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The Manager
Review of Australian Transport Standards
Transport Access Section
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

DisabilitiesTransportAccessSecretariat@infrastructure.gov.au

Dear Sir/Madam,

The SCAAN (Sunshine Coast Access Advisory Network) is aware that the Australian Transport Standards (ATS) are currently under review and would like to request that the following important changes are embedded in the ATS.

Issue 1: Mobility Restraints on All Public Buses

We strongly believe that mobility restraints for wheelchairs should be fitted to all public buses in Australia. It is vital that at least one secure and effective locking system is available on every bus so that people who use a wheelchair can be assured of their safety.

Comment: The issue of uncontrolled movement of mobility aids has been raised by many other credible commentators and is entirely valid. The existing Standards actually require that mobility aids are stable in the allocated space:

9.11 Movement of mobility aid in allocated space

An allocated space must contain movement of a mobility aid towards the front or sides of a conveyance.

The problem then is the failure to implement an existing requirement.

Several transport operators are investigating options currently. The issue of restraint is far more complex than simply putting in QStraints as per maxicabs (won't bore you with the long list of problems facing the operator) but in principal we need to support the use of a variety of restraints on request (I refuse to use bus restraints - they are required in some coaches - as they seriously restrict my capacity to move with the bus - a safety and comfort issue - and interact with other passengers - a social issue.) One problem will be that there is a diversity of mobility aids and no one restraint system will suit all. This is the lack of anchor point problem facing scooter users in taxis. Winnipeg uses three systems on all buses and allows their use voluntarily.

Reasons:

1. Manually propelled wheelchairs are at greater risk than motorised chairs. In our local area, two young people have fallen in their wheelchairs on public buses in the past 12 months. One suffered a minor head injury and, in the other instance a carer was injured attempting to lift the chair once it had fallen. The cost of a visit to the hospital by the first person and the work cover and rehabilitation cost to the worker represent an entirely avoidable expense to the taxpayer.
2. As a general rule of thumb people requiring wheelchairs for mobility have disabilities that reduce upper and lower body strength, thus their ability to brace or control their movement from sudden impact or evasive maneuvers is also greatly reduced. Unsecured people in wheelchairs should be considered to be in a high risk injury category not only to themselves but to other passengers that may be physically injured by the unsecured chair or its occupant.
3. The braking system on either a motorised or manual chair is vastly inadequate to prevent the chair being propelled forward or sideways in the event that a bus is required to take evasive action to avoid a collision or if the bus turns a corner at speed.
4. Our organisation as an example has 6 members who use wheelchairs and only 2 of them are prepared to use a bus. We estimate that this situation is true for the vast majority of communities in Australia. Any Government's aspiration to see greater use of public transport cannot succeed if so many people who use wheelchairs are not prepared to risk their safety.
5. The extra personal cost that is generated because people must use taxis is significant, as the majority of people using wheelchairs are reliant solely on a DSP (Disability Support Pension) this type of lifestyle does not allow for expensive and unnecessary taxi trips.
6. We believe that the lack of lock down devices for wheelchairs is a fundamental breach of the Objects of the Disability Discrimination Act 1992 which seek to eliminate, as far as possible, discrimination against persons on the ground of disability in the provision of goods, facilities and services.

Issue 2: The increase in loading limit of access ramps for loading mobility devices on public buses from 300 kg to 350 kg

Comment: There is no harm in supporting this, though the extent of the problem is overstated. There will be few instances where the combined weight of mobility aid, occupant and disability aids will exceed 300 kg. Where they do, the bulk of the unit will almost certainly mean that it cannot turn through

the passage between the bus wheel arches or manoeuvre into the allocated spaces. The resolution to this problem is not to impose dimensional solutions on the bus designers (buses need to be narrow enough to fit on two way suburban streets and short enough to turn corners in suburban streets), but to ensure that people are correctly informed of the mass and dimensional restrictions that a finite envelope such as a bus interior impose. People can then be more discerning in choosing a suitable mobility aid. If pushed by policy or legislation, manufacturers of aids can provide compact, sturdy units that operate with much more agility in the built environment than some of the current chariots.

The current thrust of the Standards oversight is to be stricter with mobility aid manufacturers and sales outlets as the buses have little scope for alteration. Bigger units with heavier batteries are not improvements. Better ergonomics in a smaller envelope, lighter weight but stronger materials, more efficient but smaller batteries represent improvements.

