

2012 Review of the Disability Standards for Accessible Public Transport

Transport for NSW Submission

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1. Introduction

The NSW Government supports the intent of the *Disability Standards for Accessible Public Transport 2002* (Transport Standards) and is committed to an ongoing program to eliminate or reduce barriers to access public transport services. Transport for NSW recognises the rights of people with disability to participate in communities to the fullest extent possible and the importance of accessible and inclusive transport services to people with disability. A 'customer first' culture within Transport for NSW will deliver a high level of access and service for all customers.

NSW has the largest passenger transport task in Australia with the Greater Sydney Metropolitan Area having the country's highest percentage of public transport use - 26.3 per cent of commuters use public transport for work and study in Sydney compared to a national capital city average of 19.1 per cent of commuters¹. NSW maintains Australia's largest rail, bus and ferry networks to meet this demand.

To improve accessibility to this transport system, the NSW government has invested over \$2.5 billion since the 2007/08 financial year on accessible transport infrastructure. This includes approximately \$334 million on rail infrastructure, \$1,034 million on accessible rail rolling stock, \$65 million for the construction and upgrading of wharves and \$1,069 million on the purchase of accessible buses.

To assist in informing its response on compliance and matters raised in the 2012 *Review of the Disability Standards for Accessible Public Transport 2002 Issues Paper*, Transport for NSW has consulted extensively with transport operators, industry stakeholders and the Accessible Transport Advisory Committee². Issues raised by stakeholders about the efficacy of the current standards for particular modes of transport are included in the submission.

1.1 Commitment to policy approaches

The Transport Standards were endorsed by the Australian Transport Council in 1999 on the stipulation that the Commonwealth should provide sufficient funding to state and local governments for their full implementation. The Commonwealth Government has a significant role to play in providing funding to help accelerate the delivery of accessible transport infrastructure by state and local governments. As noted above, NSW has already expended over \$2.5 billion over five years and will need to continue large scale investment to meet the Commonwealth's standards for accessible infrastructure.

Transport for NSW considers that, although responsibility for the Disability Discrimination Act 1998 (DDA) and Transport Standards lies with the Commonwealth, there has been little co-ordination of the compliance task by the Commonwealth. In particular, the Commonwealth has not allocated the resources

¹ Australian Bureau of Statistics (2008) *Australian Social Trends: Public transport use for work and study* Cat.N. 4102.0

² The Accessible Transport Advisory Committee comprises the major disability and ageing peaks to advise Transport for NSW on transport access issues

required for implementation of the recommendations from the *2007 Review of the Disability Standards for Accessible Public Transport* (2007 Review).

The role of the Australian Human Rights Commission (AHRC) in protecting and promoting the rights of people with disability in Australia is supported. However, AHRC should be resourced to assist transport and operators by providing clarity and information with regard to the interpretation of the Transport Standards. The current focus on managing complaints has led to an adversarial relationship with transport providers and operators which is costly and ultimately counterproductive.

NSW was the first state to sign up to the full National Disability Insurance Scheme with significant dedicated funding for support for people with disability. Implementation of the Scheme and the National Disability Strategy recognises that building accessible communities is not the responsibility of any one government or agency. Transport for NSW appreciates the importance of transport access for community participation by people with disability. For local government, there remains a funding gap to support action to build and maintain roadside infrastructure such as accessible bus stops. This funding was expected from the Commonwealth as part of implementation of the Transport Standards.

1.2 Implementation of the 2007 Review

Transport for NSW is concerned about the lack of progress by the previous Commonwealth Government in implementation of many of the recommendations from the first review of the Transport Standards. The Commonwealth has not allocated resources required for implementation, which has generated scepticism amongst the disability sector and has left major issues for transport operators and providers unresolved. Commentary regarding a number of the 2007 Review recommendations is provided below.

Recommendation 1: Establish a national framework for Action Plan reporting and require annual reporting by each State and Territory government

The current legislative framework is complaints based and that the Australian Human Rights Commission has no powers to audit compliance against the Transport Standards.

Transport for NSW notes that this recommendation was reflected in the *National Disability Strategy 2010-2020* which includes a commitment to “monitor adherence to and evaluate the effectiveness of the *Disability (Access to Premises – Buildings) Standards 2010* and *Disability Standards for Accessible Public Transport 2002* and improve the accessibility of reports”. No steps have been taken towards providing a monitoring and reporting framework and the added benefits that such a framework would bring to our customers is questionable.

Transport for NSW is committed to greater openness with disability stakeholders regarding implementation of its Disability Action Plan 2012-2017 and will be providing quarterly reports on implementation progress.

Recommendation 3: A technical experts group be convened, with Standards Australia, to develop technical standards specifically suited to public transport conveyances and infrastructure. Once developed, these Standards should be referenced in the Transport Standards, and made available for public use.

Transport for NSW supports this recommendation and proposes that priority is given to the development of technical standards for accessibility in the rail environment. This is due to the number of requirements in the Transport Standards which are not fit-for-purpose for rail or achievable at stations and on conveyances. Transport for NSW has set out its specific concerns in Section 3.1 of this submission.

Recommendation 4: Mode specific guidelines be developed by modal sub-committees. These guidelines would be a recognised authoritative source for providers which can be used during a complaints process.

Transport for NSW notes that the Australasian Rail Association (ARA) has been proactive in developing a code of practice for the operation of the Transport Standards in the rail environment. While Transport for NSW is sympathetic to the ARA position that operators require certainty and protection against legal actions, we note that:

- The current legislative framework does not allow for co-regulation
- Modal guidelines should not advocate a lower level of protection to people with disability than is provided under the Transport Standards
- Co-regulatory frameworks add unnecessary complexity for potential complainants to the Australian Human Rights Commission.

Better outcomes for both customers with disability and transport operators and providers are likely to be achieved by removing or amending standards which are not achievable.

Recommendation 5: A mobility labelling scheme be developed which identifies the weight of the aid and whether its dimensions fit within the dimensions for allocated spaces, boarding devices, access paths and manoeuvring areas on conveyances, as specified in the Transport Standards.

Safe, efficient and consistent carriage of all types of mobility aids is a significant issue for transport operators and providers. Transport for NSW urges the Commonwealth Government to pursue a workable solution to this issue as a matter of priority.

The Accessible Public Transport Jurisdictional Committee (APTJC) has formed a sub-committee. The convenor of APTJC has written to express support for Austroads' review towards a nationally consistent approach to the use of motorised wheelchairs and other motorised mobility vehicles. APTJC also has formally requested that mobility vehicle labelling scheme issues are included within the scope of the review. However, very little substantive action has occurred.

