October 2022

To Parliamentary Transport and Infrastructure Select Committee

Please find attached our submission on the Inquiry into the future of inter-regional passenger rail in New Zealand

Disabled Persons Assembly NZ

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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:**

**Leadership:** reflecting the collective voice of disabled people, locally, nationally and internationally.

**Information and advice:** informing and advising on policies impacting on the lives of disabled people.

**Advocacy:** supporting disabled people to have a voice, including a collective voice, in society.

**Monitoring:** monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

# The submission

**Introduction – the accessibility case for re-establishing an inter-regional rail network**

DPA is providing this submission for the Select Committee on the Inquiry into Interregional Rail Services.

DPA strongly supports re-establishing inter-regional rail passenger services in Aotearoa.

This submission highlights the benefits that the re-introduction of inter-regional rail passenger rail services in this country would have for disabled people. We discuss the accessibility elements and benefits of rail travel given that most other modes of public transport including buses, taxis and aircraft, while improving in terms of accessibility, are still largely inaccessible to many disabled people. Indeed, the issue of nearly all public transport platforms being inaccessible to disabled people throughout New Zealand was traversed in the recent *Transport Experiences of Disabled People in New Zealand* [[1]](#footnote-2) report for Waka Kotahi that DPA played a key role in writing alongside research consultants MC Cagney.

The fact that most public transport platforms are either partially or largely inaccessible to disabled people is really accentuated within the inter-regional travel space. This is the case as when it comes to, for example, the inter-regional bus networks, operated by providers including Inter-City, there is currently no provision made by these services for travel by wheelchair and mobility aid users as the Requirements for Urban Buses (RUB) does not apply to interregional buses.

Another mode of regional transport which is only partially accessible is air travel. This is the case as, for example, many aircraft used by major airlines including Air New Zealand on regional routes are often smaller and are not able to be easily accessed (if at all) by wheelchair or mobility aid users. Further, the costs of flying domestically can be prohibitive for many disabled people.

Another barrier to flying for disabled people is the associated risk that mobility equipment is not always easily stowed on board aircraft or, as cases too numerous to mention, damaged while in transit. Also, some regional airports are based a considerable distance away from the urban area they service e.g., Dunedin Airport which sees many disabled people paying substantial taxi fares to get to and from the airport.

Many disabled people do not have access to private vehicular transport in the form of cars due to not being able to drive for various reasons, i.e., cost or lack of access to vehicle modifications, or for impairment related reasons. For those disabled people who do own a vehicle, inter-regional travel can still be difficult for financial (including the additional cost of disability) or impairment related reasons.

Therefore, all the above contributes to a strong case as to why rail would support equitable transport options for disabled New Zealanders. Provided that all facets of any interprovincial rail service are fully accessible (see more about how this can be done below), this would mean that rail carriages and stations were fully accessible. An effective rail system that is equitable would be designed to accommodate everyone.

Re-establishing an accessible and affordable interregional passenger rail service would, for example, take pressure off disabled people whose impairments mean that they have limited energy levels. It would also mean (when compared with air travel) less risk that the essential mobility equipment of disabled people would be damaged while on route.

DPA welcomes the fact that the current government has re-invigorated the domestic railway engineering industry, especially with the re-establishment of the railway workshops in Hutt Valley and Dunedin. Our hope is that this will lead to the building of accessible rail stock including passenger cars (to accommodate disabled passengers) and driver carriages (to accommodate disabled engine drivers and rail workers).

This submission has been developed with feedback from our members around the country, and this includes members in regions including Wellington and Auckland, where some have accessed the suburban commuter rail services there.

**The Te Huia Hamilton-Auckland rail service example**

DPA is of the view that rail can lead the way in terms of not only providing a more accessible nationwide travel option for disabled people but can be an exemplar to other transport modes (i.e., bus systems, air services) in how they can make themselves more fully accessible to and inclusive of disabled people in the future.

Already, there is an accessible interregional rail service running in the form of the Te Huia commuter train between Hamilton and Auckland.[[2]](#footnote-3) This service has accessibility features including dedicated space for up to two wheelchair users on the train, a fully accessible toilet and some information in audio and braille for blind and vision impaired people. It permits disabled people to bring service animals on board too and people who are entitled to use the Waikato Regional Council’s accessibility concession and Auckland Transport’s AT HOP card can do so when booking the service.

