



## **Submission to the DDA Transport Standards – 5 year review**

Wellington Shire Council

### **Introduction**

Thank you for the opportunity to provide a submission into the DDA Transport Standards – 5 year review.

This submission has been prepared on behalf of the Wellington Shire Council by the RuralAccess Project and the Let's GET Connected Transport Project – Wellington Shire Council.

### **Focus of submission from Wellington Shire Council**

The focus of this submission is largely on the impact of the standards from a rural perspective where there is very little public transport infrastructure.

- 3 train services per day to Sale (15,000 pop and on to Bairnsdale (12,000 pop) (6 hour gap during the day) compared to:
- 18 services to Traralgon per day (20,000 pop) - 50 km closer to Melbourne..
- 3 buses per week to coastal community of Loch Sport 60 km from Sale
- 3 town bus services per day around the town of Sale
- Most other towns get no bus service or one service per week (eg Stratford – despite it being only 15 minutes from Sale)

This submission also draws heavily on the presentations made by Frances Ford and Garry Hammer to the enquiry at its Melbourne hearings on 7<sup>th</sup> August 2007.

**The Rural Context** – Wellington Shire covers over 11,000 square kms of Eastern Victoria. Wellington Shire has a large geographic area, a widely dispersed population, low average income, low formal qualification rates, a rapidly ageing population and high unemployment rates.

Disability and transport issues, therefore, need to be considered within this rural context. Wellington Shire faces a number of diverse and complex challenges associated with the geography and demography of such a large rural area, where the majority of communities have no public transport.

Solutions to address identified issues require working at a local level, collaboratively, with communities and service providers to develop innovative ways to address issues.

### **Background:**

The Let's GET Connected Transport project<sup>1</sup> works in partnership with the Wellington Rural Access project to identify and work together to highlight and improve transport issues specific to people with disabilities.

The Wellington Access and Inclusion Advisory group consists of people with disabilities, carers, service providers, Councillors and the project officers for Rural Access and Let's GET Connected Transport project.

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<sup>1</sup> The Let's GET Connected Transport project aims to create sustainable solutions to transport disadvantage in Wellington and East Gippsland Shires. The project is a partnership between local government and key groups across the area. It is funded through the Victorian Government's Transport connections Program.

The Let's GET Connected partnership is committed to acknowledging, linking and enhancing community strengths and the social capital that already exists within local communities. We recognise that transport options that are developed with a strong level of community participation and ownership have the best chance of being sustainable in the long term.

RuralAccess is a community development program funded by Department of Human Services to assist access and inclusion of people with disabilities in all areas of community life. There are 27 RuralAccess co-ordinators across rural Victoria – the Building Inclusive Communities program area also includes MetroAccess and deaf access Victoria.

### ***Effectiveness of the Standards in Rural Gippsland:***

#### **Inequitable Public Transport compliance**

Basically the 'TRICKLE DOWN EFFECT' is not working for us !!

The Compliance program is making good progress in Melbourne and to the areas within the fast rail network (ie circle around Melbourne that reaches Geelong, Ballarat, Bendigo and Traralgon)

We would like to acknowledge the effort and expenditure that has gone into the improvements that have occurred (in Melbourne and in areas such as the Latrobe Valley ) - they have made a major difference to people's lives.

However once you go beyond what we sometimes call 'the magic circle' defined by the edges of the fast train network in Melbourne, the picture is very different.

The Department of Infrastructure in Victoria espouses "a long-term plan for providing a fully accessible public transport network throughout the State. Department of Infrastructure and contracted public transport operators have prepared Action Plans to progressively improve the accessibility of all train, tram and bus services."<sup>2</sup>

This submission would like to point out that whilst DDA compliance seems 'on track' for Victoria as a whole there is a serious gap in accessible transport service provision for rural and remote Victoria.

