

Whittlesea Disability Network

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Submission to the to the 2012 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards)

The Whittlesea Disability Network (WDN) welcomes the opportunity to provide feedback to the review of the Disability Standards for Accessible Public Transport.

WDN is a group of residents with disabilities, carers and service providers who meet monthly to share information and consider and address emerging issues experienced by people with disabilities.

WDN has over 300 members and approximately 30-40 members attend the monthly meetings which are convened and resourced by City of Whittlesea officers. WDN provides advocacy and advice to Council, other levels of government and health and community service providers. WDN oversees a number of working groups, including an Accessible Parking and Transport Working Group. The Accessible Parking and Transport Working Group has a membership of residents with disabilities, carers, service providers and City of Whittlesea staff from the Access, Customer Service, Engineering & Transportation and Local Laws teams.

The information provided in this submission was collected from the personal experiences of the Working Group's members.

Our submission responds to each of the questions asked in the Review Issues Paper.

Questions for people with a disability, their representative organisations and the community generally

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

- **How has your accessibility to conveyances (eg trains, buses and coaches, trams, ferries, wheelchair accessible taxis and aircraft) changed? Can you provide examples?**

Trains:

The design of trains has achieved a slight increase in accessibility for people with disabilities with more floor space for wheelchairs. The Working Group is concerned that the front carriage is the only carriage that can be accessed by a boarding ramp for people using mobility aids. Work needs to be done to make all doors to have flat entry without the need for a ramp.

There is also a concern with the increased number of cyclists carrying their bicycles on the train and many cyclists using the allocated mobility aid areas to store the bicycles on the train. We recommend that the train providers encourage cyclists to use other carriages than the front carriage.

Aircraft:

The Working Group raises a number of issues around access to aircrafts for people with disabilities.

The first is the issue of wheelchair users needing to use airport provided wheelchairs after they have checked in their baggage. The airplane supplied wheelchairs are often too small for many users, very uncomfortable and/or do not meet the needs of the passenger. Passengers need to be able to access their wheelchair or other mobility aid all the way up to the door of the plane.

The issue of extra cost for legroom on flights has also been highlighted as many people with disabilities need this legroom.

Private Bus companies:

The Working Group considers that there has been some improvement however many buses that are in the fleets of private bus companies are still non-low floor buses which are not accessible for many users.

Coaches:

Many coaches are still inaccessible for people who use wheelchairs and other walking devices. A secondary issue is that community members who use mobility aids need to make a booking to the coach provider a couple of days beforehand to make sure an accessible vehicle will be available for the route that they will be taking. This results in the situation that someone who needs a mobility aid is not able to travel at short notice or may not get a vehicle that is accessible if the previous connecting piece of transport arrives late.

Ticketing system:

One of the biggest concerns of the Working Group is the new Myki ticketing system. This system has made it very difficult for many people who in the past have used public transport regularly; many have now stopped using public transport. Many of these users do not have credit/debt cards or are not able to use a credit/debt card. This makes it very difficult for them to recharge their Myki card. The other issue is that they may not have access to the internet or have the skills to use the internet, so they again find it difficult to recharge their Myki card.

These issues exacerbate the difficulties of teaching people how to use public transport (travel training). Many service providers have now got to the stage of not doing this as they feel that the individuals will not comprehend the complicated processes. The flow on effect of this is that individuals cannot access the public transport system and their own independence is severely restricted.

- **How has your accessibility to information (eg, maps, timetables, announcements, etc) changed? Can you provide examples?**

The Working Group feels that more information is available as long as you are 'IT savvy'. Many people with disabilities do not have the skills or the opportunity to access the Internet. This makes it more difficult to access information on accessible vehicles, accessible platforms/stops and other information needed in the planning of their journey.

There also was an idea of installing a feature on the public transport websites where an easy English version of the 'Route Tracker' could be printed out. This would make it easier for someone who has a disability to be able to follow where they need to go and what piece of public transport they need to use.

Positive feedback has been received that the information that is provided at the Smart Bus stops and the tram super stops has been very useful but this needs to be rolled out further.

There was also feedback on the need to improve the audible announcements that are provided on trains and trams. Many times members felt that the announcements were not being used or worse that the announcements were wrong.

