S

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**To Waka Kotahi l New Zealand Land Transport Agency**

Please find attached our submission on the Public transport design guidance: Network infrastructure for articulated buses

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](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.

## United Nations 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]](#footnote-2) 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.

The following UNCRPD articles are particularly relevant to this submission:

* **Article 9 - Accessibility**

## New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy[[2]](#footnote-3) 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.

The following outcomes are particularly relevant to this submission:

* **Outcome 5 – Accessibility**

# The Submission

DPA welcomes this opportunity to give feedback to the New Zealand Transport Agency Waka Kotahi on the Network Infrastructure for Articulated Buses.

DPA advocates for a transport system that is accessible, inclusive, integrated and climate friendly.

Over the years we have worked collaboratively alongside other disabled people’s organisations and disabled people to promote these principles to relevant transport policy stakeholders within central and local government.

In 2022, Waka Kotahi published independently commissioned research (in which DPA collaborated) entitled *Transport experiences of disabled people in Aotearoa New Zealand*.[[3]](#footnote-4)

This research illustrated the ongoing accessibility challenges faced by disabled people when using public transport. Disabled people’s main challenges included the inaccessibility of bus services amongst others.

Buses and other modes of public transport are highly frequented by disabled people throughout Aotearoa, especially in areas where regular services operate.

**DPA stresses the importance of all buses being designed and built to the standards outlined in the 2022 Requirements for Urban Buses (RUB), and that universal design accessibility requirements inform the design and construction of associated network infrastructure.**

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| **Recommendation 1:** that NZTA and other stakeholders involved in the funding, design and construction of buses and network infrastructure engage in co-design processes with disabled people and disability organisations. |

In this submission, we outline some of the key points of importance to disabled people in terms of the design of accessible network infrastructure for articulated buses.

## General safety and accessibility features

## 1.) Bus stop design

Due to the emergence of larger buses, bus stops need to be long enough to accommodate at least one or more buses.

Supporting infrastructure including bus shelters must be accessible, dry places where people can wait safely for buses, including at night.

Bus stops must be accommodating to all buses in a way that enables easy access for everyone when either boarding or departing them, including for disabled people.

Bus stops must also be safe places for passengers to board and disembark from.

A critical safety issue for disabled people is the risk of being hit by cyclists and e-scooter users while either entering or leaving buses.

There have been reported instances of this, for example, in the United Kingdom[[4]](#footnote-5) and in New Zealand, Auckland Transport’s Passenger Transport Advisory Group (PTAG) has expressed its concerns about this issue as well.

DPA recommends that action should be taken to address this problem through retrofitting/placing zebra crossings at all bus stops to prevent cyclists, e-scooter users and bus passengers from colliding with one another.

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| **Recommendation 2**: that as many buses might be used on rapid transit routes, new stops must be:* Level boarding at all doors not just the front door.
* Stops must not be on curves as this makes it difficult to board or exit at all doors.
* Stops must be clear of all obstacles such as bins and street furniture to ensure accessible boarding.
* Shelters must be large enough to accommodate the large numbers of people who will be using these stops and be able to keep people dry and sheltered from wind and rain.
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| **Recommendation 3:** that action is taken to prevent collisions between bus passengers and cyclists through retrofitting/placing zebra crossings at all bus stops to prevent collisions between cyclists, e-scooter users and bus passengers. |

## 2.) Bus design

Bus designs must account for accessibility and comply with the Requirements for Urban Buses (RUB) 2022.

More specifically, so that buses are aligned with network infrastructure requirements, we make the following recommendations.

