

Municipal Association of Victoria

March 2008

Submission from the Municipal Association of Victoria to the Five-Year Review of the Disability Standards for Accessible Public Transport

The Municipal Association of Victoria (MAV), as the peak representative body for local government in Victoria, welcomes the opportunity to provide a submission to the Five Year Review of the Disability Standards for Accessible Public Transport (DSAPT).

Main issues raised by local government:

Provider Focus - the overall report is provider focused and measured on impact on the provider as opposed to the user's needs and rights. The provider issues raised appear to be based on 'barriers' not based on opportunities and solutions.

Modal-specific guidelines - the MAV believes the recommendation of providing modal-specific guidelines will be particularly useful to public transport providers and will be instrumental in changing the issue of accessibility from the realm of 'provision through fear of litigation' to one of 'provision with confidence and purpose'. The report acknowledges the work and accomplishments of public transport providers so far, and the difficulties

in providing accessibility in the absence of modal guidelines, while at the same time appearing frustratingly slow to people with disabilities. The MAV emphasizes the importance of including people with disabilities in consultation relating to the implementation of this recommendation.

Progress in rural/regional/interface* areas - there is extremely slow progress with meeting targets in rural areas despite good improvements in metropolitan Melbourne. Access to accessible public transport for interface, rural and regional areas needs to be considered on an equitable basis. It is encouraging to note that this has been recognized in the report, but is disappointing that there is no recommendation around this issue. Rural, regional and interface councils face a number of diverse and complex challenges associated with the geography and demography of their larger municipalities, where the majority of communities have no public transport. Operators can achieve compliance with the milestones but the situation continues where many people are doubly disadvantaged. For example, people who live in interface municipalities such as Whittlesea are not serviced by public transport other than buses and taxis - but, given the distances involved in travelling around/to and from these areas, taxis become far too expensive.

Interface councils would welcome the following recommendations:

- faster rollout of low floor buses (perhaps positively targeting transport disadvantaged areas, like the rural and interface municipalities)
- timetables to indicate scheduled low floor buses (operators have so far refused this request, citing that all buses will be low floor in the future)
- clear signage on buses and at stops and numbers on sides of buses
- training of bus drivers (and taxi drivers) and an expectation that, before compliance is fully achieved, transport operators should be required to provide some better level of assistance to passengers who require/request it.

Solutions to address identified issues require working collaboratively at a local level with communities and service providers to develop innovative ways to address issues, as well as increased government resourcing and policy commitment to ensure systemic and substantial improvement.

'Whole of Journey' - although the report acknowledges the 'whole of journey' issue, it fails to address this in the recommendations. It is vital that this is addressed to eliminate the type of scenario experienced by some people with disabilities, where, for example, a low-floor tram may be in operation, but some or none of the tram stops are accessible. Although it is acknowledged that improvements such as these are often incremental, the deadlines set for compliance for some conveyances, e.g. trams and trains, are so far in the future as to be extraneous to many people with disabilities. Targets are too low and need to be reviewed in light of this issue to ensure that a 'whole of journey' experience is made possible sooner.

Possible solutions - transport providers should be required to think more strategically in their planning. Providers should notify users of accessible routes, for example. This allows passengers to plan their whole journey

without arriving at the change-over point and finding they cannot access a toilet etc.

School Buses - it is encouraging to see the recommendation for removing exemption from the standards for school buses. The recommendation is welcomed not only because it helps eliminate barriers for students with disabilities, but also because school buses in rural and regional areas are often the only mode of transport available to communities. The MAV would like to see an appropriate compliance timetable for this standard, taking into consideration the points made under the 'whole of journey' paragraph above.

Mobility Aids - the MAV acknowledges that standards need to be placed on all scooters available in Australia (large and small) to enable scooter users to access all modes of transport as recommended in the report. However, of equal importance is the need for research to be carried out on this issue before a general recommendation can be made regarding mobility aid sizing guidelines.

Many people have a purpose built wheelchair, which is suited to their particular disability and these very expensive chairs may be needed to support and correct body postures and disabilities and may have to also carry equipment such as oxygen. Sometimes the size of these wheelchairs for long trips may be cumbersome due to individual specifications. Many retailers simply want to sell the most expensive model, and families buying them may ask for the largest and best quality model without consideration of what it is going to be used for and whether it is the best model to suit the person with a disability. It would be beneficial to have information in a manual or tag to put on models in shops so customers can determine what model will fit on public transport, what will fit through standard doors, etc. This process involves awareness-raising for both consumer and retailer.

Accessible Information - although this has been mentioned in the report, this was not addressed in the draft recommendations and the MAV sees this as an important tool for increased access. A service that allows people to call up (using the National Relay Service if appropriate) or access via the Internet and have someone assist them with timetables, routes, connections, options and the like would be one of the most useful and accessible methods.