A concern has also been raised that smartphone apps are not accessible to people with visual impairments. Many of the current apps on the market do not have features of voice commands or screen readers. Standards need to be set which require that all of these apps have these features.

- **How has your accessibility to infrastructure immediate to boarding a conveyance changed? (eg, any structure or facility that is used by passengers**

in conjunction with travelling on a public transport service). Can you provide examples?

The biggest issue around public transport in our local community is lack of services. The extensions of the train line to Mernda and Epping North and tram lines are the highest priority.

There is also a major issue since the opening of the new South Morang station, with the re-routing of the buses to the station and away from Westfield shopping centre. Many residents are finding that the walk from the station to the shopping centre is too far for them to complete.

Another issue with the rerouting of current bus routes into the growth areas has been that many residents in the existing areas feel that they have less access to public transport with the bus routes now catering for these growth areas.

More funding is needed for the rolling out of accessible bus shelters, bus stops and taxi ranks.

Work on purchasing of low floor buses for regular routes needs to continue and expand.

Work on purchasing of low floor trams and installing low floor bus stops also needs to continue and increase. Many residents have highlighted to the group the issue that when they get on a tram at a super-stop, they are not sure if there is a super-stop at the other end of their journey e.g a public hospital.

The Working Group has many concerns about the infrastructure at the new South Morang station. These include lack of Tactile Ground Surface Indicators (TGSIs) in parts of the station, inappropriate direction of some of the current TGSIs, lack of signage of steps and ramp access, lack of line marking on crossings, lack of contrast between roadway and footpath, lack of pedestrian crossing markings, and height of the button for the lift which is too high for users of wheelchairs and scooters.

(Please see Attachment 1: Letter to Department of Transport on the issues at South Morang Station.)

• What do you currently see as the greatest areas of need with regard to accessibility of public transport for people with disability? Can you provide specific examples?

The biggest need in our local community in regard to public transport and accessibility of public transport is the extension of the current train and tram routes in the local area as discussed in response to the previous question. This need is urgent.

The Working Group members consider that more bus shelters in the local area are required. Funding for provision of more taxi ranks is also an issue.

Resolution of the issues around South Morang Station (mentioned above) is also a high priority.

2. As a public transport user, are there areas of the Transport Standards where you consider that a more specific requirement for compliance would improve accessibility?

If all public transport staff were to undertake Disability Awareness training, this would improve the accessibility of public transport in our local community by providing drivers and other public transport staff with better knowledge of how they can respond to the needs of people with disabilities.

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 increase in numbers of low floor buses has been great but further work needs to be done in this area to meet the needs of everyone in our community. Many people with disabilities understandably still don't feel confident that the bus system will deliver a low floored bus on the route that they need and at the time that they need it.

Lack of services of all pieces of transport in the local area is still a major issue for this outer suburban municipality. There needs to be an increase in bus routes and increase of frequency of buses on these routes. This is in addition to the need for the extension of the tram and train lines into the current residential areas and into the growth areas.

Many of the off peak tram routes still don't have low floor trams, so this becomes an issue in the planning of trips for many residents with disabilities, particularly to travel to destinations such as hospital appointments when you cannot choose the time at which you are going to travel.

Many bus drivers take off before people are seated. This leads to the increased likelihood of someone with limited mobility having a fall as the bus takes off. This could be resolved by disability awareness training for all transport staff and possibly amendments to timetabling. It is well known that significant congestion on roads in this growth municipality makes it increasingly difficult for drivers to keep to timetables.

There are also reports of bus drivers driving past people with disabilities at bus stops if the person can't flag the bus or can't see the bus coming so they don't flag the bus. This leaves people stranded at bus stops. This could be resolved by disability awareness training for all transport staff and attention to timetabling to take account of local traffic congestion factors.

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

The Working Group has a number of concerns with the current complaint processes.

Firstly, members have highlighted that many times when complaints are made to transport providers, the provider does not respond to the complaint.

Secondly, if a community member considers that they have been discriminated against and makes a complaint to the Federal Human Rights Commission but it does not get resolved there, most community members do not have the money to be able to take the complaint to the Federal Court. If the complaint is not taken to the Federal Court, the provider has no obligation to resolve the issue or make sure the issue does not happen again. People with disabilities feel that they are being further discriminated against in the process as they don't have the finances to be able to take this action.

