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To Small Passenger Services Review team

Waikato Regional Council submission on small passenger services

Thank you for the opportunity to comment on the Ministry of Transport's Future of Small Passenger Services (SPS) Consultation document 2015. We support the Local Government New Zealand Transport Special Interest Group submission on this document, and in addition wish to add some further comments. Please note this submission has not been formally considered by the Waikato Regional Council, therefore please receive it as a staff technical submission.

In general, the Waikato Regional Council agrees that Option 4 as outlined in the consultation document is the preferred option. We support this option because it allows a more consistent approach for managing SPS and reduces the compliance costs associated with the provision of SPS. The increased flexibility in SPS will reduce the barriers for new operators to enter the market, which will lead to improved transport choices for consumers, increased competition, higher incentives for innovation and the uptake of new technology, and improved customer services.

A key priority of the Waikato Regional Land Transport Plan 2015-45 is to improve accessibility for transport disadvantaged groups. We would like to make a few points in connection with this priority in relation to option 4:

- We would like to ensure that the Ministry's further consideration of options takes into account the needs of, and impact upon, our Total Mobility customers who are generally more vulnerable and transport disadvantaged. The Total Mobility scheme is a national scheme co-funded by regional councils and the NZ Transport Agency. The scheme is particularly vital to people with disability who do not have independent access to a vehicle and cannot use public transport.
- In particular, if the requirement for operators to operate 24/7 is removed, Total Mobility customers could be disadvantaged when they require services outside of peak times or regular business hours. This is a particular issue for rural areas, of which the Waikato region has many, where Total Mobility users rely on taxi services to access essential services such as healthcare. It is also our experience that people with disability rely more heavily on SPS (that is, taxi services) than those without disability. For example, the Kiwi Transport Survey 2015 undertaken by CCS Disability Action found that 16 percent of people with disability in the Waikato region reported using a taxi at least once per week, compared with 8.6 percent of Waikato respondents without disability.

- We also have some concern around the removal of safety/personal security requirements for SPS which have provided a layer of assurance to customers in the past. In addition, putting the onus on Total Mobility users to negotiate fares and removing the English language requirement of drivers would put increased burden on an already disadvantaged group.
- The reform will make it harder for regional councils to budget for their contribution to the Total Mobility scheme, as it will be difficult to predict the level of uptake of the scheme due to the changes. In any case, across the Waikato region, the ageing population is expected to result in increased access and mobility needs to facilitate access to essential services, while in rural areas decreases in the already smaller populations will mean less opportunity to spread the costs.

We recommend as a high level goal that the Ministry consider ways to demonstrate inclusiveness in transport investment generally, and in relation to regulations around small passenger vehicles in particular. It would also be useful for regions and local authorities to have access to more and better data about how transport contributes to peoples' independent participation. For example, it would be useful for the Household Travel Survey to include information about peoples' independent access to a motor vehicle, so that we could understand implications for transport planning.

We understand that information about transport links with people and society is a recognised knowledge gap, identified through the Ministry's Transport Domain Plan. We look forward to hearing about how the Ministry plans to address this gap and its consequences, and we are keen to work with you on solutions to this problem.

If you have any queries regarding these comments, please contact me direct on 07 8592830.

Yours faithfully



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