

# City of Newcastle-Response to consultation on Stage 2 Reforms of the Disability Standards for Accessible Public Transport 2002

## (Transport Standards)

Modernisation of the Transport Standards to deliver more clarity and certainty for all stakeholders is vital to creating a more inclusive community and reducing potential and actual discrimination. A general comment on our approach is that the regulatory approach has been chosen for the vast majority of the proposed reform options as this is regarded as the only way to ensure operators and providers have clearer guidance on what the performance standard should look like and how to comply.

General consideration is that the non-regulatory approach will be likely in many cases to deliver inconsistent experiences across the whole journey, especially when customers travel across service areas or between modes. This lack of predictability for the customer of the experience can erode and dissuade patronage and lead to increased isolation and systemic discrimination.

The status quo option in most cases is viewed by us as being a lost opportunity to respond and direct change within areas that have been repeatedly raised within community consultation. Therefore whilst the regulatory approach is a significant change for transport operators, providers and others, it will result in the maximum benefit for our community.

See below our response to the 61 chapters.

<b>1 Reporting</b>	Prefer regulatory option.  Compliance data against Transport Standards should be visible to the public and can be used to highlights areas, locations, modes, operators that are not delivering improvement consistent with a regional, State or Federal level.
<b>2 Equivalent Access</b>	Prefer non regulatory option  The operator is already required to demonstrate that they have undertaken consultation with relevant stakeholders if using a defence of equivalent access and conciliation already provides a mechanism for resolving complaints before they need to progress to legal action. Perhaps a definition of co-design could be provided to assist some operators/providers. However the responsibility to adapt their service to ensure there is equivalent access remains with the operator/provider and they can seek or contract people with relevant design and solution development experience. The

	<p>important factor already partially protected and that could be strengthened is that operators/providers must undertake consultation and as mentioned about more clarity could be provided for what would or would not qualify as consultation.</p>
<b>3 Rideshare</b>	<p>Support regulatory option as this may assist remove perceived ambivalence to providing accessible ride share options. It will provide more certainty about standards of service, safety and risk of discrimination.</p>
<b>4 Dedicated School Buses</b>	<p>Support the regulatory options, with preference for Option 1 over Option 2. It is fair and reasonable that some rural and remote locations may require a different model of conveyance however the exemption of dedicated school buses from compliance has lead to discrimination of people with disabilities and impacted families. When accessible taxi/s are used as a parallel service they remove accessible assets from some locations and at times require the student to travel at inconvenient times compared to other students.</p>
<b>5. Better communication of accessibility features</b>	<p>Support the regulatory model. It would be a lost opportunity to not implement consistency via this reform. The non-regulatory model would result in a patchwork of inconsistency meaning it would not be effective for people travelling across multiple providers/modes. Customers/Passengers can make more informed travel decisions if they are provided with the universally agreed upon information about accessibility features of the various modes/operators/providers. In some instances, market forces will reward those with better accessibility features.</p>
<b>6. Timely provision of information</b>	<p>Support the regulatory model of service information provision, this is expected in other aspects of daily life and needs to be introduced into the transport sphere to reduce potential discrimination, acknowledging that direct assistance is a suitable and potentially short-term measure and/or perhaps suitable in thin markets where costs may be prohibitive/of significance.</p>

	Adoption of this model may result in peak bodies within specific modes developing resources of alternative formats that operators/providers could use to provide customers with more generic information.
<b>7. Real time communication</b>	Support the regulatory model to enhance real time communication. Further examples need to be developed to assist operators/providers with appropriate communication methods and an improved focus on staff training to provide suitable responses in emergency situations or change in circumstances of travel.
<b>8. Passenger location during journey</b>	Support regulatory option with consideration to staged roll out via new fleet due to scale of retrofitting required.
<b>9. Hearing augmentation on conveyances</b>	Support regulatory option 2 with consideration to staged roll out via new fleet due to scale of retrofitting required.
<b>10. Hearing augmentation: Infrastructure and premises</b>	Support regulatory option, however potential for new technology to emerge to provide equivalent access needs to be considered/included as potentially suitable.
<b>11. Print size and format</b>	Support the regulatory option as if the non regulatory approach is taken there will be significant inconsistency across operators/providers rather than a more standardised approach. Too often individual requests for alternative formats might be considered
<b>12. International Symbol for Access and Deafness</b>	Support the regulatory approach option 1.
<b>13. Letter heights and luminance contrast of signs</b>	Support the regulatory approach, option 2 sub option 2.
<b>14. Location of signs</b>	Support the regulatory approach, support sub option 2.
<b>15. Braille embossed (printed) specifications</b>	Support the regulatory approach as aims to remove inconsistency if left to a non-regulatory approach, this reform enhances independence and inclusion, and improved access to services.
<b>16. Braille and tactile lettering for signage</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>17. Lifts - Braille and Tactile Information at Lift Landings</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>18. Lifts - Audible wayfinding</b>	Support the regulatory approach, support option 2.

