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To Whom It May Concern:,

RE: Review of the Disability standards for Accessible Public Transport

I am pleased to enclose Northern Rivers Social Development Council's response to the Disabilities Standards for Accessible Public Transport - discussion paper.

This response has been developed with information gathered during recent consultation with the Northern Rivers Council Transport Working groups. It is also based upon a robust understanding of the transport task across the Northern Rivers and community needs.

Yours sincerely

Linda Lomman
Transport Development Worker
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Submission to the Review of the *Disability Standards for Accessible Public Transport 2002*

Preface

The Northern Rivers Social Development Council's (NRSDC) Public Transport Development Project (PTDP) has been working with Local Government for the past 13 years to promote best practice in land use and transport planning processes. Through this engagement a great deal of progress has been made on ensuring access issues are addressed. This submission is based on the work carried out and information obtained from the Transport Working Groups (TWGs)¹ and Committees across the Region.

Introduction

The PTDP was initially funded through the Area Assistance Scheme under the NSW Department of Planning and has a strong focus on Local Government planning processes. Over the past decade the PTDP has set up TWGs within each of the Northern Rivers Local Councils. As a major focus, processes have been developed whereby each group has the opportunity to comment on a variety of development applications and pre-lodgement submissions to enhance transport options. Relevant applications and submissions generally focus on:

- Residential developments
- Retail developments
- Community or health centres
- Educational facilities
- Transport infrastructure.

Generally, comments are related to:

- The development's proximity to services and/or population centres
- Footpaths/bikeways and the development's connectivity

¹ Transport Working Groups, Transport Committees and Transport Policy Advisory Groups are all Council based transport advisory groups and the generic term 'Transport working Groups' (TWGs) is used throughout this submission.

- Bus access and infrastructure
- Taxi access and infrastructure
- Community transport access
- Compatibility between development and geography ie: gradients, location.

Membership of TWGs generally includes: bus, taxi and community transport operators, Council staff from either the planning, infrastructure of community services departments, Councillors, Government and community representatives and non-government organisations. This spread of skills and knowledge contributes to the quality advice given to both developers and Local Council departments through the above processes.

Scope

This response to the Review of the Disability Standards for Accessible Public Transport will focus predominantly on the adequacy of the current structures and processes through individual Local Councils, the Department of Local Government and the Local Government & Shires Association.

Response

Context

The Northern Rivers Region covers approximately 20,000 square kilometres and includes seven Local Government Areas; Ballina, Byron, Clarence Valley, Kyogle, Lismore, Richmond Valley and Tweed Shires.

Bus transport infrastructure across the Region falls under a 'Hail & Ride' system in both rural and urban areas. This system allows buses to be hailed anywhere along a route as long as it is safe for the bus to pull over. However, a number of bus stops and interchanges have been erected in the regional centre, Lismore, other major towns and villages.

Taxi ranks have also been established within new facilities or existing ones refurbished to improve passenger and driver amenity.

Each TWG has the opportunity and capacity to make recommendations on the development and refurbishment of the above types of transport infrastructure. However, over recent years it has become apparent that suitable information or processes regarding accessible transport infrastructure is not available through Local Council systems.

Current processes and constraints

TWGs are presented relevant development applications or pre-lodgement submissions through Council planning departments. The members then make informed decisions on the transport needs and potential demands of the development and generate recommendations accordingly. These comments are then passed onto the developers who *may* incorporate them into their final design. Unfortunately, these recommendations do not fall into any State Environment Planning Policy or legislation, consequently a developer is not legally obliged to comply.

A second process that supports the development of transport infrastructure is the Country Passenger Transport Infrastructure Grants Scheme (CPTIGS). These applications are developed and submitted by Council engineering departments, generally in consultation with TWGs.

However, it does not appear that a clear set of guidelines on the precise specifications for accessible transport infrastructure is available to TWGs, engineers or planners through the usual local government processes or structures. Consequently, recommendations on accessible transport infrastructure through the TWGs, Local Council planners and engineers may not wholly comply with the Disability Discrimination Act (DDA) requirements.

Whilst TWGs across the Region are doing their best to provide advice on transport infrastructure and the associated access considerations a lack of standardised information is hindering these efforts.

Local Councils, as providers of transport infrastructure through the above processes, are required to develop Accessibility Action Plans and abide by the key compliance dates set out under the Disability standards for Public Transport. However, a strategic approach to this is rarely undertaken as it is perceived to be too costly.

Issues

- ✘ *Lack of Local Government developed generic standards for accessible transport infrastructure designed to ensure that correct information is provided by the TWGs, engineers and planners.*
- ✘ *Lack of ability to strategically plan for the provision of accessible transport infrastructure and the associated costs to Councils.*
- ✘ *Lack of State Government legislative processes to ensure all new developments have robust Integrated Land-Use & Transport Planning principles that support accessible transport infrastructure.*

Recommendations

- ✓ *Clear processes developed by the NSW DLG and the NSW LG&SA for Council planners, engineers and TWGs to ensure all recommendations and conditions for transport infrastructure conforms to best practice models and standards.*
- ✓ *A checklist is developed that will assist TWGs, planners, engineers and developers to ensure all transport infrastructure conforms to accessibility standards.*
- ✓ *Robust costing structures are developed that will ensure Local Councils have the capacity to strategically plan for the provision and retro-fitting of accessible transport infrastructure.*