

28 September 2023

The West Coast Regional Council
PO Box 66,
Greymouth
7840

Tēnā koutou,

Submission on Draft Regional Public Transport Plan for the West Coast 2023-2033

1. Thank you for the opportunity to submit on the Draft Regional Public Transport Plan for the West Coast 2023-2033. This submission has been compiled by Te Mana Ora (Community and Public Health) on behalf of the National Public Health Service and Te Whatu Ora Te Tai O Poutini. Te Mana Ora recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.
2. This submission responds to the specific questions provided in the Draft Regional Public Transport Plan for the West Coast 2023-2033.
3. This submission sets out particular matters of interest and concern to Te Mana Ora.

General Comments

4. We welcome the opportunity to comment on the Draft Regional Public Transport Plan for the West Coast 2023-2033.
5. Health creation and wellbeing (overall quality of life) is influenced by a wide range of factors beyond the health sector. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the 'social determinants of health'.¹
6. The diagram² below shows how the various influences on health are complex and interlinked. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact.³
7. Transport is an important determinant of health. Road safety, air quality and emissions, physical activity levels and accessibility are some of the many factors associated with transport that have a profound impact on population health and wellbeing.⁴ In addition to direct health impacts, increased emissions from transport contribute to climate change and consequential health impacts.
8. Public transport provides accessibility to work, education, health services as well as key business areas. Access to public transport is important for people who do not have access to other transport modes, including disabled people, older people, youth and low-income earners. For example, without safe, accessible public transport, individuals who are blind, deafblind or have low vision have reduced independence,

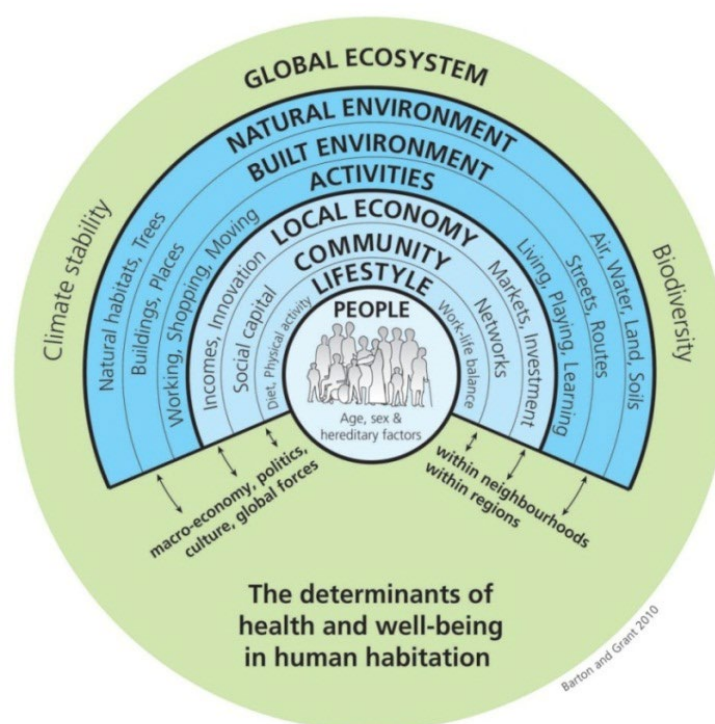
¹ Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

² Barton, H and Grant, M. (2006) *A health map for the local human habitat*. *The Journal of the Royal Society for the Promotion of Health* 126 (6), pp 252-253.
<http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

³ McGinni s JM, Williams-Russo P, Knickman JR. 2002. *The case for more active policy attention to health promotion*. *Health Affairs*, 21(2): 78 - 93.

⁴ Shaw C, Randal E, Keall M, Woodward A. *Health consequences of transport patterns in New Zealand's largest cities*. *N Z Med J*. 2018;131(1472):64–72. Epub 2018/03/23. pmid:2956593

higher rates of unemployment, limited recreational opportunities, and increased social isolation.⁵ The increased use of public transport not only reduces kilometres travelled in private cars, cuts carbon emissions and improves air quality, but also grants greater access to roads for people walking, cycling and scooting by removing single-occupancy vehicles from the roads.



Specific Comments

9. Te Mana Ora supports the West Coast Regional Council's efforts to facilitate public transport functions in the region.
10. Te Mana Ora generally supports the objectives of the Plan, including considering the needs of the transport disadvantaged, maintaining accessibility for mobility-impaired persons, and ensuring the continuation of services that meet the needs of the community and transport disadvantaged. However, the policies and actions included in the Plan are limited in their scope because they do not provide a public transport

⁵ Blind Low Vision NZ (2023). Accessed from: <https://blindlowvision.org.nz/about-us/position-statements/access-to-public-transport/>

service to people who do not meet the eligibility criteria of Total Mobility or who live outside of larger towns.

