

Public Transport Authority of Western Australia's submission to the 5year review of the DSAPT

Detailed PTA Response to the Questions raised in the "Review of the DSAPT" Issues Paper released in May 2007	
<p>1. Has the accessibility of public transport improved since the introduction of the Transport Standards?</p> <p><u>YES</u>: But need greater acknowledgement of the cost, which at the end of the day will be paid by the tax payers. In 2005 the PTA train operations carried 672,312 passengers per week of which 0.12% were people with disabilities, while realising that the improved accessibility also assists seniors and others with reduced mobility as the Australia population ages.</p> <p>Under Western Australian regulation the PTA is required to implement a publicly available "Disability Access and Inclusion Plan" the current plan covers the period 2007-2012. The development of this plan required a period of public consultation. This plan addresses how the PTA will meet its compliance with the Transport Standards and requirements of the Western Australian Disability Services Act (1993)</p>	
<p>•How has accessibility to conveyances (eg, trains, buses, trams, ferries, taxis, aircraft, etc) changed? Can you provide examples?</p>	<p>All new conveyances are design to meet the Transport Standards as far as practicable.</p> <ul style="list-style-type: none"> ➤ Transperth purchases 65 new buses each year, all meet the Transport Standards. All new rollingstock as far as practicable meets the Transport Standards, including 31 new three car sets delivered between 2005 and 2007 and 15, three car sets ordered for delivery in 2009. ➤ The entire Transwa country coach fleet meets the Transport Standards
<p>•How has accessibility of information (eg, maps, timetables, announcements, etc) changed? Can you provide examples?</p>	<ul style="list-style-type: none"> ➤ Timetables are now available in large print and braille (upon reasonable request). The website has the function to increase font size to improve its accessibility for people with visual impairment. In collaboration with the Department for Planning and Infrastructure (DPI) an accessibility map has been develop for the Perth CBD ➤ Signs and verbal announcements are provided
<p>•How has accessibility of infrastructure (eg, access to stations, stops, ports, piers, airports, interchanges, etc, as well as access to co located facilities such as toilets, waiting rooms, and food and drink, etc) changed? Can you provide examples?</p>	<p>All bus stations were audited against the Transport Standards and a work program was implemented to ensure that all bus stations meet the Transport Standards as far as practicable by late 2007. All new train stations are designed and constructed to meet the Transport Standards as far as practicable. A long-term program to improve existing train stations to meet the Transport Standards as far as practicable has been implemented. While a bus stop layout policy has been adopted, the vast majority of bus stops do not meet the Transport Standards creating problems for "whole of trip" accessibility; bus stops are not the responsibility of the PTA. Kerb height is also outside the PTA control, all new buses have automatic ramps, but these require a standard kerb height to be operated; therefore if the kerb height is wrong the ramp cannot be used.</p>

<p>2. Have these changes matched your expectations of the implementation and uptake of the Transport Standards? <u>YES</u>: PTA has done better than required, and at least meeting our expectations and those of the great majority of its passengers with disabilities.</p>	
<p>•Do you consider that the changes have matched (1) the compliance requirements and (2) your expectations?</p>	<p>PTA has met compliance requirements where practicable. Some items we consider are unachievable due to engineering and operational or technological failing, particularly the size of the gap between the train and platform, and hearing augmentation requirements.</p>
<p>•If the changes have fallen short of your expectations, can you provide examples?</p>	<p>In situations where PTA services interface with those provided by other stakeholders there is often a reduction in accessibility to the extent the PTA provides an accessible service which becomes limited at destination points. Examples of this include the regional coach service where passengers are dropped off at the side of the road, and accessible metro buses forced to use bus stops which are virtually sand patches.</p>
<p>3. Do you consider that the level of compliance required at the end of the first five year period is sufficient to have had an impact on accessibility?</p>	<p>Yes, and importantly the experience gained in meeting the target at the end of the first five year period will help the PTA work towards future targets</p>
<p>4. To what extent do you consider current data on accessibility are reliable? Can you provide examples of problems with data that you are aware of?</p>	<p>As a general indication of accessibility the data is reasonable. However, the need to provide data on all 31 items listed in the Transport Standards for all sections of the infrastructure and conveyances is likely to be a lot less reliable (i.e. reporting on accessibility of a train station when there are a number of entries). There is a difference between fully compliant with the Transport Standard compared to an accessible station, buses, trains etc. In many cases 'fully compliant' is unachievable and not necessary.</p>
<p>5. How could reporting of accessibility data be improved for future stages of the implementation of the Transport Standards?</p>	<p>Reduce amount required, see response 4. The level of reporting required, particularly in relation to reporting on all the 31 items in the standard on all parts of the infrastructure and conveyances is onerous and of limited value. The question should always be asked 'Is it needed? And why?'</p>
<p>6. Are you aware of examples where improved accessibility of public transport has led to increased patronage?</p>	<p>From perception "Yes"; when looking at the number of bookings for direct assistance on the Transperth train system and increased transfer from the train services to the CAT (Central Area Transit, Perth CBD) system indicates an increased patronage on the system by people with disabilities. This view is further supported from observation on the bus replacement services to replace train services due to maintenance work indicating an increase in patronage by people with disabilities. However the passenger count on the train services between 2002 and 2005 indicated no increase in people with disabilities using the system. More data is required to</p>

