

Yarra Trams

Review of the Disability Standards for Accessible Public Transport 2002

Summary of Yarra Trams issues

In summary, Yarra Trams seeks the following amendments to the DSAPT, particularly due to the uniqueness of trams, as well as having infrastructure, that requires shared road use:

1. There is no applicable lighting standard for tram stops. The Australasian Railway Association developed a lighting standard for railway stations. A similar standard for tram stops is required.
2. Bus stops have a reduced compliance regime for waiting areas, symbols, signs, alarms, lighting, furniture and fitments, hearing augmentation and information. This does not apply to tram stops, but as they have similar usage in the same environment as bus stops and are often shared, the same compliance regime should apply.
3. Trams are in the unique position as a rail operator, where they must share the road with cars, trucks, bicycles, and buses. The DSAPT and associated legislation should espouse the Disability Discrimination Act to assist tram operators to provide an accessible public transport system.

Questions for All Stakeholders

1. Has the accessibility of public transport improved since the introduction of the Transport Standards?

- How has accessibility to conveyances changed? Can you provide examples?

The introduction of the draft standards in 1996 became the adopted standard for new trams to be purchased in the 1999 franchise. Hence the 95 new low floor trams which replaced 25% of the existing fleet (excluding the historic W class fleet), were built to the draft standards.

While only being able to accommodate wheelchairs and similar mobility aids at platform or raised stops (currently around 180 of 1800 tram stops), new trams now are accessibility to all those who can accommodate a single step, rather than three narrow steep steps that were the only access to the entire previous fleet. For passengers with many types of mobility aids and people with prams, heavy bags etc, trams are now accessible.

- How has accessibility of information (eg, maps, timetables, announcements, etc) changed? Can you provide examples?

Changes to information and its means of provision have become more accessible through:

- Timetables and information are available through the Yarra Trams and Metlink websites
 - Websites conform to w3c guidelines for accessibility
 - New trams have improved information provided
 - Real time information displays at major tram stops
 - New signage and information at all tram stops in Melbourne by Metlink
 - the introduction of SMS information services
- How has accessibility of infrastructure (eg, access to stations, stops, ports, piers, airports, interchanges, etc, as well as access to co-located facilities such as toilets, waiting rooms, and food and drink, etc) changed? Can you provide examples?

Since the introduction of the new low floor trams, level access stops have been slowly increasing in numbers throughout Melbourne. While only 180 stops have been built, the majority are in busy areas, and one route (No 109) from Port Melbourne to Box Hill has these stops, except where narrow major roads will not yet allow them.

Even with existing trams, the platform stops remove the first step to the tram.

2. Have these changes matched your expectations of the implementation and uptake of the Transport Standards?

- Do you consider that the changes have matched (1) the compliance requirements and (2) your expectations?

The changes do not fully match the requirements of the Standards for the following reasons:

- There is no applicable lighting standard for tram stops. The Australasian Railway Association developed a lighting standard for railway stations. A similar standard for tram stops is required

- Bus stops have a reduced compliance regime for waiting areas, symbols, signs, alarms, lighting, furniture and fitments, hearing augmentation and information. This does not apply to tram stops, but should as they have similar usage in the same environment as bus stops and are often shared.

- If the changes have fallen short of your expectations, can you provide examples?

Trams must share the road with road users, and to provide an effective and accessible public transport system, the DSAPT and associated legislation must be clearer to support the DDA.

3. Do you consider that the level of compliance required at the end of the first five-year period is sufficient to have had an impact on accessibility?

Yes, see above.

4. To what extent do you consider current data on accessibility are reliable? Can you provide examples of problems with data that you are aware of?

It is difficult to reach informed decisions about compliance levels for rail public transport use due to the inconsistent interpretations of the Standards

Example - when a new compliant lift is provided to improve access, but a non-compliant ramp 1 in 8 remains the tram stop would still be considered as non-compliant.

5. How could reporting of accessibility data be improved for future stages of the implementation of the Transport Standards?

ARA is proposing a Code of Practice for the application of the disability standards. It is intended to produce a common national framework/database to a consistent standard, with data prepared by individual rail operators. Such data could then be available as input to aid more consistent State and Territory compliance reporting.

6. Are you aware of examples where improved accessibility of public transport has led to increased patronage?

Improved trams and tram stops now provide accessibility where it did not previously exist. Formal surveys have not been done, but anecdotal evidence suggests that more people with disabilities now use tram services in Melbourne. It is difficult to confirm factors contributing to increased patronage, since all public transport services in Melbourne have increased demand.

Questions for Public Transport Operators and Providers

10. Has the introduction of the Transport Standards clarified your obligations as a public transport operator or provider? If yes, in what ways has it done this?

Standards relating specifically to people with disabilities did not previously exist in the area of public transport.

11. Are the Transport Standards sufficient, or have you needed to consult other sources? What other sources have you consulted? How did you find out about these sources?