11. The lack of access to an effective public transport system on the West Coast is often highlighted as a barrier to social and economic participation. This can be a barrier for people accessing education and employment opportunities, and engagement with health and social services. Improved access to public transport is therefore important to improve equity for residents on the West Coast.
12. It is important that public transport planning takes account of the age and ability status of the population. On the West Coast, 22% of the population is aged over 65, compared with the national average of 16%. The proportion of people who are over 65 years is projected to increase to 25% by 2025.⁶ In addition, it is estimated that around 7,800 people on the West Coast live with at least one disability; for adults the main impairments are physical (47%) and hearing (20%) disabilities.⁷ Older and disabled people may have mobility issues or impairments that restrict them from driving or using other modes of transport, which makes public transport an important mode of transport for them.
13. Furthermore, one in every ten residents on the West Coast is living in an area classified as socioeconomically deprived.⁸ People who live in socioeconomically deprived areas are likely to face barriers to accessing transport, such as to own and service a car. The rising cost of fuel will also inequitably impact people who are already socioeconomically deprived.
14. In addition, people who are transport disadvantaged may drive cars at a risk to themselves and others. For example, the lack of public transport is also a reason why older people are reluctant to give up driving and why some people buy and run cheap cars, many of which are unlicensed, unwarranted and therefore uninsured. People who live outside of the larger towns are further disadvantaged as they do not have access to taxi services or the Total Mobility scheme.

⁶ West Coast DHB. 2021. West Coast DHB 2021/22 Annual Plan. Accessed from: <https://www.wcdhb.health.nz/wp-content/uploads/wcdhb-annual-plan-2021-2022.pdf>

⁷ West Coast DHB. 2021. West Coast DHB 2021/22 Annual Plan. Accessed from: <https://www.wcdhb.health.nz/wp-content/uploads/wcdhb-annual-plan-2021-2022.pdf>

⁸ West Coast DHB. 2021. West Coast DHB 2021/22 Annual Plan. Accessed from: <https://www.wcdhb.health.nz/wp-content/uploads/wcdhb-annual-plan-2021-2022.pdf>

15. Te Mana Ora encourages the Council to expand the scope of the Plan to increase access to public transport in the region, especially to meet the needs of disabled people, older people and low-income earners. The period of the Plan is 10 years therefore now is an opportunity to commit to further action to reduce carbon emissions and improve health and social outcomes.

Do you think the policies and actions for delivering public transport on the West Coast are appropriate given the characteristics of the region? Are there any other policies and actions you would suggest including?

16. Te Mana Ora supports the policy to *“maintain and expand, where practicable, support for services to meet the needs of the transport disadvantaged who meet the Total Mobility eligibility criteria”* because this service provides people with mobility and health issues with a transport option. Te Mana Ora supports the action 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.

17. However, the numbers of people who can access and benefit from the Total Mobility scheme are limited either because people do not meet the required criteria or because of geographical location. Therefore, people who are transport disadvantaged, and who are not eligible for the scheme or live rurally, are further disadvantaged.

18. Te Mana Ora supports the policy to *“understand and monitor demand for services to meet the needs of the transport disadvantaged.”* Te Mana Ora 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.⁹

⁹ Tākiwa Poutini. 2023. *People, Place & Wellbeing*. Accessed from: <https://www.takiwapoutini.nz/our-voices>

19. Te Mana Ora recommends that the 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.
20. Te Mana Ora also supports the policy to “*support the provision of other passenger transport services where there is demand, taking into account funding availability and the sustainability of services.*” Te Mana Ora recommends that the 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.
21. Te Mana Ora generally supports the action under this policy to “*explore the potential for undertaking investigation for on-demand services*”, however, Te Mana Ora recommends that Council commits to undertaking an investigation of on-demand services, rather than exploring the potential to investigate. On-demand services could reduce barriers for the transport disadvantaged and reduce emissions therefore the Council should take action to investigate demand.

Do you think that there are other services that should be available other than those identified within this RPTP? If yes, please detail what these are and justification for their inclusion.

22. Te Mana Ora suggests that the Council considers an on-demand public transport service, such as MyWay in Timaru. An on-demand service responds to passengers' pre-booked pick-up locations and destinations instead of having fixed route services. The MyWay trial in Timaru is considered a success because engagement in public transport has increased since its introduction.¹⁰ This type of service may be an

¹⁰ RNZ. 2023. Timaru's on-demand transport service gets more Waka Kotahi funding. Accessed from: <https://www.rnz.co.nz/news/national/485821/timaru-s-ondemand-transport-service-gets-more-waka-kotahi-funding>

appropriate model on the West Coast to connect provincial towns and rural locations with social and economic opportunities.

Are there any other comments you wish to make on this draft RPTP?

23. Te Mana Ora supports this explanation of transport disadvantage: *“People who face transport barriers due to limited affordability, and/or a lack of available transport options they are able to use. This includes people who live in rural areas with no vehicle, low income households, elderly people, and people with disabilities.”* However, Te Mana Ora recommends that this understanding of transport disadvantage 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 disadvantage in Aotearoa New Zealand's first emissions reduction plan.¹¹
24. 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.

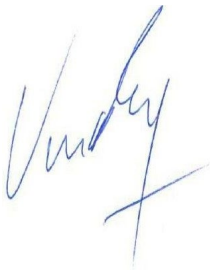
Conclusion

25. Te Mana Ora does not wish to be heard in support of this submission.
26. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.

¹¹ Ministry for the Environment. 2022. *Towards a productive, sustainable and inclusive economy. Chapter 10 Transport.* Accessed from: <https://environment.govt.nz/publications/aotearoa-new-zealands-first-emissions-reduction-plan/transport/>

27. Thank you for the opportunity to submit on the Draft Regional Public Transport Plan for the West Coast 2023-2033.

Ngā mihi,



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