Areas beyond the Regional Centres across Victoria (ie >150kms from Melbourne) are totally reliant on poorly timetabled V/line and Department of Infrastructure contracted service provision with no incentives for local country bus operators to provide a mix of accessible buses within their fleets.

For example, up until recently there were no low floor buses in the commercial bus fleets within the Wellington or East Gippsland Shires even though both Shires have large multimillion dollar bus companies operating in their areas.

As a result of the Let's GET Connected Transport Project in Wellington and East Gippsland there is now one low floor bus in each Shire but little or no interest from local operators to improve on this. Whilst this is welcomed by the local communities it highlights much more is needed to address transport disadvantage in the country.

The lack of accessible bus services in rural communities only increases the need for the disability and non-profit sector to fill the gaps with targeted community transport, resulting in restricted eligibility criteria for their particular agency or program area through limited funding guidelines. Whereas the introduction of accessible mainstream public transport options in

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<sup>2</sup> Department of Infrastructure - Disability Action Plan 2005/06

rural communities would benefit everyone in the community, particularly those with disabilities, young mothers with prams, the frail aged and those with other mobility problems.

Another aspect of our local context is the **ageing of the population**.

Across Victoria the number of people over 80 years of age is expected to increase by 60 % by 2021. In Wellington and East Gippsland this group will increase by 90 %. A high percentage of this group will have limited mobility and will no longer be able to drive.

What this means for us in a nutshell is that the areas where you have the highest proportion of people who need accessible transport are the areas where the smallest improvements have been made.

Accessibility Data reporting should also reflect the different areas of metro, regional and rural transport infrastructure and services.

#### **Recommendation:**

***A commitment to improving accessibility must be accompanied by a commitment to some basic minimum levels of service. These minimum levels would need to be negotiated depending on the context eg. 3 services per week to a small outlying township, or 12 services a day for a local town service in a major centre, or 6 services a day connecting major centres in Eastern Gippsland to the Latrobe Valley and thus to Melbourne.***

If this is not followed through there is a danger that access standards may be used to reduce and even eliminate services to people in rural areas. For example government will not allow any new services to operate without the introduction of DDA compliant bus stops. This could have serious implications for the development of flexible transport – see below.

#### **DDA Compliant Bus Stops**

On the one hand it is encouraging that the need to improve accessibility of bus stops has been recognised as part of ensuring continuous path of travel and a safe and accessible journey.

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.

However significant concerns have been raised about the implementation of this improvement plan – there are no easy answers but a one size fits all approach will not work in rural areas.

Trying to install a fully DDA compliant bus stop in areas where there may not even be sealed roads, proper footpaths or kerbs and channels is problematic to say the least.

The low-floor ramp-equipped bus solution for mobility device access is only effective at bus stop locations where there is also compatible works on the actual roadside bus stop.

Emerging innovative uses of public buses - such as dial-a-ride / demand responsive / area service bus routes are not restricted to a fixed set of pick-up and set-down points. Instead they endeavour to service the public in a very flexible way - with pick-up and set-down at locations most convenient to the bus user (often very close to people's homes). These services are increasingly common in parts of Europe and are being developed in some parts of Australia - seen as especially important given the ageing of the population. Flexible services are much more likely to be used by the people who need them most.

However a major concern has just emerged - the latest advice from Department of Infrastructure (Department of Infrastructure ) is that Department of Infrastructure will no longer consider funding these new and innovative models of transport on the basis that they do not use DDA compliant bus stops (and that where these flexible transport models have been funded in recent years the funding will now be withdrawn, for the same reasons)

It will be a retrograde step if the development of flexible transport options is stymied in this way.

Surely there are other ways that the objectives of safe flexible and accessible transport can be achieved.

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.***

#### **V Line Issues**

For many years the focus of our campaign has been on the fact that people in wheelchairs still have to travel in the baggage car on long haul trains - no seat for carer, no windows, no air conditioning and no access to toilets - truly substandard conditions.

