

Whole of Journey Transport Review

Spinal Cord Injuries Australia Submission - May 31, 2017



June 20, 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
Email
E: dsaptwholejourney@infrastructure.gov.au

The Whole journey: A guide for thinking beyond compliance to create accessible public transport journeys review

Dear Director,

Thank you for providing the opportunity for Spinal Cord Injuries Australia (SCIA) to make a submission to *'The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys review'*. This submission is mainly focusing on the areas that relate to and affect people with disability using wheelchairs and other mobility devices. SCIA anticipates that the content will be given serious consideration to ensure there is a positive outcome for passengers with disability.

SCIA is a member driven organisation that represents, supports and advocates on behalf of, and in conjunction with, people with a spinal cord injury or similar physical disability, who are mostly reliant on wheelchairs for their mobility. Hence, the accessibility, availability, reliability and safety of all modes of transport is extremely important for the whole journey.

SCIA appreciates that this guide is designed to encourage policymakers, planners, designers, builders, certifiers and operators to think beyond compliance and the physical and governance boundaries of services and infrastructure, and to focus instead on people's accessibility needs across the whole journey, however, SCIA has concern that this guide is not mandatory the above-mentioned stakeholders be responsive to the requirements save.

Furthermore, please contact SCIA if you require further information or any of the content clarified and SCIA would be very interested in attending any stakeholder meetings or forums relating to the regulations review.

Yours sincerely,

Greg Killeen

Senior Policy and Advocacy Officer | Phone: 02 9661 8855 | gkilleen@scia.org.au

The Whole Journey Submission Questions:

The Department of Infrastructure and Regional Development would appreciate your advice, in particular.

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?

Answer:

SCIA P&A supports the content contained in this section, however, it would like to strongly suggest that this guide encourages the various stakeholders to allocate a person or department that is responsible for the Disability Inclusion Action Plans (which are currently mandatory in NSW for all levels of government) so they are accountable to ensure relevant policies and procedures are developed and implemented with the aim that all modes of transport provide universal design with seamless access, particularly where there are transport interchanges.

In regard to the footpaths in and around the transport facilities, particularly in areas where there is a common boundary/border between two or more local councils, there needs to be a Memorandum of Understanding between them to ensure that the installation or changing of footpaths across common boundaries can be completed by one or all councils at one time. This will negate incidences where a council installs or changes a footpath up to the boundary leaving the remaining part of the footpath incomplete that impedes access.

Public transport passenger education and awareness about the use (and possible abuse) of the allocated space for people using mobility aids in public transport conveyances needs to be implemented. This aims to ensure parents with prams are aware they are required to vacate the allocated space when a person using a mobility aid enters the bus, light rail, train or ferry. But particularly on buses where there have been incidences in NSW of parents refusing to fold up and move the pram and vacating the space.

Transport NSW has a policy and procedures requiring the bus driver to ask the parent to move the pram, and if they refuse, then the driver is required to not move the bus and call the authorities to address the issue. Unfortunately, some bus drivers are reluctant to implement this, but they need to be held accountable and to ensure they implement the company policy and procedures.

Furthermore, as the local councils generally have responsibility to provide vehicle parking to support public transport such as at ferry wharves, train stations et cetera, it is extremely important to ensure that the allocated parking spaces for people with disability are not misused and abused by people without the mobility parking sticker and Council Rangers/Ordinance Inspectors need to be vigilant to monitor the public parking spaces.

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?

Answer:

In regard to 3.3.5 Drop off/pick up points

It is important to ensure the built environment provides curb ramps near taxi ranks, bus stops the taxi/vehicle drop-off/pickup areas at transport interchanges to enable wheelchair users to traverse between the footpath and road. This will limit the need for people using mobility aids to travel amongst vehicles to get between the footpath and taxis/vehicles.

