



18 May 2021

S21.10

## Submission to the Transport and Infrastructure Committee on the Inquiry into congestion pricing in Auckland

### Introduction

1. The National Council of Women of New Zealand, Te Kaunihera Wahine o Aotearoa (NCWNZ) is an umbrella group representing over 200 organisations affiliated at either national level or to one of our 15 branches. In addition, about 450 people are individual members. Collectively our reach is over 450,000 with many of our membership organisations representing all genders. NCWNZ's vision is a gender equal New Zealand and research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
2. This submission has been prepared by the NCWNZ (Auckland Branch) and the Parliamentary Watch Committee after consultation with the membership of NCWNZ Auckland.

### Executive Summary

3. The focus of this submission is to provide feedback on the Inquiry into Congestion pricing in Auckland in particular the impact on women, especially wāhine Māori and women experiencing additional discrimination and disadvantage because of their ethnicity, age, disability gender choice, sexuality, or socio-economic status.
4. NCWNZ Auckland Branch believe that key outcomes of The Congestion Question (TCQ) report<sup>1</sup> focus primarily on economic and environmental outcomes. It further finds that social outcomes and related modelling are less evident in the report(s) and lack any in-depth understanding of the reality of people's lives including the critical role transport and personal mobility play in those lives. In line with NCWNZ policy, the following report critiques the TCQ Findings report to ensure that equity and mitigation issues are identified.
5. This submission identifies numerous barriers and challenges for specific population groups and further argues that these groups are not well accommodated in the current TCQ project plans.

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<sup>1</sup> Ministry of Transport. 2020. *The Congestion Question. Technical Report.*  
<https://www.knowledgeauckland.org.nz/publications/the-congestion-question-technical-report/>

6. A number of recommendations in this submission focus on the need for more extensive research of specific population groups. A congestion pricing scheme cannot be considered in isolation. An understanding of broader social issues and an investigation into the capacity of public transport and community spaces to deliver equitable outcomes is required. Currently NCWNZ Auckland Branch suggest that there is still much to be done to ensure that a congestion pricing scheme delivers inclusive, affordable, safe, effective and efficient transport options.

## Background

7. The focus of this submission is to provide feedback on the Inquiry into Congestion pricing in Auckland, and in particular, the impact on women, especially wāhine Māori and women experiencing additional discrimination and disadvantage because of their ethnicity, disability, non-binary, sexuality or socio-economic status. Congestion pricing is a method used to ameliorate road traffic congestion and improve road traffic network efficiencies and performance.
8. Central Government and Auckland Council officials have been collaborating on The Congestion Question (TCQ) for several years. The purpose of the project is to investigate and determine whether or not to implement a congestion pricing scheme to all or some of Auckland's road networks.
9. The CQ Findings report (July 2020, p.14)<sup>2</sup> outlines a shortlist of five options for congestion pricing (city centre cordon, isthmus area, strategic corridors, combination of city centre and strategic corridors, regional network). Two of the five options are recommended in the CQ Findings report (city corridors and strategic corridors).
10. The CQ Findings report (July 2020) sits within the Auckland Transport Alignment Project (ATAP)<sup>3</sup>, which outlines a 30-year vision for Auckland's transport system. There are three key elements driving ATAP:
  - targeting investment to the most significant challenges
  - improving the use of the existing network
  - focussing more on managing travel demand (TCQ, July 2020, pp. 3)<sup>4</sup>.
11. It is the view of NCWNZ Auckland Branch that feedback on TCQ must also be cognisant of the ATAP 30-year vision for Auckland transport systems as well as the Draft Auckland Regional Land Transport Plan 2021 – 2031<sup>5</sup> (feedback submissions closed 2 May 2021).
12. While NCWNZ Auckland supports a Congestion Pricing Scheme in principle due to:

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<sup>2</sup> Ministry of Transport. 2020. *The Congestion Question. Main Findings.*

<https://knowledgeauckland.org.nz/publications/the-congestion-question-main-findings/>

<sup>3</sup> Ministry of Transport. 2021. *Auckland Transport Alignment Project.*

[https://www.transport.govt.nz/assets/Uploads/Report/ATAP\\_2021-31\\_Publication.pdf](https://www.transport.govt.nz/assets/Uploads/Report/ATAP_2021-31_Publication.pdf)

<sup>4</sup> Ministry of Transport. 2020. *The Congestion Question. Main Findings.*