Transport for NSW supports the development of a national design standard for mobility scooters to underpin a mobility aid recognition scheme to permit certain categories of mobility scooters on board public transport conveyances. Such a scheme has operated successfully by Transport for London over a number of years.

Recommendation 7: Commonwealth, State and Territory governments provide funding for projects in regional and rural regions where local governments are unable to resource upgrades of public transport infrastructure.

Lack of local government investment in infrastructure has been identified as one of the major impediments to the delivery of accessible public transport. This issue is not restricted to regional and rural areas but is equally an issue in metropolitan local government areas. In NSW, the key issues are:

- inaccessible bus stops which are owned and operated by local councils
- lack of kerbs and footpaths to enable people with disability to use pedestrian pathways to public transit stops, stations and interchanges, and
- use of road treatments such as traffic calming devices and the camber of local roads which prevent the deployment of low floor buses.

Transport for NSW is currently investigating the development of guidelines and co-funding arrangements to assist local governments to improve accessible bus stop infrastructure in urban and rural areas of NSW. Commonwealth funding is needed to support accessible infrastructure development by local government.

Recommendation 11: The taxi modal sub-committee be tasked with developing a staged implementation timeframe similar to that for other modes of transport, and an appropriate performance measure, to replace the 2007 milestone for Wheelchair Accessible Taxi (WAT) compliance.

Transport for NSW supports review of the current compliance target of equivalence of response time and acknowledges the difficulties faced by the Taxi Regulators' Group in developing an appropriate alternative.

In NSW the comparative response time is measured as monthly 'average' response times for bookings made through a network. While the comparative response time between standard and WATs is one tool for measuring service access, the averaging process masks differences in response times for different parts of a licensed area or at different times of day. Response time data has only recently become available for rural and regional NSW, noting that in some locations where the overall demand for taxi services is low, there are no WATs and WAT availability can be highly variable in other country locations.

Transport for NSW notes that should the current measure be replaced with a staged implementation timeframe, similar to that for other modes of transport, an end target of 100 per cent of fleet is not needed to satisfy demand for WAT services.

Recommendation 12: *Government commission research into the safety of passengers travelling in conveyances whilst seated in mobility aids (including scooters). This research should make recommendations around whether there is a need for an Australian Standard addressing this aspect of safety for mobility aids.*

Transport for NSW notes that the UK Department of Transport has conducted and published significant research to establish in what circumstances it would be reasonable for transport operators to allow people with disability using some models of mobility scooter to use the wheelchair spaces or other suitable areas aboard transport vehicles or to permit the carrying of scooters as luggage.

Transport for NSW considers that Commonwealth development of Australian research would be equally valuable in relation to wheel locking systems as an alternative to tie down systems to secure and maintain stability of wheelchairs on buses and in WAT taxis.

Recommendation 13: *The Transport Standards be amended to require new community transport vehicles greater than 12 seat capacity to comply with the Transport Standards commencing in 2017, (with full compliance by 2032).*

Transport for NSW is concerned that the financial and operational consequences of this recommendation have not been fully considered. Transport for NSW estimates that approximately 70 per cent of the existing community transport bus fleet under the funded service providers would meet the requirement of Transport Standards for wheelchair accessibility.

Community transport service providers in NSW are required to factor in the replacement cost of their vehicles as assessed over their useful life, so that substantially adequate funds are available for the vehicle replacement. The cost difference between a non wheelchair accessible bus and a wheelchair accessible bus is approximately 20 - 30 per cent of the total vehicle cost.

There are currently many operators that have buses that would be considered non compliant if this recommendation were to be introduced today. All of these are due for replacement prior to 2019. The estimated additional cost to government to upgrade existing fleet to wheelchair accessible vehicles in the interim is estimated to be \$7.6 million.

This estimate does not take into account the cost of additional vehicles needed to cater for expected growth in demand for community transport services. However the extent of future demand and service delivery requirements is uncertain due to the transition of aged care services under the Home and Community Care (HACC) program to the Australian government and the introduction of DisabilityCare. The latter is expected to increase opportunities for clients to purchase transport services directly from a broad range of providers.

Community transport service delivery models are constantly changing in response to demand and resource availability. It is anticipated that should the requirements for a bus become more onerous this may provide an incentive for organisations to

purchase smaller vehicles. Once a vehicle is converted to accommodate wheelchairs, seat capacity is reduced with each wheelchair space representing two non wheelchair seats, an issue which affects the capacity of the community transport providers to meet contracted outputs.

Recommendation 14: *Phased application of dedicated school bus services to physical access requirements in the Transport Standards, commencing in 2029 and being fully required by 2044.*

Transport for NSW has recently conducted a number of consultations on transport disadvantage in rural NSW. While there are many synergies between the use of school buses in rural and regional areas and the travel needs for people with disabilities, gradual introduction of the Transport Standards to school bus services is not supported.

The high implementation costs cannot be justified whilst ever local roads and roadside infrastructure are suitable for low floor wheelchair accessible buses. Local councils who are responsible for such infrastructure are unable to deliver it without Commonwealth funding assistance.

In the future Transport for NSW may invest in upgrading buses in communities where the synergies and cost benefits can be clearly demonstrated. For example where a wheelchair accessible bus could be used to provide town services and reduce duplication for the need for different types of vehicles.

2. Progress in implementation of the Transport Standards

2.1 Heavy rail services

The heavy rail network in NSW is the oldest and most extensive in Australia. The earliest stations in the network were built more than a century ago and much of the infrastructure is more than eighty years old. A significant proportion of the trains on the network are between 20 and 40 years old. The age of the infrastructure and the scale of the retrofitting task to bring rail services into compliance will take time and it is unlikely that the full compliance can be achieved within the timeframes established in the Transport Standards.

To meet this challenge, the NSW Government has committed \$770 million over four years to deliver a program of access improvements across the network. In addition, to respond to issues of reliability and passenger growth on the metropolitan rail network there has been unprecedented investment in heavy rail infrastructure including: the North West Rail Link; the South West Rail Link; purchase of new trains; and upgrades of existing rolling stock to extend their usable life.

Infrastructure improvements have resulted in increases in the number of people using the rail network. Since the 2007 Review, the volume of rail journeys has grown from 275.6 million trips in 2007 to 305.7 million trips in 2012 in the Greater Sydney Region. Reflecting the increased accessible journey opportunities, pensioner rail journeys (including disability pensioners) have grown at a rate one percent higher

than for the general population. Pensioner journeys on the rail network increased from 25 million trips in 2007 to 31 million trips in 2012³. In July 2013, two new and separate rail operators, Sydney Trains and NSW Trains replaced the previous entity RailCorp (providing CityRail and CountryLink passenger rail services). The new operators are focused on serving their distinct customer bases – Sydney Trains for those who need frequent and reliable trains over shorter distances within the greater Sydney metropolitan area, and NSW Trains for those who travel longer distances and need more comfortable, reliable trains with on-board services.

