March 2024

**To Bay of Plenty Regional Council**

Please find attached DPA’s submission on Te Mahere tūnuku ā-papa ā rohe
Bay of Plenty Regional Land Transport Plan 2024–2034

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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](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

## Introduction

DPA welcomes this opportunity to give feedback on Te Mahere tūnuku ā-papa ā rohe Bay of Plenty (BOP) Regional Land Transport Plan 2024–2034.

DPA has always stressed the need to develop fully accessible public and active transport networks across the motu. We also support the need for our transport system to meet climate and emission reduction requirements.

In our view, transport needs to be both climate friendly and accessible 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[[1]](#footnote-2); and

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

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

We also would like to draw the attention of Council to the 2022 research report we delivered with transport consultant MRCagney for Waka Kotahi – ‘Transport Experiences of Disabled People’.[[2]](#footnote-3) We reference the report at relevant points in this submission.

## 1. Objectives

DPA agrees with the transport vision outlined for BOP of making the transport system serve the needs of its environment and economy.

DPA also supports the underpinning objectives around this vision of providing for a:

* healthy and safe people
* environmental sustainability
* inclusive access
* economic prosperity
* resilience and security
* enabling housing supply.

The need to ensure that BOP’s transport system promotes the objectives of a healthy and safe people, environmental sustainability and inclusive access are very pertinent given the impact that Cyclone Gabrielle and other storms had on the region in 2023.

These storms served to highlight the disproportionate impact that climate change related events are having on disabled people within communities not only locally but globally.[[3]](#footnote-4)

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 “get through” in times of emergency are all very important for our disabled community.

The need for an accessible transport network is something that we endorse.

For the disabled community, public transport accessibility is crucial in that all modes for example, buses, trains, ferries, taxi/small passenger transport services and supporting infrastructure including footpaths, walkways, roads and cycleways must be made fully accessible and inclusive.

Despite these positives, we are disappointed to see that the terms disability and disabled people appear only three times in the entire RLTP document, with two of these references highlighting that footpaths are provided for the benefit of disabled people (amongst other groups) and the third when mentioning the need to reshape streets to accommodate the development of walking and cycling networks.

This lack of recognition around disability illustrates the need for Council to work more closely with the region’s disabled community on improving transport accessibility going forward.

DPA and local disabled people would welcome further direct engagement between the Council and disabled people across the region as the RLTP is further developed and implemented.

DPA also supports the inclusion of more references to disabled people and other transport disadvantaged communities wherever relevant throughout the final version of the RLTP.

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| **Recommendation 1:** that BOP Regional Council engages in further dialogue with the region’s disabled communities around the RLTP. |

## 2. Regional Disability Demographics

According to Statistics New Zealand’s 2013 Disability Survey, the BOP had the third equal highest disability population rate in the country, with 27 percent identifying as disabled people.[[4]](#footnote-5)

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 2023 total BOP population of 354,100, then there are at least 95,607 disabled people currently residing in the region[[5]](#footnote-6).

The number of disabled people is why all regional councils – including the Bay of Plenty Regional Council – should plan for the development of fully accessible, inclusive transport options.

## 3. Key issues

### a.) Barriers to achieving targets

Our key issue with the existing targets is that they do not measure the impact that the inaccessibility of transport infrastructure has on disabled people.

DPA also notes that the lack of access and mobility in terms of accessible, affordable, and efficient travel choices for people, goods and services is referred to in the problem statements.

DPA recommends the development of additional targets to measure improvements in transport accessibility for disabled and other transport disadvantaged groups. These targets should be developed in a co-design partnership between BOP Regional Council and disabled people.

Examples of targets could include counting the number of bus trips undertaken by disabled people as such a measure would identify whether accessibility barriers are being reduced on public transport.

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| **Recommendation 2:** that Council develops targets for measuring improvements in transport accessibility for disabled people. |

### b.) Investment in transport accessibility varies in different centres

Feedback from our members in the BOP indicates that there are substantially differing levels of investment proposed by the region’s road controlling authorities when it comes to making transport networks and supporting infrastructure more accessible in their areas.

Two contrasting examples are to be found in the levels of investment being proposed by road controlling authorities in Rotorua and Tauranga respectively.

DPA shares the concerns of Rotorua’s disabled community around the comparatively low spending indicated by their road controlling authority (Rotorua-Lakes District Council – RLDC) to cover local road, walking and cycling improvements in that city.

The sum proposed to be spent by the RLDC of $9.42 million over the next three years on local roads with walking and cycling improvements amounts to only $3,140,000 per year, which is clearly inadequate.

This amount does not account for future inflation and the need to service an increasing population in what is one of this country’s key tourist destinations.

DPA supports the points raised by members of Rotorua’s disabled community (who are also separately submitting to this plan) that the RLDC needs to invest more in creating accessible transport infrastructure across the Rotorua-Lakes district.

Any continuing lack of investment by the RLDC will flow through to minimal progress in improving accessibility to both roads and the pedestrian network for the disabled community of Rotorua.

By contrast, Tauranga City Council (TCC) provides a better example of a road controlling authority that is prepared to adequately invest in making its road, walking and cycling networks accessible to everyone, including disabled people.

