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Transport Access Section
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
Canberra ACT 2600

Via Email: DisabilitiesTransportAccessSecretariat@infrastructure.gov.au

Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards)

COTA Australia welcomes the opportunity to provide comments in response to the Issues Paper on the Review of Disability Standards for Accessible Transport and is grateful that the deadline for submissions has been extended until 31 May.

COTA Australia (COTA) is the national organization of the eight State and Territory COTAs. Around Australia COTAs have a combined individual membership of around 40,000 older people as well as over 1,000 member organisations with a combined membership in excess of 500,000.

Access to public transport is critical to ensuring older people are not socially isolated and able to fully participate in their community. For many older people this becomes more of an issue when they are no longer able to drive their own car. The 2013 COTA ACT survey of older people's transport issues clearly identifies that there is still a problem with accessibility for older people with mobility issues¹.

This Submission incorporates examples and issues from across the COTAs. Whilst many of them are true only for that jurisdiction, we believe that many are true across all forms of public transport and across all areas and that they show areas for improvement.

Access to transport stops

- For many older people the first barrier to using public transport is getting to the bus stop or train station. This may be because of the distances between stops, poor footpaths or poor design of the stops themselves which do not accommodate people in wheelchairs or with other mobility aids. For example, in the ACT a third of people who said they had difficulties accessing public transport identified not being able to get to the bus stop as the problem.²
- When planning bus stops and distances between them, planners appear to use times rather than distances and calculate using average walking speeds. These speeds do not reflect the time it may take someone with mobility problems to get to the bus stop which makes their trip longer and more arduous and so discourages these people.
- The lack of seating at some transport stops, lack of shade and information (such as timetables) only provided in very small print all contribute to the difficulties older people face and discourage them from using public transport.

¹ 2013 COAT ACT Survey of Older People's Transport Issues- preliminary unpublished findings

² 2013 COTA ACT Survey of Older People's Transport Issues-preliminary findings

Accessing transport

- Older people with mobility problems often report having difficulty getting on and off buses, trains and even getting into taxis. Whilst they all acknowledge that things have improved with better designed buses and improvements at train stations, it is still a problem
- Most public bus fleets are slowly being replaced with new buses that are easier to get on and off. However, the pace of replacement is quite slow and not all routes are covered by the newer vehicles. In the ACT survey, over a third of people who identified problems with using the bus system said their disability prevented them getting on the bus³
- In Melbourne, people have identified that there are significant problems with boarding many trams and the rate of replacement of old, non-compliant stock with new is very slow. There is a process to retrofit some of the low floor trams with devices to make boarding easier as even some of the newer trams do not comply with the existing boarding requirements.
- There are particular issues for people who use mobility scooters and some of the larger heavier motorised wheelchairs as the buses are sometimes not able to take them.
- The current standards with regard to train stations allow stations to have only one access point on a platform. Whilst this means people can get on the train, it does restrict their access and for many people with mobility difficulties there is a certain stigma attached to having to use special points.

Accessing information

- There are still a number of problems with accessing information about public transport despite recent improvements.
- The size of the print on timetables, in interchanges, at stations and at bus stops makes it hard for older people to read. Difficulty in accessing printed copies of timetables is also a problem.
- A growing reliance on smart phones for public transport information excludes people who do not use one. The ACT is looking to roll out some real time information on buses but it is likely this will be through a smart phone app so will be of no benefit to the many older people who do not have a smart phone.
- There needs to be requirement that all information is provided in a variety of formats and through a range of channels to ensure that everyone has the same access to it.
- People still raise issues about lack of clarity of announcements on public transport and at stations. This was raised across the country. Many bus systems do not have audio announcements, relying either on people's own observations or a visual announcement. This is definitely an area that needs more work.
- In Melbourne it has been pointed out that information displays are often remote from the point at which a wheelchair or scooter user is required to wait for a tram or train. This means that current information that is available to other passengers may not be available to those with disabilities. This is quite probably true in other places as well.

³ 2013 COTA ACT Survey of Older People's Transport Issues-preliminary findings

Lack of compliance with accessibility procedure

- Practical considerations can lead to bus and taxi drivers not implementing accessibility procedures. In the ACT people cited instances of bus drivers in a hurry refusing to lower the wheelchair ramp, or pretending that it is out of operation.
- It is still difficult to get access to a WAT, and taxi drivers may elect not pick up people with mobility aids because it takes longer to load and unload them

Travelling outside peak hours

- Public transport systems seem to be designed for people who are working and for school children with both timetables and routes built around these two groups.

Complaining

- People report that their complaints are not dealt with very well. In the ACT people said they complain and never hear back, or their complaints are simply dismissed.
- In Queensland people report not knowing how to complain about buses, ferries and trains with the phone numbers difficult to find, a website that is impenetrable and staff who are not willing to assist with complaints. People have to know that they need to go to Translink and then finding the complaints process is not easy. The Translink website identifies that people may never hear back as it says “due to the volume of comments sent to our team, it’s not always possible to provide a response to all feedback.” COTA does not believe this is an acceptable way to handle feedback and complaints.

In conclusion, it is clear that access to public transport has improved since the introduction of the standards, but still more could be done. There is a perception that there is a problem with compliance and that without a robust monitoring system the standards are never going to be fully implemented. We believe that public transport providers should be more accountable with a national monitoring system in place. We hope the review will address this issue as well as looking at ways the standards themselves can be improved.

We look forward to seeing the outcomes of the review.

Yours sincerely

Jo Root
National Policy Manager