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## **Submission on the Draft Report of the 2012 Transport Standards Review**

I am writing to you on behalf of All Aboard, a network of individuals and representatives of community and local government organisations who have an interest in the accessibility of public transport to all people who wish to use it.

The All Aboard network would like to comment on each of the Draft Report's recommendations and then provide some general comments on other parts of the Draft Report.

### **Recommendation 1.**

All Aboard supports the recommendation that the Australian Government, jointly with state and territory governments, establishes a national framework for reporting on compliance by 30 June 2016.

All Aboard would also like to see this national framework include an auditing component so that instances of misreporting and other inaccuracies would be minimised.

### **Recommendation 2.**

All Aboard supports the recommendation that the Australian Government, jointly with state and territory governments, commences a process for updating and modernising the Transport Standards.

However, All Aboard is concerned that the Australasian Railways Association and the Bus Industry Confederation are advocating for an industry code of practice in their respective industries. We believe that this would unnecessarily complicate the landscape and perhaps lead to outcomes that may be to the disadvantage of people with disabilities.

All Aboard believes that a single legislated document should contain all the necessary information required for all stakeholders to understand their rights and responsibilities regarding the accessibility of public transport in Australia. This single document should also

contain the relevant elements of all Australian Standards that are referenced in an updated and modernised Disability Standards for Accessible Public Transport.

All Aboard looks forward to contributing to the fulfilment of this recommendation by 30 June 2016.

### **Recommendation 3.**

All Aboard advocates a stronger recommendation than “the Australian Government considers the concerns raised about the complaints process”.

All Aboard considers that the current complaints process is heavily weighted in favour of public transport operators and providers. People with disabilities as individuals who often have limited resources, are at a significant disadvantage against large corporations and government bodies when attempting to address discrimination arising from situations where those bodies that are not providing the minimum access as required by the DSAPT.

### **Recommendation 4.**

All Aboard strongly supports the recommendation that the Australian Government, jointly with state, territory and local governments, develop accessibility guidelines for a whole-of-journey approach to public transport planning by 31 December 2015.

All Aboard would like to underline the fact that a journey begins when a person first seeks information about the trip and how accessible (or not) it might be.

### **Recommendation 5.**

All Aboard supports the recommendation that the Australian Government in collaboration with state and territory governments develops and implements a national motorised mobility aid labelling scheme.

However, we note that as the Assistive Technology Suppliers Association has stated in their submission, mobility devices are often modified during their life as the needs of their user change. This may require some flexibility of approach to this subject and will require significant input and consultation from all stakeholders.

### **Recommendation 6.**

All Aboard supports the recommendation that the Australian Government, jointly with industry, state and territory governments, develop consistent national compliance milestones and response times for wheelchair accessible taxis by 30 June 2016.

All Aboard also advocates consistency of wheelchair accessible taxi services and vehicles across all jurisdictions in Australia.

## **Recommendation 7.**

All Aboard supports the recommendation that the Department of Infrastructure and Regional Development, in close consultation with the Aviation Access Forum, undertake a review of the Disability Access Facilitation Plan initiative by 30 June 2015, with the aim of improving the overall effectiveness and accessibility of the plans.

## **Recommendation 12 from the 2007 Review.**

All Aboard strongly supports the recommendation from the 2007 review that government commission research into the safety of passengers travelling in conveyances whilst seated in mobility aids. This research should make recommendations around whether there is a need for an Australian Standard addressing this aspect of safety for mobility aids.

All Aboard notes the discussion on pages 107 to 109 of the Draft Report on this subject and strongly advocates that this informs the basis of a Recommendation 8 in the 2012 Review. The safety of passengers whilst seated in mobility aids is a significant issue that is discussed often throughout the disability sector. The safety of passengers on public transport should not be compromised by “unavailability of funding” or by differences in standards across jurisdictions. A national standard, informed by world’s best practice and consultation with all stakeholders should be a priority.

## **Recommendation 14 from the 2007 Review.**

All Aboard strongly supports the recommendation from the 2007 review that the phased application of dedicated school bus services to physical access requirements in the Transport Standards, commencing in 2029 be fully required by 2044.

All Aboard believes that the conclusion of the APTJC “that there is no obvious area of unmet transport need for students with disability in Australia” is not valid considering the lack of evidence on the subject.

Further, that “APTJC concluded that the current approach to meeting the transport needs for students with disability was adequate and was tailored to their needs” fails to recognise that parallel ‘special’ transport services do nothing to promote the social inclusion of students with disabilities.

It is the view of All Aboard that any vehicle purchased for the purposes of being used as a school bus should comply with the Transport Standards.

## **Some other comments on the Draft Report:**

Observation and anecdotal evidence suggests that the public transport industry in general treats the DSAPT as a sort of “aspirational target”. Where compliance has been achieved, it is very often to the minimum possible extent allowed. The spirit of the DSAPT Guidelines is that independent access is a primary aim, but it can be difficult to find instances where the DSAPT has been exceeded in order to achieve accessibility at a level that should be expected by passengers with, or without disability.