In regard to 3.4.3 Fleet Vehicle Consistency:

SCIA strongly supports this particularly in consideration that city buses recently introduced a new bus fleet, and placed the 'stop' button behind the shoulder of the passenger using a wheelchair located making it difficult if not impossible for the passenger to access. Earlier bus models have the 'stop' button located under the seat that lifts up to clear the allocated wheelchair space and positions the button in an accessible position. The new 'stop' button location was chosen without consultation with the disability sector as Transport NSW has been undertaking through the Transport NSW Accessible Transport Advisory Committee (ATAC).

Subsequently, to reposition the current 'stop' buttons to an accessible location is reported to take time, effort and resources according to Transport NSW. SCIA P&A is still waiting to find out what the plans are to reposition the 'stop' buttons.

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?

Answer:

SCIA P&A does provide an effective set of key principles to focus stakeholders in creating accessible public transport journeys. The example of suggesting planners and designers communicate with disability consumer access groups is a positive recommendation as SCIA P&A is a member of the ATAC of which members are continually sought for comment and feedback on new and existing public transport services. A good example of this was when the Sydney Ferries gave a presentation to the ATAC on the proposed 6 new ferries for Sydney Harbour. Approximately 18 months later 2 of the 6 new ferries were brought to Sydney and SCIA P&A requested a site visit to check out the accessibility. SCIA P&A and other ATAC members were very happy with design and accessibility of the new ferry.

However, in regard to 4.8 *Accessibility When Things Go Wrong*, SCIA P&A strongly suggest that bus transport operators always ensure that an accessible bus that is removed from service must always be replaced with another accessible bus. This is crucial when a bus route includes a mix of accessible and inaccessible buses with scheduled timetables (which could be hourly), as people with disability will plan to use a bus at a particular time and location. If the inaccessible bus does not arrive as scheduled then it could take another hour for the next accessible bus to arrive and people may miss important health and medical appointments or events that they are attending.

Furthermore, in the event that a train breaks down away from a train platform, it is crucial that the relevant transport authorities have people trained to assist people with disability, particularly people using mobility aids, from the broken down train and to safety.

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

Answer:

SCIA P&A believes there are various ways of stakeholder collaboration to achieve a whole journey. The State and Territory Governments uses a variety of methods to achieve collaboration including the ATAC, as well as contracting independent consultants to undertake face-to-face meetings with people with different types of disability who are not members of the ATAC. This type of collaboration provides the ability for different type of commuters with disability to share their individual perspectives and experiences when using specific types of public transport.

Furthermore, stakeholder collaboration could be done using online surveys or targeting specific disability groups with the surveys being distributed through their member organisations and other relevant networks.

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?

Answer:

SCIA P&A has seen examples of operator electronically controlled wheelchair restraint devices that prevent a mobility aid from swinging out of the allocated wheelchair space into the aisle, and this system would be effective and provide greater safety for the person using the mobility aid as well as other passengers standing in the aisle adjacent to the allocated space. In NSW, the buses have a retractable wheelchair restraint located behind where the allocated wheelchair spaces. It requires the driver to attach the restraint, however, the drivers don't mention it let alone attach it. SCIA P&A is aware of people using mobility aids who have been tipped out of the mobility aid or the mobility aid has swung across the floor when the bus has been driven around a corner or roundabout.

As previously mentioned, SCIA P&A is aware that the last rollout of new NSW public buses the placement of the 'stop' button to be used by people using mobility aids located in the wheelchair space is located behind the shoulder out of their reach. But the bus operator's justification for its position is that the location is compliant with the Standards. Although the 'stop' button placement might be compliant with the Standards, it isn't considered best practice if the passenger is unable to reach it.

Furthermore, all levels of government must ensure that the tender to procure public transport conveyances requires the conveyance to include all of the components to be compliant with the Standards, such as wheelchair access, minimum allocated space for people using mobility aids, technology to provide audio announcements, visual displays, colour contrast et cetera.

Again, thank you very much for providing the opportunity to make this submission and if further information or clarification is required do not hesitate to get in contact with SCIA P&A.

Regards,

Greg Killeen
Senior Policy and Advocacy Officer
Spinal Cord Injuries Australia