<https://knowledgeauckland.org.nz/publications/the-congestion-question-main-findings/>

<sup>5</sup> Auckland Council. 2021) *Draft Auckland Regional Land Transport Plan 2021 – 2031.*

<https://ourauckland.aucklandcouncil.govt.nz/articles/news/2021/03/auckland-s-draft-10-year-regional-land-transport-plan-headed-for-public-consultation/>

- improvements in air quality and the reduction of greenhouse emissions
- projections of long-term benefits (8-12% improvement in sustainable road network performance)
- perceived improvements in economic productivity,

the central purpose of this submission on TCQ is to ensure that equity and mitigation issues are identified, and to consider how any scheme could be structured to ensure that any one group, particularly those on lower incomes, and those experiencing multiple disadvantage, are not unreasonably impacted.

### The Treaty of Waitangi Te Tiriti o Waitangi

13. Implicit in this submission is NCWNZ's commitment to Te Tiriti. We recognise and work towards a Tiriti o Waitangi based society of Aotearoa.
14. There is a section in TCQ report on 'Mana Whenua impacts' and further information in the CQ Technical Report (July 2020)<sup>6</sup>.
15. Two of the five options are recommended in the CQ Findings report (city corridors and strategic corridors)<sup>7</sup>. There is an overview of these options in page 16 of the report.
16. The current level of analysis and reporting on the impact on Mana Whenua groups is superficial and at times contradictory. The CQ Findings and Technical reports speak to a commitment to partnership with Mana Whenua but the actual reports do not reflect a strong commitment to partnership with Mana Whenua while the report itself is dominated by economic and environmental considerations.
  - The city corridor option (the CQ Findings, July 2020 p. 16) is described as having modest equity impacts and the strategic corridor option does not mention or address equity issues.
  - On page 20 of the same report there is some brief discussion about "Mana Whenua impacts" (TCQ Findings July 2020 p. 20) suggesting the likelihood of some negative impacts on Māori households in terms of financial issues and access to places of importance. The report acknowledges the potential for positive outcomes.
  - In the more detailed Technical Report, there is little further information except to state that that the strategic corridor option affects Mana Whenua groups in a more substantial way than the city centre option. The statement regarding the strategic corridor option is inconsistent with the commentary on page 16 (the CQ Findings report), which does not identify any issues relevant to Mana Whenua or other equity issues when discussing the strategic corridors option.

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<sup>6</sup> Ministry of Transport. 2020. *The Congestion Question. Technical Report*.  
<https://www.knowledgeauckland.org.nz/publications/the-congestion-question-technical-report/>

<sup>7</sup> Ministry of Transport. 2020. *The Congestion Question. Main Findings*.  
<https://knowledgeauckland.org.nz/publications/the-congestion-question-main-findings/>

17. While there is considerable discussion in the CQ Technical report around scope, methodology and commitment to Mana Whenua and Treaty relationships, this is not reflected in the CQ Findings report to the extent required or expected. In addition, actions and recommendations for the way forward as presented in the CQ Technical report are still broad and tenuous in that the recommendations for implementation identify areas for focus rather than specific actions and commitments.

## Sustainable Development Goals

18. The UN Sustainable Development Goals<sup>8</sup> is one of the key international documents which influences NCWNZ policy and advocacy. The following sustainable development goal (SDG 11) is drawn on to inform this discussion document.

SDG 11. Sustainable cities and communities:

*“By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons”.*

## Population groups

19. The next sections consider the impact of TCQ on various population groups, in particular women, to ensure that those on lower incomes and/or those who may experience discrimination or intersectional disadvantage, are not unreasonably impacted.

### Impact on women and children

20. The CG Findings and Technical Reports do not reflect any in-depth understanding and modelling of the lives of real people, especially women’s lives, the critical role transport and personal mobility play, and what their lives may look like or play out in the time frame of the proposed implementation.

21. COVID-19 accelerated working at home for many for at least part of the week. If this trend continues it means people in more highly paid jobs, where working from home is possible, can avoid congestion for part of the week, and when they do have to travel, can probably work flexible hours and thereby avoid the congestion charge.

22. Many women, however, work in low-paid and part-time roles. They are more likely to work in an ancillary role or shift work and to be an essential and/or low paid employee. Māori, Pasifika and ethnic women make up the majority of these workers. Often these groups travel into the city or across the city from outlying areas to the central business district or another part of Auckland for their work. These groups will be adversely impacted by congestion charges.