Transport for NSW has responded to increased demand on the Sydney Trains network by introducing more than 1,000 extra weekly services as part of the new timetable which began on 20 October 2013.

2.1.1 Accessibility of Train Stations

In the period since the 2007 Review of the Transport Standards the wheelchair accessibility of stations on the previous CityRail network has improved by 13.2 per cent from 98 stations (31.8 per cent) in 2007 to 146 stations (47.4 per cent) in 2013.

Under the changed operational arrangements introduced in July 2013, there are 176 stations on the new Sydney Trains network. Currently, 68, (38 per cent) of stations on the Sydney Trains network are fully accessible and another 30, (17 per cent) of stations provide street to platform access.

The NSW Trains network includes 132 inter-city stations and 62 stations in rural areas. Currently, 77, (39.7 per cent) of stations provide street to platform access. Regular coaches that replace trains at some junction points are 100 per cent accessible.

As complete accessibility cannot be provided immediately, Transport for NSW has been co-ordinating its efforts to upgrade facilities where the greatest number of customers benefit from the investment. Prioritisation for access upgrades is based on a number of factors, including station patronage, local demographics, access to educational and health services, parking, bus services, shopping, tourism and how stations form a network or provide interchange opportunities.

The age of rail infrastructure and its configuration means that there will be continued reliance on 'direct assistance' via boarding ramps to move from rail platforms on to the train. Despite a clear preference amongst people with mobility devices for independent access from platform to train, such access will not be possible whilst ever there is variability of the rolling stock used on any given line and while platforms are curved.

The capacity to provide roll on roll off access to trains is also impacted by freight trains operating on the suburban rail network. Freight trains have a lower floor height and wider body which must be accommodated. If platforms are raised, freight access

³ Bureau of Transport Statistics (2013) *Electronic Publication No. E2013-27-Rail-Patronage* Released March 2013.

to the line is significantly impeded.

Transport for NSW is seeking to improve on-platform information provision to customers who are blind or vision impaired and for people who are deaf or hearing impaired. Many of the non-upgraded stations are not yet equipped with information screens with real time train arrival and destination information. New equipment is progressively being installed to assist all customers. Audio announcements are also being introduced across the network providing information directly to customers who are unable to see a video monitor. Where provided, Transport for NSW aims to provide spoken information that is consistent with essential visual information that is being displayed.

Transport for NSW has also adopted the underlying principle that whenever major maintenance or upgrade work takes place at stations, the rail operator or Transport for NSW should take the opportunity to ensure the output of that particular work provides for improved accessibility. Recent examples include installation of tactile ground surface indicators when platforms are resurfaced; reducing cluttered station layouts as part of the CBD station refresh program and improving wayfinding systems across the transport network.

An audit of stations on the Sydney Trains network will be undertaken to measure compliance against all relevant parts of the Transport Standards. This research will assist in prioritising works to improve accessibility and enable targeted minor works towards compliance with the Transport Standards.

2.1.2 Accessibility of Train Carriages

Like stations, compliance of train carriages has focused on accessibility for people who use wheelchairs or have limited mobility. All trains in use by Sydney Trains are accessible for persons using mobility devices with 'direct assistance' using a platform to train boarding ramp. This provides 100 per cent accessibility onto the train for Sydney Train carriages.

As at December 2012, 23 per cent of the Sydney Trains fleet of 176.5 sets were fully accessible offering: designated spaces for wheelchair users; priority seats for less mobile passengers; accessible emergency help and communication points; provision of travel information which can be seen as well as heard; and appropriate tonal contrasting of features such as handrails and doors.

Our capacity to provide accessible services is limited by the age of many of the trains on the Sydney Trains network. As some of the older fleet is expected to be phased out and completely replaced over the next 10 years, it is not practical to bring these trains into compliance. New trains are being purchased and some of the existing rolling stock will be refurbished to extend their usable life and meet customer requirements.

Accessibility of services for people with vision impairment has recently been enhanced by ensuring that manual destination and service disruption announcements are made on trains. A trial 'Radio School' program has been established to improve the clarity and consistency of on-board and on-platform announcements by providing professional training in voice, enunciation, scripting, delivery and microphone techniques. The training has been delivered to more than

300 staff on the Illawarra Line (between the city and Waterfall, Cronulla) and if deemed successful, will be rolled out more widely.

All NSW Trains on country train lines provide accessible seating, wheelchair spaces and toilets with direct assistance provided to board the train but some intercity carriages do not have sufficient door width or internal spaces to provide allocated spaces for wheelchairs. NSW Trains requires its contracted coach service operators to provide accessible services.

2.2 Bus services

Transport for NSW's fleet replacement strategy for bus services has led to great improvements in the accessibility of buses for people with reduced mobility. Since 2007, \$891 million has been invested in 1,963 new low floor accessible buses in the Sydney metropolitan contract area and 521 new buses in the Outer Metropolitan contract area.

As at 30 June 2013, 1,743 buses in the State Transit Authority (STA) fleet are accessible buses, featuring stepless low level floors; large brightly coloured handrails, wide doors and aisles, and space for two mobility aids, such as wheelchairs, ride-on scooters and prams or strollers. This represents 82 per cent of fleet, well in excess of the 55 per cent compliance target and a considerable improvement from the benchmark of 35.5 per cent of Sydney Metropolitan accessible bus services in 2007.

Contracted services operate 1,196 accessible buses (66.7 per cent of fleet) in the Metropolitan region and 364 accessible buses (41.6 per cent of fleet) in the Outer Metropolitan region. The delivery of an additional 24 new buses in Outer Metropolitan areas in July and August 2013 has increased the proportion of accessible buses in this region to 55 per cent.

It is widely acknowledged that the provision of accessible bus services in rural and regional areas is more challenging than in metropolitan areas. Bus contract reforms since the 2007 Review have ensured that rural operators are funded to provide services which meet safety and Transport Standards. However, fewer services are available. Approximately 50 per cent of rural and regional bus companies with regular route service contracts operate fewer than ten vehicles and 19 per cent fewer than five vehicles. Time series data is not available for bus services in country NSW. In 2012, self reported data from private bus services operating under contract in rural and regional areas indicate that 17 per cent of buses are wheelchair accessible. However, approximately 30 per cent of services are timetabled wheelchair accessible.

