

East Gippsland Transport Working Group

Response to Review of the Disability Standards for Accessible Public Transport

Submitted to:
Allen Consulting Group, GPO Box 418, Canberra ACT 2601
March 27, 2008

1. *Do you consider that this draft report has addressed the key issues of importance to the review? If not, what other issues do you consider are important to this review?*
 - *Provider Focus:* the overall report is provider focused and measured on impact on the provider as opposed to the users needs and rights. The provider issues raised appear to be based on 'barriers' not based on opportunities and solutions.
 - *Equity:* access for rural and remote areas needs to be considered on an equitable basis – refer p 74. Equity has not been adequately addressed under recommendations of the Report
 - *“Whole of Journey”:* although the draft acknowledges the “whole of journey” issue, it fails to address this in the recommendations, Chapter 13
 - *School Buses:* we support the school bus recommendation, as school buses in rural and remote areas are often the only mode of transport available to our communities.
 - *Mobility Aids:* we advocate strongly that standards need to be placed on all scooters available in Australia (large and small) to enable scooter users to access all modes of transport as recommended in the report.
 - *Accessible Information:* this was not addressed in the draft recommendations and we see this as an important tool for increased access.
2. *Are there options to address these problems that the review has not considered? If so, please provide details on these options and your assessment of their costs and benefits (including supporting evidence)*
 - *Equity of Access: possible options*

The standards need to include equity for all across rural and remote areas. For example the standards stipulate that by a certain date 25% of transport must accessible. Often this is met in metropolitan areas and not rural and remote areas, however the state is still seen to be compliant. Standards need to be modified to ensure equity

Exceptions to DDA - naturally rural and remote transport will be exempted from the standards due to hardship circumstances. This continues to disadvantage the community. A solution to this would be to provide financial/resource support to the transport provider.

- *'Whole of Journey' possible options*

Transport providers when considering upgrades require more strategic planning. This needs to be included in standards.

Transport providers should be required to notify users of accessible routes. This allow people to plan their whole journey without arriving to change over point and finding they cannot access toilet etc.

In terms of a cost benefit analysis of these options, we do not have the capacity to provide detail.

3. *Do you have evidence to either support or refute the assessment of options in chapter 13 of this report? Evidence may include information on the relative magnitude of impacts between options.*

No comment

4. *Do you consider that implementing the draft recommendations will involve costs to government or non-government organizations? If so, please provide any estimates of these costs.*

- Costs are inevitable when implementing change and upgrading infrastructure.
- The burden of costs will be greater across rural and remote areas. Given this, costs should be measured in an equitable manner that does not disadvantage rural and remote communities.

5. *Do you consider the criteria used in the qualitative assessment of options are appropriate? Do you have suggested changes to these criteria?*

Rural proofing needs to be part of the assessment tool. Using this ensures that all policy considers rurality in decision-making. The following link takes you to a rural proofing checklist currently successfully used in the United Kingdom www.defra.gov.uk/rural/proofing/checklist

Also find information from the transport section of their Rural White Paper implementation (2004) - www.defra.gov.uk/rural/pdfs/ruralwp/april2004/6.pdf

6. *Do you consider that the proposed framework is the best approach to implementing the recommendations from this review? If no, how could it be improved?*

No comment

Other:

Please note: Consulting Group Representatives, Melbourne - Rhonda James from East Gippsland Shire was an apology and not in attendance as an observer. Please rectify this in report.

The format and complexity of which this draft report has been developed in is extremely 'inaccessible'. We raise concern that the capacity of people with disabilities to actually feed into this report and make comment.

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