11th July 2013
Transport Access Section
Road Safety & Transport Access Branch
Department of Infrastructure and Transport
Canberra ACT 2600

Via Email: DisabilitiesTransportAccessSecretariat@infrastructure.gov.au

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

COTA Victoria welcomes the opportunity to make comments in response to the DSAPT review and we thank you for the timeline extension to make our submission.

Background to COTA Victoria

COTA Victoria a community-based organisation of older Victorians working in the interests of older people to bring about positive social change. Our mission is to resource and mobilise older people to create an age friendly Victoria. Our organisation has been effectively representing seniors' views, and facilitating the active participation of older Victorians, since 1951.

As the peak body representing older people in Victoria, COTA engages with over 60,000 senior Victorians annually. As a result of our work with older people, and on the issues that impact on them and their quality of life, we are able to track emerging or continuing issues facing older Victorians and to inform the policy processes of COTA.

Through COTA's Seniors' Information Victoria Service (SIV) which responds to over 20,000 contacts per year, and our consultation processes with older people across Victoria, transport is amongst the most frequently raised issues.

An Age-friendly framework

With an ageing population in our community, our physical environments (including our transport system) will need to be accessible to people with a range of capacities.

Accessible transport services, infrastructure and planning are important components to 'ageing well' and should be considered within an Age-Friendly framework.[1]

The World Health Organisation's Age Friendly Cities Guide identifies transport, including accessible and affordable transport, as key factor influencing active ageing and the ability for people to remain connected to their communities and 'age in place'.

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[1] World Health Organisation, Age-Friendly Cities Guide (2007) (check details)

COTA VICTORIA
4th Floor, Block Arcade
98 Elizabeth Street
Melbourne VIC 3000

www.cotavic.org.au
ABN 81 960 500 420

P: 61 3 9654 4443
F: 61 3 9654 4456

Transport services and infrastructure needs to meet the life-course requirements of all people. This approach would benefit many groups of people, including people with disabilities, adults pushing prams, those with temporary mobility restrictions, children and older people.[2]

Accessible Transport:

An accessible public transport system includes a number of interrelated elements:

- Physically getting on and off vehicles,
- Understanding how the public transport system works,
- Being able to get to and from terminals or stops
- Purchasing tickets and travelling with confidence
- Way-finding, as in, knowing when to board, where you are, when to make a connection and when to disembark.[3]
- Ensuring accessible pedestrian infrastructure (including pedestrian crossings) to public transport
- Universal design principles that support vehicular access

In summary, enabling older people and those with a disability to travel on equal terms with other travellers.[4]

Social Inclusion

Older people's need for, and use of, public transport, increases with age. Many older people (who may or may not have driven cars in the past) rely solely on public transport to ensure their involvement in social, family and volunteer activities, and to get to medical appointments.

Research on social inclusion has shown that one of the most important factors in maintaining health in the community is to support their participation. Access to a range of transport options is key to ensuring social inclusion[5].

RECOMMENDATIONS:

We endorse comments made by COTA Australia on:
- Access to transport stops
- Accessing transport

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[2] COTA Victoria, Submission to Parliamentary Inquiry into Environmental Design and Public Health, July 2011 pp3-4
[3] VCOSS, Creating Accessible Journeys, 2011, p44
[4] Frye, A. (2010). Best practice in meeting the needs of disabled people: Findings of the Euroaccess Project. Paper delivered at The 12th International Conference on Mobility and Transport for Elderly and Disabled Person (TRANSED), held in Hong Kong on 2-4 June, 2010. p3
[5] Healthy Spaces and Places; Social Inclusion, Australian Government
Department of Health and Ageing, Australia. http://www.healthyplaces.org.au/site/social_inclusion.php

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- Accessing information
- Lack of compliance with accessibility procedure
- Travelling outside peak hours
- Complaints mechanisms

We also support the recommendations contained in the report made by Victorian Council of Social Services.

COTA Victoria wishes to make **three key overarching recommendations** which we believe are critical to accessible public transport standards.

Key Recommendation:

1. A Productivity and Efficiency Framework be adopted by DSAPT STANDARDS

Currently the framework for disability standards is placed in the context of helping some people, perceived as having problems, access a service. The presumption of such a framework is that such people cost more and the rest of society is doing them a favour by enabling them to access the service.