	<p>identify any long-term trend in the number of people with disabilities using the system. However on this survey there is no evidence that the introduction of the standards is increasing the number of passengers with disabilities using public transport. Having said this the Perth metro train system was reasonably accessible in 2002, all rollingstock and major station was accessible, and the direct assistance measures were in place to provide direct assistance and ramps etc, while considerable disruption occurs due to capital works on the system during 2005.</p>
<p>7. Has the introduction of the Transport Standards helped you better understand your rights as a public transport user? If yes, in what ways has it done this?</p>	<p style="text-align: center;">Questions for Public Transport Users ONLY</p>
<p>8. Are the Transport Standards and the accompanying Disability Standards for Accessible Public Transport Guidelines 2004 (No.3)(the Guidelines) a sufficient source of information on your rights as a user of public transport, or have you needed to consult other sources? What other sources have you consulted? How did you find out about these sources?</p>	
<p>9. Are you aware of other users of public transport who appear to be unaware of their rights or obligations? How could this lack of awareness be addressed?</p>	
<p>10. Has the introduction of the Transport Standards clarified your obligations as a public transport operator or provider? If yes, in what ways has it done this?</p>	<p>In some areas because of clear details, guidelines and timeframes, however in some situations they conflict with other standards i.e. Building Codes, sometimes the Transport Standards contains tighter specification; as detailed in the ARA submission. At other times they leave gaps and the potential for different interpretation of the standards. Areas such as unjustifiable hardship and equivalent access are open to subjective interpretation.</p>
<p>11. Are the Transport Standards sufficient, or have you needed to consult other sources? What other sources have you consulted? How did you find out about these sources?</p>	<p>Sufficient as they often directly link to other standards which are specified in the Transport Standards. However, there is a constant concern, that when these standards change operator's requirements under the Transport Standards need to change automatically. The question of the requirement to retro-fit to the new standard may not be well explained. Furthermore more consideration must be given to the fact that the life-span of major infrastructure can be many years and retrofitting can be very expensive for limited benefit.</p>
<p>12. Are you aware of other operators or providers of public transport, who appear to be unaware of their obligations? Can you provide examples? How could this lack of awareness be addressed?</p>	<p>Think they are all aware; however the level of action to implement the Transport Standard may vary across providers/operators.</p>
<p>13. Are there areas of the Transport Standards that you consider unclear in terms of the adjustments operators and providers need to make? Please specify.</p>	<p>Need to clarify size and weight of mobility aids that are acceptable and practical to manoeuvre to protect the users and other passenger's safety. These need to be widely publicised as it is very expensive to change conveyances and facilities if the specifications change. The PTA supports the ARA's proposal that these specification become part of the revised Transport Standards.</p>

<p>14. Have the exemptions allowed under the Transport Standards (as specified in the previous chapter), reduced the clarity of obligations under the Transport Standards?</p>	<p>To some degree yes, because the exemptions only apply for a limited period they have the potential to increase uncertainty over future requirements. Any exemption granted, with the exception of unjustifiable hardship, should trigger an official review of the related section of the Transport Standard.</p>
<p>15. To what extent do the Transport Standards allow operators and providers a choice of ways in which they can demonstrate compliance?</p>	<p>Not enough flexibility for operators for example:</p> <ul style="list-style-type: none"> ➤ If a number of train stations are located close together, the better approach and most cost effective solution to improve the accessibility for people with disabilities would be to make selected station(s) fully accessible rather than spread the limited resources over all the stations ➤ Equilivant access provision is open to interpretation ➤ Hearing augmentation has a number of issues for the Transport Standards because of signal interference and compatibility <ul style="list-style-type: none"> ▪ need to be less specific to allow for technological changes/improvements i.e. types of audio loops ▪ could use visual displays instead of hearing loops to communicate messages ▪ provide a single place (safety zone) where a high level of services are available (visual displays, hearing loops and mark the place on the floor rather than require a complete station with the same level of services.
<p>16. Where Australian Standards or other technical requirements are specified, are these appropriate? Please provide examples where you believe the use of Australian Standards is not appropriate.</p>	<p>The AS for the design and specification of wheelchairs.</p> <p>It needs to be understood and considered that because of the strong and numerous links between the Transport Standards and other Australian Standards that any changes to these linked AS has the power of Law. Furthermore, there is limited consideration of the need to retro-fit facilities and conveyances to meet any changes in the AS and that the cost of compliance needs consideration in the process of changing AS.</p>
<p>17. Are there requirements that have proven to be impractical or difficult to implement? If so, please specify.</p>	<ul style="list-style-type: none"> ➤ See details from the ARA exemption (which the PTA is a member) – this exemption only applies to rail and for 2 or 3 years. The ARA is attempting to make the exemption permanent, while a number of the exemptions sought in the application, but not granted should form part of this 5 year review ➤ Many of the areas of future concern relate to the increasing size of mobility aids and the time and cost of upgrading conveyances and facilities if the Transport Standards change. ➤ The Transport Standards require TGSI to be installed in some cases within 300mm of the kerbing (AS 1428.4 (2002), but this requirement can be dangerous by creating the possibility of a passenger standing this close to the kerb to be hit by large mirrors on buses or trucks – The PTA have shifted the TGSI paving back to 600 mm but this change might not meet Transport Standards

