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To Hawke’s Bay Regional Council please find DPA’s submission on the Regional Passenger Transport Plan (RPTP) 2022-32

Disabled Persons Assembly NZ

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**Introducing Disabled Persons Assembly NZ**

The Disabled Persons Assembly NZ (DPA) is a pan-impairment disabled person’s organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) are able to direct their own lives. DPA works to improve social indicators for disabled people and for disabled people be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:

* telling our stories and identifying systemic barriers
* developing and advocating for solutions
* celebrating innovation and good practice

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), 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 1. 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 pertinent to this submission, including:

**Article 4.3 - Involving disabled people and our organisations in decisions that affect us**

“3. In the development and implementation of legislation and policies to implement the present Convention, and in other decision-making processes concerning issues relating to persons with disabilities, States Parties shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations.”

**Article 9 – Accessibility**

“States Parties shall take appropriate measures to ensure persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications.”

**Article 19 – Living independently and being included in the community**

“ c.) Community services and facilities for the general population are available on an equal basis to persons with disabilities and are responsive to their needs.”

**Article 20 – Personal mobility**

“ States Parties shall take effective measures to ensure personal mobility with the greatest possible independence for persons with disabilities, including by:

a) Facilitating the personal mobility of persons with disabilities in the manner and at the time of their choice, and at affordable cost.”

New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy 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 2. It identifies eight outcome areas contributing to achieving this vision, including:

**Outcome 5 – Accessibility**

“We access all places, services and information with ease and dignity.”

**The submission**

DPA welcomes the opportunity to submit on the Hawke’s Bay Regional Council Regional Passenger Transport Plan (RPTP) 2022 – 32. In the course of compiling this submission, we have consulted with local members about what they would like to see included and also incorporated some key policies we are pushing for around public transport nationally.

Before delving into the submission, we wish to draw Council’s attention to the recently released report by Waka Kotahi New Zealand *Transport experiences of disabled people in Aotearoa New Zealand* [[1]](#footnote-2)which highlighted the multitude of issues facing disabled people in the public transport space including limited access to bus and other public transport services, especially in rural areas; not having full access to mobility taxi/passenger service vehicle services on a 24/7 basis; the prohibitive costs involved in using public transport which add to the already high costs of living with disability (which have always been there inflationary surges or not); and being unable to access interregional transport services, especially those provided by bus and passenger service vehicle companies.

DPA is currently beginning the process of interacting with central government over these issues in the wake of the report’s release. Nonetheless, we would like to encourage Council to play its part in making the Hawke’s Bay public transport network fully accessible.

**RPTP has many positives to commend but real accessibility needed**

DPA is pleased to see that the Council is committing to increase the level of public transport services in the region, their frequency and availability. However, there are some risks that will need to be managed as well in the transition to a more frequent hub and spoke model including that buses will no longer run down every street, something that will need to be managed in terms of the issues this will present for people with mobility impairments and health conditions who may not be able to walk long distances. Therefore, mitigating strategies may need to include the extension of on-demand services, especially in Napier, Hastings and Wairoa. However, we acknowledge that the Council has been trialling the ‘My Way’ on demand transport service in Hastings and hopes that the trial will be successful as this will provide another option for people not readily able to access buses or taxis for any reason.

DPA especially welcomes the proposal to provide safe, comfortable vehicles which are accessible to disabled people, especially those with mobility impairments. However, we wish to stress that any new buses should be compliant with the Government’s Requirements for Urban Buses (RUB) Standards which have recently been updated. Besides, buses should be accessible for blind and low vision users, especially in terms of having audio announcements which can be seen and heard by everyone, including blind and low vision users. These standards should apply to any bus services run within urban areas such as Napier and Hastings as well as the proposed express service from Central Hawke’s Bay into Hastings and between different communities within the region.