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

These are provided in our responses to the questions above.

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

Our Working Group would like an update on what progress has been achieved on the 15 recommendations that came out of the 2007 review: we have received no information about this.

We consider that implementation of the recommendations would greatly increase the accessibility of Public Transport for people with disabilities in this country.

The Working Group endorses the following recommendations in particular:

- 'Establish a national framework for Action Plan reporting and require annual reporting by each State and Territory government
- A technical experts group be convened with Standards Australia, to develop technical standards specifically suited to public transport conveyances and infrastructure. Once developed, these Standards should be referenced in the Transport Standards, and made available for public use
- A mobility labelling scheme be developed which identifies the weight of the aid and whether its dimensions fit within the dimensions for allocated spaces, boarding devices, access paths and manoeuvring areas on conveyances, as specified in the Transport Standards
- Commonwealth, State and Territory governments provide funding for projects in regional and rural regions where local governments are unable to resource upgrades of public transport infrastructure
- The AHRC be tasked to provide greater support for representative complaints on behalf of people with disability, reducing the legal cost burden on individuals

- New governance arrangements be implemented to establish accountability for progressing recommendations from the five-year Review. APTJC should have coordinating responsibility for new initiatives (including modal committees and the technical experts group) in partnership with APTNAC
- Government commission research into the safety of passengers travelling in conveyances whilst seated in mobility aids (including scooters). This research should make recommendations around whether there is a need for an Australian Standard addressing this aspect of safety for mobility aids
- Air travel modal sub-committee (the Aviation Access Working Group) be tasked to develop guidance on the carriage of mobility aids on aircraft.'

There are two recommendations which urgently need to be implemented earlier than suggested in the 2007 report:

- 'The Transport Standards be amended to require new community transport vehicles greater than 12 seat capacity to comply with the Transport Standards commencing in 2017, (with full compliance by 2032)
- Phased application of dedicated school bus services to physical access requirements in the Transport Standards, commencing in 2029 and being fully required by 2044.'

These timelines are far too distant into the future and the delay in implementation leads to significant disadvantage on an ongoing basis.

Conclusion

As previously stated, the WDN Accessible Parking and Transport Working Group welcomes the opportunity to contribute to this review process. The Working Group considers that the Government and Public Transport providers need to acknowledge that access to public transport is the right of people with disabilities and not just "best practice". The Working Group hopes that the findings from this review will influence changes to public transport to make a system that will meet the rights and needs of everyone in our community.

We also believe, as stated above in response to Question 6, that the Commonwealth needs to take a strong role to ensure compliance by the states and the operators in the meeting of Transport Standards.

The Working Group members would like to be involved in the Public Consultation session scheduled for Friday 31 May 2013 and would be happy to expand on views that have been expressed in this submission.

Whittlesea Disability Network Accessible Parking and Transport Working Group

26 April 2013

Attachment 1 to Whittlesea Disability Network submission

23 November 2012

Mr Jim Betts
Secretary
Department of Transport
121 Exhibition Street
Melbourne, 3000

Dear Mr Betts,

Pedestrian Safety at South Morang Train Station

I write on behalf of the Whittlesea Accessible Parking and Transport Working Group.

This Working Group is made up of local people with disabilities and their carers, service providers, City of Whittlesea Transport Engineers and others who support the inclusion of people with disabilities in the community.

The Working Group has been receiving community feedback on issues of pedestrian accessibility and safety at South Morang Train Station

The issues raised by the community and working group are detailed below:

1. Tactile Ground Surface Indicators (TGSIs) at the intersection at McDonalds Road and Ferres Boulevard are incorrectly applied. A person with vision impairment using the TGSI is directed into the garden bed – see red arrow.
2. It is possible for a blind pedestrian to miss the TGSIs altogether – see green arrow. Refer photo 1.



