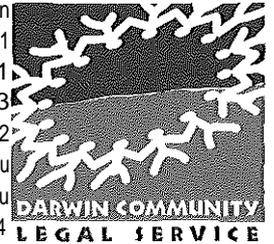


8 Manton Street Darwin  
GPO Box 3180 Darwin NT 0801  
phone: 8982 1111  
freecall: 1800 812 953  
fax: 89821112  
email: info@dcls.org.au  
website: www.dcls.org.au  
ABN: 42 840 626 724



The Secretariat  
Transport Access Section  
Via e-mail : DisabilitiesTransportAccessSecretariat@infrastructure.gov.au

Re: 2012 Review of the Disability Transport Standards for Accessible Public Transport

Darwin Community Legal Service is pleased to provide the attached submission to the above review, and looks forward to receiving the report of the review in due course.

Dawn Lawrie JP  
Disability Discrimination Advocate  
Darwin Community Legal Service  
19 April 2013



free legal advice and information • human rights and public interest law  
residential aged care rights • disability rights • welfare rights • tenants' rights  
Darwin Community Legal Service Inc,

Patron: Her Honour the Honourable Sally Thomas AM Administrator of the Northern Territory

## **2012 Review of the Disability Standards for Accessible Public Transport**

### **Darwin Community Legal Service Submission .**

The Darwin Community Legal Service (DCLS) welcomes the review of the Standards, and has sought the views of people with a disability within the greater Darwin area.

This service is pleased to report that there have been continuing improvements in accessibility to public transport since the last review.

#### **Buses**

The urban public bus fleets in Darwin and Alice Springs are 100% compliant. Following discussions with The Public Transport section of the Transport Department there is to be continuing advice to bus drivers on their responsibilities to assist people with a disability travelling on the buses.

#### **Bus stops**

Discussions have been held with the Public Transport section, and our advice is that bus shelters and bus stops are in excess of 50% compliant.

"Totem" poles are now erected at stops which include information in Braille, and the tactile ground surface indicators are in place.

There is funding within the 2012/2013 budget to continue upgrading the bus stops both in Darwin and Alice Springs.

#### **School Buses**

DCLS notes that current standards include a phased application of physical access to school buses, commencing in 2029 with full compliance by 2044. We agree with the government's comments that the ATC consider the most appropriate mechanism to progress this requirement, and we consider that the benefit to students with a disability in being able to travel with other students on school buses deserves a greater weight than that currently in place. We note that there would be cost implications in bringing the compliance timetable forward, but also make the comment that there have been cost implications for all the improvements in making public transport accessible for people with a disability, and the safety and well being of students with a disability either currently travelling on school buses or who would do so were the buses more accessible should have a high priority.

#### **Taxis**

The NT Government operates a "liftincentive scheme" to encourage drivers to pick up passengers with mobility aids who may take extra time to embark/disembark. Accessible taxis also pay a lower licence fee.

Notwithstanding these incentives anecdotal evidence indicates that some drivers will drive past a passenger with a disability, and the Department needs to be vigilant in pursuing complaints against these drivers/taxi owners, and to publicise action taken.

There are now Braille labels on the sides of taxis and mini buses, which is to be commended.

There is a need to review and mandate appropriate anchor points in all taxis deemed accessible (and therefore attracting the lower licence fee) to ensure passenger safety, and to take account of both the larger mobility devices being used and their variety. Clearly this is a matter for people with the technical expertise to provide the appropriate advice, DCLS simply makes the point that this is a safety issue to be addressed.

The current wheelchair space allocation : Height: 1500mm

Length: 1300mm

Width: 800mm

was implemented in January 2013, and there is a schedule of approximate vehicle replacements to meet the new standard.

There is concern in the Darwin community that some taxis which received registration before the current upgraded standards are simply too small to accommodate the latest wheelchairs, and that the replacement requirements should be brought forward.

Under the *National Disability Insurance Scheme* (NDIS) clients will be more able to order and buy their own mobility aids, including wheelchairs, and it is to be hoped that appropriate manufacturing standards will ensure the ability for these devices to be safely anchored when in transport.

### **Air travel**

While the issue of the number of people with a mobility disability (wheelchairs) who can be accommodated in aircraft has received attention (and DCLS does not agree that the limit of two wheelchairs per flight is reasonable or sufficient) the other matter which we believe is important is the use of aero bridges for embarkation/disembarkation.

At Darwin International Airport aerobridges are not always used by passenger aircraft even when available. Disembarking by way of steep aircraft steps can be a challenge for able bodied people and is of course impossible for people reliant on a wheelchair. There are however many travellers who while not having to use a wheelchair have mobility/ sight impairments and aerobridges provide a safe and secure means of access/egress. This also applies to older passengers or people travelling with young children. DCLS would like to see this matter formally discussed with airlines travelling on RPT routes with a view to mandating the use of aero bridges when available.

### **Ferries**

The NT Government is currently calling tenders for a ferry service between Darwin and the Tiwi islands and I presume the tender documents will incorporate the latest standards relating to ferries.

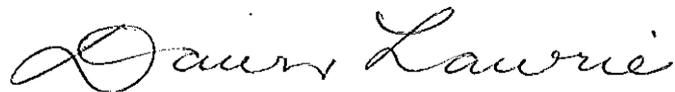
The Darwin-Mandorah ferry has adequate facilities for embarkation at the Darwin terminal, but is not compliant at the Mandorah end- where there are steep steps to cater for the extreme Darwin tides.

### **Australian Standards**

DCLS supports and encourages self advocacy for and by people with a disability, but references to "Australian Standards" which are not explicit in the legislation but must be purchased does not assist people to self advocate.

Either the standards should be more readily accessible which would require negotiation with the company or they should be spelt out in detail when there is such a reference.

DCLS is pleased to have been given the opportunity to comment on the review, and we anticipate continuing improvements for people with a disability using public transport.

A handwritten signature in cursive script that reads "Dawn Lawrie".

Dawn Lawrie JP Disability Advocate

Darwin Community Legal Service

19 April 2013