Good to know that this is about to change in Victoria with DDA modifications to some rail carriages underway- in part due to the advocacy efforts of individual people in wheelchairs.

However there are still issues of concern.

One that has been raised in a number of your hearings to date is the VLine ruling in 2004 that wheelchair access ramps stored on trains can not be used by people who are not in wheelchairs but who can't manage the gap and step between carriage door and platform.

Some stations have additional ramps available for pedestrians but this is not universal and there needs to be clearer processes for promoting and using them wherever they are needed.

Many people with disabilities have given up using trains because it is simply too hard to step on and off -this needs urgent attention.

There is still a long to go in ensuring safe travel for people with low vision. There has been slow progress in installing tactile markers at rural railway stations.

Audio announcements on trains and buses need to be more consistently provided.

#### **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.***

## **Mobility Scooters**

Another issue that has been raised by many others is the lack of accreditation/labelling for mobility scooters that are permitted on public transport.

On a positive note more material and information is now becoming available on this issue.

However there is still a lot of confusion and ignorance about the fact that there are restrictions on what type of mobility scooters are permitted on trains, buses and taxis.

A clear labelling system is long overdue – it really should not be too hard for suppliers to put on a sticker that says ‘suitable for use on public transport’ This is also a training issue for suppliers and health professionals - many of whom are unaware of the public transport requirements re size and weight limits etc. People need to be informed at point of purchase whether or not their scooter can be used on public transport.

Lack of restraints and suitable anchor points in buses trains and taxis for scooters and wheelchairs is a major safety issue.

### ***Recommendation:***

***Develop National Standards for Mobility Scooters with a labelling system to define whether they are suitable for use on public transport.***

## **Wheelchair Accessible Taxis**

Following the Victorian Country Taxi review 2005/06 the Victorian Government, through the Victorian Taxi Directorate, now offers country taxi operators the opportunity to apply for a Wheelchair Accessible Taxi (WAT) subsidy making the provision of accessible taxi services more viable and more attractive to country operators. In the whole of Wellington Shire there is only one Wheelchair Accessible Taxi operating full-time servicing a very dispersed population base of 40,000 people and a geographic area of 10,000kms. A second WAT taxi is only used as a reserve vehicle. In reality the WAT taxis only service a radius of 10kms around Sale.

Whilst the subsidy is most welcomed in country Victoria it is believed that additional benefits could be derived from the scheme by introducing a number of subsidy ‘conditions’ in exchange for the government investment:

### ***➤ Improved Vehicle standards for WAT Taxis***

Most users of WAT taxis express strong concerns about the design and comfort of some current models. Some of the cargo type vans used as wheelchair taxis are not considered appropriate by those who travel in them. Goods vehicles are not designed for people. Passengers travel without air conditioning, ‘rattle around in the back’ and ‘can’t even look out of the windows’. Accessibility issues are not just about getting wheelchairs on and off buses, trains and taxis. Solutions should be focussed more on ‘universal transport’ for all.

These views are also consistent with the HREOC Report of Wheelchair Accessible Taxi inquiry 2002 which quotes “Evidence to the Inquiry clearly indicates the desirability of a taxi design, or designs, offering greater comfort and safety for WAT passengers as well as greater acceptability to general taxi users”.

### ***Recommendation:***

***Introduce minimum vehicle standards for Wheelchair Accessible Taxis.***

### ***➤ Improved Taxi Driver Training***

Since inception of the WAT scheme not all WAT drivers have been required to undertake sufficient training to ensure they can provide a safe and high level of

service for passengers with disabilities. Community feedback and experience suggests appropriate safety procedures are not being followed.

**Recommendation:**

**Introduce mandatory regular Disability Awareness training for all taxi drivers.**

➤ **Review Taxi Surcharges for people with disabilities**

Although taxi operators start the meter at the zone boundary (often only 10 kms from the town post office) to pick up passengers outside their zone they can charge an 'out of zone' fee. This is seen by people with disabilities as discriminatory as they have no other choices when it comes to access to alternative transport options. There have also been reports of Taxi companies charging \$80 surcharge after midnight and \$35 surcharge day time for use of Maxi Cabs.