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<sup>8</sup> United Nations. Department of Economic and Social Affairs. Sustainable Development. 2015. *Transforming our world: the 2030 Agenda for Sustainable Development*. <https://sdgs.un.org/2030agenda>

23. Women also take on the primary caregiving roles to a much greater extent than men (Ministry for Women, 2020)<sup>9</sup>. According to the Gender Attitudes Survey (2019)<sup>10</sup>, New Zealanders hold pro-equality beliefs between women and men in terms of roles in the home. However, the report also states that traditional stereotyping of more specific domestic roles (e.g. cooking, shopping, cleaning) continue as respondents believe that certain roles are the responsibility of women and girls. While the report does not specifically ask a question around who 'should' take the children to and from school, anecdotal evidence suggests that women pick up this role far more than men. Given that there are higher numbers of women in part-time employment it is clear that despite the aspirational beliefs around gender equality reported in the Gender Attitudes Survey, (2019), the reality is that women do most of the caregiving work which includes driving family and children to and from school, to medical appointments, after-school commitments and other related family responsibilities. Again, this group will be adversely impacted by congestion charges.
24. Much of the literature on congestion draws on the principle that local people attend their local schools and work in their local community. This is not possible for many families when a child may attend a school outside of the community or a parent may be employed outside the community, and the only way to manage is to drive. Families and individuals in these circumstances will also be adversely impacted by congestion charges.
25. Currently there does not appear to be any real understanding of the daily lives of the women and children who will be required to negotiate their way through the CQ.
26. Extensive social modelling, time-use and other relevant research tools are required to capture real information and better understand the complexity of the daily lives of women and children.
27. In terms of avoiding significant social inequity, the proposals could only work if excellent affordable Public Transport is available across the Auckland-wide region. Even in these circumstances there will be significant numbers of women and their families who, for various reasons, (some of which are mentioned above) cannot avail themselves of this option.

### Older People

28. Auckland Transport Congestion Charges would have an adverse effect on older people on fixed incomes. This is particularly relevant for older women as they live longer, move into retirement with fewer assets and savings than men and depend on fixed incomes for a longer period (Hyman, 2017)<sup>11</sup>.
29. Congestion charges would affect these women by decreasing their options to
- support whānau in the care of extended family members
  - seek specialist medical services which are often located only in central Auckland

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<sup>9</sup> Ministry for Women. 2020. *COVID-19 and women*. <https://women.govt.nz/news/covid-19-and-women>

<sup>10</sup> NCWNZ. 2019. *2019 Gender Attitudes Survey*. <https://genderequal.nz/wp-content/uploads/2020/06/2019-Gender-Attitudes-Survey-Online.pdf>

<sup>11</sup> Hyman, P. 2017. *Hopes Dashed? The Economics of Gender Inequality*. New Zealand: Bridget Williams Books.

- work in various low paid and precarious roles such as in service work, hospitality, health, retail and so on. Often there is no choice of workplace or work schedules
  - participate in and contribute to volunteer activities e.g. city mission, guides for Art Gallery or Museum, SeniorNet, CAB.
  - participate in cultural events such as Heritage Festival, Pacifica, Writers' Festival, Marae hui.
  - study at universities, specialist sections of libraries, SeniorNet, Govt records (Parnell).
30. Many older people (particularly older women) continue to work for interest or out of necessity. Others engage in various levels of unpaid volunteer and whānau support roles. These volunteer roles are a major source of support for many community groups. This voluntary community engagement also provides the individual with enhanced social and community engagement.
31. The NZ positive ageing strategy was introduced in 2001 (Ministry of Social Development, 2001)<sup>12</sup> and in 2019 it was replaced by Better Later Life – He Oranga Kaumātua 2019 to 2034<sup>13</sup>, a strategy for making the future better for New Zealanders as they age. There are five key areas considered central to a better later life. These are:
- achieving financial security and economic participation
  - promoting healthy ageing and improving access to services
  - enhancing opportunities for social connection
  - making environments accessible
  - creating diverse housing choices and options
32. The introduction of congestion pricing is likely to impact adversely on many older people, particularly older women given the list (mentioned above) of just some of the various activities older people engage in as mentioned above.
33. The introduction of congestion pricing will likely impact directly on the first four indicators and indirectly on the fifth. Financial security and economic participation are already under threat for women workers in New Zealand who are facing increased levels of unemployment after COVID-19 (Kendall, 2021)<sup>14</sup>. Congestion pricing is also a threat to older women in terms of reducing their access to services and opportunities for social connections through social and volunteer engagement.
34. While the CQ Findings and Technical reports discuss community groups and label them as 'vulnerable' households, there is no mention of older people and more specifically older women. Although 50 interviews were carried out to explore the possible impact on lower socio-economic households, there was no specific focus on older people in the sample.