Reason:

1. Because of the improvements in mobility devices and the availability of heavier batteries for long range travelling it is necessary to make the increase to access loading ramps to bring them into line with other transport provider's, for example Taxi's. The present loading limit has already resulted in the failure of the access ramp in a proven instance causing serious injury to a person with a disability (full details can be provided if necessary).
2. The extra facilities needed by some people. Example respirators and extra equipment necessary for life support, making the mobility device heavier.
3. Some of the travelling public who use mobility devices will not use public buses because of the fear of failure of the inadequate loading limits of the access ramps.
4. We believe that the inadequate load capacity of the boarding ramps is a fundamental breach of the Objects of the Disability Discrimination Act 1992 which seek to eliminate, as far as possible, discrimination against persons on the ground of disability in the provision of goods, facilities and services.
5. This creates unnecessary and avoidable expense as the person with the mobility aid has to use Taxi's as an alternate means of transport.
6. This also causes loss of revenue to the providers of public transport.

Issue 3: Mandatory use of RTB (Raised Tactile and Braille) Signage – Buses and related infrastructure

The inclusion of RTB (Raised Tactile and Braille) signage for people who are unable to comprehend signage provided for sighted people. The inclusion of RTB signage is a necessary facility for the Blind and Vision Impaired Public, a disability which directly impacts 3% of the Australian public. The inclusion of this facility is in evidence in many areas throughout Australia but is not reflected in the ATS as a Normative requirement.

Comment: Well-intentioned but not an argument that holds up under serious examination. Perhaps qualified support is appropriate here. "Where

practicable" or other words to that effect could be applied to our statement.

Practicability is important. It is easy to require a feature but if implementing this is impracticable it won't happen. Point 1 below asks for tactile signs to identify bus numbers (route numbers?) Some inner city blade signs have over 20 routes associated with them. A compliant Brail and tactile treatment would make these blades the size of billboards. Completely impracticable unfortunately. The requirement should be for the information to be available in an accessible format, not confine it to Braille tactile which is very hungry for space. On a suburban J pole at which only a single route stops a Braille tactile addition to the timetable is easily achieved, however. Practicability.

If you are blind, tactile signs are often harder to find than the facilities that they identify, unless they are consistently located. This is easily done with toilet doors as they are located in an entirely predictable environment and do not change function. I support signs having tactile components where practicable, as this is useful as an awareness raising strategy. Functionally however, most blind travellers won't find them unaided. Braille tactile signs identifying priority seats on buses could only be practicably located on the wall or window. There are few other anchor points that would not introduce a head strike danger. The blind traveller would be seated before finding the sign if they had the window seat and out of reach if they had an aisle seat. Practicability. The Braille tactile sign would really only have an awareness raising function.

The assertion below that no signs on buses identify priority seats is false. It may be that the operator on the Sunshine Coast does not provide them, but in most buses the seats are clearly identified by sign and often by upholstery colour. In fact identification is a requirement:

31.1 Priority seating

Operators must designate at least 2 of the seats provided on their unbooked conveyances as priority seating for passengers with disabilities and other groups in need of special assistance (for example, the aging).

31.2 Information to be provided about vacating priority seating

Operators must inform all relevant passengers (by signage or similar systems) that they should vacate an identified priority seat or allocated space if a passenger with a disability requires it.

The issue is non-implementation of existing requirements on the Sunshine Coast (and perhaps elsewhere.)

Reason:

1. The use of RTB signage is necessary for the VIP's to be able to locate and identify appropriate or special use seating, identify and comprehend bus stop numbers and information, identify bus numbers.
2. As there is generally no signage to indicate the use of special seating areas on the public buses, the RTB signage will also alert all the travelling public, not just people who can see, not to use the seating provided for the disabled, elderly and people with prams.
3. RTB Signage is a system that is easily comprehended by all the travelling public eradicating the need for any extra signage
4. We believe the lack of raised tactile and braille signage at bus stops and within buses is a fundamental breach of the Objects of the Disability Discrimination Act 1992 which seek to eliminate, as far as possible, discrimination against persons on the ground of disability in the provision of goods, facilities and services.
5. RTB Signage is readily available and is regulated by a strict description in the National Construction Code Specification D3.6 and AS1428.

SCAAN sees these vital changes to the ATS as a basic human right and a duty of care by the Australian Federal Government. We urge the ATS to have these three items embedded in the ATS as a matter of urgency.

Yours sincerely



Peter Ryan
Chairman: SCAAN

Fran Vicary
Chief Executive Officer
Queenslanders with Disability Network