

This is a submission for the review of the Disability Standards for Accessible Public Transport. It relates to disability access at our local railway station at Benalla in Northeast Victoria and I provide it as a case example about the effectiveness of the Standards at Benalla Railway Station.

The Benalla station has been in existence since 1874 and originally had direct street access from the township. This access was lost when the standard gauge line was built on the southern side of the station and began operation in early 1962, leaving the station marooned between tracks ever since. This and other changes over time have had a compounding negative affect on station accessibility which is a long way from being compliant with the Disability and Discrimination Act 1992 and Aust Std 1428. Despite the fact that the Disability Standards for Accessible Public Transport have been in operation since 2002, virtually nothing has been done to improve access and the only improvements I have seen within the last 10 years is the painting of a boarding assistance area onto the platform surface and the installation of tactile marking at the edge of platforms. Unfortunately the tactile marking has proved to be counter productive for many people as it is installed near the edge where you need to step to board and disembark trains and probably because of the large needed to be taken, many people have slipped and fallen (worse when it is wet).

Issues that exist and continue to remain unaddressed include (not in any particular order):

1/ There is no compliant disability pedestrian access to the station.

Access from the main township area is via the existing pedestrian underpass that was built in the early 1960's that has two 30 metre ramps which are too steep at about 1:8 and are without any landings (it should have a gradient of 1:14 and landings every 9 m). On occasions people have become stranded at the bottom and have had to be rescued. The only access available for those with limited mobility is by vehicle via the existing vehicle overpass (which does not have pedestrian access).

2/ Platform misalignment with trains (high step up and across) is excessive at both platforms (1 & 2) making it difficult for those with mobility issues to board and disembark. The height of the rail lines has been progressively lifted each time the track bed has been re-laid exacerbating the situation. As a result it is not the first time someone has fallen between a train at Platform 1. This occurred in Jan 2019 which I personally witnessed and helped lift the trapped person out to safety. Track maintenance crews seem to be completely oblivious as to how their actions and works can impact on accessibility. Recently \$235m was spent on line maintenance and I made the responsible rail authority (Australian Rail Track Corporation - ARTC) aware in advance of undertaking works that it would be an ideal opportunity to lower the track bed at the Benalla platforms to help reduce the misalignment, but I was ignored. Despite denials from the ARTC, the line now appears to have been lifted even further since the recent works.

3/ The rear of turning buses overhang onto Platform 1 amongst waiting train passengers and only metres away from the boarding assistance area. This is an extremely unsafe practice and buses have in the past collided with bollards, sign posts and the side of the station building. On occasions waiting train passengers on the platform have had to quickly move out of the way to avoid being struck. Slow moving disabled people would be at higher risk than most. Concrete kerbing has been installed to stop bus wheels from going all the way back onto the platform, but this has become a trip hazard for pedestrians who have at times been injured trying to step over it. Other waiting passengers use it as seat without realising its purpose and danger they are putting themselves into. Buses have been turning in this location since about 1974, but buses have been progressively getting longer since then further exacerbating the situation, yet no effort has been made to rectify the situation. It is a very unsafe practice and I am truly amazed that the practice still continues.

4/ There is no designated taxi rank at the station and taxis are forced to double park at the station entrance when dropping off and picking up, especially for those with mobility issues. This usually means parking amongst and behind buses and where there are lots of people moving around, which is a less than ideal situation and I fear that sooner or later someone will be run over. Those with mobility issues are usually slow to move and would be at the greatest risk.

5/ Pedestrian access to the station for those living in the township area on the northern side of the station is via a corrugated iron lined pedestrian tunnel (approx 70m long) and links with the existing pedestrian underpass. The link between the two is very ugly and is not disabled friendly and needs reworking. There is about a 0.3m misalignment in levels and an attempt has been made to overcome it with a short threshold ramp, but it needs improvement. Steel bollards exist at both ends of the tunnel that restrict manoeuvrability, especially at the tunnel/ underpass link end. Entrance to the tunnel at the northern end measures very near the correct gradient of 14:1, but at approximately 40m long it has no landings. A ramp this length should have landings every 9 metres (4 landings required). It would be very risky to use for anyone with a walker or wheelchair; one slip and they would be out of control to the bottom! The tunnel was constructed in around 1980 and still remains with non-compliant entrances.

