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To Waikato Regional Council

Please find attached DPA’s submission on Waikato Regional Passenger Transport Plan 2022 – 2032

Disabled Persons Assembly NZ

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Introducing Disabled Persons Assembly NZ

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
* 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]](#footnote-2). 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 two key UNCRPD articles pertinent to this submission:

### 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 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.

b) Facilitating access by persons with disabilities to quality mobility aids, devices, assistive technologies and forms of live assistance and intermediaries, including by making them available at affordable cost.

c) Providing training in mobility skills to persons with disabilities and to specialist staff working with persons with disabilities.

d) Encouraging entities that produce mobility aids, devices and assistive technologies to take into account all aspects of mobility for persons with disabilities.”

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]](#footnote-3). 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 is providing this submission for the benefit of the Waikato Regional Council as it considers its Regional Passenger Transport Plan (RPTP) 2022-2032.

Before we come to the details of the plan, we wish to sincerely thank the Waikato Regional Council for introducing the BusIt Free Fare Scheme which has benefitted so many disabled people and has seen an increase in patronage from the disabled community of the local bus network. We would like to record our special thanks to former Council officer Susi Marinkovich, who drove this project to fruition and to all those who have been involved in delivering this scheme so far. This scheme is a role model for what DPA would like to see rolled out nationwide and not just for disabled people but for all New Zealanders as we will touch on in this submission.

DPA welcomes all the draft plan’s objectives, especially Objective 5 which stresses the need to provide the infrastructure necessary for accessible, effective and efficient public transport.

Indeed, this draft plan places great emphasis on the need for accessibility across all its facets which is something we strongly welcome.

Nevertheless, we do have recommendations to ensure that the plan is strengthened even further in this regard. This is because, for us as disabled people, accessibility includes being able to access infrastructure, information, communications and the most affordable fares given that many of us survive on low incomes. For us, this is irrespective of the impairments that we live with as it is the fact of living in a disabling society that imposes barriers to our participation and one of the key barriers for us is the lack of accessible transport.

DPA supports the first objective of the plan to deliver public transport services in a way that results in negative emissions from 2027 onwards. Right now, climate change is impacting our planet in an extremely negative way. One of the most impacted groups from climate change will be disabled people and if the Council does this, then it will be making a significant contribution towards both national and global carbon emissions reduction goals while improving transport accessibility.

We will comment on and make recommendations around some of the key areas contained within the plan.

**How to deliver an integrated network that enhances accessibility and wellbeing**

DPA agrees with the statements made under 2.3.1 around accessibility and wellbeing. We agree with the broad definition of accessibility as the freedom to access opportunities from education, through to housing, healthcare, recreation and employment, etc. Fundamentally, we also support the supposition that “your ability to access opportunities determines your wellbeing and freedom. To improve accessibility is to enhance wellbeing and quality of life.”

Nonetheless, disabled people face other disabling barriers in accessing these opportunities, but if we remove transport as one of the barriers to community participation for the disabled community, then we can also continue to remove the other abovementioned barriers at the same time.

Regarding improving transport service access, we recognise that the Waikato Regional Council is aiming in this plan to increase service availability. We recognise that there is some trade off required in terms of coverage versus ridership in that the more densely populated an area is, the more services will be needed and in less densely populated areas, a different mix of services will need to be provided.

However, it must be recognised that disabled people reside everywhere and not just in urban centres but also in smaller rural communities throughout the Waikato. Therefore, DPA recommends that disabled people in rural centres need to have equitable and ready access to accessible transport services and to information about them on the same basis as their urban counterparts.

To some extent, the Draft RPTP recognises this by Council seeking to partner with neighbouring regions, such as the Bay of Plenty Regional Council, on facilitating transport solutions based on the accessibility needs of communities, irrespective of where regional and district boundaries are set. DPA welcomes these proposals on the proviso that disabled people and disabled people’s organisations, including, for example, Disabled Persons Assembly and the Hamilton Disabled People’s Forum are involved in this process as co-design partners.

**Te Huia passenger service**

DPA welcomes the Council’s plans to continue the increasingly successful Te Huia rail passenger service. Several local disabled people were involved in the design of this service to ensure its accessibility. However, if any further improvements are necessary, then disabled people and our organisations need to be involved as ongoing co-design partners in this process.

**Network aspirations – regional accessibility – bus fleets**

DPA supports the Council’s statements around network aspirations and regional accessibility. In this sense, Council has correctly identified that, due to ageing and other factors, the number of disabled people within the local population will continue to grow and this will mean an even greater rate of public transport patronage from our community over the next ten years.

Therefore, DPA welcomes Council’s proposals to increase transport links between urban areas as well as within urban areas. We also support local communities having full input into the transport planning required for their area in terms of the mix of services they would prefer.