Yarra Trams has also used a range of international standards and documents from time to time. These were generally sourced from other operators around the country. ARA found it was necessary to engage a consultant to research relevant Australian Standards for applicable exterior illumination levels for railway platforms, but this is still required for tram stops.

12. Are you aware of other operators or providers of public transport, who appear to be unaware of their obligations? Can you provide examples? How could this lack of awareness be addressed?

In many cases, tram and light rail stops are the responsibility of local government, who sometimes appear unaware of their obligations.

An exemption for Part 20 of DSAPT - Lighting has been granted for railway stations, work for tram stop lighting on roads still needs to be done. Owners of road lighting may dispute that this is their responsibility.

Questions for All Stakeholders

13. Are there areas of the Transport Standards that you consider unclear in terms of the adjustments operators and providers need to make? Please specify.

There are no standards or timeframes to follow for tram stops with respect to road infrastructure. Since trams share the road with cars, trucks, bicycles, and buses, the DSAPT and associated legislation should espouse the Disability Discrimination Act to assist tram operators to provide an accessible public transport system.

14. Have the exemptions allowed under the Transport Standards (as specified in the previous chapter), reduced the clarity of obligations under the Transport Standards?

All Exemptions allowed to date have improved the clarity of obligations, but while Exemptions give operators a degree of certainty it is only temporary

Questions for All Stakeholders

15. To what extent do the Transport Standards allow operators and providers a choice of ways in which they can demonstrate compliance?

Compliance can be permitted through equivalent access and direct assistance, but certification of compliance using these alternatives is not possible. Unjustifiable hardship is not considered possible by major transport operators, although, due to entrenched and accepted practice, the use of boarding ramps, generally at a single point on train services nationally is deemed compliant.

16. Where Australian Standards or other technical requirements are specified, are these appropriate? Please provide examples where you believe the use of Australian Standards is not appropriate.

The use of 1 in 4 external boarding ramps for assisted access (Part 6.4 (c)), as per AS 3856.1 (1998) is a good example of an inappropriate Australian Standard. Note that 1 in 4 assisted boarding ramps to the 1991 edition were a feature of new low floor trams, but due to OH & S issues, they were unable to be implemented.

17. Are there requirements that have proven to be impractical or difficult to implement? If so, please specify.

Many requirements of the Transport Standards have proved difficult to implement.

Some of these include:

- hearing loops in electric tramcars,
- colour versus luminance contrast (and how to measure colour contrast),
- lighting requirements at tram stops
- stairs on existing trams
- compliant step-gap between tram and platform to allow independent access without the need for a boarding ramp

18. As a public transport user, are there areas of the Transport Standards where you consider that a more specific requirement for compliance would improve accessibility?

Yarra Trams cannot express opinion as a public transport user.

Questions for All Stakeholders

19. Do you consider that the requirements in the Transport Standards have been applied consistently across different modes of public transport?

Tram providers acknowledge they have responsibility under DSAPT, but tram stops are more closely aligned to bus stops, without the reduced compliance milestones for lighting, information, waiting areas, etc, as expressed earlier

20. Will any current areas of inconsistency be addressed through the future stages of implementation of the Transport Standards?

No.

21. Do you consider that the current exemptions granted are appropriate? Should these exemptions be reduced over time?

Yes, the current exemptions granted are appropriate, but unfortunately they are temporary. In relation to all rail operators, they should not be reduced over time.

22. In implementation of the Transport Standards, have the requirements led to a relatively consistent standard of compliance across all modes of public

transport? If not, where are the major differences in approach?

While the term 'relatively consistent' is difficult to evaluate, Yarra Trams believe major differences exist in the following:

- There is no applicable lighting standard for tram stops. The Australasian Railway Association developed a lighting standard for railway stations. A similar standard for tram stops is required
- Bus stops have a reduced compliance regime for waiting areas, symbols, signs, alarms, lighting, furniture and fitments, hearing augmentation and information. This does not apply to tram stops, but should as they have similar usage in the same environment as bus stops and are often shared.
- Trams must share the road with road users, and to provide an effective and accessible public transport system, the DSAPT and associated legislation must be clearer to support the DDA.

The remaining questions have not been answered.

Questions for All Stakeholders

23. To what extent do the requirements in the Transport Standards address all of the accessibility requirements for people with disability? Are there gaps in the coverage of requirements?

24. Does the compliance timetable provide for a gradual improvement of accessibility over the 30 year implementation period? Are there aspects of this timetable that present compatibility problems? How could these requirements be improved?

25. Are providers meeting their obligations across all aspects of accessibility, which ensures compatibility?

26. Do the requirements of the Transport Standards need to more explicitly recognise the potential other regulatory constraints that impede the capacity of transport providers to deliver the objects of the Transport Standards?

27. How well are the current arrangements for making complaints about accessibility understood by the public?

28. Are the current processes sufficiently responsive to complaints, or requests for information or advice on the Transport Standards?