6/ The pedestrian tunnel also floods after periods of heavy rainfall and when there is major flooding of the township from the Broken River which runs through the centre of Benalla. At times station staff have had to rescue stranded people from within the tunnel when they have been trapped by water (usually when trying to pass through on their mobility scooter).

7/ Buses park parallel beside the station near the main entrance. Whilst this may be convenient, the area has a reverse inclining angle which is very off-putting for disabled persons. The problem has become more obvious now that many buses are equipped with a platform lift.

When boarding using the lift it puts passengers on an angle that tilts them inwards towards the bus which is very off-putting. Buses have been equipped with platform lifts for a few years now, yet the problem continues to exist unaddressed. A flat bus parking area is required.

8/ Two disabled car parks are provided near the main entrance to platform 2 which is a convenient location, but the area is on a sloping angle similar to that of the bus parking area which makes it awkward to get a disabled person in and out of a vehicle, as wheeled mobility devices want to roll towards the kerb. All disabled parking needs to be in a flat area.

9/ A disabled toilet is provided which is accessed via the passenger waiting room. It serves the purpose okay, but it has 2 door locks. One of the door locks can only be locked and unlocked from the inside and if users became incapacitated or were unable open the lock, then gaining access would be very difficult (demolition of the wall or door would probably be the only option). V/Line are aware of this issue, but have made no effort to remove the lock. The other lock is suitable and can be opened from both sides of the door. A Mylak lock and key would be a good option if it is to be locked. This is a simple and low cost fix, yet it remains unaddressed.

10/ The ticket sales counter is not at a suitable height for anyone in a wheelchair (too high) and they would have trouble seeing over it. This area and the waiting room were renovated only 10 years ago, yet such a simple improvement for the benefit of the disabled was overlooked.

In Victoria all rail assets are owned by Victrack, but different assets they have different operators which makes getting matters resolved more complicated. At Benalla the Station and Platform are leased to V/Line and the lines are leased to the ARTC. There are many train and bus services per day

including weekends which are mostly V/Line services, but there are also NSW Trainlink XPT services that run between Melbourne & Sydney.

I am aware that train facilities are not required to be fully compliant with Disability Standards for Accessible Public Transport until 2032, but despite the existence of disability access legislation since 1992 very little effort has been made to make the station more compliant and accessible. Out of frustration I assisted my wife (who has a physical disability) lodge a complaint against V/Line with the Human Rights Commissioner. Our complaint ultimately resulted in a mediation session with V/Line and whilst we were listened to, sadly nothing came of it.

Whilst I appreciate it can be costly to be compliant with disability access standards, I would expect government agencies such as V/Line and the ARTC to be gradually working towards making facilities more compliant. Yet what I see at Benalla is non-compliance whether it be through ignorance, a lack of awareness or an unwillingness to spend the money.

In discussion with a staff member from your office I was informed that compliance was not going to be part of the current review, but I was encouraged to provide feedback about how the standards were being implemented at Benalla Railway Station. I would also like to know how you foresee the standards being applied to train facilities over the next 11 years? At the present rate of compliance, Benalla Station will not be compliant within that time frame. Something needs to change!

Should anyone want to visit Benalla and personally see the issues, I would be more than happy to show anyone around. Please contact me if you would like further information.

Greg Dennis,

PS: the local community is currently lobbying for the standard gauge railway line that was opened in 1962 to be relocated to the northern side of the railway station as part of works associated with the Inland Rail Project. This would put all of the railways lines together within the centre of the railway yard and is a very practical solution towards overcoming many of the accessibility issues as it would return direct street access to the station, yet there is strong resistance to this proposal by the ARTC and avoidance of becoming involved in the issue by V/Line.