April 2024

**To: Ministry of Transport**

Please find attached DPA’s submission on Draft Government Policy Statement on Land Transport 2024

For any further inquiries, please contact:

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# Introducing Disabled Persons Assembly

**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

**Introduction**

DPA welcomes this opportunity to give feedback on the the Draft Government Policy Statement (GPS) on Land Transport 2024.

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*.[[1]](#footnote-1)

This research illustrated the ongoing accessibility challenges faced by disabled people when using public transport. Disabled people’s main challenges included, for example, issues around using Total Mobility (TM), the inaccessibility of bus services, lack of footpaths and safe crossing points, and feeling excluded from the planning of sustainable city centres, as well as the ableist attitudes of some transport planners.

Given these issues, we are very concerned about four key aspects of the Government’s draft land transport statement.

These are:

1. That there is no specific mention of the importance of accessibility, including for disabled people and other transport disadvantaged communities.
2. That it makes public transport a comparatively lower priority for funding.
3. That it signals that walking and cycling projects will be a lower priority for funding.
4. That the new transport policy settings may impact this country’s emissions reductions targets, worsening climate change that is (and will continue) to heavily impact upon disabled people.

In this submission, we stress that transport accessibility needs to continue being a key priority when it comes to transport policy.

We also elaborate on the need for active transport modes, including walking and cycling, to be accorded higher priority.

**DPA does not support the proposed strategic priorities and direction of the Draft GPS 2024.**

We expand on our reasons below.

**1. Impacts of climate change on disabled people**

While we acknowledge the statement’s points around the need to manage transport related emissions, it appears that plans to prioritise the roading network over other modes could undermine any positives which may result for the climate from having more hybrid and electric vehicles on our roads.

A greater emphasis on roading could result in our national carbon emissions rising again after registering a small but not insignificant decline within the past few years.

We are concerned by this shift as disabled communities – both locally and globally - are already being subjected to the worst impacts of climate change.

An article published by the journal *Nature Climate Change* [[2]](#footnote-2) highlighted that governments are failing to take disability inclusive climate action and disabled people are disproportionately more at risk of higher mortality rates in climate emergencies.

This is underpinned by the fact that disabled people have been accorded lower priority in climate emergencies or other disasters and systemically excluded from receiving emergency healthcare and humanitarian support as a result.

One of the best ways to achieve effective climate action is through reducing transport-based emissions and building an accessible, active transport system.

**2. Whole-of-journey approach to transport investment needed.**

DPA notes the complete absence of an accessibility lens within the draft statement.

Accessibility is vital given that all modes of land transport in terms of motor vehicles (cars/vans), buses, walking, cycling, small passenger vehicles, rail and ferry services are still largely inaccessible to disabled people.

Although there are some improvements that have been made through, for example, having more accessible buses (especially in urban centres), passenger service vehicles, trains and footpaths/walkways, the fact remains that significantly more progress needs to be made to address the wider systemic issues faced by disabled people across the transport space.

The ‘Transport Experiences’ Report mentioned above recommends that Government take a whole-of-journey approach when making decisions around future transport investments to improve access to transport for disabled people.

As the report outlines, if Government adopts this approach, it would then be able to shift away from relying on making small interventions that address only specific aspects of some trips meaning that there is either minimal or no acknowledgement of the wider systemic issues faced by disabled people across the transport space.

**3. Accessible Journeys for All**

Adopting a whole of journey approach would lead to the realisation of the vision contained in both the ‘Transport Experiences’ and the Human Rights Commission’s (2005) *Accessible Journey* reports of creating a transport system centred upon the need to provide accessible journeys for all.

The accessible journey vision is based upon four systemic pillars which are:

1. **Measuring accessible journeys:** measuring the ability of all people to travel, and the diversity of people on the streets – this is undertaken through measuring journeys made and not made and people’s presence on the streets.
2. **Promoting the voices of marginalised people:** the Ministry of Transport, Waka Kotahi and other transport and government authorities doing more to promote the voices of disabled people when it comes to transport planning and policy development.
3. **Connecting across government:** ensuring that transport planning is undertaken using a joined-up approach as transport does not exist in isolation but rather to connect people.
4. **Question and research:** more specific research being undertaken into why disabled people do not have accessible journeys.[[3]](#footnote-3)

