- a) Action 11 needs a reference to clause 5.3;
- b) Remove “Part 1” in clause 5.3, and replace it with “Appendix A”, which is where exempt services are listed;
- c) “East West Coaches” needs deleting from Appendix A, as Council now has a contract with them;
- d) NZTA/Waka Kotahi was consulted about clarifying clause 5.3, and they suggest to add text to the end of the last sentence.

The changes are shown below, deletion of text is shown with ~~strikethrough~~, and new added text is shown with underline. These are not substantive changes and will not affect other submissions or the public.

**Action 11** Maintain a schedule of exempt services (refer to clause 5.3 and Appendix A)

## 5.3 Exempt services

The Land Transport Management Act 2003 requires all exempt services in a region to be registered before operation with the Regional Council, so that public transport networks can be planned and delivered in an integrated manner. For the West Coast, exempt services ~~this relates primarily to~~ are mainly inter-regional public ~~transport~~ bus services. These ~~ere~~ are registered commercial services that operate without any financial support from the Council. They ~~se~~ are ~~set out~~ listed in ~~Part 1~~ Appendix A of this Plan. As these services operate independently, operators can set fares, timetables, and routes as they see appropriate, provided they notify Council of those changes at least 15 working days prior to them being implemented.

### Exempt Services

InterCity	<a href="https://www.intercity.co.nz/south-island-buses">https://www.intercity.co.nz/south-island-buses</a>
East West Coaches	<del>https://www.eastwestcoaches.co.nz/</del>
Atomic Shuttles	<a href="https://www.atomictravel.co.nz/">https://www.atomictravel.co.nz/</a>

<i>Recommendations of other services that should be available</i>	
CCS (S1.2)	Cycle lanes should be fully and safely accessible for children, elderly and disabled people. Seeks that a ramp meeting the building code is constructed at the railway station and that safety improvements be made to ensure it is a safe and enjoyable journey to bike to Cobden or Paroa.
John Caygill (S3.4)	Urgent need for a wheelchair taxi in Greymouth.

### **Decisions – CCS (S1.2) and John Caygill (S3.4)**

Accept in part

#### **Reasons**

The Panel accepts in part, and agrees in principle, with the CCS comment that cycle lanes should be accessible and safe for children, elderly and disabled people. There may be merit in having a ramp at the railway station for improved walking and cycling access, but this would need further investigation. The Panel cannot commit in the Draft RPTP to funding improvements to walking and cycling facilities, as this is a matter that would need to be considered in the Council's Long Term Plan process. Furthermore, walking and cycling are not included in the definition of public transport so are not considered in this Draft RPTP. The submitter is referred to *The West Coast Regional Walking and Cycling Strategy 2009* and the overarching *West Coast Regional Land Transport Plan 2021-2031*.

Regarding John Caygill's submission, the Panel accepts in part, and agrees in principle, that it would be beneficial for the disabled community to have a wheelchair taxi service in Greymouth. The Panel shares Mr Caygill's concern that there is currently no hoist service available for Total Mobility wheelchair passengers in Greymouth. However, the Panel cannot commit in the Draft RPTP to specifically fund this, as it is a matter that would need to be considered in the Council's Long Term Plan process. There is also a commercial element to this in that it would require a business case, and support from the Greymouth taxi provider. It would also need support from NZTA/Waka Kotahi as they co-fund Total Mobility wheelchair hoists.

<i>Further actions sought</i>	
Disabled Persons' Assembly (S8.3)	Seek that Council require all urban buses servicing the main centres of Westport, Hokitika and Greymouth be made fully accessible and compliant with the Requirements for Urban Buses (RUB) Standards
Michael Nolan (West Coast Disability Steering Group) (S10.6)	Consideration should be given to the United Nations Convention on the Rights of Persons with a Disability (UNCRPD). The New Zealand Government has signed to the UNCRPD and ratified it in 2008, taking a leading role in the development of the Convention. The UNCRPD is a commitment to disabled people enjoying the same human rights and opportunities as all other citizens.

### **Decision – Disabled Persons' Assembly (S8.3)**

Reject

#### **Reasons**

At the Hearing, the Panel was made more aware of the issues facing transport-disadvantaged people, including the difficulties for disabled people to travel on commercial bus services between main centres

on the West Coast. However, the Panel cannot support adding a requirement to the Draft Plan for all urban buses to be made fully accessible and compliant with relevant Standards. The Requirements for Urban Buses Standards apply only to vehicles seating 13 or more people. Council does not currently subsidise any bus services meeting this criteria, and so cannot require in the Draft Plan compliance with the Urban Buses Standards. The Urban Buses Standards would need to change, and Council cannot do this. The Panel also does not support adding a requirement to the Plan for smaller passenger vehicles with less than 13 seats to be upgraded to meet similar accessibility standards, as this could make these services unaffordable.

**Decision – Michael Nolan (\$10.6)**

Accept in part

**Reasons**

With respect to Mr Nolan’s submission, the Panel accepts the part of the submission referring to the United Nations Convention on the Rights of Persons with a Disability (UNCRPD or Convention), and acknowledges the important role it has. However, the Panel cannot commit to a comprehensive investigation into how to fully implement the Convention in public transport services on the West Coast. Since the Government has signed up to the Convention, it is the Government’s role to ensure they pass legislation that is consistent with the UNCRPD, including the Land Transport Management Act. The RPTP must then meet the Act's requirements for the purpose and preparation of RPTPs. The submission point is therefore more relevant for central government to consider.

Notwithstanding this, the matter can be raised at the South Island Regional Transport Committee Chairs meeting, as this is the appropriate forum to address national matters.

The Panel is also aware that the Council has functions under several other pieces of legislation, and with a small rating base, can only allocate a certain amount of funds to the Total Mobility Scheme. On further consideration by the Panel, given that NZTA/Waka Kotahi has provided in recent years an additional subsidy for Total Mobility passengers which reduces their taxi fare to 25% of the cost, another option is that Council can investigate lifting the maximum threshold of \$30 for a subsidised Total Mobility fare. This does not need to be added to the Draft Plan.