<b>19. Lifts - Emergency communication systems in lift cars</b>	Support the regulatory approach. Promotes inclusion and consistency. Especially important at non-staffed stations.
<b>20. Lifts - Reference for lift car communication and information system</b>	Support the regulatory approach. Promotes inclusion and consistency. Where technical advancement provides an alternative approach to induction loops the equivalent access requirement may facilitate newer technology being implemented.
<b>21. Information and communication technologies (ICT) procurement</b>	Support the regulatory approach, option 2.
<b>22. Mobile web systems</b>	Support the regulatory approach. Option 1.
<b>23. Accessible Fare System Elements</b>	Support the regulatory approach. Promotes inclusion and consistency. Option 2 sub option 1 may be best to commence with and implement a staged approach over 5 to 10 years to reach higher compliance of sub option 2.
<b>24. Doors on access paths</b>	Support the regulatory approach. Option 1 or 2 is suitable. Promotes independence and inclusion.
<b>25. Continuous access on access paths</b>	Support the non-regulatory approach due to issues of ownership within specific locations impacting delivery of the potential standard.
<b>26. Flange gaps within access paths</b>	Support the regulatory approach either option 1 or 2. All efforts must be made to reduce potential hazard of flange gaps. Promotes consistency.
<b>27. Resting points</b>	Support the regulatory approach. Promotes inclusion, equality and consistency and will ensure it is applied as opposed to non regulatory.
<b>28. Requirement for handrails in overbridges and subways</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>29. Location of fare system elements</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>30. Allocated spaces and priority seating in waiting areas</b>	Support the regulatory approach. Promotes inclusion, consistency and clarity.
<b>31. Accessible toilets with equal proportion of left and right hand configurations</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>32. Emergency call buttons in accessible toilets</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>33. Ambulant toilets</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>34. Lift specifications and enhancements</b>	Support the regulatory approach. Promotes inclusion and consistency.

<b>35. Specifications for escalators and inclined travellers</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>36. Poles, objects and luminous contrast</b>	Support the regulatory approach option 1, sub option 1. Promotes inclusion and consistency.
<b>37. Lighting</b>	Support the regulatory approach via either of sub options within option 4. Lighting can promote safety and confidence when using transport modes and within transport spaces, along with providing the ability to carry out particular functions. Without suitable guidance on what is appropriate, inconsistency will exist across the system reducing confidence of some customers and impact potential patronage.
<b>38. Signals and process for requesting boarding devices</b>	Support the regulatory approach sub option 2. Promotes independence, inclusion, and consistency.
<b>39. Notification by passenger of need for boarding device</b>	Support the non-regulatory approach. Regulatory approach does not seem to resolve the issues of timeliness for booked services where assistance might be provided.
<b>40. Portable boarding ramp edge barriers</b>	Support the regulatory approach and option 3. Promotes safety, inclusion and consistency.
<b>41. Boarding ramp and removable gangway definitions</b>	Support the regulatory approach. Promotes consistency.
<b>42. Removable gangway design - ferries</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>43. Nominated assistance boarding points</b>	Support the regulatory approach, option 1 sub option 5.
<b>44. Identification of lead stops</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>45. Pontoon boarding points on infrastructure</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>46. Bus, tram and light rail boarding points on infrastructure</b>	Support the regulatory approach, option 2. Promotes safety and inclusion.
<b>47. Hail-and-ride boarding points on infrastructure</b>	The non-regulatory option is preferred as providing hail and ride boarding point infrastructure across an entire LGA is unrealistic considering in many locations/jurisdictions kerb and ramp is not even in place.  The non-regulatory model will also encourage maximising existing and newly established potential boarding points rather than the regulatory option which will potentially draw significant resources to a multitude of low level patronage points.
<b>48. Accessible taxi ranks</b>	Support regulatory approach with sub option 3 however suggest that federally funded grants scheme be established similar to NSW's

	Country Passenger Transport Grants Scheme to assist local authorities deliver on the Federal commitment.
<b>49. Accessible passenger loading zones on-street</b>	<p>The regulatory and the non-regulatory options both have merit. The status quo option should be rejected.</p> <p>Where existing loading zones are in place, many of these will not have the required space to be compliant with newly constructed infrastructure if the regulated option is pursued. One implication may be that many of these spaces may be removed as cost to comply with potentially newly adopted regulations. There is also some concern about the potential of passenger/pedestrian conflict with trucks in these spaces.</p> <p>The non-regulatory approach and guidance may provide opportunity for Councils to look at how we can retro fit in some locations kerb ramps and also deliver higher featured loading zones considering accessibility.</p> <p>"Kiss and ride" drop off passenger zones have been created in multiple locations across the community and these are not always provided with close proximity to accessible pathways or kerb ramps. Could guidance be provided about the benefit of kerb ramps in these locations so they do not continue to be created at times only by the changing of street signs and no infrastructure adaption.</p>
<b>50. Accessible parking spaces in infrastructure off-street carparks</b>	Support the regulatory approach, sub option 1.
<b>51. Grabrails on access paths</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>52. Grabrails in allocated spaces</b>	Support the regulatory approach. Promotes inclusion and consistency.
<b>53. Mobility aid movement in allocated spaces – passive restraints</b>	Support the regulatory approach. Promotes safety and inclusion.
<b>54. Mobility aid movement in allocated spaces – active restraints</b>	Support the regulatory approach. Promotes safety, inclusion and consistency.
<b>55. Appropriate seats on booked services</b>	Support the regulatory approach. Promotes independence, choice, dignity, inclusion and consistency.
<b>56. Conveyance dwell times at stops</b>	Support the non- regulatory approach. Application of the proposed regulation is ill

	defined and does not provide a suitable method to manage the concern.
<b>57. Stairs on trains</b>	Support the regulatory approach, sub option 2. Promotes independence.
<b>58. Stairs on ferries</b>	Support the regulatory approach, sub option 3. Promotes independence.
<b>59. Stairs on buses</b>	Support the regulatory approach. Promotes independence.
<b>60. Doorway contrast and height</b>	Support the regulatory approach. Promotes independence.
<b>61. Implementation approach</b>	Support implementation option 1 or 2 as most suitable.