



Disabled Persons Assembly NZ

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To West Coast Regional Council

Please find attached DPA's submission on Regional Public Transport Plan

For any further inquiries, please contact:

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Introducing Disabled Persons Assembly NZ

We work on systemic change for the equity of disabled people

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People's Organisation run by and for disabled people.

We recognise:

- Māori as Tangata Whenua and [Te Tiriti o Waitangi](#) as the founding document of Aotearoa New Zealand;
- disabled people as experts on their own lives;
- the [Social Model of Disability](#) as the guiding principle for interpreting disability and impairment;
- the [United Nations Convention on the Rights of Persons with Disabilities](#) as the basis for disabled people's relationship with the State;
- the [New Zealand Disability Strategy](#) as Government agencies' guide on disability issues; and
- the [Enabling Good Lives Principles](#), [Whāia Te Ao Mārama: Māori Disability Action Plan](#), and [Faiva Ora: National Pasifika Disability Disability Plan](#) 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.

UN Convention on the Rights of Persons with Disabilities

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD),¹ a foundational document for disabled people

which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention. There are a number of UNCRPD articles particularly relevant to this submission, including:

Article 3 – General principles

Article 9 – Accessibility

Article 19 – Living independently and being included in the community

Article 20 – Personal mobility

New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy² to guide the work of government agencies on disability issues. The vision is that New Zealand be a non-disabling society, where disabled people have equal opportunity to achieve their goals and aspirations, and that all of New Zealand works together to make this happen. It identifies eight outcome areas contributing to achieving this vision. There are a number of Strategy outcomes particularly relevant to this submission, including:

- **Outcome 5 – Accessibility**

The Submission

DPA welcomes the opportunity to feedback on the West Coast Regional Council's Draft Public Transport Plan.

We will focus on the Total Mobility (TM) Scheme aspects of the plan which have been a focus for disabled people on the West Coast.

Background

In 2022, Waka Kotahi published independently commissioned research (in which DPA collaborated) entitled *Transport experiences of disabled people in Aotearoa New Zealand*.¹

This research illustrated the ongoing accessibility challenges faced by disabled people when using public transport. Disabled people's main challenges included, for example, issues around using Total Mobility (TM), the inaccessibility of bus services, lack of footpaths and safe crossing points, and feeling excluded from the planning of sustainable city centres, as well as the ableist attitudes of some transport planners.

DPA acknowledges the immense challenges that face the West Coast's population in accessing public transport and this includes all modes be they buses, taxis, trains and ferries.

We recognise that disabled people in rural/provincial New Zealand face even greater barriers to accessing public transport than do their disabled counterparts in urban centres (who still face considerable barriers all the same) due to very few or non-existent, accessible public transport options in their areas.

According to Statistics New Zealand's 2018 Census data (the latest available), the number of disabled people who live within the West Coast Regional Council area stood at 9% (n= 2,841).²

Total Mobility and transport inaccessibility on the West Coast

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>

² Statistics New Zealand. (2018). Census place summaries – West Coast Region. Retrieved from <https://www.stats.govt.nz/tools/2018-census-place-summaries/west-coast-region>

The West Coast's disabled community believe that the current TM service across the whole region is both inadequate and expensive.

The inadequacy is highlighted by the fact that for the Coast's disabled community, the only accessible public transport available are two mobility taxi vans located in Westport and Hokitika.

Recently, there had been three vans available, but this reduced to two only after the service in Greymouth was discontinued when the taxi firm there decided that its running costs exceeded the small number of trips undertaken by clients.

Hato Hone St John also offers a mobility hoist vehicle service, but this is limited to only transporting people to medical appointments.

The affordability issue is highlighted by the current maximum fare for TM users on the Coast being \$30. This might be sufficient if a user wants to undertake a short trip – provided a mobility vehicle is available in their area, which as we have pointed out are few and far between.

Consequently, disabled people on the Coast experience considerable barriers in terms of accessing things like visits to more distant family/whānau and friends – and much else besides.

DPA supports the West Coast's disabled community in terms of the following recommendations.

Recommendation 1: that Council undertakes full, targeted consultation before approving the transport plan with disabled people and disability organisations throughout the West Coast.

Recommendation 2: that Council focuses the targeted consultation on changes to Total Mobility, including the possibility of providing funding to support the establishment of other community-based mobility services on the Coast.

According to the *Transport experiences of disabled people in New Zealand* report³, disabled people are not well served when it comes to accessing inter-regional transport services either. These options include the likes of InterCity Coachlines, Atomic Shuttles and other smaller coach-based services which transport people. These are largely inaccessible to disabled people, especially for people with mobility impairments. Many tourist coaches are also inaccessible, and these include those bringing tourists to the West Coast and other visitor hotspots throughout Aotearoa.

A major reason behind the inaccessibility of interregional services is that current public transport guidance issued by central government only applies to journeys within cities and regions. ⁴

DPA and the West Coast disabled community recommend that the West Coast Regional Council join in lobbying central government to strengthen transport accessibility standards so that they apply to all public transport modes, including city, regional and inter-regional services.

Recommendation 3: that Council collaborate 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.

DPA also recommends 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.

Recommendation 4: that Council also support calls for making other public transport platforms accessible nationwide including inter-regional bus and train services.

³ 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), Pg.94.

⁴ Ibid.

DPA recommends that the West Coast Regional Council transition all TM users to a card-based system by agreeing to phase out the current voucher-based system as soon as possible.

We understand that the West Coast is one of two remaining regions in the country to maintain paper vouchers for TM with all others having moved to a card system in recent years.

For any disabled people who travel outside of the West Coast and access taxi services, this would present an issue for any drivers and companies who are mainly used to dealing with card-based systems now.

Any consultation with the disabled community around public transport issues should include proposals to implement a card-based TM system on the Coast.

Recommendation 5: that Council transition all TM users to a card-based by phasing out the voucher-based system as soon as practicable.