6th November 2020

To publictransport@nzta.govt.nz

Please find below DPA’s submission on the Requirements for Urban Buses in New Zealand (2014) Review 2020.

## 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

# Right to Access Transportation

DPA believes that disabled people have equal rights to those of other people in Aotearoa, including the right to participate in all aspects of economic, social and political life. These rights must be given effect in accordance with the United Nations Convention on the Rights of Persons with Disabilities[[1]](#footnote-2) (UNCRPD), the Human Rights Act, and other rights-based laws.

We would like to draw attention to article 9 of the UNCRPD[[2]](#footnote-3) which commits state parties to implementing appropriate measures to ensure disabled people have access, on an equal basis with others, to transportation as well as to other services.

Access to transportation is essential for disabled people to be able to live independently and to be able to access social, educational and economic opportunities on a safe and equitable basis to others.

# DPA’s recommendations

DPA supports the majority of the proposals outlined in the overview of the RUB since collectively they will improve the accessibility and useability of buses for wheelchair users. We are, however, disappointed that there are no proposals to update the requirements for audio and visual information on urban buses, as this would ensure consistency across the regions.

The accessibility of key journey information in audio and visual formats makes a significant positive impact to the journey experience and most importantly, enhances the independence and safety for people with visual or auditory impairments. We note that the three main councils, Auckland, Greater Wellington, and Environment Canterbury are trialing audio and visual information on buses. We urge the findings from these trials to be incorporated into the RUB at the earliest possible opportunity.

DPA would also like see a date by which buses that are not compliant with the RUB are no longer permitted to operate. This would help ensure that non-compliant buses are phased out in a timely manner and would give stronger effect to the Transport Agency’s 2018 position statement on inclusive access that *‘everyone should have fair and equitable access to the transport system’.*

Some further comments on the specific proposals

**Proposal 1: Require bus wheelchair ramps to have a maximum gradient of 12%**

DPA supports this as we are aware of ramps that are too steep for comfort or safety being used on some buses, especially at bus stops without a kerb**.**

**Proposal 2: Specify a height range of 900-1000mm for the installation of ticketing machines**

This measure is important to ensure that wheelchair users can access ticketing machines independently.

**Proposal 3: Create a second wheelchair space in the priority seating area on single-deck urban buses**

DPA strongly supports this measure to support groups with more than one wheelchair user being able to travel together.

**Proposal 4: Require one sideways-facing folding seat on both the near and far sides of the bus, in the priority seating area**

DPA has reservations about folding seats in priority areas. Folding seating can be problematic where it is needed to be folded up or down for people who are using mobility devices and/ or who have muscle weakness and/or are unstable on their feet resulting in them facing difficulties in being able to fold the seats down independently, which cuts across the purpose of a priority seating area. The provision of a horizontal handhold for occupants of side-ways facing seats is supported as it will mitigate this.

**Proposal 5: Allow different types of mobility devices onto urban buses (if they adhere to specified maximum measurements)**

DPA supports allowing different mobility devices onto urban buses, and in particular would like to see this extended to include the smaller mobility scooters. Mobility scooters vary greatly in dimensions and some have a wheelbase the same size as a powered wheelchair but are still excluded in some regions. For example, in Christchurch no mobility scooters can go on buses (even though some fit within the measurements specified for wheelchairs), while in Wellington they can if they are less than 90cm long and in Auckland they can be up to 1.2m long.

**Proposal 6: Install a wheelchair-specific button to indicate to the driver when to deploy the ramp**

DPA supports the proposal to install clearly marked wheelchair-specific buttons located in close proximity to the designated wheelchair spaces so that wheelchair users can independently indicate to the driver when they wish to disembark as this will improve the ability for wheelchair users to travel independently on buses.

1. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html> [↑](#footnote-ref-2)
2. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html> [↑](#footnote-ref-3)