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<sup>12</sup> Ministry of Social Development. 2001. *New Zealand Positive Ageing Strategy*. <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/planning-strategy/positive-ageing/index.html>

<sup>13</sup> Ministry of Social Development. 2019. *Better Later Life – He Oranga Kaumātua 2019 to 2034*. <https://www.superseniors.msd.govt.nz/about-superseniors/ageing-population/index.html>

<sup>14</sup> Kendall, L. 2021. *Uneven results – the economic impact of Covid – 19 on women*. <https://news.anz.com/new-zealand/posts/2021/03/covid-impact-on-women>

35. We believe that 50 interviews do not provide an in-depth understanding of the daily lives of older people and how they might negotiate their way through the CQ. In the past decade, research on the life-course has emphasised dissimilarity and individualisation, thus challenging established age-specific 'life-stage' developmental pathways (Kooij, Jansen, Dijkers, & de Lange, 2014)<sup>15</sup>. Retirement or the life patterns of older people in particular are seen as increasingly heterogeneous (Han & Moen, 1999)<sup>16</sup>.
36. As with our recommendations for Mana Whenua we suggest that extensive social modelling, time-use and other relevant in-depth research tools are required to capture real information to better understand the heterogeneous pathways of older people and address the five key areas for achieving a better later life (Ministry of Social Development, 2021)<sup>17</sup>.

### Disabled People

37. The rights of disabled people in New Zealand are enshrined in the United Nations Convention on the Rights of Persons with Disabilities (2006)<sup>18</sup>, the United Nations Convention on the Elimination of all Forms of Discrimination against Women (CEDAW, 1979)<sup>19</sup>, ratified by the New Zealand government in 1985, and the New Zealand Disability Strategy (2016)<sup>20</sup>. Implicit in these frameworks is the vision of New Zealand as a non-disabling society - a place where disabled people have an equal opportunity to achieve their goals and aspirations, and all of New Zealand works together to make this happen ([www.odi.govt.nz/nz-disability-strategy](http://www.odi.govt.nz/nz-disability-strategy)).
38. Despite the above policies and strategies, disabled people and their families continue to experience significant disadvantage socially and economically in comparison to non-disabled people. For example, unemployment rates for disabled women have increased from 8% (pre-COVID-19) to 15% (post-COVID-19) whereas the post-COVID-19 rates were at 5% for non-disabled men and women (NZ Household labour force survey, 2020)<sup>21</sup>.
39. Disabled people consistently score lower than non-disabled people on measures of health and wellbeing. Sixty-one percent of disabled people report a life satisfaction score of 7 or over compared to 87% of non-disabled people. Disabled people also report significantly lower measures of health and happiness compared to the non-disabled population and greater levels

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<sup>15</sup> Kooij, DTAM, Jansen, PGW, Dijkers, JSE, de Lange, AH. 2014. Managing aging workers: A mixed methods study on bundles of HR practices for aging workers. *The International Journal of Human Resource Management*, 25(15): 2192–2212. doi:10.1080/09585192.2013.872169

<sup>16</sup> Han, S-K, Moen, P. 1999. Clocking out: Temporal patterning of retirement. *American Journal of Sociology*, 105(1): 191–236.

<sup>17</sup> Ministry for Social Development. 2021. *The Positive Ageing Strategy – background*.

<https://www.superseniors.msd.govt.nz/about-superseniors/office-for-seniors/positive-ageing-strategy.html>

<sup>18</sup> United Nations Convention on the Rights of Persons with Disabilities. 2006. <https://www.odi.govt.nz/united-nations-convention-on-the-rights-of-persons-with-disabilities/read-the-convention/>

<sup>19</sup> United Nations. 1979. *Convention on the Elimination of All Forms of Discrimination against Women New York, 18 December 1979*. <https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>

<sup>20</sup> Office for Disability Issues. 2016. *New Zealand Disability Strategy 2016–2026*. <https://www.odi.govt.nz/nz-disability-strategy/>

<sup>21</sup> NZ Household labour force survey. 2020. <https://www.odi.govt.nz/whats-happening/updated-numbers-on-disability-from-stats-nz/>

of loneliness and social isolation. These measures of difference have increased post-COVID-19 (NZ Household labour force survey, 2020)<sup>22</sup>.

