

June 2024

**Tēnā koutou**

Please find attached DPA’s submission on Auckland's Draft Regional Land Transport Plan for 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/$file/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:**

* **Rangatiratanga / Leadership**: reflecting the collective voice of disabled people, locally, nationally and internationally.
* **Pārongo me te tohutohu / Information and advice**: informing and advising on policies impacting on the lives of disabled people.
* **Kōkiri / Advocacy**: supporting disabled people to have a voice, including a collective voice, in society
* **Aroturuki / 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 11 – Situations of risk and humanitarian emergencies**
* **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**
* **Outcome 6 – Attitudes**

# The Submission

# DPA welcomes this opportunity to give feedback on Auckland’s Draft Regional Land Transport Plan for 2024-2034 from Auckland Transport, the NZ Transport Agency, KiwiRail and Auckland Council.

DPA states that the highest priority should be given to ensuring that Auckland’s transport network is well integrated, affordable, reliable, safe and accessible. DPA consistently highlights the importance of transport to disabled people, especially public transport. It gives access to community, services, cultural events, education, employment and connects us with the world around us. As a significant number of disabled don’t drive or do not have easy access to modified vehicles, a large proportion use public transport for both accessibility and affordability reasons.

**Access and connectivity**

DPA highlights the lack of accessibility input in the regional plan and the need to accommodate the transport needs of all disabled people whether we commute via personal or public transport is crucial across all modes, especially with Auckland’s disability population estimated at 330,467 people.[[1]](#footnote-2)

DPA acknowledges the important role of small passenger service vehicles in transporting disabled people. We support Auckland Council’s and Waka Kotahi’s endeavours to enforce standards for the industry to protect the wellbeing of the disabled community.

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| **Recommendation 1:** that Auckland Council provides 100% of the fit-out costs for mobility vehicle modifications as is done in Palmerston North by their regional council. An increase in mobility vans would give more access for disabled people to a world that is predominantly inaccessible. |

We are currently awaiting the review of the Total Mobility scheme which provides an alternative mode of travel for people who cannot easily access public transport, particularly those who live in rural areas of Auckland. DPA recommends that the 75% Total Mobility discount is retained.

The plan states that there are existing deficiencies in the transport system and an inability to keep pace with increasing travel demand which limits access to employment and social opportunities. Investing in accessible and affordable transport is not only beneficial for disabled people, but for all Aucklanders. The more people using public transport means fewer vehicles on the road and the additional benefit of being positive for the environment.

**Climate Change and Resilience**

It is positive to see the rollout of electric ferries and buses to reduce carbon/GHG emissions which was a recommendation from DPA in a previous submission on the proviso that these services were made accessible.

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| **Recommendation 2:** that the commitment to reduce carbon emissions for transport and support of carbon and greenhouse gas emissions reduction projects continue. |

In multiple submissions, DPA highlighted disabled people are one of the population groups being disproportionately impacted by climate change locally, nationally and internationally.[[2]](#footnote-3) Accessibility also includes the importance of a more climate resilient transport system for a community that relies heavily on it.

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| **Recommendation 3:** that disabled people be prioritised as a key population group for consultation on any climate change mitigation. |

DPA recommends that when any mitigation through design is undertaken that all contractors or staff of Auckland Transport, the NZ Transport Agency, KiwiRail and Auckland Council be reminded of Auckland Council’s commitment to universal design.[[3]](#footnote-4)

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| **Recommendation 4:** thatany contractors involved in design are reminded of Council’s commitment to universal design. |

**Travel Options**

Disabled people dependence on public transport is beneficial to Auckland as high car dependency due to urban expansion is limiting the ability to develop communities based on a compact urban design approach.

Waka Kotahi research in 2022[[4]](#footnote-5) in collaboration with DPA’s research illustrated the ongoing accessibility challenges faced by disabled people when using public transport.

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| **Recommendation 5:** that the accessibility of transport infrastructure, including train stations, ferry terminals, ferries, buses and trains is vital if disabled people are to have inclusive and equitable access to all modes of public transport. |

One of the challenges faced by disabled people is the inaccessibility of bus services with limited spaces for wheelchair users, unsafe ramps or bus drivers driving past disabled people who are wanting to board.

Bus driver education is important as disabled people were told that bus drivers had a right to deny a disabled passenger if their time schedule was tight. It also highlights the need for better scheduling of bus services. However, DPA does appreciate the experienced drivers who drive to the curb, lower the ramp, communicate with disabled people, support us when needed and drive carefully and calmly.

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| **Recommendation 6:** that all new public transport operators are given accessibility awareness training. |

The interruptions to Auckland’s transport network have profound consequences for disabled people as the trains which are accessible are replaced with buses that are not accessible during network failures that can leave us without ready access to our homes, families/whānau or the supports we need to live.