DPA recommends that both urban and inter-urban services should be fully compliant with accessibility standards, especially those around the Requirements for Urban Buses (RUB) which have been recently updated by central government.

Moreover, DPA recommends that all Waikato bus fleets be changed to electric buses in a way that results in negative emissions from 2027. Electric buses must be also RUB accessibility compliant, especially for disabled people.

**Passenger network interchanges**

Overall, we support the RPTP’s plans under 2.3.7.2 around key metro priorities including the establishment of links between Hamilton and other significant towns in the Waikato such as Morrinsville and coverage-oriented links between Hamilton and smaller towns, on the proviso that all services are fully accessible to disabled people. We also endorse the Hamilton Ridership Network Plan which aims to reduce waiting times through increased service frequency, thereby making transfers easier.

As for Hamilton, we support policies 7 and 8 which talk about the need for a ridership policy within Hamilton and near blanket coverage in that 95 percent of properties in the city should have a 600 metre or less walking distance in order to access a public transport service.

For this reason, DPA welcomes plans to place bus stops at most interchange locations with all-weather protection connected by safe and wheelchair accessible facilities. However, we would like to recommend some tweaks to this proposal in that all bus stops (including basic ones) should have full weather protection. Otherwise, all people, particularly disabled people and people with health conditions, would be at risk of being rained on or having to be exposed to other adverse weather. Furthermore, it is not just wheelchair users who would benefit from having accessible bus stop and interchange facilities but also people using other mobility aids such as walkers, and people pushing children’s strollers. High quality tactile strips must be placed at all bus stops as well to enable ease of navigation by blind and vision impaired people.

**Targeted services**

In terms of school transport, disabled students transport themselves to and from school in similar ways to their non-disabled peers. However, specialist transport services for high needs disabled children are funded through the Ministry of Education and are provided by transport providers contracted to them. Otherwise, disabled students and their families/whanau walk, rideshare, cycle, or come to school in private motor vehicles as do their non-disabled peers.

Therefore, DPA recommends that any School Assist or Dedicated School bus services are accessible to disabled students and educational staff. This would ensure that disabled students and staff have equitable access to the full suite of Council-provided transport services which are available to their non-disabled peers.

Community transport services should also be equitably available to disabled people within their communities and be designed to accommodate the needs of the local disabled population. This might include, for example, door-to-door/dial-a-ride services, rideshare initiatives, community mobility vans, etc. Again, these community-level services should be co-designed by Council alongside disabled people and our representative organisations within local communities.

These same principles should apply to transport to special events within the Waikato Regional Council area by ensuring that all special events services are provided on transport modes which are fully accessible to disabled people.

**Total Mobility and fare concessions**

Total Mobility (TM) is a fare discount scheme that is utilised by many disabled people both within Waikato and throughout Aotearoa.

DPA welcomes moves towards taking a region-wide approach to the scheme. However, we remain concerned about provisions contained within the plan to, at times of financial stress upon TM, potentially limit the number of trips that a user can take as well as adjusting maximum fare cap thresholds.

We recognise that Council has fiscal considerations to meet but these should not be at the expense of disabled people’s freedom to transport ourselves around and participate within our communities. In fact, such measures would undermine the earlier stated draft RPTP objectives around transport services enabling full accessibility to the community, especially for disabled people. Above all, any moves like this would seek to further marginalise and isolate disabled people within our communities.

Therefore, DPA recommends that the Regional Council work alongside us, the Disabled People’s Forum and other disabled people’s organisations as well as groups including the Aotearoa Coalition for Transport Equity, both locally and nationally, to call for more central government funding to enable the Total Mobility scheme and, indeed, all public transport platforms to be fare-free for all New Zealanders. In fact, the existing BusIt Scheme illustrates the benefits that fare free travel can have on Waikato’s public transport system and if this were extended to gradually cover all groups within our population and on a national basis, then imagine the significant benefits that will accrue to both the environment and our communities.

Moreover, with respect to Total Mobility and service accessibility, DPA recommends that the Regional Council ally with both DPA and other local and national disabled people’s organisations to lobby central government for more funding to ensure that more accessible mobility vehicles are placed into service around the country, including in the Waikato, along with sufficient drivers paid at the living wage to drive them. Such moves would ensure that disabled people have equitable access to a 24/7 mobility taxi service on the same basis as non-disabled people have access to ordinary taxis. Consequently, this would end regular occurrences including disabled people needing to leave night-time events earlier than their non-disabled counterparts due to a lack of drivers and given the need of drivers and taxi companies to meet understandable health and safety requirements around time spent working on the road.