40. Disability also has a profound impact on levels of material hardship and poverty in families. The number of children living in a household with at least one disabled person and experience material hardship is three times the number of children in non-disabled households experiencing material hardship. Disabled children are over two times more likely to live in material hardship than non-disabled children (NZ Household labour force survey, 2020)<sup>23</sup>.
41. Disabled people are one of the most intersectionally disadvantaged groups in our communities and women and girls experience even greater hardship, poverty, levels of risk and general disadvantage than other disabled people (United Nations Convention of Rights of Persons with Disabilities, 2006)<sup>24</sup>.
42. Congestion charges, as outlined in the CQ Findings and Technical reports, will impact on disabled people in a number of ways. While this is acknowledged in the report there are a number of issues that require further consideration.
43. There is some discussion of disabled people in terms of mitigations policies and practices. The proposal identifies some exemptions for disabled and mobility users. However, a key issue is that Mobility Cards are given to individuals, not to cars and often it is a relative or friend who drives the person. The same issue applies to families and parents when disabled children and children with intellectual disabilities are driven to schools. Hospital appointments are also challenging as outpatients often have limited control over the timing of these appointments. There is already evidence of people missing appointments because of travel and parking costs and a congestion charge will exacerbate this. These are just some examples of how disabled people are reliant on cars and road usage.
44. While Mobility Card users receive a car use subsidy from the Auckland Regional Authority, disabled people are usually on lower incomes than non-disabled people, and often cannot afford appropriate transport. This, in turn, impacts adversely on their ability to engage in paid and unpaid work and ultimately on their social connections and wellbeing.
45. Public transport is presented as an alternative option for disabled people, but the disabled community have significant concerns with current public transport arrangements in Auckland in terms of schedules, bus design, bus regulations, cost of fares, driver education and general safety issues.
  - Public transport (PT) schedules. Changes to schedules in Auckland in the last two years have seen services reduced in some of the outer areas and some bus routes into the city

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<sup>22</sup> ibid

<sup>23</sup> ibid

<sup>24</sup> United Nations Convention on the Rights of Persons with Disabilities. 2006. <https://www.odi.govt.nz/united-nations-convention-on-the-rights-of-persons-with-disabilities/read-the-convention/>

requiring one or two changes (Wilson, 2021)<sup>25</sup>. Overall, this has made it even more difficult for disabled people to access public transport in a timely and safe manner.

- Future planned expenditure on public transport as outlined in ATAP (Wilson, 2021)<sup>26</sup> is suggested as inadequate for future PT development. Projected spending on buses, trains and ferries will fall by \$360 million compared with previous ATAP, in 2018. This will likely impact on disabled people in terms of reducing their public transport options and accessibility.
- Public transport design. The design of trains and buses appears to be outdated in terms of accessibility. In other countries (for example in Western Australia) drivers are able to press a button to enable the wheelchair ramp to slide in and out. Bus drivers are more likely to stop and pick up disabled people if the process is quick and easy on their busy schedules. Currently disabled people often feel singled out and embarrassed about the level of effort required for them to board a bus.
- Public transport regulations. In many other countries all sections of train carriages and buses (to a lesser extent) are accessible, not just one part of one carriage. Public transport regulations limiting one space for a wheelchair or pram is inadequate and fosters an attitude of first-come first-served rather than one of inclusivity.
- Public Transport costs. Public transport in Auckland is relatively expensive. In a study of 50 cities on the cost of public transport by Deutsche Bank (NZ Herald, 2018)<sup>27</sup>, Auckland ranked as the third most expensive city in the world behind London and Dublin. As disabled people are generally on a lower income than non-disabled people, their ability to afford public transport, coupled with the requirement to change buses, limits both accessibility and affordability of public transport.
- Public transport driver education. While public transport drivers (buses) receive driver education, their understanding of the invisible and visible barriers that disabled (and older) people face is limited. Disabled people do not feel comfortable or safe on buses where the driver is under pressure to meet unrealistic schedules. Twenty-four percent of New Zealanders identify as disabled. Many more are disabled but prefer to identify as older or elderly. Regardless of this, older/elderly people also report a reluctance to use public transport (particularly buses), especially in the rain, when bus floors are slippery, and drivers often do not wait for individuals to take their seats before driving off to the next stop.
- General street safety issues. One of the most concerning issues for disabled people is that some of the solutions thought to reduce the number of cars on the road e.g. e-bikes and scooters, segways and skateboards, are not necessarily delivering these outcomes. Research suggests that these alternative transport modes often replace walking, cycling or