Bus operators in both metropolitan and regional areas also have identified particular difficulties with the provision and maintenance of infrastructure by local councils. While transport operators are making their best efforts to comply with the Transport Standards' requirements, the inability of local government to supply accessible bus stops and roadside infrastructure compromises these efforts and undermines the benefit accruing from significant investment in the provision of new and upgraded accessible transport vehicles. Going forward it will be important to maximise the benefits of the accessible bus fleet by making stops accessible.

Transport for NSW is continuing to seek opportunities to improve on board and real-time bus service information for all customers through the use of new technologies. A priority is the investigation of audio options to help blind and partially sighted people use the bus network independently. Technological approaches are also supplemented by good customer service and training of bus drivers to better meet the needs of all customers.

Issues raised by disability stakeholders in the 2007 Review regarding lack of availability of accessible replacement vehicles and changes to timetabled accessible services because of breakdowns and unexpected maintenance have largely been eliminated in the Metropolitan and Outer Metropolitan contract regions. This is due to the increased capacity of operators to provide replacement services due to the increased size of the accessible fleet.

All STA bus depots are fully accessible and may be accessed by customers to collect lost property or to undertake 'travel training'.

2.3 Light rail services

Light rail links Central Station with Sydney's Inner Western Suburbs via Haymarket, Pyrmont, Glebe and Rozelle. All light rail stops and carriages are fully accessible and compliant with the Transport Standards.

Transport for NSW is committed to 100 per cent compliance with the Transport Standards for future development of light rail services in the Sydney CBD, south east and inner western suburbs.

The inner west light rail extension comprises nine new stops: Leichhardt North, Hawthorne, Marion, Taverners Hill, Lewisham West, Waratah Mills, Arlington, Dulwich Grove and Dulwich Hill Interchange. Each of these stops will provide step free access, accessible real-time passenger information, new access paths and facilities for switching between transport modes, kiss-and-ride drop off areas and accessible parking spaces.

Following extensive feasibility investigations and consultation, the NSW Government is proceeding with a new light rail line extending from Circular Quay through George Street to Central Station and to the University of NSW via Anzac Parade and Alison Road.

Purchase of new light rail vehicles will enable alignment between the platform and the train, reducing the horizontal gap to within acceptable limits. These vehicles will include accessible on-board information systems, allocated spaces for wheelchairs, help buttons and priority seating for other less mobile customers.

The light rail solution increases choice of travel options for people with disability who will be able to use the light rail network to connect to other accessible modes in key city and suburban locations. Seamless transfers between high-frequency, reliable buses, light rail and rail for commuters is a key benefit for all customers.

The expanded light rail service will operate as a 'turn up and go' service, with services running every two to three minutes in peak times, and slightly less frequently in off-peak. Printed timetables will not be used.

2.4 Ferry services

NSW has the most extensive public ferry service in Australia with 46 commuter wharves and 28 ferries operating on Sydney Harbour alone. Each year 14 million trips are undertaken on Sydney Ferries. Since July 2012, Harbour City Ferries - a partnership between Veolia Transdev and Transfield Services - have operated Sydney Ferries under the NSW Government's franchise model.

Under these arrangements the NSW Government retains ownership of Sydney Ferries' existing vessels and the Balmain Shipyard and control fares and service levels. A key focus of the new operator is to lift standards of customer service. Staff training to meet the needs of all customers is a central aspect of the new operator's approach to customer service.

2.4.1 Accessibility of ferry vessels

All Harbour City Ferries' 28 vessels and STA's two Newcastle ferries are wheelchair accessible via direct assistance. However, it is acknowledged that there are a number of shortcomings in relation to compliance of ferry vessels. Audio/visual information systems are not installed on the majority of vessels and accessible toilets are not generally provided on board.

Improvements to onboard services will be considered as part of future fleet replacement strategies.

2.4.2 Accessibility of commuter wharves

Ownership of many of the commuter wharves (22 out of 46) was transferred to the NSW Government in 2007 when a number of local government authorities conceded that they were unable to maintain and improve their wharf infrastructure. As a result there is a significant backlog in wharf infrastructure development that Transport for NSW is required to address. To address the backlog, upgrades of ferry wharves are now incorporated in the \$770 million Transport Access Program and new works are prioritised as funding becomes available.

As at June 2013, 43 per cent of wharves provide accessibility from the wharf to the vessel. While Transport for NSW is working to provide entry platforms, gangways and pontoons that are accessible by people with disability, access to wharves continues to be restricted by the steep topography of the landside connections. In many locations around Sydney harbour, access from the street to the wharf remains non-compliant and the cost of doing so is prohibitively high. Transport for NSW is not the owner of these assets.

2.5 Taxi services

Wheelchair accessible taxis (WATs) are specially equipped taxis that provide essential transport for people with disabilities or mobility difficulties. While the

Transport Standards call for equivalent response times to standard taxi services, achievement of this standard is largely due to availability of WATs in the taxi fleet.

As at 30 June 2013, there were 623 WATs in the Sydney Metropolitan fleet, representing 11 per cent of the total taxi fleet. In Outer Metropolitan, Rural and Regional areas there were 231 WATs representing 17 per cent of the total taxi fleet outside of Sydney. Throughout NSW the proportion of WATs as a component of the overall taxi fleet has increased from 9.9 per cent to 12.3 per cent since 2007.

Despite substantial gains in the number of WATs, average response times for WATs continues to be slower in comparison to standard taxis. The standard taxi average response time is 6.05 mins minutes while the WAT average response time is 9.22 minutes. Reliable average response time data for other areas of NSW is not yet available.

However, the actual impact of lack of parity of response times on people with disability is not well understood. Recent customer research by Transport for NSW indicates WAT response times to be only slightly behind that for standard taxis, and that most customers find WAT response times to be acceptable.

- For the 61.4 per cent of WAT customers that booked in advance, 93 per cent of their WATs were on time or early.
- For the 32 per cent of WAT customers who booked immediately, 79 per cent of WATs arrived within 20 minutes; 3 per cent of WAT customers waited over an hour.
- Most WAT customers (91 per cent) found their waiting time acceptable, with only 5 per cent reporting a completely unacceptable wait time, and 4 per cent a little unacceptable.

Customers identified the most important aspects of service as those related to safety, with the most important being securing their wheelchair properly.

