

31 May 2017

Director – Road Safety Policy and Transport Standards
Road Safety and Productivity Branch
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601, Australia

Comments on: The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys.

The draft Guidelines are a welcome start to the process of ensuring accessible public transport journeys. In response and as with all drafts undergoing consultation, matters considered by stakeholders to have been omitted or under-emphasised are noted.

Journeys begin on leaving 'home', going to and through the built environment to carry out the various activities of the day, and are completed on returning 'home'.

Journeys often cross jurisdictions, with footpaths and some roadways being the responsibility of local authorities, other roads and railways planned and managed by state government or private consortia. Monitoring carparking, footpath dining and local precinct planning are most often the responsibility of local authorities.

Linkages and consistency across state boundaries and between state and private infrastructure and government, private and corporate transport modes are vital to contributing to the creation of an accessible whole of journey outcome.

- The Guidelines are not regulations but offer guidance on how the Objects of the Disability Discrimination Act might be met during a person's 'whole of journey' experience. A clear statement to this effect in the Introduction to the Guidelines, and frequent reminders in the text, would remind the readers that the entirety of the pedestrian and public transport environment is covered by the Disability Discrimination Act and subject to complaint under that Act.
- Consultation with people who have disabilities is mentioned but given too little emphasis. The importance of consultation in reaching accessible solutions that meet public expectations cannot be over-estimated.

- The Guidelines should be included in the various planning instruments developed by Commonwealth, State, corporate and local authorities. They should be quoted as the performance benchmark for the pedestrian and public transport environment.
- Procurement process and policy can ensure that only accessible systems, fixtures and facilities are put into service, but no mention of procurement is made in the Guidelines.
- Project scopes of work must list precinct accessibility as mandatory and allocate realistic budgets to achieve accessible outcomes.
- While apps and digital technology are able to provide vital information, they receive too much emphasis in the Guidelines. Information in multiple accessible formats and media should be emphasised.
- Integrated planning and cooperation between the various whole-of-journey stakeholders is emphasised but no indication of who would be the coordinating authority is provided.
- No indication of how third parties such as Telstra will be convinced to report temporary pathway disruptions, or how the transport provider will communicate this information to the travelling public in a timely manner, is suggested.
- Examples of service hailing procedures are given but are rather limited in scope. Further examples of existing procedures should be given.
- The Guidelines have a strong metropolitan focus, with little guidance for authorities in rural and regional areas. Material and examples from rural and regional areas should be included.
- A national electronic ticketing system, allowing easy travel while travelling interstate, must have accessible options for all users.

Submitted by

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