

2012 Review of the Disability Standards for Accessible Public Transport

Submission

Standardization of the Specifications and Standards For the Public Transport Network

By Petr Fletcher



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Introduction

I seek to raise the issue of the lack of consistency in the design and construction of public transport infrastructure and vehicles, which produces continuing barriers to access for people with diverse mobility requirements. The only way to address these problems in the long term is to establish a standard template to inform procurement decisions, so that this mismatch will be eliminated.

For instance, there are differences between trains and train platforms. Trains vary in height from one model to another. There are also variations within models. Train platforms vary in height from one to another. They can also vary in height along their length. The horizontal and vertical gaps between train platform and train doorway can also vary. Almost universally, regardless of the variation, they are outside the tolerances required by the Disability Standards for Accessible Public Transport.

The interior layout within trains also varies considerably, making navigation difficult, especially for people with vision impairment. There is a lack of consistency of design - a result of an absence of a standard design template.

To a lesser extent, this also applies to low floor trams and tram platforms. For example, during the off-peak period when passenger loads vary negligibly along a route, you can easily see differences in the height and width of the entry gap from stop to stop. These differences can also be seen while sitting at a platform stop and observing each arriving tram, even those of the same type.

If consistency of design is ever going to be achieved, a standard template must be developed and implemented. All new rolling stock and infrastructure must then conform to this template.

As older infrastructure and rolling stock comes due for major overhaul, refurbishment or rebuild, the template should be applied insofar as it is possible. In this way, eventually all public transport will eventually meet the standard, thereby providing consistent and independent accessibility.

A template for public transport infrastructure and rolling stock should use the DSAPT as an absolute minimum design standard. A template should take into account that the DSAPT may evolve in the future to further improve the usability of public transport by people with various disabilities.

Use of the DSAPT as a minimum set of standards would differ from the current model. We perceive that the Department of Transport and transport operators appear to have used the DSAPT as an aspirational target. This method of operation, as seen from the point of view of the public transport user, produces unsatisfactory and discriminatory outcomes.

The use of ramps was meant to be a stop gap measure in circumstances where the minimum 40 x 12 entry gap specified in the DSAPT could not be met. Instead, it has become normal operating procedure that ramps are the primary method of wheelchair boarding on trains. This restricts wheelchair users to the front door of trains only. These ramps are not generally safe for any other use and are not normally deployed for those people who have other mobility problems.

A template should be developed that does not require a portable ramp to enter a public transport conveyance. True level, step-less access is required to make public transport properly accessible to the entire population.

Entry methods to platforms should have redundancy. There should be at least two methods of accessing the platform, for example an elevator and a ramp, both of which should conform to the relevant standards. This allows continued access in the event of breakdown or other unavailability of one means of entry.

Even in 2011, new railway station platforms are being built where the height is different than that of the trains it will service. This means that ramps continue to be the primary method of boarding for people who use wheelchairs or scooters.

Even in 2011, older train platforms undergoing resurfacing works are not being brought up to a height that would make level entry into a train possible.

Properly considered templates or set of guidelines must be developed to provide consistency of design of public transport infrastructure and rolling stock in order to create a transport system that can be used by everyone.

These standard templates could be set as Australian Standards and these Australian Standards should then be referred to in the DDA.

These standards should include such specifications for:

Trains

1. The height of passenger train floors must match the height of all train platforms.

A standard specification needs to be set for the height of all future passenger train floors to match the height of platforms to enable customers using wheelchairs, electric scooters and other mobility aids as well as customers with prams and shopping trolleys to board or alight trains independently at any entry door on a passenger train.

2. The height of all train platforms must match the floor height of new and existing passenger train rolling stock floor heights.

A standard specification needs to be set for the height of train platforms for both existing and the construction of future train platforms.

Existing train platforms need to be redeveloped to comply with this specification to enable customers using wheelchairs, electric scooters and other mobility aids as well as customers with prams and shopping trolleys to board or alight trains independently at any entry door on a passenger train.

3. The length of new and existing suburban and regional train platforms to be long enough to adequately accommodate current and future passenger trains.
4. The interior layout of all passenger trains must be consistent in design for all vehicles.

A standard design template needs to be developed to provide a Consistent internal layout of all passenger trains to enable blind/vision Impaired customers to better independently navigate their way around inside passenger trains.

5. The use of portable ramps must be eliminated for wheelchair, motor scooter users and other passengers.

A template should be developed that does not require a portable ramp to enter a public transport conveyance. True level, step-less access is required to make public transport properly accessible to the entire population.

