

# Review of the Disability Standards for Accessible Public Transport 2014 – Draft report

SUBMISSION BY MARRICKVILLE COUNCIL  
[www.marrickville.nsw.gov.au](http://www.marrickville.nsw.gov.au)

camperdown dulwich hill enmore lewisham marrickville newtown petersham st peters stanmore sydenham tempe

**Marrickville**  
*a diverse, vibrant and innovative community*



# contents

|  |          |
|--|----------|
| <b>Introduction</b>                              | <b>3</b> |
| <b>Draft Report – Summary of recommendations</b> | <b>4</b> |
| <b>Easy Access railway station upgrades</b>      | <b>5</b> |
| <b>Introduction of Inner West Light Rail</b>     | <b>6</b> |
| <b>Accessible bus services</b>                   | <b>7</b> |

## Introduction

Marrickville Council welcomes the opportunity to provide comment on the Review of the Disability Standards for Accessible Public Transport Draft Report 2014.

Council made a submission on the review during the consultations of 2011, from which the draft report was generated.

Council is generally in support of the 7 new recommendations that are proposed to address the issues highlighted in the review process and to move forward in the implementation of the standards.

As a result the focus of this submission is to highlight experiences that have occurred since the last review period (2011) when Council's submission was prepared.

Notably Marrickville has since that time seen the completion of two easy access railway upgrades, planning underway for another, the introduction of light rail and increased numbers of low-floor accessible buses.

The comments provided below respond to achievements, challenges and ongoing concerns arising from these initiatives.

## Draft Report – Summary of recommendations 2014

### **Recommendation 1 — National reporting on compliance**

That the Australian Government, jointly with state and territory governments, establish a national framework for reporting on compliance by 30 June 2016.

### **Recommendation 2 — Modernise the Transport Standards**

That the Australian Government, jointly with state and territory governments, commence a process for updating and modernising the Transport Standards. This work should be undertaken in close consultation with local government, industry and the disability sector, and include research on the technical issues raised in this review, the development of options, and assessment of the impact of any proposed changes to the standards, with this work to be completed by 30 June 2016.

### **Recommendation 3 — The complaints process**

That the Australian Government considers the concerns raised about the complaints process.

### **Recommendation 4 — Whole-of-journey accessibility**

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.

- **Whilst guidelines on the whole-of-journey approach are welcome, a more robust set of standards may be required to enable compliant systems that are fully workable and/or agreed protocols for successful implementation.**

### **Recommendation 5 — National motorised mobility aid labelling scheme**

That the Australian Government in collaboration with state and territory governments to develop and implement a national motorised mobility aid labelling scheme.

### **Recommendation 6 — National wheelchair accessible taxi compliance milestones**

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.

### **Recommendation 7 — Review of Disability Access Facilitation Plan**

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.

## Easy Access railway station upgrades

Since the 2007 review (that was carried out in 2011), the Marrickville LGA has had two railway station upgrades, Sydenham and Newtown; whilst Newtown Station is located just across the border with the City of Sydney, parts of the Newtown suburb are within the Marrickville LGA and the station services residents in both LGAs.

The planning, consultations and outcomes achieved in Newtown were of a high quality and the improvements to access were equally welcome. The improvements have made a noticeable difference to the usage of the station and have benefitted many people including those with disabilities and others who formally had no access to the station. In addition, families, cyclists and older people can now easily use the station, a vast improvement on the previous situation.

A large part of the success of the Newtown Station upgrade is attributable to the consideration paid to the interaction between the immediate surroundings/adjacent areas and the station itself.

In contrast, the process used to deliver the upgrade at Sydenham Station (which followed Newtown) did not consider adjoining areas or adequately address how they are fundamentally important to the functionality and accessibility of the station, nor to related services such as the bus interchange points. Sydenham serves as a significant interchange in the local area and yet accessible interchange between rail/bus remains uncompliant in regards to the DSAPT in several areas.

Planning for the creation of a viable and improved accessible interchange between bus and rail did not happen. The split responsibilities between modes and transport agencies concerned meant that no overall coordination was evident that would have led to integration of modes. The pedestrian approaches to the station remain non compliant and are a barrier to many people who would need the lift facilities within the concourse to access the trains.

Further, the temporary access to the station during the works provided a more accessible entry and exit than that achieved at the completion of works, at which point these (accessible) facilities were decommissioned.

There is no doubt that the works within the internal boundary of the station have led to a far superior outcome. Council is pleased with the added amenity the upgrade has achieved. However Council is disappointed that, under the banner of an easy access upgrade with a measure being compliance with DSAPT, the pedestrian approaches and the bus interchange locations have been completely ignored. This is despite continued advocacy and raising the issues at each stage of design & development. While Council remains in contact with Transport for NSW and has had mixed responses to our concerns, the situation currently remains unchanged. It is suggested that a better way to have achieved a compliant result would have been for each party to be involved cooperatively and in accord with an agreed design outcome that it be a functionally accessible station.

