



Comments on the draft report - DDA Transport Standards – 5 year review

Wellington Shire Council

Introduction

Thank you for the opportunity to provide comments on the draft report.

These comments have been prepared on behalf of the Wellington Shire Council by the RuralAccess Project and the Let's GET Connected Transport Project – Wellington Shire Council.

This submission concentrates on the effectiveness of those recommendations which are likely to impact rural areas.

Inequitable Public Transport compliance

It is encouraging to note that this has been recognized in the report, but is disappointing that there is no recommendation around this issue. Rural councils face enormous inequities when it comes to the provision of public transport and where it is provided it does not meet the needs of its population. It is vital that government commit to improving these compliance standards. Across Victoria the number of people over 80 years of age is expected to increase by 60 % by 2021. In Wellington and East Gippsland alone this group will increase by 90 %. A high percentage of this group will have limited mobility and will no longer be able to drive.

Without a commitment to establish a more equitable system of compliance then the areas where you have the highest proportion of people who need accessible transport will be the areas where the smallest improvements have been made.

Recommendation: Set a timeframe for a minimum level of compliance standards to be introduced for rural areas.

School Buses

We welcome the recommendation for removing exemption from the standards for school buses. At the same time it is recognised that this measure would need to be phased in to a minimal service level.

Recommendation: Set a timeframe for a minimum level of compliance standards to be introduced for rural areas.

Community Transport

By removing the exclusion on Community Transport the compliance costs would be shifted to providers who are already struggling to support the running costs of small buses. It would also add significantly to the purchase costs placing further limitations on the provision of transport services in rural communities.

In the State of Victoria there is no coherent policy framework around the role, function and operation of community transport – not even an agreed definition.

There are a lot of transport resources in local communities that are often termed community transport, however there are also significant systemic barriers that need to be addressed before these resources can be fully utilised. These challenges include: appropriate funding, accreditation of vehicles, accessibility,

insurance and liability and better coordination with public transport so that it fills the gaps and avoids duplication.

At present community transport in rural Victoria is **unfunded, unaccredited and unsustainable**.

Any investment in Community Transport needs to be supported by:

- ♣ A Statewide government led Integrated Transport Planning Framework that includes all modes of transport, ie community buses, school buses, taxis, public transport etc
- ♣ Recognition and State Government funding to support Community Transport as part of a legitimate mix of transport services in rural communities
- ♣ A statewide policy framework to ensure the community has the information it needs to fully sustain and operate a community transport service

Further recommendations around this issue need to be explored.

Mobility Aids

We welcome the recommendation to introduce Australian Standards and labelling for mobility aids suitable for use on public transport. These standards would also need to be communicated across government and via the health sector services that are largely responsible for recommending the suitability of particular mobility devices.

The report did not adequately address the issue of modifying access ramps stored on trains so that people who are not in wheelchairs but who have mobility issues can safely embark and disembark the train.

Recommendation:

Design a ramp that is safe for both wheelchair users, pedestrians and V Line staff – a ramp that can't collapse regardless of weight distribution.

Complaints Process

We support the findings of the report which highlighted the inadequacies of a complaints process which shifts the responsibility to individuals who often feel threatened or at risk of retribution if making the complaint. Reporting is often seen as 'making a fuss' and very rarely gets recorded and/or followed up.

The recommendation to provide HREOC with powers to instigate cases in Federal Court where it identifies broader or systematic non-compliance is also supported however it is felt that another option could be explored which would potentially lessen the onus on an individual making a complaint. The current system of modal reporting is inadequate, not transparent and lacks accountability

Recommendation: Introduce a multi-modal universal complaints number for all public transport providers.

DDA Compliant Bus Stops

The issues raised in our submission still remain largely unresolved where potentially, for the next 20 years, we may have situations where an accessible bus stop may exist but not be serviced by accessible buses and where accessible buses can't be used fully because of difficulties with bus stops.

More work needs to be done on design options and researching solutions that have been developed in other parts of the world. For vehicles intended for use in these situations – ideally the total access solution will be contained within the bus and not dependent upon compatible physical works/surfaces at the roadside. For instance it may be feasible to develop a flip out ramp that has another component to lengthen it if necessary (to ensure gradient is not too steep if there is no kerb).

Recommendation:

Review the policy for DDA compliant bus stops to ensure that flexible transport programs are not endangered by the standards required. It appears this policy has been developed to respond to needs in the metropolitan areas and then applied nationally or statewide with little attempt to consider the local implications of implementing such regulations in rural and remote areas.

Wheelchair Accessible Taxis

Considerably more needs to be done to improve the standard response times for WATs. The \$10 'lifting fee' appears to be the only incentive for drivers to pick up wheelchair passengers and we know that this fee is being eroded by taxi operators through private agreements. In many cases drivers report receiving less than half the payment which is a disincentive to pick up wheelchair passengers.

Recommendation:

Payment of the Lifting Fee should only be made to a driver and operator who have completed an approved DDA training program. A fixed proportion of the fee should be payable to all drivers.

We also believe that in country Victoria additional benefits could be derived from the State Governments subsidy scheme by introducing a number of subsidy 'conditions' in exchange for the government investment. From the users perspective improved vehicle standards for WAT Taxis, improved driver training and taxi surcharges all need to be addressed in the reviews recommendations.

Information and Timetables

This has been mentioned in the report, however it was not addressed in the draft recommendations. Many people find transport information either absent, inaccessible or difficult to use. Signage is also poor and variable in most parts of the State.

Recommendation:

That all transport operators be required, under contract, to promote their services, provide up to date information, easy to read maps and timetable information in a range of formats.

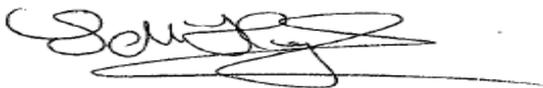
Conclusion

Wellington Shire Council requests that the issues raised by this submission be considered by the Inquiry.

Wellington Shire Council would be pleased to provide you with further information relating to the issues we have raised. For more information please contact Sheryl McHugh or Frances Ford as listed below.

Yours sincerely

Signed on behalf of the
Let's GET Connected Project and the Wellington RuralAccess project by:



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