

South Australian Department of Planning, Transport and Infrastructure (DPTI) response to the May 2014 Draft Report of the Review of the Disability Standards for Accessible Public Transport 2002

Introduction

This submission should be read in conjunction with the South Australian Department of Planning, Transport and Infrastructure submission to the '2012 Review of the Disability Standards for Accessible Public Transport 2002'.

Cable Drive Ferries

One Transport mode not covered in the above submission (or by any other party) is a cable ferry. DPTI operates a fleet of 12 cable drive ferries across the River Murray and one cable guided ferry which operates on the Cooper Creek when in flood. The ferries are operated by DPTI as a free service to the public.



Figure 1 A typical River Murray Ferry, (Albatross II)

As can be seen from the image, the ferries are predominantly vehicle ferries, although provision is made for pedestrians.

River Murray Ferries

Factors that distinguish the River Murray cable drive ferries from more conventional ferries are:

- The ferries are predominantly vehicle ferries, although provision is made for pedestrians. The River Murray ferries also carry heavy vehicles.
- The ferry is predominantly a means for vehicles to cross the river and drivers or passengers within vehicles, who may be disabled, are transported across with no limitations. These ferries are all regional and are located on rural roads without footpaths. While ferries do accommodate pedestrians, the access provided is based around the infrastructure set up principally for vehicular loading and unloading. Pedestrians approaching the ferry must do so on the shoulder of the approach road or on the road itself, then down the concrete ramp, across the steel ramp and up the ferry flap.
- The approach road is generally unlit, although a street light is located at the approach vehicle barrier so that the ferry operator can see waiting pedestrians.
- There is minimal pedestrian infrastructure of any sort because the requirements are minimal. For example there are no waiting rooms and no toilets (except where coincidentally there is a riverfront public park provided by the local council) etc.
- The ferries go backwards and forwards on demand leading to a short waiting time to board (generally less than five minutes) followed by short travel times (generally two to three minutes including waiting to disembark)
- The number of pedestrians of any type transported on most ferries is minimal (averaging less than five per day). There are three crossings that at times carry more. Mannum can have up to 100 pedestrians per day in busy times, at Walker Flat 50 children a day cross when a nearby camp is operating and at Morgan up to 50 per day cross in summer. The number of disabled passengers is unknown but even including all types of disability would still be a small number.
- The infrastructure and ferries are both long lived. (The majority of ferries are over 50 years old).

Similar (but generally larger) ferries are in use in some other states (principally NSW). Some aspects of the DDA may be easier to comply with for larger ferries.

The department is committed to providing access to disabled persons. This can be achieved by the person crossing the ferry as a passenger in a car or bus. Alternatively ferry operators will provide direct assistance to ensure a disabled person can access the ferry. Where a person in a wheelchair or mobility scooter accesses a ferry they are generally placed in a vehicle space.

There are several issues which limit improving the access:

- The very small number of pedestrians of any type limits the justification for expenditure to improve disabled pedestrian access.

- The concrete ramp is fixed at a slope of approximately 1:7. The ferry flap is generally also below this slope, but in drought conditions it can go considerably steeper. This slope meets the requirement for direct assistance (1:4), although it exceeds the unassisted slope requirement (1:14 for ramps longer than 1520mm). To change the concrete ramp slope would also require a change in the steel landing and the ferries making this change impractical.
- Access to the ferries along the rural roads is generally problematic for people who require mobility assistance or are vision impaired. Making the ferries and associated loading facilities fully compliant would be prohibitively expensive, but wouldn't significantly increase the number of disabled people who were able to access the ferries.
- The cumbersome nature of the standards makes it time consuming to determine what features are required.
- The ferry DDA standards are written around a conventional passenger ferry with longer pedestrian wait and travel times. Many of the provisions are irrelevant, but it is unclear what is appropriate for this type of cable drive ferry.

The department has however made the following changes to improve access:

- Lighting levels have been increased on the new ferries and are being improved during full refits of the existing ferries (but not to the specified level: see below). (67% of operating ferries)
- Slip/trip/fall hazards have been minimised on new ferries and are being minimised during full refits. (67% of operating ferries)
- A rest area is being provided on new ferries and during full refits. (50% of operating ferries)
- Stringent inspection and repair regime is undertaken for all non-slip surface coatings to meet safety requirements.

The following are examples of potential changes that have not been implemented as the cost is perceived to be disproportionate to benefit and direct assistance would be provided instead:

- Hearing loops (there is a PA system, however it is not used frequently and it is not used for destination information; as trip destination is obvious). Direct assistance is provided by hand signals to inform pedestrians when to board and disembark.
- Tactile indicators are not used. A person requiring tactile indicators to safely use the ferry would not be able to safely use the approach roads to the ferry.
- Lighting doesn't fully comply with the standards as the glare at the specified level is excessive, creating risks for all users. Lighting levels are much higher than on the approach roads. A vision impaired person would not be able to reach the ferry or ferry infrastructure along the unlit approach road at night.

- The lighting levels in the legislation appear to be based around suitable indoor levels, whereas our ferries and approaches are all open and outdoor levels would be preferable, based on AS/NZS1158.3 Lighting for roads and public spaces.
- Where we have fitted access gates with child resistant latches, the latch is out of reach of a wheelchair mounted person. Given that direct assistance is available, it is considered that the risk of a child entering the vehicle area exceeds the inconvenience to the disabled person.

Cooper Creek Ferry

The Cooper Creek ferry is only operated when the creek floods (three times in the last 20 years)

It is not possible to reach the Cooper Creek ferry without a vehicle and accordingly minimal concession is made to providing disabled access. The ferry is predominantly a means for vehicles to cross the river and drivers or passengers within vehicles, who may be disabled, are transported across with no limitations.

Discussion

Due to the fact that the main limitations to disabled access are the rural approach roads without footpaths, rather than the ferries and associated infrastructure. It may be that measures other than further upgrading the ferries and associated infrastructure to address rural disability issues might be preferable. For example mobility scooters can readily access the River Murray cable drive ferries unassisted. Subsidising mobility scooters for rural residents would address a wider range of issues than just access to the ferries at a very much lower cost than further ferry and infrastructure upgrades. However any such scheme would need to consider the results of the ACCC investigation into their safety. A labelling scheme to ensure compatibility between mobility scooters and infrastructure would also be essential.

Summary

In summary, DPTI Cable drive ferries are predominantly vehicle ferries that also carry pedestrians.

Generally the biggest restriction to disabled access is getting to the ferry infrastructure in the first place as access is along a rural road. Even for those for whom the approach road is not a restriction, there are limitations to what can be done to improve unassisted disabled access at a reasonable cost, based on the small number of potential users. Accordingly access for many disabled people would be as a passenger in a vehicle, or with direct assistance.

New ferries and recently refitted ferries have several upgrades to improve disabled access.

The primary method of reducing disability discrimination in rural areas may need to be a mechanism other than investing in infrastructure. As an example increased subsidies to make mobility scooters more affordable for rural residents would be more cost effective and address additional issues than upgrading the ferries to a higher standard than the current generation of new and refitted ferries.