**Need for accessible rail services, train stations and information**

DPA recommends that high priority should be accorded to the accessibility of every interregional rail service. This means both physical accessibility in terms of ensuring that passenger carriages have seating which can be accessed by wheelchair and mobility aid users, sufficient corridor width for wheelchair and mobility aid users as well as disabled people using, for example, disability assist dogs to navigate within carriages, and fully accessible toilets. The needs of people with sensory impairments and neurodiverse people should be accommodated as well in terms of, e.g., variable lighting to reduce overstimulation for some autistic people. Audio announcements should be mandated on all trains and at stations to inform people about destinations the progress of their journey as well as arrival and departure times. This aspect would be beneficial for blind and vision impaired people and, indeed, everyone on board the rail service.

Other important accessibility considerations include provision for disabled passengers to easily get on and off rail carriages. Making all railway stations, especially platforms, fully accessible for disabled people including, for example, the placing of tactile strips to enable easy and safe navigation by blind and low vision people.

To enable easy interaction between carriage entrances and station platforms, rail cars should enable wheelchair and mobility aid users and, indeed, all passengers the ability to both embark and disembark independently without assistance (if people choose), through enabling smooth level, no-step entrances between platform and carriage. One of our members told us that the commuter train system used in Melbourne, Australia enables all passengers, including disabled passengers, to easily enter and exit rail cars without the need, for example, to have rail staff temporarily place ramps when disabled people request them as is currently the case on the Wellington and Auckland commuter rail services.

DPA strongly recommends that national standards be adopted and set for rail carriage design or (if they exist already) these should be updated to include universal design accessibility standards.[[3]](#footnote-4)

The need for why nationally consistent rail passenger carriage standards is needed was highlighted by one of our members who found while travelling by rail recently that there was an inconsistency in the accessibility of two different train services they had travelled on. They reported that the Wellington commuter train had an accessible toilet whereas the Wairarapa service did not.

Mandating accessible train design standards would assist New Zealand Rail and other providers to meet the Ministry of Transport’s *Transport Outcomes Framework* number one priority of enabling inclusive access to transport for all New Zealanders (including disabled people) to enable their full economic and social participation.[[4]](#footnote-5)

As part of these standards, provision should be made on trains and at train stations to have regular audio announcements which are particularly helpful for blind and low vision people and for everyone else on the train service to know where they are going and as to where various stops are (as on the Te Huia service). Video screens at both stations and on trains should be enabled to play announcements in New Zealand Sign Language (NZSL) and Te Reo Māori plus other languages (especially for the benefit of tourists and people with English as a second language).

DPA recommends that signage and information about rail services, stations and on the trains themselves, must be available in fully accessible formats including New Zealand Sign Language, Te Reo Māori, Easy Read, Braille, large print and audio.

DPA recommends that railway stations (where there is a need to build new ones or update them) should either be built/retrofitted to universal design specifications with features including accessible platforms, accessible toilets and changing facilities (including wet floor showers for both customers and staff needing them), ramped and/or level entrances, wide doorways, lifts, adequate lighting on both the platform and inside the stations themselves and sufficient mobility parking and drop off spaces. Cafes and other public facilities (including ticketing facilities) should include features such as seating of varying heights (enabling people to more easily get into and out of seats) and accessible counters.

The importance of providing accessible information about rail services and stations was conveyed to us by a Wellington member who did not know that the Wellington Railway Station had recently added two new accessible toilets (after many years of lobbying) into that building. Having this knowledge can mean the difference between a disabled person travelling by rail or opting to use other less accessible modes of transport

While DPA acknowledges that there are some modern, accessible rail stations, we note that others, due to their age and historic nature, will need to be extensively modernised if interregional rail becomes more available again.

**Disability responsiveness and awareness training for staff and employing disabled people in rail**

One core element of having an effective interregional rail service would be to have well trained staff. This will be especially important for staff who are tasked with customer facing roles including conductors and onboard and station-based platform staff.

DPA recommends as part of new and ongoing staff training (including on existing commuter-based services in Auckland and Wellington and interregional services) that completing disability responsiveness and awareness training be mandatory and for refresher courses to be run on a regular basis for all staff. These courses should be provided and delivered by disabled people.

This will empower rail staff to provide services in a way which respects the dignity and autonomy of disabled people and promotes positive attitudes towards us within the rail system.