In the interim, DPA supports Council’s RPTP proposals regarding fare and ticketing systems that retain existing customers including plans to retain the BusIt Free Fares scheme, that all children under the age of 5 travel free of charge, that concessions continue to apply for Super Gold card holders and that Council retain the flexibility to introduce fare concessions for other specific groups.

**Providing accessible information about transport**

DPA welcomes Council’s commitment under Objective 4 of having all public transport information widely available, including for disabled people.

DPA recommends more specifically that the final RPTP mandates the publishing of all information and communications about public transport in accessible formats including New Zealand Sign Language (NZSL), Easy Read, Braille, large print and audio. This includes web-based information which must comply with website accessibility standards.

DPA recommends that all bus stops, transport terminals and interchanges have signage in Te Reo Māori, NZSL, audio and digital formats regarding bus timetables and service provision.

DPA recommends that Council more extensively promotes the Flex Bus app and that it includes a simple guide for how to use the app plus that it commits to fixing any accessibility issues identified by the disabled community.

**Investing in accessible transport infrastructure**

DPA supports calls in the RPTP for investment by all local councils in the Waikato - including by the regional council within the areas it has responsibility for - in accessible infrastructure which supports end-to-end journeys by all passengers. Therefore, DPA recommends that the Regional Council, in collaboration with other local authorities throughout the region, design and build all supporting transport infrastructure including footpaths, railway stations, bridges, bus stops, etc, using universal design (UD) standards which incorporate the accessibility needs of all people, including disabled people.

For this investment to be enduring and sustainable, we reiterate our call again for disabled people and our locally based disabled people’s organisations to be involved in the co-design of such infrastructure.

# DPA’s recommendations

The Disabled Person’s Assembly recommends:

* **Recommendation 1:** That Waikato Regional Council collaborate in a co-design process with DPA, other disabled people’s organisations and the Disabled People’s Forum on all accessible transport initiatives contained within the RPTP.
* **Recommendation 2:** That disabled people in Waikato’s rural centres need to have equitable and ready access to accessible transport services and to information about them on the same basis as their urban counterparts
* **Recommendation 3:** Thatif accessibility improvements need to be incorporated within the Te Huia service improvement plan that these will need to be made as part of a co-design process with disabled people and our organisations.
* **Recommendation 4:** That both urban and inter-urban services should be fully compliant with accessibility standards, especially those around the Requirements for Urban Buses (RUB) which have been recently updated by central government.
* **Recommendation 5:** That all Waikato bus fleets be changed to electric buses from 2027. Electric buses must be also RUB accessibility compliant, especially for disabled people.
* **Recommendation 6:** That all bus stops (including basic ones) should have full weather protection. High quality tactile strips must be placed at all bus stops as well to enable ease of navigation by blind and vision impaired people.
* **Recommendation 7:** That any School Assist or Dedicated School bus services are accessible to disabled students and educational staff. This would ensure that disabled students have equitable access to the full suite of Council-provided transport services on the same basis as those available to their non-disabled peers.
* **Recommendation 8:** That the Regional Council work alongside DPA, the Disabled People’s Forum and other disabled people’s organisations both locally and nationally to call for more central government funding to enable the Total Mobility scheme and, indeed, all public transport platforms to be fare-free for all New Zealanders.
* **Recommendation 9:** That on Total Mobility, the Regional Council ally with both DPA and other local and national disabled people’s organisations to lobby central government for more funding to ensure that more accessible mobility vehicles are placed into service around the country, including in the Waikato, along with sufficient drivers paid at the living wage to drive them. Such moves would ensure that disabled people have equitable access to a 24/7 mobility taxi service on the basis as non-disabled people have access to ordinary taxis.
* **Recommendation 10:** That the final RPTP mandates the publishing of all information and communications about public transport in accessible formats including New Zealand Sign Language, Easy Read, Braille, large print and audio. This includes web-based information which must comply with website accessibility standards.
* **Recommendation 11:** That all bus stops, transport terminals and interchanges have signage and announcements in Te Reo Māori, NZSL, audio and digital formats regarding bus timetables and service provision.
* **Recommendation 12:** That the Regional Council, in collaboration with other local authorities throughout the region, design and build all supporting transport infrastructure including footpaths, railway stations, bridges, bus stops, etc, along universal design (UD) standards for all people, including disabled people.

1. United Nations Convention on the Rights of Persons with Disabilities, December 13, 2006. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html> [↑](#footnote-ref-2)
2. Office for Disability Issues. (2016). *New Zealand Disability Strategy 2016 – 2026*. Retrieved from https://www.odi.govt.nz/assets/New-Zealand-Disability-Strategy-files/pdf-nz-disability-strategy-2016.pdf [↑](#footnote-ref-3)