Page 19:

All Aboard would like to request citations for the following: “Both the AHRC and the Australian Federation of Disability Organisations (AFDO) supported legal recognition of the (proposed rail industry) code.” We have been unable to find reference to this subject in the AFDO submission and no submission from the AHRC appears on the Infrastructure website.

Page 26:

All Aboard would like to see the phrase “in a number of instances” replaced with “in the majority of instances”. This would more accurately reflect the current situation.

Page 27:

The term “fully accessible” needs to be defined. It is often misleading as used. The table states that NSW trains are “fully accessible”. If this were an accurate assessment, the ARA exemptions would not be necessary. Direct assistance is required for boarding. The table states that Sydney’s light rail system is fully accessible. However, direct assistance is required for boarding.

Page 28:

The requirement for boarding of trains at the front door of the front carriage by passengers with mobility devices is specific to Melbourne. Other cities have different arrangements, meaning that visitors must acquaint themselves with the local requirements before they travel.

Page 29:

All Aboard would like to see the phrase “The Victorian Department of Transport ... often require direct assistance ... “ replaced with “ ... in most instances require direct assistance ...”

It is the understanding of All Aboard that the raised section of platform (aligning with the first door of the first carriage) at a small number of railway stations in Melbourne is not an interim measure, but the beginning of an initiative to provide independent access. These raised sections of platform provide a boarding gap that approximates the Part 8.2 Standard. The accessibility is good and they are generally well liked by mobility aid users and train drivers alike. This shows that, despite the protestations by some operators and their representative organisations, the DSAPT can be met or exceeded if sufficient creativity and effort is applied.

The most recent railway stations built in Melbourne provide roll-on, roll-off access to the front door of the front carriage for two of the three types of trains currently operated. Generally, the gap is within the tolerance required by DSAPT 8.2. In fact, very little work would be required to provide compliant access to every door of the train from these new station platforms.

Page 32:

All Aboard would like the phrase “... only via a lift ...” be changed to “... only via a single lift ...”. As noted in other submissions, two accessible means of entry and exit should be made available in case of breakdown: either two lifts or a lift and a ramp.

Page 33:

The assertion (it is unclear whether the assertion is being made by the Report or by the Victorian Department of Transport) that “there is no standard specifying the vertical and horizontal gaps that should not be exceeded for independent access. These tolerances are inferred from Section 8.2 of the Transport Standard governing the use of boarding devices”, is puzzling. Surely where the tolerances that trigger the requirement for the use of a boarding device occur, there must logically be a lack of independent access for an average mobility aid user.

The sentences: “Victoria based the current specified boarding gap of 12 mm (vertical) and 40 mm (horizontal) on an Australian Standard for hoists and ramps used for road transport including buses and taxis.” and “However, there is no specific standard for trams, and European standards have different vertical and horizontal gap requirements for the deployment of ramps” is partly in error. It is the DSAPT that specifies the maximum boarding gap that triggers the use of a boarding device. Victoria is bound by the requirements of the DSAPT. Further, the boarding gap of 12mm (vertical) and 40mm (horizontal) is based on two different Australian Standards that are in agreement on this subject: AS3856.1 (ramps and hoists for road transport) and AS1735.12 (for lifts, escalators and moving walkways).

Page 34:

All Aboard notes that since the Review commenced, the boarding gap of Melbourne’s low floor trams has improved significantly due to modifications to the Combino (the most numerous type) tram and a new approach to tram platform design. This shows that, like with train platforms, a fresh approach to design can negate the need to revise Standards that in the past may have seemed too difficult to achieve..

Page 50:

All Aboard suggests another dot-point: “provision of information”, for example route and location information on buses and route and timetable information at bus stops that is accessible to all passengers. 100% compliance was required by 31 December 2007. However observation suggests that Victoria in particular is a very long way short of that target.

Page 76:

All Aboard suggests that the words “or no path at all” be added after “... surrounded by inaccessible paths”.

Page 90:

All Aboard notes that due to the joint submission by the ARA and V/Line, and the submission by Metro Trains Melbourne being listed on the Infrastructure website as “confidential” and therefore not available to the public, it is hard to understand what “the significant benefits of a National Code of Practice Accessible Rail” might be.

Page 97:

The final paragraph on this page seems to confuse access to trains from platforms (raised platforms) and access to platforms from the street (ramps or subways).

In conclusion, All Aboard would like to congratulate the Secretariat for compiling such a detailed and comprehensive report. We understand that the Draft Report was based on a wide variety of views and opinions from a wide variety of sources and that accurately distilling all this into a single document must have been a challenging task.

All Aboard looks forward to seeing the final Review in due course.

Sincerely,

Ray Jordan  
(Admin)  
All Aboard Network