*Case Study: A Wellington Shire wheelchair bound resident at Stratford has to pay \$30 surcharge to get a WAT taxi from Sale (15 minutes away) to travel across to Maffra (a 10 minute journey). Immediately the \$30 Multi Purpose Taxi Program subsidy has been consumed before the trip has started.*

**Recommendation: Extend zone boundaries for Wheelchair Accessible Taxis in rural areas to surrounding areas so that users are not charged an 'out of zone' fee.**

➤ **Taxi Lifting Fee**

There is very strong evidence (reported by regular taxi users) that the proportion of the \$10 lifting fee that is meant for the driver (\$6.70) 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.**

➤ **Multi Purpose Taxi Program**

The Multi Purpose Taxi program continues to be problematic in Victoria. The impact of the annual subsidy 'cap' imposed on large numbers of people with disabilities (depending on diagnosis, not on need) has been enormous in rural areas. At least the cap has now been increased to \$1030 per year (from \$550 a year ago) – half price subsidy of up to \$30 per trip.

## **Exemptions under the Transport Standards for School Buses**

We realise that a permanent exemption has been granted for school buses - the impact of this may not have been fully understood at the time (and there have been some major changes since this exemption was granted).

You will not be getting submissions about this issue in most of your public hearings for the obvious reason that in almost every state of Australia there is not a separate school bus network – students travel on public transport that can also accept fare paying passengers. So if the public transport fleet improves this has obvious spin offs for school students.

In Victoria however, for reasons that go back many decades, we have a dedicated school bus fleet that in rural areas often comprises the bulk of our "public transport" infrastructure.

We have many many towns and districts that have no route service (because it is not seen as economically viable) that have a school bus route. In Wellington Shire we have 62 school buses and 2 route buses – plus a V Line replacement service that has not changed its timetable for 40 years. Across Gippsland school buses travel almost 30,000 km per day – in Wellington Shire alone nearly 6000 km per day. This gives some idea of our situation.

The Transport connections program has attempted to address this issue over the last few years with the development of the Gippsland School Bus Flexibility project in partnership with Department of Infrastructure. This project is overseen by the Gippsland Regional Managers forum (managers of all government departments in Gippsland and CEOs of local councils). The project focuses on overcoming the barriers currently experienced by post-compulsory students and members of the general public in accessing the spare capacity on school buses in the Gippsland Region. It is about identifying opportunities and demand for using spare school bus capacity, addressing bus contract issues, improving application forms and practices, consolidating relevant policy documentation, and promoting the availability and benefits of using spare capacity on school buses.

For some transport disadvantaged people this will make all the difference in enabling them to access services and facilities and to maintain social connections with their communities. However it is likely that many of the same people who are transport disadvantaged will have difficulty accessing the conventional school bus for access reasons.

There are also many students who are unable to use conventional school buses. Most students with disabilities attend mainstream schools not specialist schools, and schools and families often have extreme difficulty in catering to their transport needs.

Just two instances to share with you

- A member of our Access and Inclusion Advisory group spent 6 years driving her daughter 100 km each round trip to and from mainstream secondary school every school day because she was unable to access the school bus in her wheelchair
- We have been approached by a local primary school seeking advice on how to meet the needs of a boy who wears callipers and is unable to get up the steps of standard school bus for such things as going to school swimming lessons with his class. This child is being isolated from his classes as special arrangements have to be made each time (eg taken to and from the pool by the school principal in his car)

Current exemptions under 'hardship' and the exemption for 'dedicated school buses' under the Disability Discrimination Act is contributing to an inequitable balance of accessible services between Melbourne, the Regions, and rural and remote Victoria.