The NSW Government continues to implement incentive programs to improve the take-up of WAT licences and to increase the availability of WAT vehicles generally:

- In urban areas WAT licences are \$1000 per annum (compared to around \$35,000 to lease a general taxi licence in Sydney) and in the country they are issued for free.
- The need for WATs to be a new vehicle has been relaxed (but a ten year age limit is retained); and
- WAT drivers are fully reimbursed for the costs of specialist WAT driver training and assessment costs;
- Interest free loans are available for the purchase of WATs by regional operators.

2.6 Information services

There are two aspects to this area of the Transport Standards: information about services and information while using a service. Since the 2007 Review, Transport for NSW has made considerable progress in the provision of accessible information about services. Improvements to accessibility of information provision during the journey have been more recent and this area is continuing to evolve in response to identified customer needs.

2.6.1 Information about services

The NSW Government considers the 131 500 website, call centre, mobile website, Interactive Voice Recognition and twitter the key source of public transport information provision. All operators in the Greater Sydney Region area are required to provide information to 131 500.

The call centre is accessible to the hearing impaired through a TTY telephone service and via the National Relay Service.

The current 131 500 website strives to conform to W3C's Web Content Accessibility Guidelines 2.0. The 131 500 website is being upgraded and will be fully compliant with AA Web Content Accessibility Guidelines developed by the W3C Consortium. The upgraded site is due in the 4th quarter 2013. The 131 500 website carries information on the accessibility of the rail, bus and ferry network (excluding bus stops) and accessible routes, including through the trip planner and timetable functions. Light rail accessibility information is also provided. Real-time information on planned and unplanned service disruptions is available from this site and twitter.

A trial on the 131 500 website providing information about lift breakdowns and lift maintenance works has commenced for some stations. Future roll out of the real-time information on lifts for the network will be subject to the trial program completion and evaluation.

Transport for NSW also provides avenues for customers to access real-time and static transport information through a variety of in-house and third party applications and websites. These include the TXTBUS real-time bus arrival service, the 131 500 mobile website and app, timetable and wayfinding information on Google Maps and third-party developed transport information apps. These can be accessed via Smartphones and other mobile devices.

The new Transport for NSW website for Opal card information will be compliant with AA Web Content Accessibility Guidelines by early 2014.

All bus operators are required to provide timetable information about accessible transport services in their printed timetables. Increasingly this information is provided through online services. However, printed bus timetables continue to be requested by older customers and their readability continues to be a concern for this customer group. Typically a bus timetable feature timetables, a map, and text notes. Each timetable consists of selected bus stop locations, or "time-point locations," which are printed in white text on a black background. At a fundamental level, reading and deciphering bus timetables is a highly complex task, which is made more difficult by the legibility of the font. Transport for NSW will work to develop standards for layout and typography that will improve the clarity and readability of timetable information.

Bus operators are also required to provide timetable information in alternative formats on request.

Transport for NSW is currently updating its guide for Accessing Rail Services. The guide provides advice on planning an accessible rail journey, including information on “Easy Access” features at each station on the network, interchange to other modes of transport, network maps and information about concessionary travel, passes and schemes.

2.6.2 Information while using a service

Information during a journey is important and can be widely different, ranging from information at stations, wharves and bus and light rail stops to dynamic information on the vehicle itself.

Since the establishment of Transport for NSW in November 2011, there has been a significant focus on providing information which is more customer focused and clearer.

Many customer improvements have been implemented which enhance access by people with disability to provide information while using public transport services. Key initiatives are outlined below.

Transport for NSW has conducted a review of signage and wayfinding throughout the transport network to make it easier for all customers to identify and locate transport modes as well as navigate through stations and transport interchanges. Test sites have been developed in locations such as Circular Quay, Milsons Point and Martin Place to test principles for the de-cluttering of the transport environment and improvement in the placement, relevance and legibility of customer facing information. Strategic principles and the design and use of access related pictograms and symbols have been assessed by a sub-group of the Transport for NSW Accessible Transport Advisory Committee.

New passenger information indicator screens are being rolled out on platforms at rail stations. This is coupled with audio announcements about next train on platform. Notwithstanding this, the provision of information by staff using ‘direct assistance’ will be necessary for some time, particularly when normal service provision is disrupted and information is required to be changed continuously and within short timeframes.

All new rail carriages feature automated audio/visual information systems. Manual announcements by train guards are made on older rolling stock. To increase the consistency and clarity of non-automated announcements a trial of 'Radio School' pilot on the Illawarra line has been completed. Further roll-out of this training is subject to evaluation and funding.

Standards and guidelines for audio and visual passenger information announcements have been developed and are being implemented on Sydney Trains and NSW Trains services.

Stakeholders have indicated that audio/visual information systems on buses and ferries would improve access for vision and hearing impaired persons. While there is

scope for further development of in-vehicle audio and visual next stop information on strategic corridor bus routes and transit ways, this is very difficult to provide on more circuitous routes with shorter distances between stops and bus stops do not have discrete names.

The cost of retrofitting vehicles with this audio-visual equipment is considered to be prohibitive, with an estimated cost of \$35 million to install appropriate systems to over 5000 buses on the network in the Greater Sydney Region. Further costs would need to be incurred to roll out the service on a state-wide basis.

Driver distraction and safety risks also need to be considered. Direct assistance, enhanced disability awareness training for drivers and development of real time travel information Smartphone applications with voice activation are regarded as reasonable alternatives to automated destination announcements.

NSW is aware of the need to continue improving staff training in disability awareness to ensure that the provision of direct assistance (including information provision) complies with the requirements of the Transport Standards.

Discussions have commenced with disability stakeholders to develop transport information applications tailored to meet the needs of people with disabilities. For example, vision-impaired persons in particular have difficulty in knowing which bus to hail on busy routes and with selecting the appropriate service from a queue of buses. A real-time travel application may be employed to address this issue, subject to design and testing.

3 Commentary on the efficacy of the current transport standards

Transport for NSW strongly recommends that the current Review of Disability Standards for Accessible Public Transport not only focuses on assessing compliance with the requirements set out in Schedule 1 of the Transport Standards but also considers any necessary amendments to the Transport Standards. Amendment of the current Transport Standards is required to provide realistic specifications for transport operators by removing standards that are not capable of being complied with and to take into account technological innovations that supersede the prescriptions contained in the original 2002 Transport Standards. While it is arguable that areas of non-compliance (particularly in the rail and maritime environments) fall under the “unjustifiable hardship” and “equivalent access” provisions of the DDA, the uncertainty creates significant difficulties for transport providers.

In the case of technological changes, the current approach of expressing requirements in quantified terms has had the effect of restricting the scope of alternative solutions that may achieve better outcomes for people with disability.

