

23 April 2021

Disability and Transport Standards Section
Land Transport Policy Branch
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
CANBERRA ACT 2601

Via email only DisabilityTransport@infrastructure.gov.au

Dear Sir/Madam

Reform of the Disability Standards for Accessible Public Transport

The Municipal Association of Victoria (MAV) welcomes the opportunity to respond to the Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement (Consultation RIS).

The MAV is the peak representative and advocacy body for Victoria's 79 councils. The MAV was formed in 1879, with the Municipal Association Act 1907 appointing the MAV the official voice of local government in Victoria.

Role of local government

Victorian councils are not a primary public transport service provider. However, some individual councils do operate free community bus services which are particularly useful for people with disability, and older people when they move from driver to non-driver. There is also increasing demand for councils to provide local community transport services to assist in maintaining social connections and independence, particularly in rural areas.

Additionally, almost all councils across the state fund, develop and maintain associated infrastructure such as bus shelters and adjacent footpaths.

Victorian councils are also well-connected to their local communities, including disability groups. They have expertise and pre-existing relationships with people living with disability. As such, they are well placed to inform relevant reforms and ensure individual needs can be met.

Broad support for proposed reforms

With approximately one in five Australians having a disability, appropriate access to public transport is critical for these individuals to participate fully in our local communities. Improving accessibility also improves connection and equity.



The MAV broadly supports the intent of the 16 areas of reform, as well as amendments to references of the Australian Standards, for The Disability Standards for Accessible Public Transport 2002 (Transport Standards).

Of particular relevance to Victorian councils is the proposed emergency egress reform. While the proposal to have at least two accessible egress routes that lead away from bus stops, bus interchanges, tram stops and other public transport facilities located within a road reserve seems reasonable, further consultation is warranted.

The MAV recommends consultation with councils be conducted to capture any associated complexities. This will be particularly pertinent where public transport infrastructure interfaces with council land. The MAV is willing and able to assist in this proposal.

Barriers to implementation of reforms and improved accessibility

The MAV has conducted a high-level assessment of the barriers to implementing more accessible public transport-related infrastructure managed by councils. The key concerns from a council perspective relate to the potential for complexities associated with emergency egress, as well as funding constraints. More specifically, they include:

- a) As described above and noted in the Consultation RIS, complexities associated with infrastructure planning, approvals and development at bus or tram stops, where multiple landowners are involved (e.g.: local government, state government and private property).

This is particularly relevant to the proposed emergency egress reforms where multiple landowners would need to be involved to ensure safe emergency egress can in fact be provided away from some bus or tram stops.

- b) Funding constraints, which are particularly evident in the Victorian context, and the complexities associated.

In Victoria, councils have been operating in a revenue constrained setting since 1 July 2016. This comprises the ability of councils to provide additional services, such as delivering accessible infrastructure improvements.

These funding constraints limit the extent to which councils can efficiently plan, design and install neighbourhood infrastructure, such as footpaths adjacent to bus stops, which are required to ensure an overall seamless journey. Significant costs are borne by councils in their role in installing new (or maintaining existing) footpaths and other infrastructure abutting the public transport network. New government-funded accessible shelters and stops are always welcomed. We believe they will only be successful if councils have the capacity to ensure the adjacent infrastructure is accessible, in good condition and that sufficient maintenance funding is available.

The MAV notes the reform consultation process is also seeking benefit and cost information to assist in developing a cost benefit analysis for Stage 1 of the reform. In response to this, the MAV requests that the analysis considers the resources available to councils to deliver on more accessible public infrastructure and support an accessible public transport network for Australians living with a disability.

Ongoing consultation with councils

Please note that while this high-level submission aims to highlight a key concern for Victorian councils, it does not purport to reflect the broad range of views of individual councils. The MAV has promoted the opportunity to make individual submissions in response to the Consultation RIS. Some councils may choose to take up this opportunity.

Many councils have a strong commitment to advocating on behalf of people with disability on transport accessibility. Transport barriers continue to feature strongly in all consultations that councils and other stakeholders undertake with people with disability.

The MAV remains committed to continuing to liaise with the Department of Infrastructure, Transport, Regional Development and Communications and other key stakeholders about council issues and concerns in relation to these reforms, and this critical policy area. We are able and willing to facilitate a jointly hosted webinar or workshop with the Department and Victorian councils on the reforms, including considerations for local government in areas such as the enhanced emergency egress requirements.

Should you have any queries about this submission, please contact Emma Lake, Manager Infrastructure and Community Strengthening via email (elake@mav.asn.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Thompson', written in a cursive style.

Kerry Thompson
Chief Executive Officer