6. Able body passengers must by law vacate train compartments designated for wheelchairs or people with disabilities upon request.

A regulation needs to be put in place that requires able body passengers to vacate train compartments designated for wheelchair, motor scooter and other disabilities upon request and appropriate signage needs to be displayed in these areas to inform other passengers that it is an offence not to vacate these areas when asked to do so.

7. Audible announcements and visual displays must be installed and operating properly at all times in all new and existing suburban and regional passenger trains while in service.

A standard template needs to be developed for these mechanisms to be installed and operating properly in all passenger carrying trains.

At times these audio announcements and visual displays are either non-existent or turned off in some trains. Also these devices are not properly programed at times and are giving customers the incorrect destinations and locations which is extremely confusing for blind/vision impaired

passengers as well as other customers.

8. Access to and from all new and existing passenger train platforms must have an elevator as well as a DDA compliant ramp installed to provide an alternative method of access for wheelchair and electric scooter users.

A standard template needs to be developed to ensure that two methods of entry to island train platforms is provided for access for wheelchair and electric scooter users as well as other passengers such as people with prams and trolleys.

In the event of a power failure or elevator breakdown there needs to be a DDA compliant ramp from island platforms to enable customers using wheelchairs, electric scooters or other mobility aids as well as customers with prams or shopping trolleys to enter or exit this type of platform.

9. Designated toilets at railway stations for people with disabilities must be unlocked and accessible at all times.

Trams

To a lesser extent, the above also applies to low floor trams and tram platforms. For example, during the off-peak period when passenger loads vary negligibly along a route, you can easily see differences in the height and width of the entry gap from stop to stop. These differences can also be seen while sitting at a platform stop and observing each arriving tram, even those of the same type.

To overcome accessibility problems for tram passengers using wheelchairs, electric scooters and other mobility aids as well as passengers with prams and shopping trolleys there needs to be a standard template for the following:

1. The height of new and existing tram floors must match the height new and existing tram platforms.

A standard specification needs to set for the height of all future passenger tram floors so they will match both new and existing platforms to enable passengers using wheelchairs, electric scooters and other mobility aids

as well as customers with prams and shopping trolleys to board or alight trams independently at any entry door on a tram.

2. The height of tram platforms to match the height of new and existing passenger tram floor heights.

A standard specification needs to be set for the height of tram platforms for both existing and future tram platforms to enable passengers using wheelchairs, electric scooters and other mobility aids as well as customers with prams and shopping trolleys to board or alight trams independently at any entry door on a tram.

3. The length of tram platforms in the Melbourne CBD to be also long enough to adequately accommodate to safe boarding and alighting of at least two trams.
4. The gap between tram platforms and the tram entrance doors must not exceed 40 mm.
5. The interior layout of all passenger trams must be consistent in design for all vehicles.

A standard design template needs to be developed to provide a consistent internal layout of all passenger trams to enable blind/vision impaired customers to better independently navigate their way around inside passenger trams.

7. Audible announcements and visual displays must be installed and operating properly at all times in all new and existing trams while in service.

As well as internal audible announcements and visual displays informing passengers of the tram destination and next tram stop there also must be an external speaker fitted next to the entry doors of trams for the announcement of tram destinations and route numbers when the tram arrives at a tram stop.

A standard template needs to be developed for these mechanisms to be installed and operating properly in all passenger carrying trams to better inform blind/vision impaired and other passengers of the destination and route number of the particular tram as well as the next stop.

Buses

The Melbourne route bus fleet is gradually improving as far as accessibility is concerned for people with disabilities.

There is now a Low Floor Smart Bus system operating on some bus routes in Melbourne and these buses are equipped with visual displays and audio announcements informing passengers of the next bus stop. There are also external speakers fitted next to the entry door of the bus which announces the bus route and destination when the bus doors open.

These low flow buses have the capability to be lowered down to the curb or footpath height so that the bus floor at the entrance is almost flush with the curbing or footpath. This allows wheelchair and electric scooters and other mobility aids to board or alight the bus without the use of ramps. This is also an advantage for passengers with prams and shopping trolleys as well as the elderly.

However, as good as these buses are equipped, some bus drivers refuse to lower the bus to the curb and the audio announcements are either not working or the volume is too soft to hear on some buses.

To overcome accessibility problems for bus passengers using wheelchairs, electric scooters and other mobility aids as well as passengers with prams and shopping trolleys there needs to be a standard template for the following:

1. All route buses must be low floor buses with the capability of being lowered down to curb or footpath height.

To overcome accessibility problems for bus passengers who are blind or vision impaired there needs to be internal audio announcements on all buses to inform passengers of the next stop. There also needs to be an external speaker fitted near the entry door to announce the bus destination and route number.