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| **Recommendation 4:*** That all doors must be able to be used for boarding and exiting.
* Buses should accommodate four wheelchair spaces.
* Buses should also include separate spaces for luggage and children’s strollers.
* Bus floors should be fully flat from the front to the back as steps towards the rear can be inaccessible for older and disabled people to navigate.
* RUB lighting requirements should apply to all areas of every bus.
* Bus ramps should be of sufficient width to admit larger wheelchairs, mobility devices and children’s strollers.
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## 3.) Safety of bus terminals, hubs and stations from crime and anti-social behaviour

DPA would like to take the opportunity afforded by this consultation to briefly talk about the safety of buses, bus terminals, hubs and stations around the country from crime and anti-social behaviour and how their design and placement contributes to this. Disabled people are disproportionately at higher risk of being the victims of violence and crime compared to non-disabled New Zealanders.[[5]](#footnote-6)

According to Radio New Zealand, there have been an increasing number of attacks reported at bus hubs and stops with six serious attacks reported in both Auckland and Dunedin in the year to May 2023 alone.[[6]](#footnote-7) One of the most serious and widely reported concerned a 16-year-old teenager who was killed at the Central Dunedin bus hub in an April 2024 attack that has caused deep concern within the Ōtepoti-Dunedin community.[[7]](#footnote-8)

Before the attacks, a considerable number of Dunedin bus patrons, including disabled people, had reflected about the lack of safety experienced when accessing the local hub as many had witnessed increasing levels of anti-social behaviour and crime there.

The hub, based in the centre of the city and opposite it’s police station, did not prevent anti-social behaviour or, ultimately, the tragic killing of the young student.

There is a need to review the design and safety aspects of all future bus hubs, shelters and stops to ensure maximum safety for all bus passengers.

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| **Recommendation 4:** that the safety and design components of all bus infrastructure in terms of bus hubs, shelters and stops is reviewed to ensure maximum safety for all passengers. |

The same applies when it comes to the safety of both bus passengers and drivers from attacks. RNZ reported in April 2024 that there had been an increasing spate of violent attacks against bus drivers in Auckland.[[8]](#footnote-9) These types of attacks have arisen due to a lack of screens to protect drivers from the possibility of being attacked.

Introducing screens and improved lighting on all buses would contribute towards improving safety for everyone, including drivers, on bus services.

However, the installation of screens present a barrier for some disabled people in interacting with drivers, for example, Deaf and hard of hearing passengers may not be able to easily interact with drivers and people using wheelchairs or mobility aids may face difficulties if screens inhibit accessibility.

To address these concerns, we recommend the following:

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| **Recommendation 5:** that bus driver and passenger safety be improved on all buses through installation of protective screens and lighting. |
| **Recommendation 6:** that the design and installation of screens is undertaken in a way that does not create further barriers for disabled passengers and is done as part of bus co-design between disabled people, bus operators and regional councils. |

1. <https://social.desa.un.org/issues/disability/crpd/convention-on-the-rights-of-persons-with-disabilities-articles> [↑](#footnote-ref-2)
2. <https://www.odi.govt.nz/nz-disability-strategy> [↑](#footnote-ref-3)
3. Doran, B., Crossland, K., Brown, P., & Stafford, L. (2022). *Transport experiences of disabled people in Aotearoa New Zealand*. Wellington, New Zealand: Waka Kotahi NZ Transport Agency. Retrieved from <https://www.nzta.govt.nz/assets/resources/research/reports/690/690-Transport-experiences-of-disabled-people-in-Aotearoa-New-Zealand.pdf> [↑](#footnote-ref-4)
4. <https://road.cc/content/news/low-risk-cyclist-collisions-floating-bus-stops-306073> [↑](#footnote-ref-5)
5. <https://www.equaljusticeproject.co.nz/articles/disabled-and-disadvantaged-disabled-people-as-victims-of-crime-in-new-zealand2023> [↑](#footnote-ref-6)
6. <https://www.rnz.co.nz/news/national/517894/timeline-recent-attacks-at-bus-stops-and-transport-hubs> [↑](#footnote-ref-7)
7. <https://www.rnz.co.nz/news/national/517716/13-year-old-charged-with-murder-after-dunedin-bus-hub-stabbing> [↑](#footnote-ref-8)
8. <https://www.rnz.co.nz/news/national/515148/increase-in-attacks-has-auckland-bus-drivers-worried-they-may-not-come-home-union> [↑](#footnote-ref-9)