DPA welcomes the inclusion of fares that provide value for money and are lower for people who are on low incomes. Nevertheless, while we welcome discounted lower fares aimed at lower income users, we would like to emphasise our support for the call made by the Aotearoa Public Transport Equity Coalition for fare free travel to be made universally available to every public transport user across the country with adequate funding for this coming from both central and local government. Having fare free travel would encourage greater public transport uptake and, thus, lead to fewer carbon emissions. In the short to medium-term, we would recommend the establishment of a regional concessional fare scheme that makes public transport completely free, for example, to transport disadvantaged communities including Community Services Card holders and all disabled and older people as a starting point. One example of a fare free transport scheme aimed at disabled people and their carers/support people is the BusIt Scheme run by the Waikato Regional Council. To this end, DPA recommends that the Regional Council work alongside DPA, and other disabled people’s organisations, both locally and nationally, to call for more central government funding to enable all public transport platforms to be fare-free for all New Zealanders in line with the call from the Aotearoa Public Transport Equity Coalition.

DPA welcomes the inclusion of a policy to improve service standards so that buses run according to the established timetable. These standards should include respect for the rights of disabled and older customers whose accessibility needs will need to be met and respected on all services.

DPA welcomes the need for clear, concise and accessible information (including real time) information around public transport. We recommend that this include having information made available about public transport in the Hawke’s Bay region via accessible formats including in Māori, Braille, Easy Read, New Zealand Sign Language and audio. This includes web-based information which must comply with website accessibility standards.

DPA also supports the need for improved access to bus stops, and better passenger facilities including bus shelters. In this respect, DPA recommends that all bus stops must have high quality tactile strips installed which enable blind and low vision people to easily navigate them, that they are at a level gradient as possible to enable smooth transfers by wheelchair and mobility aid users as well as by people with mobility impairments and that all shelters, regardless of size, should have full weather protection and adequate lighting for safety reasons.

On Total Mobility (TM), DPA recommends that the Council and other local and national disabled people’s organisations should work together with central government on addressing the issues around the TM scheme which is currently bedevilled by issues, such as those that Council has highlighted in the RPTP around its unaffordability for users and other inequities faced by scheme members, an issue also taken up in the Waka Kotahi/MR Cagney report on transport for disabled people. Ultimately, we would like to see a reformed system where all disabled people have equitable access to 24/7 mobility taxi/passenger vehicle services on the same basis as non-disabled people have access to ordinary taxis.

Therefore, the recommendations we make should help inform a better transport service and experiences for disabled people and, indeed, everyone in the Hawke’s Bay region.

**DPA’s recommendations**

The Disabled Person’s Assembly recommends:

**Recommendation 1:**  That any new Council-contracted buses should be compliant with the Government’s Requirements for Urban Buses (RUB) Standards which have recently been updated. Besides, buses should be accessible for blind and low vision users, especially in terms of having audio announcements which can be seen and heard by everyone, including blind and low vision users. These standards should apply to any bus services run within urban areas such as Napier and Hastings as well as the proposed express service from Central Hawke’s Bay into Hastings and between different communities within the region.

**Recommendation 2:**  That Council work alongside DPA, and other disabled people’s organisations, both locally and nationally, to call for more central government funding to enable all public transport platforms to be fare-free for all New Zealanders in line with the call from the Aotearoa Public Transport Equity Coalition.

**Recommendation 3:** That Council, in the short to medium term, establish a regional concessional fare scheme that makes public transport completely free, for example, to transport disadvantaged communities including Community Services Card holders as well as all disabled and older people as a starting point. One example of a fare free transport scheme aimed at disabled people and their carers/support people is the successful BusIt Scheme run by the Waikato Regional Council.

**Recommendation 4:** That all information on public transport be made available by Council via accessible formats which include Māori, Braille, Easy Read, New Zealand Sign Language and audio. This includes web-based information which must comply with website accessibility standards.

**Recommendation 5:** That all bus stops must have high quality tactile strips installed which enable blind and low vision people to easily navigate them, that they are at a level gradient as possible to enable smooth transfers by wheelchair and mobility aid users as well as by people with mobility impairments and that all shelters, regardless of size, should have full weather protection and adequate lighting for safety reasons.

**Recommendation 6:** That the Council and other local and national disabled people’s organisations should work together with central government to address the various issues around the TM scheme, such as those that Council has highlighted in the RPTP around its unaffordability and the inequities faced by many users.

1. Waka Kotahi New Zealand. (2022). *Transport experiences of disabled people in Aotearoa New Zealand.* Wellington, New Zealand: Doran, B., Crossland, K., Brown, P., Stafford, L. Retrieved from https://www.nzta.govt.nz/resources/research/reports/690 [↑](#footnote-ref-2)