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<sup>25</sup> Wilson, S. 2021. The Transport Plan that Auckland deserves. *New Zealand Herald*.  
<https://www.nzherald.co.nz/nz/simon-wilson-the-transport-plan-that-auckland-deserves/VYYQPSENBISPEWTRJ3RAFYOK4M/>

<sup>26</sup> *ibid*

<sup>27</sup> Orsman, B. (2018). Auckland public transport third most expensive in the world. *New Zealand Herald*.  
<https://www.nzherald.co.nz/nz/auckland-public-transport-third-most-expensive-in-the-world/VXIJ6QD56RBJZ4RVYCD7W53BWY/>

public transport rather than replacing car use and decreasing congestion (QUT, 2020)<sup>28</sup>. Regardless of the congestion issue, the increase in these modes of transport is an additional stress for disabled people. They reduce the independence of disabled people as footpaths are no longer safe. Disabled and older people are not able to navigate and negotiate these alternative transport modes quickly enough and in many parts of Auckland, footpaths are broken or neglected, further threatening street safety. The costs associated with accidents involving these alternative modes are significant with electric scooter injuries alone costing NZ taxpayers 7 million dollars in 15 months (Kenny, 2020)<sup>29</sup>. Disabled people acknowledge that there are council rules and regulations around the use of e-scooters but there is no monitoring or enforcement of illegal practices.

46. At a time when central and local governments are legally committed to making public transport and streets more inclusive and accessible, disabled people are feeling less confident about accessibility and safety issues. As public transport becomes further from the reach of disabled people, many are feeling increasingly socially isolated and cannot necessarily afford companion transport or taxis, even at a reduced price.
47. The NZ Office for Disabilities identifies eight key outcomes in the NZ Disability Strategy<sup>30</sup>. These outcomes are education; employment and economic security; health and wellbeing; rights, protection and justice; accessibility; attitudes, choice and control; and leadership. We believe the CQ issue, coupled with additional barriers disabled people face regarding public transport options (now and future) mean that disabled people are further disadvantaged by the CQ proposals.

## Public Transport

48. ATAP has reduced fares for community service card holders, and this is acknowledged in the discussion on mitigations. It is also important to be aware that, despite the fact that a majority of disabled people are on lower incomes, these incomes are not always within the community services criteria. Disabled people have additional costs relative to non-disabled people and individuals have different accessibility issues. Thus, a mitigations policy based on a specific income limit may not deliver meaningful results for the disabled population.
49. More engagement and research are required with all population groups identified in this submission. As modes of non-car transport change, a range of opportunities and barriers will emerge. This submission has already commented on the impact of alternative modes of transport e.g. e- scooters on the disabled population, however other future developments e.g. the introduction of electric buses offer an opportunity to design buses and routes that are inclusive of the needs of all population groups.

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<sup>28</sup> QUT (2020). *e-Scooter Safety*. <https://research.qut.edu.au/carrsq/wp-content/uploads/sites/296/2020/12/e-Scooter-Safety-1.pdf>

<sup>29</sup> Kenny, J. 08 Feb 2020. *Electric scooter injuries costing NZ taxpayers 7 million dollars in 15 months*. <https://www.stuff.co.nz/national/119064363/electric-scooter-injuries-cost-nz-taxpayers-7-million-in-15-months>

<sup>30</sup> Office for Disability Issues. 2016. *New Zealand Disability Strategy 2016–2026*. <https://www.odi.govt.nz/nz-disability-strategy/>

