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To Ministry of Transport (MOT)

Please find attached DPA’s submission on the Public Transport Operating Model (PTOM).

## 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 accessible transport

The United Nations Convention on the Rights of Persons with Disabilities[[1]](#footnote-2) (UNCRPD) affirms the right of disabled people to access transport services and facilities on an equal basis with others and requires States Parties to engage with disabled people and our organisations on changes which would significantly impact on us.

As transport services and facilities have a direct and major impact on the lives of disabled people, it is essential that our views are considered in all aspects of transport planning.

The UNCRPD Articles most relevant to our submission are:

* **Article 4.3** Involving disabled people and our representative organisations in decisions that affect us[[2]](#footnote-3)
* **Article 9.1** Accessibility (including transportation)[[3]](#footnote-4)
* **Article 19** Living independently and being Included in the community
* **Article 20** Personal mobility[[4]](#footnote-5)

# Current Public Transport Operating Model

DPA regards the current Public Transport Operating Model (PTOM) as having a number of serious flaws in that it fails to prioritise transport use for disabled people; does not promote or foster innovation in the area of accessible transport; is fragmented in terms of relationships between Regional and local Government (for the purposes of this submission Regional Government includes Auckland Transport), MOT / Waka Kotahi / transport operators; allows exemptions and does not cover all types of transport services; and leads to the loss of continuity in terms of driver training in customer service and disability responsiveness.

# Proposed new objectives for PTOM

DPA largely supports the proposed new objectives for PTOM, but wishes to see an additional objective added. Our specific comments on the proposed new objectives follows:

***Competitors have access to public transport markets***

DPA understands the theory that new competitors having access to transport markets will foster increased accessibility of public transport. However, we note that this has not happened under the current model and so this will need to be incentivised and mandated. There is also a need to support and mandate co-operation between different parts of the public transport system in order to ensure accessible travel for disabled people.

***Public transport is an attractive transport option***

There are many factors that need to be considered to make public transport an attractive option for disabled people including: being able to easily get on and off vehicles, footpaths, bus stops and stations being in good repair and accessible, accessible and safe road crossings, driver attitudes and responsiveness, journey planning information being available in accessible formats and being able to signal buses to stop.

Overall, the PTOM needs to ensure that the whole public transport system is accessible and responsive to the needs of disabled people.

***Public transport services are sustainable, including a sustainable work force***

DPA strongly supports this objective. A sustainable workforce is crucial to disabled people being able to get around safely and effectively. If drivers change frequently and there is no continuity of drivers who have received training in customer service and disability responsiveness then disabled people don’t get the support and co-operation from drivers and the wider workforce that they need.

***Public transport services reduce the environmental and health impacts of land transport***

As many disabled people are more at risk of the health effects of environmental pollution, DPA supports this objective.

**Proposed New Objective**

DPA would like the following objective to be added to the list of proposed new objectives of the PTOM:

***Public transport services and systems are accessible to disabled people on an equal basis with others***

Adding the above objective would affirm disabled people’s right to access transport as stated in the UNCRPD and ensure that this is given the priority that it needs to for effective change to occur.

# Roles and relationships in the public transport system

For disabled people to be able to use public transport on an equal basis with others it is necessary for not only the vehicle itself to be accessible, but also for all of the associated transport infrastructure including footpaths, crossings, ticketing, timetables, route information, maps, stations, bus stops and interchanges to be accessible in an integrated and coherent way.

In order to make public transport journeys accessible to disabled people, all of the players involved in the public transport system need to cooperate and work together. Disabled people, who simply want to make a journey, should not be left with the task of having to work out which organisation they need to raise accessibility issues with.

DPA would like to see the PTOM support and mandate cooperation and the working together of all public transport players to ensure disabled people can access public transport on an equal basis with others.

# Services that work outside the PTOM

DPA believes that all public transport services should be brought into the PTOM.

**Exempt Services**

Under the current PTOM, some public transport services are exempt from operating under the model. These include inter-regional services and on-demand public transport services.

Currently it is not possible for a wheelchair user to get from Cape Reinga to Bluff using public land transport. This is particularly frustrating when we are being urged by Government to ‘explore our own backyard’.

Bringing exempt public transport services into the PTOM including key inter-regional services and on-demand public transport services will lead to greater accessibility and choice for disabled people.

# Conclusion

The current PTOM has not led to significant improvements in access to public transport for disabled people, indeed some of its unintended consequences may actually have stalled or regressed accessibility improvements.

An additional objective explicitly stating Government’s intention that the purpose of the PTOM is to ensure disabled people can use public transport on an equitable basis with others would send a clear signal of Government intent in this area.

Ensuring that the PTOM covers all public transport services including inter-city services and on- demand public transport services will also ensure greater accessibility and choice for disabled people.

1. <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. *"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.”* [↑](#footnote-ref-3)
3. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html> [↑](#footnote-ref-4)
4. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-20-personal-mobility.html> [↑](#footnote-ref-5)