#### Submission from

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# Section A: For operators and providers: Compliance against Schedule 1 of the Transport Standards

Questions for operators, providers and their representative organisations

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

### Part 28.2 Period of notice of requirement for accessible travel

Any advance notice required of a requirement for accessible travel must not exceed the period of notice specified for other passengers.

# Various parts related accessible coach stops

In regional areas of Western Australia many stops are seldom used (45% had less than 1 passenger per week) and do not justify upgrading to meet disability transport standards but retained on network to improve the service to these regional areas.

# These requirements that have proven to be impractical or difficult to implement,

Booked services operate with a number of constraints which are not experienced by unbooked urban services. These booked services have four main differences in that they: provide services in regional areas, have a much small fleet of conveyances, operate over longer distances, and in relation to coaches have a single operator. These differences also mean that Transwa provides a large number of stops to improve the service offered to regional passengers, however many are seldom used and do not justify upgrading to meet disability transport standards.

To allow boarding on demand, which may be available to people without a disability, requires 6 seats to be removed permanently which reduced road coach capacity by about 10% and from records has a very low level of utilisation. During peak periods; weekends, school and public holidays this may result in other passengers being prevented from traveling if these

seats are always removed. This constraint is an issue for regional road coaches, seats are permanently removed on regional train services due to the train's additional capacity

In relation to accessible stations/stops, during 2017/18, 751,657 passengers got on and off Transwa's regional train and coach services, and the network includes 248 train stations and coach stops. The numbers below gives an indication of the uneven train stations and coach stops utilisation

- 80% of passenger got on and off at 5% of stations/stops on the network located in the major regional centres
- 90% of passenger got on and off at 10% of stations/stops on the network
- 2.5% of passenger got on and off at 72% of stations/stops on the network which had less than 5 passenger per week
- 0.4% of passenger got on and off at 45% of stations/stops which had less than 1 passenger per week

Many of the low patronage stops are used by student returning from boarding school for holidays and are retained on the timetables to improve the quality of service offered to regional West Australian.

Transwa are prepared to consider upgrading a station/stop for disability access if requested.