These four pillars create the basis for five system interventions which are based on the premise that it should be ‘business as usual, done better’ in the accessible transport space:

1. **Empowered advocacy:** that the transport and disability sectors collaborate to collate information around opportunities and challenges with respect to accessible transport.
2. **Accessible attitudes:** improving the transport sector’s approach to accessible journeys through engaging in systemic co-design responses with the disabled community/sector and undertaking disability awareness and responsiveness training aimed at eradicating ableist attitudes.
3. **Accessible infrastructure:** co-designing all transport infrastructure standards using an ‘accessibility first’ lens.
4. **Accessible vehicles:** Government continually improving its design standards and funding for accessible vehicles including taxis, community vans, shuttles, buses, trains and ferries.
5. **Accessible information:** making information about transport services more easily accessible and available to everyone, including disabled people.[[4]](#footnote-4)

If these approaches were incorporated into the final GPS, then not only disabled people but every New Zealander would benefit.

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| **Recommendation 1:** that the whole-of-journey and accessible journeys for all approaches are incorporated as strategic priorities in the final Government Policy Statement on Land Transport. |

**4. More roads is the wrong priority**

**DPA disagrees with the** proposed policy settings of prioritising building more roads, including new roads of Roads of National and Regional Significance as they will not increase transport options for disabled people nor will they alleviate the large-scale traffic congestion that our roading system already struggles with, particularly in the major urban centres of Auckland, Wellington and Christchurch and an increasing number of other locations.

For disabled people, whether they be drivers, passengers, pedestrians or cyclists, the impacts for our community can include significant delays in getting to everyday activities like employment, shopping and health appointments, breathing in more unhealthy emissions (in the form of fumes which can impact on people with respiratory conditions) and increased safety risks for both motorists and cyclists/pedestrians who include disabled and older people.

Disabled people should have the right to exercise transport choice and that this should include access to public transport as well as active and non-active modes.

Having a fully accessible public transport system should form the centre of a more modern, accessible, safe and climate friendly transport system that encourages the uptake of fewer vehicular journeys, not more.

Having more roads will mean more vehicle journeys resulting in a perpetual cycle of more congestion and greater emissions.

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| **Recommendation 2:** that public transport be accorded equal (if not greater) priority alongside road transport in the new GPS and that accessible transport options for disabled people are given high priority. |

**5. De-prioritisation of public transport**

**a.) Public transport – bus and provincial/regional/inter-regional services**

DPA is concerned about the draft GPS’s de-prioritisation of our public transport system and recommendations to accord lower priority to the funding of public transport, as this will impact on the ability of regional councils to add new services or improve existing ones.

Crucially, fare increases for public transport will be very difficult for many people to manage, not least disabled people as many within our disabled communities live on low incomes. Fare increases – stemming from the need to increase fare box recovery from passengers alongside cuts to subsidies - will severely impact the number of journeys that can be undertaken by disabled people who rely on these services to access their communities.

All public transport services, including buses, trains and ferries, need to be affordable for all users, especially for transport disadvantaged groups including disabled people.

The draft GPS also does not adequately address the need to expand accessible public transport provision to provincial, rural and inter-regional areas.

Disabled people face significant barriers when it comes to accessing public transport in these locations due to the unavailability of buses, taxis, small passenger service vehicles and shuttles within these areas.

This makes travelling around rural and provincial communities extremely difficult for disabled people whose only transport options in small provincial/rural towns like Oamaru, Alexandra, Masterton, Dannevirke, Westport, Greymouth or Kaitaia is through accessing private vehicles driven by family/whānau, neighbours or friends, a small number of mobility taxis/small passenger service operators or locally based shuttle services.

When it comes to accessing inter-regional coach services including, for example, Intercity or Atomic Shuttles, these services are completely inaccessible to a considerable number of disabled people, mainly wheelchair and mobility device users, who cannot travel on them.

DPA recommends that the need to improve access to public transport services in provincial/rural communities and inter-regional transport services is accorded high priority within the GPS in line with accessible journeys for all vision.

**b.) Rail**

DPA recommends that the GPS should equally recognise rail for the social and environmental benefits it brings.

We welcome the draft statement’s call for more freight to be moved via rail as this will remove more heavy vehicles from our roads.

