



*Dedicated to a better Brisbane*

12 June 2017

Mr Markus James  
General Manager  
Road Safety and Productivity Branch  
The Department of Infrastructure and Regional Development  
GPO Box 594  
CANBERRA ACT 2001

Dear Mr James

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

Brisbane City Council (Council) is unique in Australia in terms of its involvement in public transport. As well as its role in transport and land use planning, Council continues to provide significant funding for public transport including the operation of bus and ferry services. Council also has a key role in providing infrastructure such as bus stops, pathways, signage and traffic signals which are integral to the whole journey approach.

In this role, Council is well advanced in making Brisbane's public transport system accessible to all. Council's bus and CityCat fleet is now fully accessible and Council is progressing in achieving *Disability Discrimination Act 1992* (Cth) compliance for Council's bus stops and ferry terminals utilising innovative designs to adapt to some of the unique topography of Brisbane. The attached letter from Councillor Adrian Schrunner, Chairman of Public and Active Transport Committee, to the Honourable Jane Prentice MP provides an update on Council's progress and importantly, the significant funding required to achieve 100% compliance.

Council welcomes this document as it clearly provides valuable guidance and direction regarding considerations relating to planning and providing accessible transport for the whole end-to-end journey. Council's comments on the guide and responses to the submission questions are attached. If you wish to clarify any of the matters raised in Council's submission, please contact Mr Andrew Lintern, Business Improvement and Transport Strategy Manager, Transport Planning and Strategy, Brisbane Infrastructure, on (07) 3403 5602.

Council looks forward to providing further input into the next round of modernisation of transport standards, and the opportunity to share our experiences in the development of accessible public transport services.

Yours sincerely

Colin Jensen  
**CHIEF EXECUTIVE OFFICER**



***Council's Submission on the Australian Government's consultation draft  
The Whole Journey: A guide for thinking beyond compliance to create accessible public  
transport journeys***

**Overarching comments**

Council is unique in Australia in terms of its involvement in public transport. As well as its role in transport and land use planning, Council continues to provide significant funding, as well as operating bus and ferry services. Council also has a key role in providing infrastructure such as bus stops, pathways, signage and traffic signals which are integral to the whole journey approach.

*The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the guide) contains sensible and achievable aspirations. It reflects conversations that Council has had with internal and external stakeholders about going beyond the requirements of the *Disability Discrimination Act 1992* (Cth) and the *Disability Standards for Accessible Public Transport 2002* to improve accessibility for all. The guide provides a sound explanation of the issues faced by people with disability and the benefits of achieving accessible whole journeys. Council agrees that the whole-of-journey should be accessible especially for those whom public transport is not a mode choice but the only option available to them.

The content of the guide strongly aligns with concepts identified as part of the development of the new Transport Plan for Brisbane (TP4B) that is currently being drafted. The TP4B is intended to guide the future development and delivery of Brisbane's transport network as a whole and this would positively contribute to achieving a range of desired outcomes identified in the development of the TP4B.

When applied specifically to the public transport network, the guide will provide valuable guidance and direction relating to providing accessible origin-to-destination transport. It should be noted that the mindset change required from 'what needs to be done to comply' to 'what needs to be done to best facilitate accessibility' is potentially underplayed, as is the practical steps or whole-of-journey examples for partnerships with transport users and the wide range of other stakeholders responsible for segments of the whole journey.

Key challenges for Council in achieving the intent of the guide will be funding, coordination and the assessment of Council's achievements in facilitating accessibility. Much of the infrastructure and systems were developed at a time before there was the same degree of consideration for accessibility. This often makes retrofitting a more accessible solution very difficult, expensive or impractical in relation to the impact on other users or the community. The financial burden to achieve the best whole journey results cannot be borne by Council alone. The Australian Government needs to provide a funding stream to local and state governments and others involved in the provision of public transport to deliver the best possible whole-of-journey outcomes.

The second key challenge is that different organisations are responsible for delivering different sections of the guide and so will require coordination between those organisations. The eight key stages of the journey are therefore useful in terms of focusing efforts to improve accessibility and connectivity.

The third key challenge is that the guide states 'customer focused performance criteria should be built into all stages of projects'. Council is currently implementing an Enterprise Performance Management (EPM) Strategic Planning process that will provide clarity in the 'why' and 'how' Council's projects facilitate improvement. The guide itself is silent on how to measure the accessibility of the whole journey.

## Specific comments

### Section 1 – Introduction

Section and page number	Comment	Recommendation
1.1 – page 5	The guide focuses on the delivery of accessible public transport and technical criteria under transport standards. There are other factors in achieving an accessible public transport journey.	The text could mention that training of front-line staff in interacting with people with disability (even if temporary) in a respectful and compassionate way is an essential part of achieving accessible public transport journeys.