## Conclusions

50. The central purpose of this NCWNZ submission on TCQ is to ensure that equity and mitigation issues are identified, particularly those that impact on women, and to consider ways a scheme could be structured to ensure that any one population group, especially those on lower incomes, and those experiencing multiple disadvantage, are not unreasonably impacted.
51. The current level of analysis and reporting on the impact on Mana Whenua groups is superficial and at times contradictory. The CQ Findings and Technical reports speak to a commitment to partnership with Mana Whenua but the actual reports do not explicitly reflect this to the extent required or expected. In addition, actions and recommendations for the way forward as presented in the CQ Technical report are still broad and somewhat tenuous.
52. The CG Findings and Technical Reports do not reflect any in-depth understanding and modelling of the lives of real people, especially women's lives and their families or what that may look like or play out in the time frame of the proposed implementation.
53. Older people and more specifically older women are absent from the CQ reports. Implementation of congestion pricing has implications for this older age group especially in light of government policy for A Better Later Life.
54. While disabled people are acknowledged in the CQ Findings and Technical report, current research carried out for the CQ project does not appear to provide an in-depth understanding of the daily lives of disabled people and how they might negotiate their way through the CQ. In addition, we argue that current public transport options as an alternative to road usage are problematical and creating further accessibility barriers for disabled people. While discussion around mitigations for the disabled population are present in the CQ Findings and Technical reports, they do not yet reflect an in-depth understanding of the diversity of the disabled population and their varying needs. More effective engagement with disabled people and their representative agencies is required.
55. Lessons drawn from international experiences of introducing traffic congestion pricing indicate that a successful congestion scheme requires public transport to be incentivised so that it is frequent, affordable, safe, comfortable, handy and reasonably fast. (Wilson, 2021)<sup>31</sup>. A congestion pricing scheme requires a robust public transport system for all population groups in the community. It is the view of NCWNZ Auckland that population groups identified in this submission do not currently perceive public transport as a safe, affordable and accessible option to car usage. Future projections on public transport spending (ATAP) do not augur well for the development of a comprehensive and inclusive public transport system that will incentivise the population groups identified in this submission to choose public transport over private car usage.
56. Considerable thought on mitigations has gone into the CQ Technical report. However, price point and community services criteria alone do not meet the diverse needs of these population

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<sup>31</sup> Wilson, S. 2021. The Transport Plan that Auckland deserves. *New Zealand Herald*. <https://www.nzherald.co.nz/nz/simon-wilson-the-transport-plan-that-auckland-deserves/VYYQPSENBISPEWTRJ3RAFYOK4M/>

groups. Affordability, safety and accessibility are key areas for consideration. It is recommended that a wider range of factors is required for consideration in terms of mitigations.

57. This submission identifies numerous barriers and challenges for specific population groups. While economic considerations are very important, so too are other issues, and it is the view of NCWNZ Auckland Branch that economic and environmental measures are emphasised at the expense of social measures resulting in a number of population groups within the greater Auckland regions being excluded to varying degrees from the CQ project plans.

## Recommendations

58. **Mana Whenua.** Actions and recommendations for the way forward need to be more explicit rather than aspirational. They must ensure that Mana Whenua are actively engaged and present at all stages and not during the implementation phase only.
59. **Women and Children.** Extensive social modelling, time-use and other relevant research tools are required to capture real information, to better understand the complexity of the daily lives of women and children, and how congestion pricing will impact this group.
60. **Older People (Older Women).** Extensive social modelling, time-use and other relevant in-depth research tools are required to capture real information to better understand the heterogeneous pathways of older people, particularly older women, and how congestion pricing will impact on the five key areas that are integral to A Better Later Life.
61. **Disabled People.** More effective engagement with disabled people and their representative agencies is required. Additional in-depth research is required across all disability groups to understand and address the unique and multiple challenges that disabled people face. Current proposals under the CQ plan are inconsistent with and challenge the eight key areas of the NZ Strategy for Disabled people.
62. As with other groups identified in this report, research must also focus on public transport accessibility and affordability along with security and safety issues in our streets and locales around public transport hubs.
63. **Public Transport.** While the CQ project aims to disincentivise driving, there needs to be extensive research and commitment to incentivising public transport usage specifically for population groups identified in this report. A number of challenges around public transport have been identified across this submission and future research must be cognisant of, and further investigate, these concerns.
64. **Mitigations.** Affordability, safety and accessibility are key areas for consideration in the development of mitigations policies. While the CQ Findings and Technical reports recognise mitigation as an essential part of the CQ, a broader range of factors around mitigations are required for consideration.
65. More in-depth research of specific population groups is recommended in this concluding section of the submission. In-depth research will make visible the diverse needs of these groups which can then be included in formulating an appropriate mitigations plan. NCWNZ Auckland Branch envisages that a mitigations policy will address social and economic needs.

66. We further recommend that any mitigation policy integrate both road user and public transport user options. A congestion pricing scheme goes hand in hand in with an inclusive, effective, efficient, public transport scheme.



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