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## Hobsons Bay

CITY COUNCIL

6 March 2008

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CANBERRA ACT 2601

Ask for: Megan Salisbury  
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Our Ref: 088999

Dear Sir/Madam

### REVIEW OF THE DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC TRANSPORT

Reference is made to the Draft Report on the Review of the Disability Standards for Accessible Public Transport. Hobsons Bay City Council commends the Australian Government for its initiative in developing the Disability Standards for Accessible Public Transport under the Disability Discrimination Act (DDA) and welcomes the opportunity to comment.

Hobsons Bay City Council's vision is for a *sustainable community, celebrating diversity and providing opportunities for all*. We are committed to delivering high quality infrastructure and services to meet the needs of the growing community, and to ensure Hobsons Bay continues to be a place of opportunity and long-term sustainability.

The Review of the Disability Standards for Accessible Public Transport offers an exciting opportunity for all tiers of government to work towards meeting the needs and aspirations of our community members with disabilities. We look forward to being involved in the dialogue as the standards continue to develop.

Please find attached Hobsons Bay City Council's submission.

Yours sincerely



Bill Jaboor

CHIEF EXECUTIVE OFFICER

Encl: Response



## Hobsons Bay CITY COUNCIL

### Review of the Disability Standards for Accessible Public Transport Response from Hobsons Bay City Council

Hobsons Bay City Council commends the Australian Government for its initiative in developing the Disability Standards for Accessible Public Transport under the Disability Discrimination Act (DDA) and welcomes the opportunity to comment on the Draft Report for the Review of the Disability Standards for Accessible Public Transport.

Please find the Council's response to the questions listed in the discussion paper.

1. *Do you consider that this draft report has addressed the key issues of importance to the review? If not, what other issues do you consider are important to this review?*

The draft report has considered many of the key issues of importance for the review. However, we would like to draw attention to an apparent imbalance between the social and economic impacts of implementing the transport standards. As a result of this imbalance a greater emphasis has been placed on the economic cost of retrofitting public transport infrastructure, with very little or, in some cases, no regard for the social and economic implications for people with disabilities being excluded from using transport.

2. *Are there options to address these problems that the review has not considered? If so, please provide details on these options and your assessment of their costs and benefits (including supporting evidence)*

Currently in Victoria, there is an agreement between Local Government Authorities and the Department of Infrastructure (DOI) that ensures all cost implications of the transport standards are covered by the DOI. The Local Government Authority project manages the process of implementation and maintenance. Hobsons Bay City Council would strongly recommend this agreement continue, as the cost of implementation could not be covered effectively within the constraints of the Council budget.

The cost of measuring the social impacts of the implementation of the Disability Standards is hard to determine. However, this does not negate the necessity to make an informed decision of the effectiveness of the implementation that considers both the social and economic costs. As the DDA is based on a premise of the individual's rights to engage in meaningful social and economic experiences or alternatively a social justice model, it seems contradictory to only analyse the effectiveness of its implementation on an economic basis.

3. *Do you have evidence to either support or refute the assessment of options in chapter 13 of this report? Evidence may include information on the relative magnitude of impacts between options.*

Hobsons Bay City Council has no evidence to either support or refute the assessment of options in the report.

4. *Do you consider that implementing the draft recommendations will involve costs to government or non-government organisations? If so, please provide any estimates of these costs.*

Implementation of the draft recommendations will increase the cost of supplying community transport within the municipality. Although the Council agrees in principle to 'amending the exclusion for community bus services to include in the Transport Standards those community services whose purpose is to service people with disabilities or older people', the cost of community transport is currently additional to operational costs for the Council and therefore requires external funding. This will mean additional funding of approximately \$30,000 will have to be sought for each community transport vehicle required.

The Council also has concerns about the wording of questions to be included in the Australian Bureau of Statistics surveys of people with disabilities. It is integral that patronage is only part of the data required as this only represents part of the story. If people are not utilising public transport there needs to be a mechanism in place to understand what barriers are preventing usage and the increase in demand that may result from greater access to public transport to people previously disenfranchised.

5. *Do you consider that the criteria used in the qualitative assessment of options are appropriate? Do you have suggested changes to these criteria?*

For the purpose of this review the comparative assessment criteria should be defined, including the weighting of each of the five options. Without this information Hobsons Bay City Council cannot confidently comment on the effectiveness of the criteria used and whether any changes are required.

6. *Do you consider that the proposed framework is the best approach to implementing the recommendations from this review? If not, how could it be improved?*

The proposed consultative framework for accessible transport has merit however we have three additional comments for consideration:

- A. Establish a formal two-way passage of advice between the Technical Experts Group, Modal Sub-committees and the Sub-committee to develop a mobility aid labelling system.
- B. Develop a process by which HREOC or other representative groups have the power to instigate court cases where there is systematic non-compliance with the Transport Standards or a need to establish a precedent to clarify compliance requirements (as per page 150 of report)
- C. Develop an Australian Standard for transport to provide a concise reference for implementing the Disability Standards for Accessible Public Transport.