October 2024

**To Environment Canterbury**

Please find attached our submission on Tomorrow’s transport, together! Draft Canterbury Regional Public Transport Plan Consultation

For any further inquiries, please contact:

Chris Ford

Policy Advisor – Southern and Central

policy@dpa.org.nz

**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:**

**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.

# The Submission

Disabled Persons Assembly (DPA) welcomes this opportunity to feedback on the Draft Environment Canterbury (Ecan) Regional Public Transport Plan.

In past submissions, we have positively acknowledged ECan's engagement with DPA and disabled people in its consultation around public transport accessibility issues, especially in relation to Total Mobility and buses.

Once again, we wish to thank ECan for being proactive in engaging with representatives of the disability community on transport issues through its Accessibility Reference Group.

DPA welcomes the initiatives undertaken since the adoption of the last plan for the benefits they have brought to disabled people and members of the wider community, including:

* The introduction of low flat fares which have seen a rise in patronage.
* Timaru’s on demand MyWay by Metro service which has received positive feedback from users there.
* The acknowledgement of the importance of Total Mobility as an integral part of the public transport system for disabled people who cannot use modes like buses.
* The roll out of the Metro card system which has enabled an increase in public transport patronage, including by disabled people.

|  |
| --- |
| **Recommendation 1:** that the current low flat fares be retained to encourage patronage. |

## What do we think of the vision?

DPA supports the vision outlined in the consultation document that: ‘Public transport is the mode of choice for more people and provides a safe, frequent, seamless, low emission transport option.

We recommend adding ‘accessible’ to that statement in its broadest, generic sense to promote the need for all Cantabrians to have full and easy access to public transport, and this includes disabled people.

|  |
| --- |
| **Recommendation 2:** that accessibility is added to the vision statement for public transport. |

## What do we think of the top five priorities?

DPA supports the proposed top five priorities of:

* Improving our environment
* Growing patronage
* Innovation and technology
* Accessibility
* Affordability

All the above are equally important to disabled people in the public transport context. Improving the environment is important, especially in a time when climate change is impacting the lives of everyone, including disabled people who are being disproportionately harmed by its impacts.

Growing patronage is another interrelated consideration as the more people who use decarbonised public transport, the fewer carbon emissions there will be, as well as reducing traffic congestion.

Promoting and providing for the growth of innovative technology on the public transport network is pivotal in terms of accessibility features such as audio announcements, electronic ticketing and signage which all benefit disabled people and non-disabled people alike.

Accessibility is very important to disabled people including through making public transport networks including buses, on-demand services and Total Mobility fully accessible in both the physical and technological sense.

When it comes to accessibility and innovative technology, we recommend that bus screens which run on the real time system are made audible so that blind and low vision people can access all announcements as well as sighted people who find them useful for various reasons.

|  |
| --- |
| **Recommendation 3:** that bus screens which run real time announcements are made audible. |

Another issue around accessibility and safety that has been raised by disabled people who travel on electric buses is that they often stop and re-start suddenly, particularly at intersections. This practice is potentially unsafe for all passengers, particularly disabled passengers, older passengers and young children who may have greater difficulty keeping their footing or balance.

|  |
| --- |
| **Recommendation 4:** that safety measures are reviewed by ECan to minimise and eliminate the risk of injury on electric buses when they stop and re-start. |

Disabled bus patrons have also commented on the need to ensure that all buses can kneel upon request to enable ease of onboarding and offboarding by disabled and non-disabled customers alike.

|  |
| --- |
| **Recommendation 5:** that ECan ensure that all buses contracted by it can kneel at customer request. |

Affordability is a very important consideration, especially in a time when we have just passed through a cost-of-living crisis. Enabling low-income people to have greater access to public transport including through the availability of low flat fares has been important, and this includes for disabled people who are predominantly low-income earners.

## Pets on buses

We note that feedback has been asked for around the proposal to introduce pets on buses.

From a disability perspective, permitting animals to travel on buses needs to be carefully undertaken to ensure the safety of both disabled and non-disabled passengers and drivers alike.

We acknowledge the legal right of disabled people who use guide dogs and disability assistance animals to take them on public transport.

However, guide dogs and service animals are well trained prior to going into service to work in all sorts of environments, including on public transport. Bringing pets/animals which have not had any training onto buses could add complications in, for example, that these animals may affect the ability of guide/assistance animals to safely support and/or navigate their owners around.

DPA recommends several measures be adopted so that personal pets are able be brought onto buses safely.

|  |
| --- |
| **Recommendation 6:** that pets (aside from guide dogs/ disability assistance animals who already have a legal right to do so) can be brought onto buses provided the following rules are adopted:* Ensure that all animals are muzzled or in carriers, especially dogs and cats.
* Ensure that no animals (apart from disability assistance and guide dogs) can be seated in wheelchair spaces.
* Small animals should be in carriers.
* Dogs must be on leashes.
* That there is a limit of one animal per customer allowed on bus services.
* That all bus drivers are fully trained in the protocols around letting animals on board.
 |