We strongly believe that the argument for Disability Standards needs to be placed within a robust Productivity and Efficiency Framework, and that this Productivity and Efficiency Framework be clearly articulated at the beginning of the revised standards, and in all further work in this area. That is, the emphasis should be on the economic *benefits*, not the economic *costs,* of these standards.

We believe accessible standards makes access universal for all people, regardless of their age, ability or other characteristics, and that this makes a significant contribution to productivity and efficiency.

Examples of using a productivity and efficiency framework include:

- It is easier for all people to speedily enter and exit public transport if everyone can do so easily, thus increasing productivity and efficiency for the whole transport system. This includes people who are young and fit, and who may have a temporary disability (for example a broken ankle) or who have a pram or young children.

- Since the introduction of ramps and railings for access to buildings, it is common to see fit young people and children use these access points, not just the disabled, because they are easier and quicker.

- Easier access on and off trams in Melbourne means that fit people move on and off trams very quickly, whereas previously there was significant delay as people climbed down steps and tried to squash into a small safety zone to avoid cars, or had to wait, causing a backlog of people trying to exit the tram, when cars did not stop to allow them to exit.

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- More people choose to use the public transport system because it is easy and friendly to use, even if they have not been regular users of that system. This increases profits and reduces costs of services. This increases productivity and efficiency, as more people choose to use the system, including not only regular users, but tourists and residents who are travelling outside of their normal daily commute. (Multi-sense products using sight, hearing, and touch help to create such a system)

Economies of Scale
  - When standard 'disability' features, such as multi-senses signage, hand grips accessible to all people of all heights, etc. are introduced across all systems, including with others worldwide using best practice, costs fall based on standardization and economies of scale.

Productivity Savings
- Good standards actually prevent further disability and injury of passengers. This is a productivity saving through:

  - Reduced delays while dealing with accidents (even seemingly minor accidents like falls on trams, which happen often, given the jerky way in which trams start and stop, with no warning to passengers still fumbling with trying to get the ticket post to acknowledge their Myki card)
  - Reduced legal and other costs dealing with complaints and claims
  - Reduced costs of claims payouts
  - Reduced cost to government through the hospital and medical system. (For example, falls are a key factor in forcing older people to move from their home into aged care accommodation.)

  There are many other productivity and efficiently arguments which could be made and we urge the Review to articulate them. These include helping to reduce the costs to business of traffic congestion and improved certainly of arrival times for workers.

2. Recommendation: Accessibility to public transport include the concept of availability of public transport

Accessibility to public transport must include the concept of availability of public transport. In many outer suburbs and in regional and rural Victoria, public transport is very poor, in terms of frequency and quality. This has a huge impact on the capacity of older people to access other services and to lead a meaningful life.

While we acknowledge that this is to some extent a broader issue, we think it important that the review make reference to the need for public transport to be available to all citizens, and to note the major areas of disadvantage.

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3. Recommendation: Standards should explicitly require accessible information that details a variety of formats including audible announcements on vehicles

- Creating accessible transport also involves creating information pathways on "journey accessibility". We strongly recommend the Standards explicitly state the provision of material (auditory, print and electronic) that identifies where and when accessible vehicles, services and infrastructure are in operation and include audible announcements on all vehicles.

- Providing accessible information, in a variety of formats is important for building confidence in using the public transport system and creating better access.

- Using information and technology to break down barriers can create new opportunities for independent access to transport. The installation of audible announcements and visual displays is essential for navigation for older people with visual or hearing impairment. For example, Prague has a navigation and guidance system that enables blind people to identify which bus is passing.

CONCLUSION

We have not commented on the compliance system as this has been well stated in submissions by VCOSS and other organisations, including COTA Australia. We do urge the review to look at how public transport providers can be made more accountable through a national monitoring system that looks at the implementation of standards across all transport systems. Whilst accessibility improvements to public transport is being made, it is still piecemeal, and slow. By redefining the standards within a productivity and efficiency framework, COTA Victoria believes the improvement of access would be viewed as more of a priority by governments and funded appropriately.