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Maribyrnong City Council

Response to 2012 review of the Disability Standards for Accessible Public Transport Discussion Paper

The Maribyrnong City Council welcomes this opportunity to contribute to the review of Disability Standards for Accessible Public Transport (2012).

This submission has been divided into three sections:

1. Brief background demographics and policy context specific to the City of Maribyrnong.
2. Response to questions being asked by the Commonwealth government of organisations such as local government and Disability Advisory Committees (DAC).
3. Draft recommendations the Maribyrnong City Council would like to contribute to this review.

1. City of Maribyrnong

Maribyrnong is a highly diverse community with an estimated total population of 72,896 persons. 40% of our population were born overseas and 43% of people speak a language other than English. It is estimated that one in five persons in Maribyrnong has a disability.

The City of Maribyrnong also experiences a number of challenges, including:

- Rating 4th in Metropolitan Melbourne on the SEIFA index of disadvantage.
- A relatively high unemployment rate of 6.2% (compared to the Victorian average of 5.2 % and the Melbourne average of 4.9%) – March 2011;
- Females in the municipality experience the poorest health in the Western Region;
- Males in the municipality have the lowest life expectancy in Victoria (74.8 years);
- 24.4% of persons experience transport limitations.

It is predicted the City of Maribyrnong will experience significant population growth over the next 20 years. By 2031 it is estimated Maribyrnong's population will increase to 107,790, a rise of 32,738 (30%) on the 2012 forecast population. The average annual population growth rate is predicted to be around 1.9%. All areas of the municipality are expected to increase in population, particularly the suburbs of Footscray, Maribyrnong, Maidstone, Yarraville and Braybrook. Council recognises that it will be particularly important in a period of rapid change that the municipality remain accessible, inclusive, welcoming, and responsive to the needs of people of all abilities.

Maribyrnong City Council develops a number of policies that support and direct our community. The policies and action plans that support this document are the Disability Policy and Action Plan 2012-2015, the Human Rights and Social Justice Framework 2013 and the Maribyrnong Integrated Transport Strategy 2012.

Public Transport Context in the City of Maribyrnong

The City of Maribyrnong is serviced by three metropolitan rail lines (Sydenham, Weribee and Williamstown) with six train stations, two tram routes (57 and 82, 21 bus routes, one Night Rider route (942), and a number of regional buses and trains that stop in Footscray.

Maribyrnong City Council Integrated Transport Strategy (MCCITS) 2012 identifies three key areas to improve the travel experience of public transport users in general. These are: formalising key intermodal interchanges at Footscray and Highpoint; the facilitation of access to stations and stops by improving the pedestrian environment and the creation of better bus-train interchanges; and improving information and marketing through real time information via mobile devices, and accurate audio and visual announcements. MCCITS proposes partnership work with the Victorian Department of Transport to achieve good planning and improvements. Council has also identified its key responsibility for footpaths and improved pedestrian linkages and facilities.

2. Response to questions being asked by the Commonwealth government of organisations like local government and Disability Advisory Committees.

Public transport is a necessity for people with disability. It is a vital method to ensure accessibility and participation. It is not an optional extra. The standards governing accessible public transport contribute to the quality of life of people with disability at a fundamental level. It is important that they are given the consideration their significance warrants.

2.1. Has accessibility to public transport improved since the commencement of the first Transport Standards review in 2007?

Maribyrnong City Council notes that works on the Regional Rail Link project have had a direct impact on public transport users in the City, but this submission will not report on the impact of that project.

Since the transport review in 2007 there have been improvements to tram stops at the Footscray Station and Highpoint shopping centre. However, this has not created wheelchair accessibility to other stops along this tram line.

Similar improvements have been made to tram stops in the CBD and other lines in the inner city of Melbourne. It would be helpful if tram lines which have these improvements are identified and that all stops along these lines become accessible.

The introduction of low access buses is reported by users as an improvement but again people require audio and visual information about which bus routes these buses travel. Driver/ operator education about how to interact and engage with people with disability is essential for all public transport. Consideration should also be given to the fitting of extra safety equipment in consultation with wheel chair and other disability public transport users.

The addition of audio communication announcements has been welcomed by all public transport users. Visual displays of timetables and announcements improve accessibility. Incorrect and outdated information can however create disruption and further barriers to public transport users. The introduction of audio announcements and regularly updated web timetables have been an improvement, however; many users report inaccuracy of the announcements; last minute changes announced when people are already on transport and there is inadequate time to get off and change. Some users refer to 'kidnap trains' that change destination at key intersecting stations such as North Melbourne and Footscray. For example, passengers have reported boarding a train bound for Werribee leaving Flinders

Street Station but as the train is leaving North Melbourne Station it was announced that it was a Craigieburn train. Thus passengers are stuck and have to get out at the next station and wait for another train to return to North Melbourne and wait for another train going to Werribee. Such mistakes are not only inconvenient they can be frightening and stressful. A mixture of incentives to improve performance and penalties for such breaches of customer service may be considered to effect change.