2. All route buses must be fitted with an internal and external public address system to announce the next stop, bus route number and destination.

3. All route buses must be fitted with visual display signage in the following areas:
 - (a) Internal showing next stop
 - (b) External on front of bus showing destination and route number
 - (c) External on side of bus showing destination and route number
 - (d) External on rear of bus showing route number
4. All route buses must have the same floor plan and seating layout.

DDA Compliance

Acts, Regulations and Standards such as the Disability Discrimination Act 1992 (DDA) and Australian Standards are necessary so that organizations such as Public Transport operators will provide vehicles and infrastructure for the public to use that are fully accessible and non-discriminatory.

The current complaint mechanism for alleged breaches or non-compliance of the DDA appears to be flawed and in some instances a complete waste of time for everyone concerned.

Should an individual or organization wish to currently lodge a complaint with the Human Rights Commission for non-compliance, the current system is lengthy and very resource dependent as follows:

1. The complainant needs to lodge a written complaint with the Human Rights Commission.
2. A conciliation process takes place
3. If the complaint fails to be resolved the complainant has to initiate proceedings against the offender in the Federal Magistrates Court.

This whole process involves a great deal of the time and money by all parties involved in the matter and in particular, the complainant.

There appears to be a need for a government authority with authorized officer's whose roll it would be to investigate complaints relating to alleged breaches or non-compliance of the DDA lodged by individuals or organizations.

Should it become apparent that an alleged breach of the DDA has taken place, the offender could be given a reasonable time to comply with the act before any further action would be initiated against them.

Should the offender fail to comply within a reasonable time or refuses to comply with the DDA, the responsible authority would then begin a prosecution action against the offender which would be heard at the Federal Magistrates Court.

Very severe penalties would need to apply for non-compliance.

Exclusions and Exemptions

Public Transport operators are currently excluded from complying with the DDA in some circumstances.

For example: Existing public transport will progressively become accessible over a 20-year period with substantial access within 10 to 15 years (30 years for trains and trams).

Although this is somewhat reasonable given that some of Melbourne's existing Hitachi trains are due to be put out of service and therefore all the remaining suburban passenger are accessible apart from boarding and alighting because of the difference with platform and train floor heights

This also applies to Melbourne's Yarra Trams which still has a very large fleet of old trams with a mix of new low floor trams which are accessible apart from where there are no platforms at most tram stops or at existing platform tram stops where there is a height difference between the tram floor and platforms that exceeds 12 mm and in some cases where the gap between the tram and platform is greater than 40 mm.

However, in my opinion having to wait until the year 2032, before public transport operators and providers have to 100% comply with the standards under the DDA is far too long for people with disabilities to wait to be treated equally by public transport operators.

Accessible information on Public Transport

Since the inception of public transport in Victoria, we have seen the introduction of new trams, trains and buses over the years.

However, accessibility and accessible information has not greatly improved on the public transport network.

Examples include:

- Timetables that have a small font size are difficult to read for people who are vision impaired and are also too high off the ground for wheelchair users and people who are short in stature to read.
- There are no audio announcements on most buses to indicate the next stop.
- The audio information boxes at train stations often don't work when the green button is pressed.
- The audio announcements on trains often announce incorrect destinations and often don't work.
- At some railway stations there is a sign displaying the arrival times of trains and buses. The posts supporting these signs normally have a button which when pressed activates an audio announcement detailing the arrival of the next bus. However, the audio announcements associated with these signs generally give the arrival of the next Smart Bus, but does not include information relating to other bus routes that also use the same bus stop. Furthermore, there is no audio information relating to the arrival times of the trains arriving at these stations. This is discriminatory against blind and vision impaired people as they are not able to access other information such as train arrivals on these signs.
- Because there are no audio announcements on most trams and buses, blind and vision impaired people have to ask the drivers of these vehicles to inform them when they arrive at their destination. However, there are many examples of the bus and tram drivers either forgetting or not bothering to let the person know when they have arrived at their particular stop.
- The contrast on train station name signage on platforms is not sufficient enough to make these signs clearly visible to people with a visual impairment.
- Printed timetables and timetable booklets are printed with very small font and are not accessible for people with a vision impairment.

Recommendation

Disability Discrimination Act states the need for having public transport as equally accessible for able bodied people.

Disability Standards for Accessible Transportation Act indicates areas in which it needs to gain compliance, by being unable to adjust the equipment directly it needs to do this by additional services one of which is accessible information.