DPA recommends that disabled people be actively recruited and hired to work on all rail services and for roles at all levels, including those which are customer-facing, up to and including being engine drivers/operators and managers.

**Electronic ticketing and booking system availability**

Another aspect of enabling accessibility to our rail system is increasing the inclusiveness of booking and ticketing processes.

DPA hopes that the National Ticketing Solution as proposed in the *Transport Outcomes Framework* will enable disabled people to easily book and undertake travel across a wide range of platforms, including rail. Any National Ticketing System should be accessible to a wide range of people including blind and low vision people and people with mobility impairments or dexterity issues, amongst others.

**Affordability of rail travel for disabled people**

When it comes to paying for rail travel, there is a need to ensure that it is affordable for everyone, including disabled people. Most disabled people are low-income earners according to Ministry of Social Development (MSD) figures provided for the Welfare Expert Advisory Group in 2018 that showed that 54 percent of current working age beneficiaries are disabled people. [[5]](#footnote-6) There are also significant numbers of disabled people who rely on Accident Compensation Corporation (ACC) payments or low waged employment to survive.

DPA members who have fed back on this submission support the extension of the Total Mobility (TM) system to rail travel. TM is a transport fare subsidy scheme which enables disabled people to access taxis via half-price discounts on fares and is generally available to people who cannot easily access other modes of public transport, i.e., buses. The TM system, in operation since the mid-1980s, is jointly funded by central government through taxation revenue (via Waka Kotahi/NZ Transport Agency) and local government through rates revenue (via regional councils). Many disabled people around the country access TM through using a photographic ID-based swipe card system.

The extension of TM subsidies to the public rail system, especially one which sees the re-emergence of a truly accessible and inclusive interregional rail system, would be hugely beneficial for disabled people. It would enable, for example, many disabled people to travel at a significantly discounted rate to visit family/whanau, friends and business/work colleagues around the country. DPA recommends that if government were to agree to extend TM coverage to rail services as part of an interregional rail transport strategy that the fare discount should be set at 75 percent of a full fare (the current discount for TM users under the government’s cost of living transport support package which has been extended to January 31, 2023).

**Interruption of commuter rail services in Auckland during upgrades needs better consideration for the needs of disabled people**

DPA recognises that although the issue of commuter rail services does not fall within the scope of this inquiry, we do wish to raise the issue of the impacts that interruptions to Auckland’s commuter rail system for upcoming maintenance and upgrading work will have on disabled people.

We recognise in stating this the absolute necessity for undertaking these upgrades. Recently, DPA (alongside other disabled individuals and organisations) expressed concerns in the media[[6]](#footnote-7) about the lack of accessible alternative transport options for disabled people who frequent the Auckland commuter rail service to use as work proceeds over the next few years or more. Our concerns centre around the fact that there are few accessible buses and even fewer accessible mobility taxis available to transport disabled Aucklanders who are regular rail passengers. Therefore, Auckland Transport’s suggestion that accessible buses and taxis be possible replacement options for disabled commuters needs to be urgently reviewed in partnership with disabled people and our Disabled People’s Organisations (DPOs – see more about them below). The committee should also note this as an issue of concern for not only Auckland but for other locations where work on the rail network may need to be carried out in the future, especially if an inter-regional network becomes a reality.

**The necessity for co-design processes involving disabled people**

DPA recommends that disabled people and our representative Disabled People’s Organisations (DPOs) be part of the co-design process of the new inter-regional rail system. This should include disabled people having full input (alongside other stakeholders) in the implementation, design and delivery of a newly extended interregional rail system. Essentially this must apply in respect to the design of accessible rail carriages, stations and other stock/infrastructure, fare structures, and developing disability responsiveness and awareness training for all rail staff and developing recruitment processes which will enable the hiring of more disabled people as rail employees.

The best way to engage with disabled people in the co-design process is through the DPO Coalition, whose member organisations include DPA, Balance New Zealand, Blind Citizens New Zealand, Deaf Aotearoa, People First, and Muscular Dystrophy Association. DPO Coalition members meet regularly and, as part of each meeting, engage with government ministers and officials. Therefore, if Government were to proceed with a decision to revive the interregional rail system, the DPO Coalition would be the best way to do so as a first step.