People with disability report, via the Maribyrnong City Council's Disability Advisory Committee and public forums, that the designation of the front carriage of trains in Victoria for disability access has a mixed impact. Whilst it promises that people with disability will receive assistance to board and leave the train, there are occasions when people have been left on the platform because the carriage is full, the train is running late or they have not been able to get to the front of the platform due to overcrowding on the platform.

People with disability suggest that new stock be compatible with existing platforms or have appropriate and safe ramps fitted to enable all train and tram and bus transport to be wheel chair accessible to all carriages.

The Disability Standards for Public Transport currently exempt school buses and community transport. We recommend that this exemption to be lifted. Research suggests that it is during the early years that people form their initial views about disability and inclusion. Excluding primary and secondary school students with disability from school buses may send the wrong message and contribute to a sense of isolation and exclusion. An achievable and encouraging timetable of **compliance with DSPT** could be planned for **all forms of transport**.

2.2 Are there areas of the Transport Standards where you consider that a more specific requirement for compliance would improve accessibility?

As stated above, the transport standards could include school buses and community transport.

2.3. To what extent do you feel that the requirements in the Transport Standards address all of the accessibility requirements for people with a disability? Are there gaps in the coverage of requirements?

The standards are reasonably good but they are not widely known or understood. There are clear gaps in relation to transport for primary and secondary students as stated above. An increase in the number of accessible taxis and 24 hour availability could also improve the waiting times experienced by people with disability.

2.4. Do you find that the current processes with regard to making a complaint or seeking information are sufficient or sufficiently responsive?

There is a need to clarify complaints processes and ensure that users are not deterred. In Victoria there are examples where services and operators have not met the standards but individuals are required to take expensive and stressful legal action to get changes. Furthermore, there are not adequate enforcement requirements or processes attached to the standards. For example, it is optional to participate in mediation. It may be worthwhile to consider creating an 'accessibility quality assurance framework' thus separating out a minimum and enforceable standard that could make the complaints process and public transport system, inclusive and publicly responsible.

2.5. As a body representing the views of people with disability, do you have any specific responses or perspectives with regard to the issues raised in the questions above?

'Nothing about us without us' is a philosophy developed by the disability movement and shared with the general community during the 1970s. It remains a thoughtful and achievable philosophy, but children rely on the voice of their parents who are often busy and in many instances overburdened with extra responsibilities parenting children with extra health, education and socialization needs. Young people's access to secondary and further education is also negatively impacted by the exemption of school buses and community transport from the standards. The exemption of school buses at the outset of implementing Transport Standards is likely to have been resource driven but this can no longer be acceptable. Children with disability are entitled to travel to school safely with their peers and be included in services that are provided for the whole community.

The current complaints mechanism places an undue and unrealistic burden on individuals with disability to pursue their complaint at their own costs. This is an ineffective and unjust system that needs to be reviewed and updated. Complaints should be framed in a 'quality improvement process' that all public transport operators are expected to contribute to and embrace.

2.6. Other key issues you would like to see addressed?

Public awareness and support for improving inclusion and access for people with disability is an ongoing and key issue. We would like to see public awareness campaigns (along the lines of the Worksafe campaigns to 'stop creating barriers'. New barriers are sometimes created by technological innovations and developments to address transport gaps that may not consider disability access from their inception. There needs to be consideration as to how and if standards will ensure future planning and developments include disability access.

3. Some draft recommendations the Maribyrnong City Council and the DAC would like to make to this review.

- **Planning:** DSAPT compliance to be costed for public transport alongside a roll-out plan developed for each state and territory to meet Commonwealth and recommended international public transport standards.
- **School Buses and Community Transport:** It is a priority to include these forms of transport. This may require specific additional standards or advocacy for funding to assist such services to meet the general standards.
- **Timetables:** Wheelchair accessible tram timelines (WAT) to be available in print, on line and rolled out to audio announcement stops. Accessible buses to have audio announcements with their route number, final destination and link points to other accessible bus/trams and trains.
- **Enforceability:** recommendations from the report should be referred to COAG to request consideration of how to ensure the standards and the review recommendations can be enforced by each state, territory and local government area.

Appendices

Disability Policy and Action Plan 2012-2015

http://www.maribyrnong.vic.gov.au/Page/Page.aspx?Page_Id=2799

Human Rights and Social Justice Framework 2013-2016

http://www.maribyrnong.vic.gov.au/Page/Page.aspx?Page_Id=8866

Maribyrnong Integrated Transport Strategy

http://www.maribyrnong.vic.gov.au/Page/Page.aspx?Page_Id=391