The Working group requests that these TGSIs direct people toward the far side of the path to the station which then can be used as a “shoreline” by vision impaired pedestrians. Refer Photo 2



Currently TGSIs direct people to use the left hand side of the path as a “shoreline” leading to wide steps that do not have TGSIs or hand rails presenting a dangerous hazard for people who are blind or vision impaired. We also feel that a sign is needed at this intersection to show which path has a ramp access and which path has steps. Refer photo 3



By aligning the TGSIs (Photo 1 and 2) to direct pedestrians to the right hand side of the path, they would direct people to the ramp, refer photo 3, a far safer path of travel for pedestrians who are blind or vision impaired.



Both the ramp and the steps lead to points where pedestrians must cross the main roadway to the car park and bus stops. There is no marked crossing on this road.

Australian Standard 1428.4.1 requires the use of warning TGSIs at points where there is no grade differential between a footpath and a road way and where there are bollards in the pedestrian walkway.

There are no TGSIs at these points in violation of the Standard. Refer Photo 4

This roadway carries high car and bus volume to access the car park and bus stops as well as passenger pick up and drop off.

There have been numerous reports of pedestrians having near misses with vehicles at this crossing.

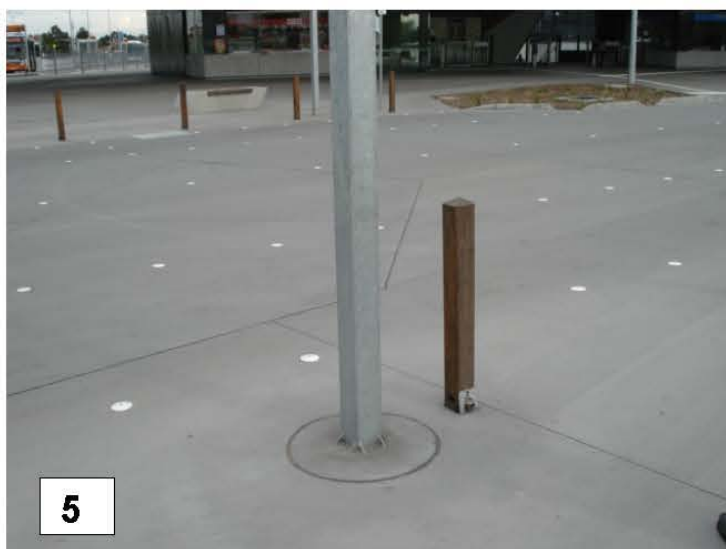


Photo 5 demonstrates the lack of clear demarcation between footpath and roadway as well as the lack of contrast between the pole and its background which clearly needs warning TGSIs to protect pedestrians.

Photo 6 Shows the “pedestrian crossing” on the eastern pedestrian approach to the station entrance presenting TGSIs that have been applied almost in compliance AS1428.4.1 creating a far safer entry/departure path for all pedestrians including those who are blind or vision impaired.

Unfortunately inconsistency of design and nonstandard TGSIs application over the whole station precinct creates a very dangerous environment for users with a vision disability.



The Working Group request that both of these crossings are changed to be fully chevron marked pedestrian crossings to warn motorists of the presence of pedestrians and to direct the pedestrians to cross in a specific area.

Where pedestrians are free to mingle and share pavement with vehicles, they are most at risk.

Another area of concern at the station is the TGSIs located at the end of the stairs at the eastern walkway.

A person with vision impairment using the right hand rail and the right hand side of the path will arrive at a point where there are no TGSIs. Refer Photo 7.



There also has been a concern from members of the Working Group that the signage on the platform runs parallel to the platform, which makes it difficult for people to know what platform is what when they arrive on the platform from the stairs or come out of the lift. It is felt that signage is needed that runs 90 degrees to the platform. This would mean that users of the station will have full vision of the platform numbers when they arrive on the platform from the stairs or the lift.

The Working Group would also ascertain if a Disability Discrimination Act Audit has been conducted on this site. If so, what were the findings and recommendations?

We ask the Department to address the issues identified in this letter and indicate timelines for rectification. We look forward to your early response

Members of the Working Group would be pleased to meet with your Department to discuss these matters. Please call Stephen Bell on 9217 2028 or email Stephen.Bell@Whittlesea.vic.gov.au.

Yours sincerely

Russell Hopkins
Director Community Services

City Of Whittlesea