### Section 2 – Influencing Factors

Section and page number	Comment	Recommendation
2.3 – page 10	The drivers capture some of the key issues we are facing but some of the major issues in the transport industry have also been omitted.	<p>Suggest expanding to include under 'other possible drivers':</p> <ul style="list-style-type: none"><li>• Generation Y and later generations will become an increasing proportion of the workforce and have very different approaches to transport. They are less likely to own a car, more likely to rely on public transport, more likely to embrace developing transport options and have greater expectations of on-demand and tailored services.</li><li>• Modernisation and growth of night/weekend economies creates a change in the nature of transport demand. This leads to the spread of the commuter demand to respond to extensions of hours of operation, expansion of demand generators beyond the traditional CBD and expansion of flexible work arrangements.</li><li>• Australia is becoming more multicultural and inclusive. Immigration continues to broaden our cultural mix, while a concerted effort by government to remove discrimination means that public transport needs to be accessible to people of greatly different needs,</li></ul>

		backgrounds and abilities. Accessibility improvements will need to continue, including the availability of journey planning and service information in a range of formats and languages and via multiple platforms including print and electronic media.
2.3 – page 10	The drivers capture some of the key issues we are facing but some of the major issues in the transport industry have also been omitted.	<p>Suggest expanding to include under ‘other possible drivers’:</p> <ul style="list-style-type: none"> <li>• Generation Y and later generations will become an increasing proportion of the workforce and have very different approaches to transport. They are less likely to own a car, more likely to rely on public transport, more likely to embrace developing transport options and have greater expectations of on-demand and tailored services.</li> <li>• Modernisation and growth of night/weekend economies creates a change in the nature of transport demand. This leads to the spread of the commuter demand to respond to extensions of hours of operation, expansion of demand generators beyond the traditional CBD and expansion of flexible work arrangements.</li> <li>• Australia is becoming more multicultural and inclusive. Immigration continues to broaden our cultural mix, while a concerted effort by government to remove discrimination means that public transport needs to be accessible to people of greatly different needs, backgrounds and abilities. Accessibility improvements will need to continue, including the availability of journey planning and service information in a range of formats and languages and via multiple platforms including print and electronic media.</li> </ul>
2.4 – page 11	Urban design is a critical element of public transport. However, the	Use terminology in relation to passenger experience rather than passenger journeys.

	<p>industry needs to think more broadly about how this contributes to the public transport experience, rather than the journey. This is more than just about wayfinding and enhancing the sense of security and safety. It is also about encouraging passenger presence in multi-functional stations (i.e. stations that can provide retail and refreshment opportunities) as the enhanced presence often can create a greater sense of safety and security. Queen Street bus station is an excellent example of a facility that encourages use with multi-use functions by providing opportunities with shops and food vendors.</p>	<p>Need to encourage the development of public transport interchanges which have multi-use functions that are passenger friendly and maximise the positive journey experience and minimise the perception of delay time at an interchange.</p>
<p>2.6 – page 12</p>	<p>There are few examples of best practice around governance for whole journeys, for either the focus on interfacing precincts and places, or the wider issues that restrict infrastructure/operator stakeholders to their own 'silo' of work.</p>	<p>Source examples from state/local governments of examples for whole journey consideration.</p> <p>There is the potential to expand or add in to Section 2.2, though this is in relation to inclusion planning rather than the whole journey.</p>

### Section 3 – Parts of a journey

Section and page number	Comment	Recommendation
3.1.2 – page 16	It is worth noting that in Queensland, the Queensland Government agency for contracting and integrating public transport in Queensland, TransLink, takes responsibility for customer communication and their information is the source of truth rather than 'transport providers' and 'service providers' as outlined in the document.	Clarify that 'transport providers' are not always the appropriate source of customer information.
3.1.4 – page 17	The suggestion that customer service staff should be trained and equipped to help people plan their whole journey, not just the public transport component, is impractical. The myriad of possible origins, destinations and transfer opportunities make such an expectation unrealistic.	Delete this reference, or at least soften to note that customer service staff should assist where they can. There should not be an obligation on customer service staff to understand every variable in every possible trip combination. Although there are tools to assist front-line staff, real-time information on road closures may not be available quickly enough, particularly in the context of unforeseen events.
3.2 – page 19	In relation to the text box 'Travelling to and from public transport nodes is easy and efficient for people with accessibility requirements', one of the main detractors for those with a temporary disability in using public transport outside of peak times is the inability to find parking close to transport nodes due to commuter parking.	It is recommended that access throughout the day be taken into consideration when designing and planning the whole journey to ensure that public transport remains accessible to everyone at any time of day (or night) and not just for commuters.
3.2.2 – page 20	Council agrees with reinforcing the importance of maintaining well-kept footpaths and walkways (no hazards for people with disability).	Pathway quality should also include widening and ensuring that footpaths are continuous and unobstructed.