# DPA’s recommendations

The Disabled Person’s Assembly recommends:

* **Recommendation 1:** That high priority be accorded to the accessibility of every interregional rail service. This means both physical accessibility in terms of ensuring that passenger carriages have features including seating which can be accessed by wheelchair and mobility aid users, sufficient corridor width for wheelchair and mobility aid users as well as disabled people using, for example, disability assist dogs to navigate within carriages, and fully accessible toilets, amongst other features. The needs of people with sensory impairments and neurodiverse people should be accommodated as well in terms of, e.g., variable lighting to reduce overstimulation for some autistic people. Audio announcements should be mandated on all trains and at stations to inform people about destinations the progress of their journey as well as arrival and departure times. This aspect would be beneficial for blind and vision impaired people and, indeed, everyone on board the rail service.
* **Recommendation 2:** That there should be national standards adopted for rail carriage design or (if they exist already) these should be updated to include universal design accessibility standards.
* **Recommendation 3:** That signage and information about rail services, stations and on the trains themselves must be available in fully accessible formats including New Zealand Sign Language, Te Reo Māori, Easy Read (suitable for people with learning disabilities), Braille, large print and audio.
* **Recommendation 4:** That railway stations (where there is a need to build new ones or update them) should also be built/retrofitted to universal design specifications with features including accessible platforms, toilets and changing facilities (including wet floor showers for both customers and staff needing them), ramped and/or level entrances, wide doorways, lifts, adequate lighting on both the platform and inside the stations themselves, and sufficient mobility parking and drop off spaces.
* **Recommendation 5:** That all rail staff (including on existing commuter-based services in Auckland and Wellington and interregional services) complete mandatory disability responsiveness and awareness training and that refresher courses be run on a regular basis for all staff. These courses should be provided and delivered by disabled people.
* **Recommendation 6:** That Government extend Total Mobility coverage to rail services as part of an interregional rail transport strategy and as part of this, the fare discount should be set at 75 percent of a full fare (the current discount for TM users under the government’s cost of living transport support package which has been extended to January 31, 2023).
* **Recommendation 7:** That the select committee note the need for Auckland Transport, in its intention to carry out repair/upgrade work on several commuter rail links, to urgently review its decisions around proposed accessible transport alternatives in partnership with disabled people and our representative Disabled People’s Organisations (DPOs).
* **Recommendation 8:** That disabled people and DPOs be part of the co-design process for any new inter-regional rail system. This must include disabled people having full input (alongside other stakeholders) in the implementation, design and delivery of a newly extended interregional rail system. Essentially this should apply in respect to the design of accessible rail carriages, stations and other stock/infrastructure, fare structures, and developing disability responsiveness and awareness training for all rail staff.

# Conclusion

DPA supports the reinvigoration of an inter-regional rail network within New Zealand. Any inter-regional network must be fully accessible, affordable and reliable, particularly for disabled people and other transport disadvantaged groups. A good rail network must incorporate elements of universal design-based accessibility throughout to enable everyone, including disabled people, the opportunity to access it.

DPA wishes to appear before the select committee in support of this submission.

1. 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-2)
2. Tehuiatrain.co.nz. (n.d.) *Accessibility*. Retrieved from <https://www.tehuiatrain.co.nz/travel-with-us/accessibility/#:~:text=The%20train%20has%20space%20for,the%20launch%20of%20the%20service>. [↑](#footnote-ref-3)
3. Auckland Council. (n.d.) *Auckland Design Manual.* Retrieved from <https://www.aucklanddesignmanual.co.nz/design-subjects/universal_design> [↑](#footnote-ref-4)
4. Te Manatu Waka – Ministry of Transport. (2018). *A framework for shaping our transport system: Transport outcomes and mode neutrality*. Wellington, New Zealand. Retrieved from <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/transport-outcomes-framework/> [↑](#footnote-ref-5)
5. Kia Piki Ake – Welfare Expert Advisory Group. (2018). *Welfare system: statistics.* Retrieved from <http://www.weag.govt.nz/background/welfare-system-statistics/>

 [↑](#footnote-ref-6)
6. Johnson, E. (2022, October 4). Auckland rail closures: Disabled train users say replacement buses inadequate. *Stuff*. <https://www.stuff.co.nz/auckland/300704284/auckland-rail-closures-disabled-train-users-say-replacement-buses-inadequate>

 [↑](#footnote-ref-7)