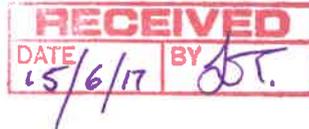




In reply please quote
Enquiries to Jeanette Bath
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Reference #11534520



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Marcus James
General Manager
Road Safety and Productivity Branch
Department of Infrastructure and Regional Development
GPO BOX 594
CANBERRA ACT 2601
AUSTRALIA

Dear Sir,

***THE WHOLE OF JOURNEY GUIDE: A GUIDE FOR THINKING BEYOND
COMPLIANCE TO CREATE ACCESSIBLE PUBLIC TRANSPORT JOURNEYS***

I reply to your letter of 27 March 2017, File Reference F17/387-03.

Thank you for the opportunity to provide comment on the consultation draft of The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys (Guide).

The Department of Planning, Transport and Infrastructure (DPTI) understands the need for integrated planning and urban design for public transport developments and supports the Guide as an aid to provide advice and encourage access for everyone.

As DPTI have been involved in the development of the Guide and advised technical comments during this process, I attach the views of the Accessibility Advisory Committee representing peak disability organisations in Adelaide for your consideration.

Yours faithfully,

Graeme Brown
General Manager,
Asset Management Directorate

13 June 2017



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Dear Peter,

*THE WHOLE OF JOURNEY GUIDE; A GUIDE FOR THINKING BEYOND
COMPLIANCE TO CREATE ACCESSIBLE PUBLIC TRANSPORT JOURNEYS*

Thank you for the opportunity to provide comment on the consultation draft of The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys.

The Guide was consulted in detail with representatives of peak disability organisations at a recent Accessibility Advisory Committee (AAC) monthly meeting, hence the views expressed are not necessarily those of DPTI.

AAC has answered the five questions outlined in the consultation paper below.

1. Thinking about influencing factors (Section 2): Have the key factors been identified and appropriately discussed? Are there any additional influencing factors that should be included?

It is acknowledged that the Guide development responds to the second review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards), which proposed the development of accessibility guidelines for a whole of journey approach to public transport to act as a planning tool and addresses Recommendation 4 of the review.

Furthermore, it is understood that the Guide does not impose additional regulatory requirements or standards, but intends to emphasise the need for all levels of government to consider all parts of the journey for people with disability when engaging in transport planning. However, AAC is of the opinion that the Guide must uphold and implement the principles of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and ensure that at the onset of the early planning stages it is mandatory that all levels of government and private bodies comply with a whole-of-journey outcome via an enforceable Federal Legislative Instrument such as the Disability Discrimination Act 1992.

This approach will not only ensure that Australia meets its International obligations under Articles 4 and 9 of UNCRPD, but will also provide certainty for the travelling public, including people with disabilities.

2. Thinking about parts of a journey (Section 3): Does this section fully describe the whole journey and key considerations across the journey? Are there any other opportunities or issues that need further consideration?

There is an underlying assumption that transport users will have a Smart Phone and/or possess the knowledge to use a Smart Phone and the related apps. However, this is often not the reality for older people and people with a disability. For those who use modern technology, there is an assumption that all new infrastructure will support modern technology, but not all infrastructure is modern.

Furthermore, there is an assumption that disruption to business as usual (Guide 3.7) makes that customers are regular users and familiar with the environment, but advice should be provided on how to address the needs of ad-hoc passengers and infrequent users such as, people from the country or overseas visitors. They would not be aware of the name of the operators/providers of public transport to check websites or customer service centres etc.

3. Thinking about what does this mean for you (Section 4): Does this section provide an effective set of key principles to focus stakeholders in creating accessible public transport journeys?

Sections 4.4 and 4.6 are very important: Maintain the human touch; Communicate, don't correspond.

Having customer service staff available to assist is critical to ensuring journey completion.

4. Thinking about stakeholder collaboration to achieve a whole journey: How can this be best achieved?

Consultation should to be undertaken with true meaning. Stakeholders need to be provided with options. If changes need to be made after a period of consultation, then check back with stakeholders that the change does not disadvantage anyone.

To be inclusive and assist everyone in providing feedback, the document should be available in different formats such as plain easy English and include pictograms.

Community education should be factored into consultation. Even if the whole journey is accessible for a person with disability, if other passengers interact in an inappropriate way, a fully accessible journey could become inaccessible. Such as not vacating Priority seating or Allocated spaces.

5. Thinking about best practice examples: Are there any additional best practice examples or case studies you would like to see referenced in an appendix which could further encourage, be used to draw upon, and potentially facilitate Whole Journey understanding and networking?

The AS1428 series should be referenced in the Guide to inform policy makers, planners, designers, builders, certifiers and operators to understand people's accessibility needs across their whole journey.

In addition to good examples, some bad examples should be included to show what not to do, further enhancing people's understanding of what is workable and accessible.

Yours sincerely,



Jeanette Bath

CHAIR – ACCESSIBILITY ADVISORY COMMITTEE

30 May 2017

