

Institute of Public Works Engineering Australia Victoria Division Limited



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Dear Sirs,

REVIEW OF THE DRAFT REPORT FOR “ACCESSIBLE PUBLIC TRANSPORT”

The Institute of Public Works Engineering Australia Victoria Division (IPWEA (Vic)) is pleased to be able to make some comments on the Draft Report of January 2008 for the ‘*Review of the Disability Standards for Accessible Public Transport*’.

IPWEA (Vic) commends the review of the Disability Transport Standards 2002 (the Standards) and supports the objective of the Disability Discrimination Act to improve access to public transport for all members of our community.

While I understand that this review is not to include a detailed technical assessment of the Transport Standards or specifications in the relevant Australian Standards, there are some framework and process matters that need to be commented on.

My comments are intended to reinforce the following important principles:

- ♣ The removal of discrimination from public transport services is important; and
- ♣ The method of funding upgrades to infrastructure and/or services is to be fair.

IPWEA (Vic) first raised some issues relating to lighting in July 2002, when the Standards were initially proposed (a copy of this correspondence is attached). These issues remain as these sections of the Standards were not amended in May 2005.

It is impractical and inappropriate for interior lighting standards to be used for outside situations. The AS1158 series of Australian Standards on the *Lighting of Roads and Public Places* is more appropriate in many sections. For example, AS1158 already contains specific and detailed lighting recommendations for transport interchanges.

The lighting of bus stops along public roads is more problematic, particularly as there is no statutory responsibility to provide lighting along roads. There are probably numerous bus routes on roads with no street lighting. Providing a lighting level of 150 lux at the stop, may cause questions to be asked when the rest of the road is not lit, access paths do not exist and the bus service does not run at night, or stops shortly after dusk. Nuisance light spill and environmental concerns then become issues that the community starts raising with local authorities that may not be responsible for the provision of the transport service or even have a say in the location of the bus stops.

Another significant issue is the funding of access paths – and to bus stops in particular. In Victoria, no level of government has a statutory requirement to fund extensions to the existing network of footpaths. There are many examples of subdivisions where some roads do not have footpaths. These developments may also contain roads

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that are used as bus routes. Property owners typically fund the initial construction of footpaths when they buy land from developers.

If Councils were required to fund the provision of access paths, an argument then exists that this discriminates against those that have already funded a footpath. Transport operators/providers do not consider they are responsible for funding this.

The nature and connectivity of existing infrastructure should be considered in the addition, extension or amendment of any public transport route. Transport operators often have the power to alter transport routes and determine the location of stops. This is not something the road authority (VicRoads or Councils) can always influence.

It is unlikely that anyone would build an airport without considering the road network, however, there may not be a footpath or a bicycle lane to the airport. While this is an extreme example, it highlights the type of issues relating to tram, taxi or bus stops.

In summary, it appears that the Disability Discrimination Act and the Standards are attempting to rely on existing statutory responsibilities to provide equitable public transport services. Unfortunately, these responsibilities will not always exist and/or may not be clearly defined, particularly in regard to the funding, provision and/or maintenance of the related infrastructure.

Also, the requirements of the recent Inter-Governmental Agreement must be fully considered in the implementation and interpretation of these documents. It would be in the interest of all sectors of the community if some responsibilities were clarified.

I welcome the opportunity to discuss these issues with you should you require.

Yours faithfully,



MAURICE STABB
PRESIDENT

c.c. A. Gibbs