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Mr Mike Mrdak
Secretary
Department of Infrastructure and Regional Development
GPO Box 594
CANBERRA ACT 2601

Dear Mr Mrdak,

**REVIEW OF THE DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC
TRANSPORT 2002 DRAFT REPORT**

Public Transport services welcomes the opportunity to respond to the Draft Report and congratulates the Commonwealth Department of Infrastructure and Regional Development on the report.

Responses to the seven recommendations have been separately addressed in the attachment.

Yours sincerely,

Ross Stargatt
A/Executive Director Customer Experience and Innovation
Public Transport Services

26 August 2014

Response to Draft Report of the Review of the Disability Standards for Accessible Public Transport 2012 recommendations -

Recommendation 1 – National reporting on compliance

That the Australian Government, jointly with state and territory governments, establish a national framework for reporting on compliance by 30 June 2016.

As advised in our previous submission dated 4 October 2013, the new requirement to report compliance is not supported by DPTI. Real concerns have previously been raised by many sections of the community requiring a clear and consistent understanding as to exactly what constitutes compliance to enable useful and consistent data collection.

Additionally, the added cost of reporting could provide far better outcomes for people with disabilities if used to provide accessible infrastructure or conveyances.

A far more reasonable and transparent approach is for operators/providers of public transport services to provide accessibility for everyone. That is, use outcome focused (fit for purpose) performance criteria to ensure accessibility.

Recommendation 2 – Modernise the Transport Standards

That the Australian Government, jointly with state and territory governments, commence a process for updating and modernising the Transport Standards. This work should be undertaken in close consultation with local government, industry and the disability sector, and include research on the technical issues raised in this review, the development of options, and assessment of the impact of any proposed changes to the standards, with this work to be completed by 30 June 2016.

Since the implementation of the Premises Standards in 2010, the current Transport Standards place far greater obligations in the built environment for transport operators/providers than other public buildings, still used by everyone, including people with disabilities. This is further impacted by the common misunderstanding of designers and architects that BCA requirements fulfil the requirements of the more onerous Transport Standards, such as, stair riser heights, continuous accessible path of travel widths, circulation spaces etc.

Since 2002, when the standards were written, the many advancements in technology, such as 'phone apps providing real-time information along with other relevant information for people with disabilities has evolved.

DPTI supports this recommendation and has previously advised difficulties associated with implementing the Transport Standards.

Recommendation 3- The complaints process

That the Australian Government considers the concerns raised about the complaints process.

DPTI would be most concerned if the requirement for conciliation is removed as this process provides the opportunity for all parties to openly discuss, understand and be informed about

issues relating to the implementation of the current Transport Standards. The opportunity for face-to-face open discussion should not be under valued.

Recommendation 4- Whole-of-journey accessibility

That the Australian Government, jointly with state, territory and local governments, develop accessibility guidelines for a whole-of-journey approach to public transport planning by 31 December 2015.

This approach is fully supported by DPTI as a continuous path of travel from start of journey (home, work, school, medical appointments etc) to accessible public transport is clearly a requirement to participation.

However, ongoing funding challenges have not been addressed in the current report.

A funding commitment from the Federal Government would greatly boost the participation of people with a disability using public transport and in doing so, enhance the lives of people with a disability to contribute and participate in society.

Recommendation 5- National motorised mobility aid labelling scheme

That the Australian Government in collaboration with state and territory governments to develop and implement a national motorised mobility aid labelling scheme.

DPTI supports this recommendation and understands that work is currently being undertaken nationally in this area.

While the Transport guidelines do provide functionality requirements, many imported scooters are unable to perform all these requirements in a safe and consistent manner. A labelling scheme is welcomed and should provide clarity for both purchasers and transport providers.

Recommendation 6- National wheelchair accessible taxi compliance milestones

That the Australian Government, jointly with industry, state and territory governments, develop consistent national compliance milestones and response times for wheelchair accessible taxis by 30 June 2016.

Proudly, DPTI currently meets the equivalent response times for accessible taxi services and recommends that a sub-committee be formed to consider this requirement in detail. Furthermore, given our unique insights and understanding in this environment, DPTI would welcome the opportunity to participate in this forum.

Recommendation 7- Review of Disability Access Facilitation Plan

That the Department of Infrastructure and Regional Development, in close consultation with the Aviation Access Forum, undertake a review of the Disability Access Facilitation Plan initiative by 30 June 2015, with the aim of improving the overall effectiveness and accessibility of the plans.

N/A