We also support proposals contained in the GPS to complete the Auckland City Rail Link and associated infrastructure and to provide new trains and some rail infrastructure for Wellington and the Lower North Island, moves that will benefit all rail passengers in these regions, including disabled people.

DPA recommends that funding for rail improvements in the Auckland and Wellington regions is adequate to ensure that all trains and associated infrastructure are environmentally friendly and built to accessible, universal design standards.

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.[[5]](#footnote-5)

However, we note the Government’s desire to only invest in the busiest and most productive parts of the network – that between Auckland, Hamilton and Tauranga through the Rail Network Investment Programme.

This focus on only one part of the rail network to the detriment of others is yet another sign of the government’s proposals to concentrate on road transport at the expense of other modes.

DPA recommends that the draft GPS include plans to create and sustainably fund modern, environmentally friendly and fully accessible rail networks across the country.

**c.) Walking and cycling projects**

Funding for walking and cycling programmes are equally at risk as we note the proposals to prioritise walking, cycling and micromobility projects only in areas with high economic growth potential.

DPA has always supported proposals to enable safe, attractive, and connected opportunities for walking, cycling and other micromobility around the country on the proviso that there are separate but parallel spaces created to safely separate pedestrians and cyclists/micromobility users.

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 around the country for the building of these pedestrian friendly spaces which benefit everyone, including disabled people.

DPA recommends that the draft GPS accord greater priority for Waka Kotahi to invest in safe, accessible and inclusive walking, cycling and micromobility options.

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| **Recommendation 3:** that all public transport services, including buses, trains and ferries, be affordable for all users, especially for transport disadvantaged groups including disabled people. |

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| **Recommendation 4:** that the need to improve access to public transport services in provincial/rural communities and inter-regional transport services is accorded high priority within the GPS in line with accessible journeys for all vision. |

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| **Recommendation 5:** that the GPS should recognise rail for the social and environmental benefits it brings. |

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| **Recommendation 6:** that funding for rail improvements in the Auckland and Wellington regions is adequate to ensure that all trains and associated infrastructure are built to accessible, universal design standards. |

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| **Recommendation 7:** that the draft GPS include plans to create and sustainably fund modern, fully accessible rail networks across the country. |

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| **Recommendation 8:** that the draft GPS accord greater priority for Waka Kotahi to invest in safe, accessible and inclusive walking, cycling and micromobility options. |

**6. Road Safety**

DPA is very concerned about the recent shift in government policy on road safety away from that outlined in the ‘Road to Zero’ strategy introduced under the previous government to permitting greater speeding on sections of our roading network, simply for the sake of perceived efficiency.

Disabled people are at great risk from being seriously injured or killed in traffic accidents and as pedestrians.

If disabled people are mobilising as pedestrians, there are issues, for example, with some people not having the agility/speed to get away from speeding vehicles due to being wheelchair/mobility device users or having slower walking speeds.

Both disabled and non-disabled tamariki/children are at even greater risk of being seriously killed or injured on our roads and wider transport network due to speeding or other unsafe driving behaviour.

DPA feels that safety is best provided through changing the whole system: streets, speeds, regulations about who has priority, deterrence through enforcement, and active monitoring as to how many people are using each mode (as walking, cycling and public transport are much safer than driving).

Safety must be a strong priority but a focus on greater police enforcement is not evidence-based. There needs to be much more focus on safety for people outside vehicles, via proper investment in walking and cycling infrastructure and via shifting to safer modes.

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| **Recommendation 9:** that the GPS incorporates a safety lens throughout by continuing to encourage people to shift to safer, environmentally friendly, fully accessible transport modes. |

1. 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-1)
2. Stein, J.S., Stein, M., Groce, N. & Kett, M. (2023). The role of the scientific community in strengthening disability-inclusive climate resilience. *Nature Climate Change 13*, 108-109. <https://www.nature.com/articles/s41558-022-01564-6.epdf>? [↑](#footnote-ref-2)
3. Ibid, pp.98-99. <https://www.nzta.govt.nz/resources/research/reports/690> [↑](#footnote-ref-3)
4. Ibid, p.99-100. <https://www.nzta.govt.nz/resources/research/reports/690> [↑](#footnote-ref-4)
5. <https://www.dpa.org.nz/page/71/AllSubmissions.html> [↑](#footnote-ref-5)