<p>18. As a public transport user, are there areas of the Transport Standards where you consider that a more specific requirement for compliance would improve accessibility?</p>	<p>Questions for Public Transport Users ONLY</p>
<p>19. Do you consider that the requirements in the Transport Standards have been applied consistently across different modes of public transport?</p>	<p>Yes, in WA from a PTA perspective, but cannot comment for modes we do not operate or control</p>
<p>20. Will any current areas of inconsistency be addressed through the future stages of implementation of the Transport Standards? (see Appendix B)</p>	<p>In some cases yes, for example a number of areas require 100% compliance by December 2007 with other only 25%. What is the use of having such items as hearing loops, signs, symbols, priority seating 100% compliant, when any person with a disability will not be able to enter the conveyances, for example older style buses with steep steps or inaccessible stations.</p>
<p>21. Do you consider that the current exemptions granted are appropriate? Should these exemptions be reduced over time?</p>	<p>Gaining an exemption is a complex process because of the large number of parties involved, but can work OK. The ARA exemption should be made permanent and built into the Transport Standards. Exemption should only be reduced if the grounds for the exemption and the operational practicalities are better considered in the Transport Standards.</p>
<p>22. In implementation of the Transport Standards, have the requirements led to a relatively consistent standard of compliance across all modes of public transport? If not, where are the major differences in approach?</p>	<p>Yes from a PTA perspective, cannot comment for other operators and modes.</p>
<p>23. To what extent do the requirements in the Transport Standards address all of the accessibility requirements for people with disability? Are there gaps in the coverage of requirements?</p>	<ul style="list-style-type: none"> ➤ The requirements of the Transport Standards do not clarify size/weight of mobility aids; also need to consider wheel size to reduce potential to jam in any gap. ➤ Will always be a place for equivalent access and a place for direct assistance, staff need to be trained to be able to discreetly assist people with disabilities. Other users must also be considered – they have the same mix of rights and responsibilities as all public transport passengers.
<p>24. Does the compliance timetable provide for a gradual improvement of accessibility over the 30 year implementation period? Are there aspects of this timetable that presents compatibility problems? How could these requirements be improved?</p>	<p>Should identify parts of the Transport Standards as a higher priority than others to ensure ability to travel to destination. The same weight is given to all items for example:</p> <ul style="list-style-type: none"> ➤ braille signage Vs ramps required to get on and off conveyances ➤ accessible buses Vs accessible drinking fountain

25. Are providers meeting their obligations across all aspects of accessibility, which ensures compatibility?	Yes for PTA, cannot comments for other operators/providers.
26. Do the requirements of the Transport Standards need to more explicitly recognise the potential other regulatory constraints that impede the capacity of transport providers to deliver the objects of the Transport Standards?	Yes they do, conflicts do exist including OHS requirements for staff and safety issues for other passengers.
27. How well are the current arrangements for making complaints about accessibility understood by the public?	Very well understood,
28. Are the current processes sufficiently responsive to complaints, or requests for information or advice on the Transport Standards?	Yes,
Issue Questions NOT raised in the “Review of the DSAPT” Issues Paper but considered relevant by PTA to the 5 Year Review	
Lack of operational knowledge by the organisation that wrote and/or enforces the DSAPT	APNAC needs more operational representatives – as reflected on the ARA drive to establish direct alliance with the HREOC on issues with the Transport Standards implementation
Inconsistency in the gap between railcar and platform and the flange gap at pedestrian level crossings; linked to Question 16	<ul style="list-style-type: none"> ➤ A 75 mm flange gap is allowed under AS1742, but only 40mm between the rail car and the platform under the Transport Standards. ➤ Also inconsistent is the height gap between the railcar and platform and specification on track and train wheels means the requirements cannot be meet on some occasions.