3.2.4 – page 22	Typographical error of Tank Rank Master Plans (should be Taxi Rank).	Replace 'Tank' with 'Taxi'.
3.2.5 – page 22	Regarding the comment 'Organisations that approve works and management plans should require that provisions such as temporary kerb ramps be included in management plans'.	Suggest re-wording to be less specific or add caveats such as 'where no other safe, convenient and accessible options exist'.
3.3.8 – pages 27/28/29	This section states that people with disability may have difficulty with automated fare collection systems (for example smartcards), therefore the onus is on public transport providers to provide specific training and support. Although there is an example of Guide Dogs Queensland in the text box, there is no explanation for the potential for support organisations to assist with training and support in partnership with the public transport provider.	Amend these references to include that support organisations could also assist people with disability to access public transport through better understanding of ticketing and other aspects.
3.4.2 – page 31	Audible announcements may be possible at interchanges but are not feasible for individual bus stops for a number of reasons such as installation, maintenance and noise pollution for local residents. It would be more economical to address through real-time bus monitoring and announcements and visual representation via smartphones.	Council agrees with the comment.
3.4.5 – page 32	It is agreed that driver training is critical to overcome issues of people not being able to access education and information through technology such as apps. In Brisbane, drivers are able to assist people on and off the public transport fleet and provide critical information to assist with the journey.	Council agrees with the comment.
3.5 – page 34	This section notes the challenges of interchanging for passengers with disability. It refers to the disincentive to travel that this can create and the need for the transfer to be easy, convenient and efficient. It does not address the issue that in many cases historical urban planning and development have created circumstances where this is not	In the text box, add another point that service planning needs to consider people with disability as a key customer demographic including service designs that specifically facilitate and encourage their use of public transport.



	possible.	
3.7 – page 41	Disruption of services for buses is very difficult to manage and it can be difficult to provide accurate forecasts of service arrival times where disruptions or incidents on the road network occur. The majority of issues relate to traffic congestion which can change on a minute-by-minute basis during peak periods.	Council agrees with the comment.
3.8.5 – page 45	There are references to the importance of feedback, and the guide refers to various social media applications.	The primary form of feedback should be the appropriate formal feedback channel offered by the various jurisdictions in the first instance. This allows appropriate documentation and development of considered feedback and responses, rather than the emotive and immediate avenues provided by social media. Social media can be an important avenue but should not be promoted as the primary means of feedback.

#### Section 4 – What does this mean for us?

Section and page number	Comment	Recommendation
4.2 – page 48	Council agrees that the change in mindset towards human-focused design should think beyond just compliance.	This section could refer to redefining project objectives to be more aligned to 'facilitating accessibility in consideration of the whole journey'.
4.3 – page 49	Council agrees with the use of data, applications and technology to address accessibility issues.	There should be greater emphasis on the development and use of apps to provide much of the accessibility required. These apps need to be able to address various disability requirements. They are much more cost-effective, community-focused and can be tailored to address specific needs, rather than expensive infrastructure solutions.

## Response to Questions Proposed in the Guide

No.	Question	Response
1.	<p><b>Thinking about influencing factors (Section 2):</b> Have the key factors been identified and appropriately discussed? Are there any additional influencing factors that should be included?</p>	<p>Yes, other key factors should include that public transport is not a mode choice for some, it is the only option available to them. An accessible design does not always mean an increase in project cost. Often it can be achieved for around the same cost if the designers work to accessible guidelines from the start of a project.</p> <p>Whole-of-life costs should be considered as an influencing factor for users, owners and operators. Accessible whole-of-journey transport needs to be cost-effective and competitive to ensure users will use it, and it can be maintained and operated.</p> <p>Governance and efficiently understanding and dealing with whole journey issues that by definition may be remote/outside the control of a specific project team/agency should be discussed further and best practice examples provided. There are numerous project examples throughout the guide but these relate primarily to one or two components of the journey and not the whole journey.</p>
2.	<p><b>Thinking about parts of a journey (Section 3):</b> 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?</p>	<p>Another issue that should be considered is that buildings themselves are accessible for people leaving from and travelling to them. The guide should also address the safe and accessible crossing of roads.</p> <p>Further, ride quality on the public transport leg itself is not addressed, for example, the poor condition of vehicles or carriages which includes suspension, narrow or tight seating, rutted or poor condition roads, and the quality and quantity of priority seating.</p>
3.	<p><b>Thinking about what does this mean for you (Section 4):</b> Does this section provide an effective set of key principles to focus stakeholders in creating accessible public transport journeys?</p>	<p>The view of the whole journey could be expanded upon (i.e. within Section 4.5) to include the use of comprehensive engagement with future project stakeholders and transport users. This may flag other whole journey issues, for example, a barrier beyond the project scope that may otherwise negate any accessibility benefits from the project itself.</p>
4.	<p><b>Thinking about stakeholder collaboration to achieve a whole journey:</b> How can this be best achieved?</p>	<p>Leveraging off existing partnerships and opening up project planning to encourage earlier participation particularly from disability advocacy groups to maximise outcomes would be of advantage.</p>

No.	Question	Response
5.	<p><b>Thinking about best practice examples:</b> 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?</p>	<p>The document could also refer to some New Zealand case studies such as 'An Accessible City', the transport chapter to the Christchurch Central Recovery Plan and its 'Streets and Spaces Design Guide'. Both of these case studies strive to create a connected, inclusive, efficient and safe public realm network for all people and a number of projects have been completed (e.g. Christchurch Central Interchange, street improvement projects, Riccarton Bus Lounge).</p>