Transport for NSW also supports the widely held view of the disability sector that Australian Standards’ requirements be imported into the Transport Standards rather than merely referenced. This would not only make the requirements of the Transport Standards more accessible for disability stakeholders, but also assist transport infrastructure providers to fully understand and implement the Australian Standards.

Specific recommendations aimed at providing certainty to operators are set out in the sections below.

3.1 Standards relating to rail services

3.1.1 Station standards

One of the major constraints faced by Transport for NSW and the rail operators is the classification of stations as Class 9b buildings under the Building Code of Australia (BCA) and Access to Premises Standard and the lack of consistency and rationality between the performance requirements of this Standard and the Transport Standards.

The classification of stations as Class 9b buildings means every new station or station upgrade requires an alternative solution to meet BCA requirements as they cannot be 'Deemed to Satisfy'. Examples of conflicts in the operation of the standards include:

- The requirement to include a balustrade when the platform edge height is greater than one metre. This requirement cannot be implemented for obvious operational reasons.
- The necessity to exceed the maximum allowable travel distance to an exit because platforms need to be at least 180 metres long to fit an 8 car train.
- Exit stairs that exceed the maximum allowable number of stair risers due to clearance heights required for overhead wires and the level of the platform.
- Requirement for 80 per cent coverage of inductive hearing loop coverage under the BCA Access to Premises Standard compared to 10 per cent coverage under the Transport Standards.
- Introducing a requirement for compliance of staff facilities on platforms and in work environments such as sub-stations and stabling yards in which people with physical disabilities are unlikely to meet the job requirements.

Other areas specific to the Transport Standards which present difficulties in implementation at stations are set out below:

3.1.1.1 Unjustifiable hardship and staged implementation

Transport for NSW notes that there is currently no legal precedent to assist in defining the extent of unjustifiable hardship permitted for government transport operators and providers. While efforts are directed to achieving the maximum extent of compliance possible, the lack of certainty over the interpretation of 'unjustifiable hardship' is a hindrance to decision-making on high cost capital works.

Capital works planning to enhance accessibility would also benefit from legal recognition in the Transport Standards of staged works at a single location. While the present legislative arrangements provide for staged implementation of the Transport Standards and allows operators and providers to decide the order in which

their conveyances, premises and infrastructure are made accessible, it implied that full accessibility will be achieved as works are undertaken at each location. Transport for NSW notes that more customers would benefit from an approach that allows for staged works at stations that are more complex (for example, have multiple entries and platforms) and consequentially require greater capital investment.

In recent years, Transport for NSW also has invested in a number of ramp only projects that provide street to platform access for customers with limited mobility. This approach allows for access for people with limited mobility more quickly than could otherwise be provided.

3.1.1.2 Provision of cross corridor access

At some stations with extremely low patronage and high costs of delivering cross corridor access via lifts, exemptions may be sought from providing any access solution.

3.1.1.3 Roll on roll off access to trains

Reducing the cross fall on platforms to within the compliant range is a priority from customer safety perspective. However realignment of old platforms is a significant cost impost necessitating a staged approach. Creating a straight edge along older railway stations may only be achievable through relocations or platform extensions. While this may be desirable at high patronage stations, it is not clear that cost of doing so in all locations is justifiable in terms of the number of customers who would directly benefit.

Furthermore, the capacity to undertake the necessary work to standardise platform heights in order to achieve roll on roll off access is limited by the variability of rolling stock that is used on the rail network. Transport for NSW is developing a sectorisation strategy that will enhance its ability to tailor station solutions on some but not all rail lines. But at least one sector will continue to operate with mixed fleets into the next decade under proposed arrangements.

Platform heights built to accommodate freight train requirements will continue to restrict capacity for roll on roll off accessibility on some suburban lines into the foreseeable future.

3.1.1.4 Circulation requirements and access pathways on platforms

The current requirement for access paths of 1200mm is often not possible to achieve along the full length of the station platform when retrofitting older stations. In many locations compliant development is restricted by the presence of heritage items on the platforms and where seats can be provided. The capacity to incorporate part of the width of tactile ground surface (600mm) would assist in these situations.

It is not possible to provide access to every door of the train at some stations. This is due to the narrowing of platforms and insufficient width to deploy ramps. The cost of platform widening is considered to be prohibitive due to the high cost of moving signalling systems.

3.1.1.5 Tactile Ground Surface Indicators (TGSI)

Transport for NSW would welcome further guidance in the Transport Standards on

the use of TGSIs, particularly in relation to the application of directional TGSIs. Transport for NSW has recently engaged with the blindness and vision-impairment sectors regarding directional TGSIs at stations and found that there was no consensus amongst the sector about their use.

For transport operators and providers there are also potential conflicts between users arising from TGSIs placement. While customers who are blind largely favour maximisation of TGSIs placement, older customers and customers with mobility impairments have concerns over too many TGSIs becoming trip hazards and mobility impediments.

3.1.1.6 Customer information systems

Transport for NSW is continuing to improve the provision of real-time journey information at stations however would support further clarification of the meaning of 'equivalent information' under the Transport Standards. Transport for NSW is aware of the need to continue improving staff training in disability awareness to ensure that the provision of direct assistance, including information provision, complies with the requirements of the Transport Standards.

It is increasingly apparent that new technologies can provide information for people with sensory disabilities yet would not be deemed to meet the Transport or the Access to Premises Standards, designed more than a decade ago. Examples include but are not limited to:

- Requirements for extensive coverage of inductive hearing loops, a technology which has been shown to be ineffective in a rail environment because of electrical interference and has been largely superseded by modern hearing aids.
- Provision of single point information centres on platforms with voice activation in lieu of platform wide audio announcements at stations with low levels of patronage and staffing.
- Growing use of touch screen technologies for information kiosks and ticketing purposes. Such technologies offer substantial customer benefits and interactive capacity but do not meet the Transport Standards which prescribe old technology of tactile raised buttons.
- Provision of real time journey information via smart phone applications developed by third-party app developers.

3.1.1.7 Precinct issues

Transport for NSW has recently adopted a 'whole of precinct' approach to upgrades of stations and major transport interchanges. This ensures a greater level of accessibility for customers with disability and allows customers to interchange between accessible modes of transport more easily. However, the general topography of Sydney makes this difficult to achieve in all locations.

Particular issues arise when the local government authority has not made sufficient investment in footpath infrastructure. Commonwealth funding will be needed to alleviate this, as per Recommendation 7 of the 2007 Review.