The few town and route services that are provided in 'rural' communities mostly utilize school buses during down time. Because of the exemption from DDA legislation there is no requirement or incentives for local operators to provide 'accessible' transport in rural remote areas.

The Transport Connections Program has sought assistance from Regional Department of Infrastructure to ensure that all V/Line coach services including the V/Line rail replacement coach service that operates between Traralgon/Sale via Glengarry, Toongabbie, Cowwarr, Heyfield, Tinamba and Maffra becomes fully accessible. Currently taxis are dispatched to connect wheelchair passengers to V/line rail services which contradicts the preference of people with disabilities to be served as far as possible by mainstream rather than segregated services

There are also a number of rural transport services which are believed to be 'exempt' from DDA compliance because of their 'temporary' nature, eg the Yarram to Traralgon Department of Infrastructure contracted bus service has been operating for the past two

years without the requirement for the operator to make that service accessible for an ageing community.

### **Recommendation:**

**Remove the DDA exemption for School Buses in rural areas.**

### **Community Transport**

This area needs an inquiry to itself. There is no coherent policy framework around the role and function and operation of community transport in Australia – not even an agreed definition.

There are a lot of transport resources in local communities that can be termed community transport and there are some exciting projects about making better use of these resources.

However there are also significant systemic barriers that need to be addressed before these resources can be fully utilised - these include insurance and liability issues, accreditation of vehicles, resources for repairing maintaining and changing over vehicles, and better co-ordination in relation to public transport - to fill gaps and avoid duplication.

### **Complaints Process**

It has been reported through the Transport Connections Project and community consultations that many people with disabilities are not aware of how to effectively make a complaint when something goes wrong, ie left stranded on stations when the train has no ramp to provide a wheelchair passenger or WAT taxis refusing a fare because it is seen as not economical.

Reporting is often seen as 'making a fuss' and very rarely gets recorded and/or followed up.

People are not often referred to the 'official' complaints registers for different transport modes. Information and advice about traveling with a disability varies considerably from operator to operator and call centre to call centre.

### **Information and Timetables**

Many people find information on the V Line website inaccessible and difficult to use. We still have no access to large print timetables or timetables in other formats.

Local bus timetables vary dramatically depending on the operator. Some operators have gone to a lot of trouble to make their timetables clearer and easier to read – others barely promote their services at all and their timetables are an extremely well kept secret (let alone accessible in a range of formats)

Bus operators are expected to promote their services and provide good timetable information as part of their contract and subsidy arrangements with government – however it seems these requirements are rarely enforced.

As in so many areas, some bus operators are innovative and responsive to customer demand - others are resistant to any positive change (even with substantial government subsidy support)

**Additional comments:**

**Impact on Independent and Agency Transport services:**

- There is a huge financial burden on rural services to provide transport, eg >\$50,000 per annum on transport subsidies for which they are not funded.
- Many clients are isolated without private or alternative transport. One disability agency reported that a work crew picks up a number of clients so that they can access their service.
- Agencies struggle to purchase accessible buses at a reasonable price – even attempting to buy Government (Department of Human Services) fleet vehicles at trade-in prices has been tried and failed.
- It was also reported that some Melbourne ‘van’ dealers allegedly ‘throw out’ hoists and strip the vans of any modifications when traded so that they have a better re-sale value.
- The cost of providing ‘modified’ transport for family members with a disability is a huge financial impost with car prices ranging upwards of \$65,000. Because of the price of some of these vehicles, they are now being considered as ‘luxury vehicles’ and attract even further government taxes and surcharges.
- Families are often forced to move ‘into town’ so they can be nearer support services
- People know very little about alternative transport options such as assisted medical appointment transport
- Many people maintain ownership of a car although they no longer drive – they get others to drive it for them.

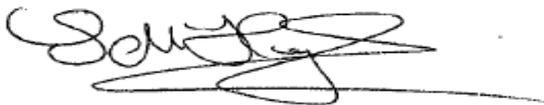
**Conclusion**

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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