Wheelchair accessible taxis (WATs) - it is encouraging to see that the number of WATs in operation has increase in the past few years. However, it is disappointing to note that the standard for response times for WATs (that by 31 December 2007, the average response time for WATs is the same as the average for all taxis) has not been met. This is an area that needs examining in more detail to ascertain what practical measures may be put in place to improve on progress with this standard. The Queensland experience could be used as the starting-point for some consistent implementation of WATs. Queensland has a higher percentage of WATs in operation (476 WATs , over 15% of the total in the state) and the government is being extremely proactive in funding and supporting the roll out of WATs in regional areas. With regards to raised tactile signage on taxis, it is

recommended that this signage also be in Braille and not only on the outside of the vehicle but also on the inside, as not all issues arise prior to getting into a taxi.

Community Transport - the MAV welcomes the recommendation around this issue. It makes sense to include in the standards a service which has as its customer base, many people with mobility problems. However, more clarity around the exact detail and implications of this is required, as the report is somewhat confusing around this issue.

Concern has been raised by (particularly rural-focused) local government on the exact implications. Small community transport groups often use community volunteers and their own private vehicles to transport people around smaller Victorian towns and the volunteer nature and resources of these smaller rural transport services has not been fully considered in choosing the preferred option of 5D.

If there is a requirement for these smaller volunteer based services to be compliant, they may well disappear from these small rural communities. This could have the unfortunate outcome of increasing discrimination against rural communities in regards to their available transport options.

The MAV believes that to negate these issues the available resources of these small operations and the potential for additional funding inputs needs to be fully considered as part of this review and a response provided at the earliest stage.

Trains - a number of passengers travelling on country trains have found it to be discriminating to have to sit in either the guard's van or the luggage compartment, because of lack of adequate wheelchair space in carriages. In some cases, people have had to be separated from their purpose built wheelchairs and/or their equipment. Families and carers have also stated there is no access to toilets, once a person is seated in either the guard's van or luggage van. Although there are V-Line carriages available with accessible toilets, they do not operate every day. Rural areas already suffer from a lack of adequate transport generally, so this only exacerbates the problem.

Reporting framework - regarding recommendation 7 - the timescale of developing and implementing a mandatory reporting framework by end of 2008 seems ambitious given the length of consultation for this current document (into March) and the consultation that will be required for the development of the proposed framework. It would be preferable if this timeframe be realistic enough to allow adequate consultation to achieve the best reporting outcome.

Bus stops - in Victoria, there is an agreed plan between the State Government and councils to upgrade 10,000 bus stops across the State to DDA requirements by June 2010. This program, the biggest upgrade in the State's history, is funded by the State Government to agreed specifications and the work is contracted to councils to implement. To date, the program is on track with some 3,000 bus stops having been upgraded to date, since

2006/7. The MAV and individual councils are strongly committed to the success of the bus stop program, and a key part of this is the obligation for compliance assessment and reporting. The MAV strongly supports these activities being the responsibility of the State Government, rather than individual councils. The State Government supports this position as it ensures consistency, efficiency and accountability.

Particular rural issues

As well as the Community Transport issue raised above, a number of general concerns have been raised from rural and regional municipalities:

Cost – increased costs are inevitable when implementing change and upgrading infrastructure and the burden of costs will be greater across rural and regional areas. Given this, costs should be measured in an equitable manner that does not disadvantage rural and regional communities.

Appropriateness of criteria used in the qualitative assessment of options

- rural proofing** is a useful part of the assessment tool which ensures that all policy making and development considers rurality in decision-making. The following website link shows a rural proofing checklist currently successfully used in the United Kingdom <http://www.defra.gov.uk/rural/proofing/index.htm>. Information is also available from the Transport section of their Rural White Paper implementation (2004) www.defra.gov.uk/rural/pdfs/ruralwp/april2004/6.pdf

Equity - the standards need to include equity for all across rural and regional areas. Although a standard may be met in metropolitan areas by the target date, it may not be met in rural and regional areas. However, despite this, the state is still seen to be compliant. Standards need to be modified to ensure equity and consistency (to some extent) across jurisdictions, but avoiding the prescriptive standards approach, to take into account differing rural/metro and jurisdictional needs and capabilities

Unjustifiable Hardship -

Overall, there seems to be a need to instill in transport providers the importance of the compliance dates for these Standards and that target dates need to be adhered to. Applying for exemptions should not be a matter of course if a provider cannot comply. Where rural and regional transport is exempt from the standards due to hardship circumstances, this continues to disadvantage the community. A solution to this would be to provide financial/resource support to the transport provider.

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*Interface municipalities are those located on the outer edge of metropolitan Melbourne, which experience issues faced by both rural and metro municipalities.

** Rural proofing is a commitment by the (UK) Government to ensure that all its domestic policies take account of rural circumstances and needs. It is a mandatory part of the policy making process, which means that, as policies are developed, policy makers should systematically:

- consider whether their policy is likely to have a different impact in rural areas, because of particular rural circumstances or needs;
- make a proper assessment of those impacts, if they are likely to be significant.
- adjust the policy, where appropriate, with solutions to meet rural needs and circumstances.

Rural proofing applies to all policies, program and initiatives and it applies to both the design and delivery stages. Source: www.defra.gov.uk

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