Transport for NSW also faces challenges when building multi-storey car parks in the vicinity of rail stations. The access specifications regarding mobility parking spaces, lift requirements, ramps and cross falls for the facility are covered in the Access to Premises Standard, however the access pathway *between* the car park and the station or interchange is not covered by either the Premises or the Transport Standard. While a change in the Transport Standards to address this anomaly would assist in engaging with councils about providing accessible pathways in the scope of works, many NSW councils could not make this commitment without Commonwealth funding assistance.

3.1.2 Trains

In regard to train conveyances, rail transport operators have relied upon a number of exemptions granted by the Australian Human Rights Commission in relation to elements of the Transport Standards that are not achievable in the rail environment, such as accessible toilets and stairs. This is due the origin of Standards on requirements for premises which do not take into account the constraints arising from train carriage and rail track widths.

Transport for NSW would support appropriate action by the Commonwealth to provide a more realistic, mode specific performance based standard that recognises these constraints.

Retrofitting of existing rolling stock is particularly difficult given the width of existing medium and narrow train sets. Essential safety and operational equipment on existing medium and narrow train sets is located in the vestibule areas which limits the area available for allocated wheelchair spaces and circulation spaces around them. There are also difficulties in locating on-board information systems. Door widths on some intercity trains are not wide enough. Rectification of these issues will impact on the body structure of the train with consequential impacts on costs.

Recommendations regarding rail services

Transport for NSW makes the following recommendations regarding the Review of the Disability Standards for Accessible Public Transport 2002:

1. That stations and transport interchanges are considered for a specific classification in the National Construction Code and that the *Access to Premises Standards 2010* are amended to achieve the consistency with the requirements contained in the Transport Standards.
2. That modal specific standards are developed for both rail platforms and conveyances.
3. That the Transport Standards allow for staged implementation at locations where the costs of addressing all access issues are unjustifiably high and that the consideration is given to the development of performance requirements

rather than prescriptive approaches to allow operators and providers greater flexibility in delivering accessibility outcomes.

4. That the Transport Standards remove premises based requirements for rail conveyances and adopt performance based standards that recognise the constraints of the rail environment.
5. That the Transport Standards are amended to clarify the concept of 'equivalent information' and to permit operators and providers to utilise new technologies to provide accessible journey and travel information to customers with sensory disabilities.
6. The Transport Standards are amended to include requirements for accessible pathways within the interchange precinct, including from park and ride facilities and Commonwealth funding assistance is provided for implementation.

3.2 Standards relating to bus services

In the case of buses, there are very real physical, technological and economic constraints to implementation of the Transport Standards.

Requirements to provide equivalent access for people with vision and hearing impairments to information at bus stops and on-board conveyances are subject to various interpretations. As the Transport Standards were written before the widespread use of Smartphone technologies, Wi-Fi and high-speed data access, there may be alternative solutions to accessible information provision to those outlined in the Transport Standards.

Taking into account the potential for future rapid technological change, Transport for NSW urges that the Transport Standards are principle based rather than prescriptive.

Bus operators are dependent on roads and roadside infrastructure (including kerbs, bus stops and footpaths). These are for the most part controlled by local councils. Transport for NSW customers would benefit from actions to ensure that local councils meet their obligations under the Transport Standards. A major issue is the camber of the road as it impacts on the angle of the vehicle to the footpath. Even with an accessible bus stop and accessible bus access can be limited if the curve of the road is too great.

The Transport Standards do not currently specify bus zone length at bus stops which can be an impediment to pulling up parallel to the kerb and deploying an accessible ramp. Consideration of this issue in the Transport Standards and additional Commonwealth funding for implementation is recommended.

Another major issue for bus operators is the safety of mobility device users on board buses. Three key issues arise: mobility scooters that are too large for use on public transport vehicles; securement of wheelchairs on board; and safe direction of travel.

In respect of mobility scooters, all bus operators in NSW continue to strongly advocate for the labelling of mobility scooters, as per Recommendation 5 of the 2007 Review. Requirements for public transport such as operating space, ramp inclines and maximum laden weight have been harmonised for different modes of transport in the Transport Standards. This has given rise to unrealistic expectations of passengers as to the types of mobility devices that can be transported. Despite guidance on the Transport Standards regarding the size envelope and laden weight limit of mobility devices that can be used on public transport conveyances, these limits are not well understood by community members. The majority of bus operators in NSW ban all three wheeled devices due to safety risks and all mobility devices which have a size envelope greater than 750mm wide and 1300mm long.

Currently there is no mechanism for bus drivers to determine which mobility devices meet these dimensional and weight requirements. Consequently bans in relation to specific journeys have been challenged by some disability advocates in the AHRC.

Bus operators and wheelchair users of public buses have been reporting difficulties over wheelchair securement systems. Currently, the most common type of wheelchair securement system installed on buses is a tethering strap. A shortcoming of this securement system is that the wheelchair user must rely on someone else to secure their wheelchair. Bus drivers are unable to provide this assistance without affecting on-time running performance and risking security of the bus. Several alternative securement devices have been developed and trialled in the United States, including an automated docking system. Research is required to test the commercial viability and safety of such wheel locking devices in the Australia context.

Current on board safety rules for buses tend to specify that an occupied wheelchair must be facing rearwards. While this is in line with safety research it is subject to challenge by some customers who prefer to face forward. To assist operators, it is proposed that Transport Standards specify the direction of travel for safe carriage of mobility devices.

Recommendations regarding bus services

Transport for NSW makes the following recommendations regarding the Review of the Disability Standards for Accessible Public Transport 2002:

1. Modal specific standards are developed for bus conveyances
2. Consideration is given to development of Standards for the delivery of on-board information through alternative means including Smartphone devices. Any new standard should be principle based rather than prescriptive to increase the capacity of transport operators to utilise ongoing technological innovations.
3. The Commonwealth Government establishes additional funding mechanisms, including grants and interest-free loans to assist local councils to meet their obligations under the Transport Standards. This was previously considered under Recommendation 7 of the 2007 Review.

4. Minimum bus zone lengths are specified in the Transport Standards to facilitate the operation of low floor buses. Additional Commonwealth funding for implementation is made available to local councils.
5. The Transport Standards specify that occupied mobility devices should face to the rear when the bus is in motion.
6. Research is undertaken to identify appropriate wheel based locking system to ensure the safe carriage of wheelchairs on buses.
7. Recommendation 5 of the 2007 Review regarding labelling of mobility scooters is implemented as a matter of priority.

3.3 Standards relating to ferry services

The Transport Standards assume a static environment. Unlike any other modes, ferries and wharves exist in a dynamic element which can lead to decreased accessibility. This is due to tidal variability of the fixed end to gangway, the pontoon to ferry, the orientation and movement of the vessel. The variety in the type of vessels and wharves mean there are different gap heights and widths.

