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Disabilities Transport Access Secretariat
Transport Access Section
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

Dear Secretariat

2012 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards)

Local Government NSW (LGNSW) welcomes the opportunity to provide a response to the *2012 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) Issues Paper*.

Local Government NSW is the peak body for NSW Local Government, representing all the 152 NSW general-purpose councils, the special-purpose county councils and the NSW Aboriginal Land Council. Local Government NSW is a credible, professional organisation representing Local Government and facilitating the development of an effective community-based system of Local Government in NSW. (LGNSW's predecessors were the Local Government and Shires Associations of NSW.)

Our response to the Issues Paper is framed by the following resolution from the 2011 NSW Local Government Association conference:

That the Local Government Association calls upon the Australian Government to provide funding and resources in order to modify existing and/or establish new infrastructure to assist local councils with their obligations under the Disability Discrimination Act to comply with the Disability Standards for Accessible Public Transport requirements so that the necessary infrastructure can be transformed to meet the required standards.

As Local Government in NSW is required to comply with the standards in the provision of accessible bus stops and taxi infrastructure, our response will address the questions in Section A of the paper – questions for operators, providers and their representative organisations.

- 1. Have you been able to meet the 2007 Transport Standards legislated targets? If not, can you elaborate on the reasons for not being able to meet these targets?*
- 2. Have you been able to meet the 2012 Transport Standards legislated targets? If not, can you elaborate on the reasons for not being able to meet these targets?*

LGNSW has no definitive data on the number of bus stops across NSW which have been modified to meet the 2007 or 2012 standards. In order to develop an evidence base by which to understand the extent of compliance, we would support a nationally coordinated collection of data. This would establish an overall picture of the size of the infrastructure task facing Local Government, its progress in the implementation of the Transport Standards, and the sector's ability to adequately fund these requirements.

Sources independent from Local Government, including the NSW Bus and Coach Association, have given some sense of the scale of the accessible infrastructure issue in NSW. For example there are approximately 7,200 regular bus routes in greater metropolitan Sydney, and possibly another 1,000 routes in rural and regional areas of NSW. Within these routes there are over 37,200 individual bus stops in Sydney alone, and estimates of another 10,000 bus stops outside of Sydney. It is also worth noting that these estimates exclude the hail and ride stops which are common especially in rural and regional areas of NSW.

These numbers, while indicative only, illustrate the scale of the infrastructure issue facing councils in NSW.

3. *Are there requirements that have proven to be impractical or difficult to implement? If so, please specify.*

LGNSW is concerned that the introduction of the Transport Standards was not accompanied with any additional resources for implementation, nor was there a process to allow the full impact or cost-shifting implications on Local Government to be fully assessed. The scale and cost of implementation of the accessible transport standards may be beyond the capability of Local Government.

Councils in NSW already face a massive task in funding and maintaining existing assets. The ongoing sustainability of funding streams to support infrastructure commitments is a priority for Local Government. Research conducted for the 2006 Local Government Inquiry in NSW suggest that councils in NSW face an infrastructure renewal backlog of \$6.3 billion, and an annual renewal gap of \$600 million, mainly to address the problem of roads and transport related infrastructure reaching the end of their economic life and replacement and maintenance being beyond their capacity. (Source: *Independent Inquiry into the Financial Sustainability of NSW Local Government, 2006*). This funding gap has been confirmed by a recently released NSW Treasury Corporation (TCorp) report on the assessment of the financial sustainability of NSW councils, which shows that the infrastructure backlog had grown to \$7.2 billion as at 2012.

The 2007 *Review of the Disability Standards for Accessible Public Transport 2002* recommended that 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 (Recommendation 7). LGNSW notes that the Australian Government's response to this recommendation was essentially that the provision of funding is a matter for each state government to consider. We suggest that, until there is a commitment from the NSW and Australian governments to adequately resource Local Government to address the infrastructure burden of the Standards, it is unlikely that the targets will be met.

Under the 2006 Inter-Governmental Agreement (IGA) with the Federal Government on cost shifting, an agreement was reached that Local Government would be compensated for any additional work it has to perform on behalf of, or to meet the requirements of other levels of government. The 2013 Inter-Governmental Agreement (IGA) with the NSW Government contains a similar clause. The introduction of the Transport Standards in 2002 was not accompanied with any additional resources to implement the requirements in the legislation, nor was there a process to allow the full impact on Local Government to be fully assessed.

4. *Can you provide detail on any initiatives and action you have undertaken, not currently detailed under the Transport Standards or other legislative requirements, in relation to removing discrimination against people with disabilities?*

Local Government in NSW actively plans for the provision of accessible infrastructure, for example within their comprehensive accessibility and/or pedestrian and mobility planning frameworks. The Integrated Planning and Reporting framework allows for the inclusion of accessible infrastructure and related issues in the context of councils' overall strategic planning and asset management systems.

The Standards establish specific requirements for access to transport services such as establishing the space allocation requirements for wheelchairs on buses and trains, lift and ramp access at railway stations and bus/rail interchanges, and access to transport service information. In addition to these responsibilities passengers must also have the capacity to use a mass transit system. This is where Local Government plays a major role integrating accessible public transport services with the provision of accessible bus stops, footpaths and kerbside infrastructure to create accessible and liveable communities. Without appropriate funding to address the compliance targets supporting the Transport Standards, councils may be unable to resource the required works in the target timeframes.

Thank you for the opportunity to comment on the issues paper. Should you require further information on our response, please contact Richard Connors, Senior Policy Officer Roads and Transport on 9242 4073 or Richard.connors@lgsw.org.au.

Yours sincerely



Noel Baum
Director - Policy