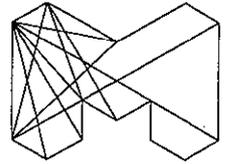


22 April 2013



CITY OF MELBOURNE

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Transport Access Section
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Department of Infrastructure and Transport
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Dear Sir/Madam

SUBMISSION TO THE 2012 REVIEW OF THE DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC TRANSPORT 2012 (TRANSPORT STANDARDS)

On behalf of the City of Melbourne Disability Advisory Committee, I thank you for the opportunity to provide a submission to the review of the Disability Standards for Accessible Public Transport.

Accessible public transport is a vital issue for our residents with a disability in being able to access services and facilities. The City of Melbourne, as a capital city council, is in a pivotal position in being able to identify a broad range of accessible transport issues confronting our citizens and recommend a range of innovative transport solutions.

The City Of Melbourne Disability Advisory Committee consisting of members with a wide range disabilities living across the Melbourne Metropolitan area, identified from their firsthand experience the public transport issues and recommendations in this submission.

If you have any queries in relation to this submission, please do not hesitate to contact Peter Whelan, MetroAccess Project Officer on 9658 8587.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ken Ong', written over a white background.

Cr Ken Ong

Chair City of Melbourne Disability Advisory Committee

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Customer reference

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Policy Context/Background Research

- The City of Melbourne's Disability Action Plan states '*The City of Melbourne will demonstrate global leadership as a barrier free city where people with a disability can access and participate in all aspects of life with dignity and independence*'.
- The Convention on the Rights of Persons with Disabilities (2006), ratified by Australia, directs signatories to, '*take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas*' (Article 9 Accessibility)
- Submission by the City of Melbourne Disability Advisory Committee to the National Disability Insurance Scheme advocating equity of life opportunity.
- Submission by the City of Melbourne Disability Advisory Committee to the National Disability Strategy. "The ability to move around the community underpins all aspects of life for people with disability." (National Disability Strategy, page 32, 2010)
- City of Melbourne submission to the Victorian State Disability Action Plan 2013-2016 which highlighted the human rights aspect need for accessible public transport.
- Submission to the review of accessible toilets at metropolitan railway stations in 2012.
- In 2010, the experiences of 100 Victorians living with disabilities were researched in *The Equipping Inclusion Studies*. The Studies concluded that a range of duty holders are responsible for the participation experiences of people living with disability, including departments of infrastructure and transport. Specific barriers to participation were identified as distance between facilities; visual and tactile surfacing of roads and paths; accessible paths of travel; kerb cuts; signage; welcoming buildings with operable doors and lifts, accessible counters, and educated and friendly staff. (p75)

Data analysis demonstrated that 25% of the 100 participants in this study had unmet needs for accessible public transport. The following quotes from people living with disabilities illustrates this:

- "I stayed in Seattle where it is more physically accessible. I realised I felt different and the difference was that I felt more like I used to feel before my accident when I lived in an environment that was built to include rather than exclude me".
- "I need accessible low floor regular public transport that will take me to where I need to go rather than having to take three forms of public transport on a crappy Sunday timetable in order to attend Mass regularly where my friends go." (p63)
- "I need low floor public transport, sufficient seating on public transport in order to go out and do things with people or on my own and feel like I'm part of something, part of the community, part of life."

- As I mainly use public transport I spend time planning the route through information on the internet. Often I use one bus and two trains or two buses and one train to get somewhere; can be limited by access and the time of day/night travelling."

Specific Recommendations

Signage/Communication on Public Transport

- Signage and communication for public transport should always include a clear visual display of all public service announcements such as cancellations and time tables. Emergency announcements such as evacuations need to have visual displays in all public areas including toilets, lounges, and food outlets.
- The needs of people with a sensory impairment have not received appropriate recognition under the current standards, particularly in the area of access to information. Of particular note have been the learnings from the redevelopment of Swanston Street by the City of Melbourne
- The trial by the City Of Melbourne and Vic Roads of innovative way finding signage installing tactile street name plates in particular parts of the CBD has recently been approved by Vic Roads. Blind Citizens Australia at their annual conference in Geelong in 2012 identified initiative as being very innovative in meeting the needs of people with vision impairment.
- There needs to be significant improvements to audio devices which inform travellers of approaching trams, their tram number and the destination. This issue was identified with the redevelopment Swanston Street in the Central Business District in 2012.
- The small print size of timetables and other customer service information on public transport infrastructure needs to be reviewed to improve access for people with vision impairment and low vision.
- More people, and especially people with a disability are using apps to access information regarding public transport. This has made information far more accessible; however there are no Australian standards to ensure apps have a high level of accessibility and ease of use. Consideration needs to be made for this review to recommend to the body overseeing Australian Standards such provisions are developed.
- Information must be accessible. Currently the Australian Public Transport Standards does not mandate the provision of information in alternative formats. This situation is clearly discriminatory and at conflict with the objectives of the DDA. The provision of raised Tactile and Braille signage is not mandated by the Standards with the choice of whether to provide Raised Tactile and Braille signage to be made by the public transport operator. Raised Tactile and Braille is essential for all way finding and service access information in public transport infrastructure

and conveyances. Braille is not "supplementary" signage. It is an "alternative format" for signage. For a blind person who reads Braille, it is simply signage.

- Consideration needs to be given to bus numbers being put on the sides of buses. This will assist older residents with mobility issues and people with intellectual disabilities who are taught to travel alone. Travel aide teachers employed in Special Schools have identified this as a simple but very effective measure which would assist their students.
- Maribyrnong City Council in Melbourne and disability services in that municipality has developed a set of communication cards to assist communication between taxi drivers and passengers with communication difficulties. The Victorian Taxi Directorate has trailed these tools. Consideration could be given for this innovative program to be extended nationally.