Some improvements may be able to be achieved through front end loading. At present side loading is used and a shift to front end loading would require a change in operational policy.

The Transport Standards do not specify access requirements for the link between the wharf and the street. This has led to situations where considerable funds have been invested in bringing wharves into compliance with the Standards but they remain inaccessible because the owner of the landside infrastructure is unable to make the required investment.

There are some unique issues for the maritime environment relating to vessels. While new vessels coming into the fleet in 2016 will be compliant, retrofitting the existing fleet is prohibitively expensive and difficult to align with Marine Survey Standards for safety, most notably requirements for lips and seals around doorways.

Weather affects maritime services more than other modes. Boarding areas are weather exposed due to docking space requirements, potentially creating high slip areas in wet conditions.

Toilet access and widths of passageways are major challenges for the legacy fleet.

Recommendations regarding ferry services

Transport for NSW makes the following recommendations regarding the Review of the Disability Standards for Accessible Public Transport 2002:

1. Part 6.5 of the Transport Standards regarding the slope of ramps connected to pontoon wharves is expanded to consider the effect of tidal variability on other dynamic elements of the interface between the wharf and ferry vessels.

2. The Transport Standards require the relevant landowner to provide an accessible pathway between the wharf and the street. Additional Commonwealth funding for implementation is made available to local councils.

3.4 Standards relating to taxi services

Transport for NSW notes the ongoing difficulty in measuring comparative response times for WAT services. This is due to two factors:

- The comparative response time is measured as monthly 'average' of bookings made through the specialist WAT booking service. This measure can mask significant differences in response times for different parts of a licensed area or at different times of day. For example, recent customer research indicates that users experience more difficulty getting WATs in late afternoons and early mornings on weekdays.
- Monitored response times are based on WAT jobs booked through networks, which in most regions cover less than 50 per cent of WAT jobs. Many users receive an effective service from the taxi industry by booking directly with drivers.

Transport for NSW analysis indicates that in 2011/12 the percentage of WAT jobs booked through networks to be:

- Sydney 45.4 per cent of wheelchair jobs
- Newcastle 39 per cent of wheelchair jobs
- Central Coast 35.5 per cent of wheelchair jobs, and
- Wollongong 84.4 per cent wheelchair jobs.

The extent to which these 'private' arrangements affect overall system performance and the effective supply of accessible taxis for other users is not well understood.

It should be noted that in some localities, availability of WAT taxis may be adversely affected by the requirements of other programs including assisted school travel programs for children with disability who are unable to use public transport and HACC Community Transport. In NSW, 2,300 individual transport services daily are provided to children with disability. An estimated 20 per cent of these journeys are provided by WATs. The pressure on WAT availability in some localities may be reduced as other forms of accessible transport are made available.

Transport for NSW does not support replacement of the current measure with a staged implementation timeframe leading to 100 per cent of fleet to WAT services. However a requirement to have a percentage of WAT services in each taxi region, linked to underlying demand would benefit people with disability.

While issues relating to correct accessible footprint have largely been addressed through the increase in minimum head room and vertical door opening from 1410mm to 1500mm for all vehicles coming into service, there is scope for the Transport Standards to directly reference requirements for wheelchair tie down systems. Current Transport for NSW *Wheelchair Accessible Taxi Measurement Protocol 2008*

requires WATs to meet AS.2942-1994 *Wheelchair Occupant Restraint Assemblies for Motor Vehicles*.

Customers who are blind or vision impaired have recommended that raised taxi registration numbers that are required to be placed on the exterior of passenger doors of taxis should additionally be provided in Braille and in both tactile and Braille forms on the inside passenger side of the vehicle. It has been suggested that while the former is needed to provide assurance that the person with vision impairment is entering a taxi, the latter would assist should a concern arise during the journey.

Recommendations regarding taxi services

Transport for NSW makes the following recommendations regarding the Review of the Disability Standards for Accessible Public Transport 2002:

1. The Commonwealth Government acts to implement Recommendation 11 from the 2007 Review, giving due recognition to the overall demand for WAT vehicles including from specialist services such as assisted school travel programs and HACC Community Transport.
2. Clause 17.7 requiring raised taxi registration numbers to be placed on the exterior of passenger doors forward of the handle is extended to include Braille and placement of raised taxi registration numbers and Braille form numbers to be placed on the inside passenger side of the vehicle.
3. Standards regarding WATs reference *AS.2942-1994 Wheelchair Occupant Restraint Assemblies for Motor Vehicles* and *AS/NSW 3856-1998 Parts 1 and 2, Hoists and ramps for people with disabilities – Vehicle mounted*.

3.5 Standards relating to information services

At the time the Transport Standards were developed, technologies such as Smartphones, electronic ticketing and interactive kiosks were not widely available. As a result Part 27 of the Transport Standards emphasises print based information.

Given the increasing reliance on these technologies by transport operators to ensure effective real-time updating of the information on their networks, it is important that they are recognised in the Transport Standards.

Smartphone applications and personal navigation devices needs to be recognised under Clause 27.2 as a means of providing 'equivalent access' for people who with sensory disabilities. Transport for NSW has been proactive in the development of smartphone applications which are developed through partnerships with third-party developers who are provided with access to real time transport data. Voice activation is a requirement to make Smartphone applications accessible and providers are encouraged to include this feature.

Interactive kiosks with touch screen technology pose different challenges for compliance with the DDA. The requirements for heights and clearance spaces in the design of these kiosks is well understood, however, there has been less attention to the needs of people with vision impairment. Text readers can be integrated with the

touch screen DDA kiosk so that the user does not have to read the text themselves but the kiosk will speak text as it is presented to the user. Appropriate accessibility standards need to be developed for both information kiosks, customer information screens and ticketing machines. This is required to give certainty to both manufacturers and suppliers of the technology and to the transport operators that procure them.

Transport for NSW also has significant concerns with the wording of Clause 27.4 of the Transport Standards “All passengers must be given the same level of access to information on their whereabouts during a public transport journey”. This has led to unreasonable expectations within the vision-impaired and blindness sector about what constitutes ‘receiving information’. While information is provided through next stop announcements on board trains and transit way buses with fixed stops, it is not achievable on most suburban bus services except through direct assistance from drivers and personal navigation devices.

Recommendations regarding information services

Transport for NSW makes the following recommendations regarding the Review of the Disability Standards for Accessible Public Transport 2002:

1. Part 27 of the Transport Standards is amended to allow equivalent information provision through the use of new electronic technologies.
2. Clause 27.4 of the Transport Standard is clarified.