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| **Recommendation 7:** that the reliability, resilience, and scheduling of Auckland’s public transport system, especially at peak times, is improved. |

**Safety**

Disabled people have raised their concerns around the transport system being harmful and does not support better health outcomes for us. One issue raised was the safety of scooters and other micromobility devices and the onus on the individual pedestrian to be aware of scooter riders. Scooters have their uses and are used by the disabled community but the injuries to disabled people are a serious concern. There is also the concern of the poor management of them by businesses. For example, people with mobility impairments and blind and low vision people are often forced to mobilise on roads when scooters are strewn across footpaths or driveways.

DPA is concerned about parking spaces on the footpath for micromobility equipment and we do not agree to it. However, DPA supports the Public Transport Accessibility Group (PTAG) Auckland plan governing the use of e-scooters and other micromobility.

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| **Recommendation 8:** that all motorised vehicles are removed from the footpath or when on the footpaths, the rider walks and pushes the e-scooter similar to cyclists for the safety of disabled. |

It has been mentioned in a previous submission but would like to repeat it here that when investment decisions are made around pedestrian infrastructure including walkways and cycleways, there be an emphasis on the need for these to be built separate but parallel to one another to ensure the safety of pedestrians who travel by foot, wheelchair, or mobility aids (i.e., walkers).

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| **Recommendation 9:** that improving the safety of the Auckland transport network. This is important across all transport modes, footpath and road crossing networks, walkways and cycleways. |
| **Recommendation 10:** that improving the safety of the pedestrian network is undertaken to make it safer through the inclusion of features such as raised pedestrian crossings, mobility kerb cuts, smoother footpaths, and audio signals. |

DPA have heard disabled feedback on the lift outages at stations and known disabled who have had to climb the stairs while carrying their wheelchair which is unacceptable, unsafe and inaccessible. Alternative plans need to be communicated to your station staff and to disabled commuters when there are outages. Other suggestions for implementation were an accessible assistance 24/7 button or an accessible emergency number for all disabled.

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| **Recommendation 11:** that solutions put forward by disabled be implemented along with continued consultation with our community. |

**Asset management**

DPA is concerned with the reactive maintenance and low levels of investment that impact the reliability of our transport network and management of transport assets. However, it re-emphasises the significance to build back better with the focus on accessibility being a priority and ensuring that assets are built to universal design standards.

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| **Recommendation 12:** that transport infrastructure including buses, rail carriages, bus and ferry terminals as well as railway stations are built to universal design accessibility standards. |

DPA received feedback from the community that the trains short period of time to get on and off the train for disabled is a safety and accessibility issue with floor sensors for the T-car doors being a potential solution.

In a previous submission, it was requested that carriages include wide aisle ways with spaces where wheelchair and mobility aid users can sit, audio announcements, good lighting, signage and information in accessible formats. In addition to this is the need for accessible toilets separate from Parents space and a private quiet space for disabled people who need it.

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| **Recommendation 13:** that disabled people and/or disabled peoples’ organisations be contracted for accessibility audits of all transport networks. |

The Waka Kotahi ‘RUB’ requirements[[5]](#footnote-6) provide a good outline of bus requirements. We were advised that a good example for accessible buses is run by Otago Regional Council.

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| **Recommendation 14:** that investment in creating a more modern, electrically powered, accessible bus service is continued with a view to remove accessibility issues raised by disabled people. |

DPA knows the importance of the Auckland ferry network connecting the city and its outlying communities including Waiheke and Great Barrier Islands. It also will reduce traffic congestion from people travelling from North Shore into the city.

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| **Recommendation 15:** that the electric ferry service ensure accessibility upgrades are carried out both on the ferry network and its supporting infrastructures, such as terminals. |
| **Recommendation 16:** that disabled people and our representative disabled people’s organisations are co-design partners in all planning, decision making and asset management. |

DPA is disappointed with the consistent removal of accessible parking in accessible places without replacing it in equally convenient and accessible places. Accessibility to bus-stops and crosswalks can be dangerous, so this should be a important especially with Auckland Transport’s commitment to accessibility[[6]](#footnote-7).

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| **Recommendation 17:** that all agencies work with disabled community groups in a collaborative manner to ensure an accessible and safe transport network in Auckland |

1. 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-2)
2. 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>.

   [↑](#footnote-ref-3)
3. <https://www.aucklanddesignmanual.co.nz/> [↑](#footnote-ref-4)
4. <https://www.nzta.govt.nz/assets/resources/research/reports/690/690-Transport-experiences-of-disabled-people-in-Aotearoa-New-Zealand.pdf> [↑](#footnote-ref-5)
5. <https://www.nzta.govt.nz/resources/requirements-for-urban-buses/> [↑](#footnote-ref-6)
6. <https://at.govt.nz/media/1989002/accessibility-action-plan-2022-24.pdf> [↑](#footnote-ref-7)