
30th May 2017

Marcus James
Australian Government
Department of Infrastructure and Regional Development
General Manager
Road Safety and Productivity Branch

Dear Marcus

Re: The Whole Journey Guide – A Guide for thinking beyond compliance to create accessible public transport journeys

The ACAA has reviewed “The Whole Journey” and provides a response as follows:

The DSAPT 2nd review has resulted in a series of recommendations but disappointingly without statutory powers to ensure empowerment of individuals/passengers that may have a disability.

Comments made are in two parts:

- a) Document structure
- b) Technical provisions contained within the document (in direct response to Part 5.2 of the Consultation document)

President
Mr Mark Relf

Vice President
Mrs Farah Madon

Secretary
Mr Terry Osborn

Treasurer
Ms Lindsay Perry

Committee Members
Ms Cathryn Grant
Ms Anita Harrop
Mr Francis Lenny
Mr Bryce Tolliday

a) Document structure

The structure needs to have 2 / 3 parts which are recommended to be instructional and form part of a checklist process:

1. Planning

- a. Audit and Plan Regionally with all stakeholders which require Urban and Non-Urban approaches. Audit public footways to transport stops and develop plans to install/upgrade footpaths and kerb ramps and roadway crossings between inbound and outbound stops.
- b. Obtain public feedback on which bus and tram routes should be prioritised for footpath access upgrades. Ferry wharves and train stations can also be included.
- c. Develop regional planning strategies involving 2, 3 or more local governments and transport providers to co-ordinate an “accessibility upgrade” of main transport corridor routes to avoid piece-meal work and huge gaps in the “journey”.
- d. Develop priority transport routes that involve access to major community facilities.
- e. Develop budget strategies that include a DSAPT infrastructure.

2. Implementation

- Upgrade 250 metres of footpaths and kerb ramps from every bus and tram stop on main roads in 5 years, then another 250 metres in years 6-10 on secondary roads, and another 250 metres in years 11-15 along side streets, by which point the job will be almost complete.
- Government's to boost funding for Community Transport in regional and rural areas.

3. Maintenance and Review

- Patronage data collection to assist with review processes.

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b) Technical provisions contained within the document

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?

- Title should be revised to read....A guide for **acting** beyond compliance...
- Review language used.
- Opportunity for state Government's to mandate this guide?
- The format of some sections of the Guide can potentially include a two column arrangement whereby Column 1 contains the minimum DSAPT requirement and then the 2nd column has a Guide enhancement.
- What is the timeframe for an amendment of DSAPT to be in place?
- Commentary concerning inter-relationship between DSAPT and Premises Standard would be beneficial at the start of the document given it is unlawful to contravene a disability standard.
- Which standard Premises or Transport takes precedence when applicable?
- The document discusses the intent of a seamless approach, yet a process is recommended to be developed with the benefit of statutory powers.
- Should the intent be to increase regulation to provide better services for all, and in so doing negate the fact that users may decide that they need to initiate a complaint under the DDA?

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?

Suggest each stage should be coded e.g.;

Stop A journey planning..... Step Z arrival at destination.

Articulate that the regulation of surrounding infrastructure is governed by the local regulatory authority (typically councils).
Emphasise that accessibility legislation does not apply to the same degree (as DSAPT does not apply to these areas)

Suggest that a passenger rights regulation is developed including a process of “formalised” direct assistance from staff members that interface directly with customers.

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?

- Review wording in document and replace terms such as “should” or “consider” with “must” or “shall”.
- Suggest that “kit of parts” drawings are developed in relation to key facilities which are not otherwise fully prescribed by DSAPT & associated standards – hearing augmentation, seating, ticket machines, drinking fountains etc.

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

Provide questionnaires to inform stakeholder workshops.

Workshops to involve:

- Users
- Transport operators
- Infrastructure and vehicle designers
- Local authority (Council) representatives

Stakeholders training on whole of journey approach highlighting federal governance (not state or council legislative provisions) and interdependence with transport providers to deliver an equitable service.

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 drawn upon, and potentially facilitate Whole Journey understanding and networking?

European Union Passenger Rights enacted legislation in relation to Bus, Air, Rail & Ferry travel – for example EU Regulation 1107/2006.

Please feel free to contact me should you have any follow up questions

Regards

A handwritten signature in black ink, appearing to read 'Terry Osborn'.

Terry Osborn
Secretary