An example of this is the proposal by the TCC to spend $176.7 million over the next ten years to improve public transport, walking, cycling and public realm improvements to Cameron Road between Tauranga Hospital and Barkes Corner.

The TCC have taken a proactive approach and invested in improving transport accessibility for everyone, including disabled people. This proactive approach is informed by the TCC equivalent of a disability strategy, “Accessible Tauranga Action and Investment Plan”, which is lacking in Rotorua.

DPA recommends that the BOP Regional Council encourages greater collaboration between all road controlling authorities in the region, especially when it comes to improving the accessibility of public transport and supporting infrastructure in a more equitable way.

This can best be done through Council developing a transport accessibility action plan as a collaboration between disabled people and all relevant transport stakeholders, which would ensure greater equity of access to public transport for everyone, including disabled people across the region.

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| **Recommendation 3:** That Council develop a regional transport accessibility action plan for disabled people in partnership with disabled people and all relevant transport stakeholders. |

### c.) Mobility taxi shortage and Total Mobility (TM)

Disabled people throughout the BOP 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[[6]](#footnote-7) 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 mobility conversions of small passenger service vehicles had not had much uptake with providers saying that the amount available did not fully cover the costs involved in vehicle conversion.

During this time, Waka Kotahi announced a review of the Total Mobility (TM) Scheme[[7]](#footnote-8) to consider these and other issues that have surfaced around the scheme 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 BOP will still need access to affordable, accessible public transport options.

That is why DPA recommends that the BOP Regional Council set aside additional funding for the next two financial years of the plan (2024/25 and 2025/26) 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 as much cost.

Council should increase its maximum contribution 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.

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.

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| **Recommendation 4:** that BOP 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. |

### d.) Urban bus services

DPA is 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.

One of the consequences of this move has been the new government’s dropping of the previous government’s free transport for children and young people policy as we will see these age groups charged full fares again as of 1 May 2024.

This will probably result in higher fares that will particularly impact upon a considerable number of people, including tamariki/young disabled people and their families/whānau.

DPA recommends that the BOP Regional Council invests in keeping fares as low as possible to ensure that disabled people have continued access to affordable, accessible public transport on urban bus services across the region.

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 which are currently inaccessible to wheelchair and mobility aid users.

This issue is pertinent in the small rural communities of the BOP region. This creates barriers to disabled people living in them to accessing not only their own communities but healthcare and other important appointments in major centres including Tauranga and Rotorua.

One of the ways in which this has been managed has been through the establishment of small-scale door-to-door passenger services (including health shuttles) in these areas, 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 the BOP Regional Council investigate interregional and alternative transport options with the aim of developing accessible transport services that would be inclusive of everyone, including disabled people across the whole region.

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| **Recommendation 5:** that BOP Regional Council invest in keeping urban bus fares as low as possible. |

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| **Recommendation 6:** that BOP Regional Council investigate the development of interregional and alternative accessible transport services that would be inclusive of everyone, including disabled people. |

### e.) Rail

We note that there is discussion in this document of having more freight moved via rail from the region’s main port of Tauranga to take pressure off existing road networks and that is a positive.

However, the need for rail to move people for environmental, social and economic reasons should be given equal consideration. DPA sees 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 travellers.

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.[[8]](#footnote-9) In the absence of any foreseeable actions by central government in this space, Council should fund feasibility studies into the development of locally based commuter rail services to illustrate what could be possible if there was more investment from central government in rail.

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| **Recommendation 7:** that BOP Regional Council (alongside other interested parties) fund a feasibility study into passenger rail services. |

### f.) Walking, cycling and micromobility

DPA welcomes the ongoing commitment of the BOP Regional Council 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 walking, cycling and other micromobility options.

If the government’s draft policy statement is adopted in its current form, this will mean less funding from Waka Kotahi being available to councils for the building of the accessible walkways, cycleways, and places where micromobility vehicles can go.

DPA recommends that the BOP Regional Council (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 8:** that the BOP Regional Council (alongside other local authorities) continue investing in safe, accessible and inclusive walking, cycling and micromobility options. |

1. 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> [↑](#footnote-ref-2)
2. 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-3)
3. Schulte, C. (2020, March 28). People With Disabilities Needed in Fight Against Climate Change. Retrieved from [https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change](https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report) [↑](#footnote-ref-4)
4. Statistics New Zealand Disability Survey: 2013. <https://www.stats.govt.nz/information-releases/disability-survey-2013> [↑](#footnote-ref-5)
5. Statistics NZ Subnational population estimates (RC, SA2), by age and sex, at 30 June 1996-2023 (2023 Boundaries). <https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979> [↑](#footnote-ref-6)
6. <https://www.rnz.co.nz/national/programmes/checkpoint/audio/2018920173/money-set-aside-for-wheelchair-taxis-not-being-spent> [↑](#footnote-ref-7)
7. <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/total-mobility-scheme/> [↑](#footnote-ref-8)
8. <https://www.dpa.org.nz/page/71/AllSubmissions.html> [↑](#footnote-ref-9)