Classifying essential pedestrian approaches as outside of the scope of the (easy access) project team, yet designing entries at the least accessible point for the surroundings (when there are better options), is in stark contrast with the intention of the legislation to achieve accessibility. It would appear the standards are not sufficiently directive to compel linked agencies to work together on the same project when that is critical to the capacity of the project to deliver an accessible outcome.

Other easy access projects such as the upgrade of Marrickville Station have had similar difficulties in the initial design and planning stages. Specifically that while compliance to the DSAPT is a project objective, the interpretation of what constitutes compliance or a functional outcome for users becomes seriously compromised by other competing regulations (state), individual agency policies and internal guidelines.

## Introduction of the Inner West Light Rail Extension

Since the 2011 recommendations, the Inner West Light Rail Extension has begun operating through Marrickville. This new service connects Dulwich Hill Station to Central via several stops along the Inner West GreenWay corridor and through Leichhardt.

Much of the supporting infrastructure to the light rail stops is highly accessible, however passage on and off the carriages themselves is not. The provisions permitted in the standards for assisted access have been designed in and used even though fully independent access would have been possible to achieve, particularly given that infrastructure other than the rail tracks was constructed largely from scratch.

As a transport mode, light rail/trams work best for quick passenger transfers that are easily facilitated, thus enabling large numbers of people to be transported without additional staff involvement, unlike current procedures for heavy rail.

Subsequently it is disappointing that in a new key piece of inner west transport infrastructure the providers have chosen to rely on assisted access to accommodate people with a disability. To introduce the added element of staff intervention slows the system and ultimately makes it less viable and certainly more problematic for users with a disability.

It is suggested that the DSAPT was developed without adequate light rail guidance; this is particularly concerning as new light rail projects are increasingly being considered to address public transport needs and enhanced sustainability. Despite the intention of the standards, in this instance easily achieved independent access has been substantially compromised.

In order to save cost and maintain frequency, providers have used a combined system of new and old light rail stock with different floor heights. Ironically the newer light rail vehicles are designed to be more accessible than the older ones yet due to running in conjunction with the old light rail vehicles they are higher from the platform than the older model. Thus in order to accommodate both models the platform has to be lower than either, which then requires a ramp to board.

This is a poor outcome and interpretation of the assistive access provision which is more appropriately applied as a contingency measure when there is little technical alternative or substantive evidence of unjustifiable hardship. While it could be argued that this outcome complies with relevant DSAPT requirements, it is nonetheless a lesser provision, technically not needed and a substantive loss of provision to anyone needing at grade access to the carriage. If this practice continues an entire new Sydney network will be developed with sub-standard access.

Observation of effective light rail/tram networks in cities where they are heavily used confirms the need for fully independent access in this transport mode. Slowing a light rail/tram service down to assist passengers at any stop, signalling drivers of the need for deployment of a ramp and negotiating entry/exit with staff amongst other travellers in a time pressured environment is simply not an effective or practical operation for such a transport option.

If people with additional access needs were to become frequent users, the current system would grind to a halt as delays would be unavoidable. There is concern that people would be denied access due to timetabling pressures and the sheer difficulties in assisting in busy situations.

In addition such practice promotes stereotypes of dependence, 'otherness' and that people with disabilities require help for basic tasks. It also risks people with disabilities being seen as an inconvenience and resource intensive rather than just another traveller which is how they are regarded in other places offering sensibly designed independent systems.

## Accessible Bus Services

The number of accessible low floor buses servicing the local area has increased in the last three years. However, reliability of scheduled accessible services and information about the services remain far from optimal and are often simply inaccurate.

The frequency of scheduled services (presuming they adhere to the schedule) is also lacking and needs to be improved. Perhaps primary routes should be prioritised for achieving 100% accessibility; or the reliability of timetables advising of accessible vehicles be enhanced so that they can be depended upon.

Reports of people being denied access to the bus, the bus not stopping despite room being available and of being told that manual ramps are “not working” such that drivers can maintain schedules are all too frequent. Enhanced driver training ought be expedited to avoid such circumstances.

Many members of the Marrickville Access Committee often report inconsistencies and a failure for the depot to match low floor buses to the scheduled accessible services. This leaves people stranded, missing appointments and connections and so the current system is regarded as a largely unreliable option to get to your destination and return.

As the report has highlighted there are widespread concerns with the effectiveness of the current complaints procedures.