Infrastructure/Coordination Issues

- Public Transport operators can achieve compliance with the Standards, however depending on the coordination between operators especially in interface Councils, such as Whittlesea in northern Melbourne, people with a disability can still be transport disadvantaged. Train and/or tram services stop on the outskirts of Melbourne at the termination of their route, buses which may not be access compliant or expensive taxis may be the only available form of transport to the resident for the next part of their journey. Also buses and taxis are not always available.
- In the development of new public transport infrastructure such as new train stations in North Melbourne and in the outlying suburbs of Melbourne such as South Morang, it is imperative disability organisations are fully consulted with. With the North Melbourne redevelopment, Vision an Australia has an office nearby and many clients use this station.
- With the establishment and/or redevelopment of train stations and/or bus interchanges, two lifts need to be installed to ensure ease of access. With lift breakdowns which are happening at new train stations, electric backup generators need to be mandatory to guarantee ongoing usage.
- The closure of toilets at many train stations over the past fifteen years has created significant difficulties for people with disabilities and older residents. The Disability Advisory Committee recommended in a review to the State Government in May 2012 that all public toilets at metropolitan train stations be open at all times transport modes are operating. A report on the progress of this initiative would be appreciated as part of a more responsive reporting mechanism.
- Any short term solution to utilize older style railway carriages to address overcrowding on suburban train lines in Victoria must ensure such infrastructure is fully compliant with accessible Public Transport Standards. Carriages recently introduced in Victoria for this purpose are non-compliant and creates significant difficulties for people with a disability.

- In Western Australia one designated part of the train platform has been raised to allow users of motor scooters/wheelchairs and people who find it difficult to lift their feet on to the train to access the train independently. In Victoria, the train driver pulls out a ramp near the front of the train. Many users of scooters and wheelchairs have questioned the effectiveness of this method. Consideration needs to be given to the introduction across Australia of the Western Australian model of a permanent ramp access from the platform on to the train.
- The Standards should consider the need for new accessible infrastructure to be introduced in a coordinated manner. In Melbourne, 'super' style accessible tram stops are being installed, yet older style trams which still have steps are being used on these routes. Also with the establishment of super tram stops there is still a gap between the tram and the side of the tram stop creating a substantial difficulty for people using a wheel chair.
- Consideration needs to be given to the development of guidelines for the location of accessible bus stop upgrades to cater for low floor buses. A ranking system giving priority to hospitals, community, senior, and shopping centres, and those locations where older and residents with a disability regularly frequent should be developed as part of the Standards, instead of relying on an ad hoc approach.

Residents Traveling by Train to the Melbourne Central Business District.

- Many country residents with a disability in Victoria travel to Melbourne by train for hospital/medical appointments. The provision of, and the transportation of specialist equipment and/seating/space especially for people using motorized scooters needs to be considered and planned for by V Line Country Services.
- More research is required as wheelchairs/motorized scooters are made to individual specifications before 'across the board' recommendations are made regarding mobility aid and sizing guidelines.
- There have been recent examples of people being separated from their purpose-built wheelchair and/or equipment. Mobility aids will need to comply with Transport guidelines (VLine 1300mm x 800mm), however many people have specific purpose built wheelchair constructed for individual needs. Transport authorities could work in partnership with occupational therapists and manufacturers of wheelchairs/motorized scooters to implement a consistent labelling system that indicates whether a wheelchair or scooter is an appropriate size for travel on public transport. People with disabilities could then make an informed choice about whether a mobility aid will suit their travel needs when purchasing the aid.
- State Government and Capital Territory rail authorities need to be cognizant of, and actively promote that they can provide additional or specialist services for people with a disability. This service does not seem to be well known.
- The Standards exempt school and community buses from having targets to

become compliant which, which for country residents and many people with a disability precludes them from using these services.

- The Travellers Aid organisation in Victoria has for over a century provided a quality service to travellers coming to, and leaving Melbourne. Consideration needs to be given to increasing, and expanding the role of this organisation in order to provide an even greater individualised service to travellers who have unique transport needs. Travellers Aid is in a unique position to identify changing transport needs for people with a disability and the elderly.

Personal Assistance on Public Transport

- The Standards require that transport operator staff provide direct assistance to people with a disability. However there is a lack of clarity as to what is the minimum acceptable level of direct assistance. What are the features of a quality assistance service? What standards does a person refer to in order to substantiate a complaint of poor service?
- Modal-specific service standards be developed in consultation with people with a disability and their representative organizations.
- In light of the partial compliance with the Standards, operators be required to increase staffing levels to deliver more direct assistance to people with a disability.
- Consideration could be given to the funding of organisations like Travellers Aid in Victoria to provide greater personal care assistance. A recent issue of people who are deaf/blind.
- Periodic disability awareness training of identified staff employed in public transport need to have regular access to quality disability awareness.

Community Transport

- Local Government and a range of community organizations have played a significant role in developing and managing community transport services. These services have assisted individuals and groups with a disability to access services and places. There have been many documented studies of best practice' in Community Transport.
- The State, Commonwealth and Territory Governments need to recognize Community Transport as an equal partner in the provision of accessible transport. The review does not give adequate standing to Community Transport, its current importance and the role it can play in the planning and effective provision of flexible transport options.

Development of accessible Marine/Riverboat Transport

- In Melbourne there are often proposals to develop public transport and taxi services on Port Phillip Bay and on the Yarra River. Tourist boats operating on the Yarra and Maribyrnong Rivers cannot provide a service to people using a wheel chair.
- Standards need to be further developed to ensure river/marine public transport will cater for the needs of people with a disability, especially those with a physical disability. Access to river boat/marine transport with tidal changes is a challenging issue for access standards, however overseas standards do meet universal access principles.