



Date: 21 July 2022

DisabilityTransport@infrastructure.gov.au

Submission - Stage 2 reforms of the Transport Standards

Introduction

Council officers welcome the opportunity to provide feedback on the Community consultation on *Stage 2 reforms of the Transport Standards*. The information provided seeks to support the advancement of the rights of people living with disability.

The City of Stonnington is located in Melbourne's inner south-eastern suburbs, about 3 to 13 kilometres from the Melbourne CBD. The population in 2021 was 104,703. As our population grows and the community age the number of people living with disability will increase. In 2021, 4,014 Stonnington residents reported needing help in their day-to-day lives due to disability, a long term health condition or old age; an increase from 3,463 people in 2016.

Council's *Inclusion Plan 2019-2022* supports inclusion as a universal right and is the foundation of our vision that *Stonnington will be inclusive for all members of the community*. While the *Inclusion Plan* focuses on disability, we know that 'inclusion' has a much wider reach and applies to all members of our community.

Stage 2 Reform of the Disability Standards for Accessible Public Transport 2002

Access to public transport is critical for people with disability to fully participate in the community and the economy. The Australian Government has partnered with the Queensland Government to reform the Disability Standards for Accessible Public Transport 2002 (Transport Standards). The reform process is looking at ways to improve the Transport Standards to ensure they meet their objectives of removing discrimination for people with disability in accessing public transport.

Stonnington Disability and Access Committee

The Stonnington Disability and Access Committee (SDAC) is an advisory committee of Council. The committee is comprised of people living with disability, carers and service providers; and assists Council to identify and respond to issues impacting people who live, work or visit Stonnington. In May 2022, the Committee was consulted about the Stage 2 reforms of the Transport Standards. Below are the issues and barriers identified in the City of Stonnington.

Accessible Tram routes

There is no fully accessible tram route in terms of stops and vehicles in Stonnington. Overall, there is a lack of DDA compliant tram stops, in particular on main routes such as Toorak Road, Chapel Street, High Street, Glenferrie Road and Wattletree Road. However, it is critical that adequate planning, consultation and quality design occurs prior to construction to ensure the stops enhance accessibility without impacting on the precinct. For example, Council is aware that poorly designed stops, such



as Bridge Road in Richmond, can negatively impact on the economic vitality and aesthetics of a commercial precinct.

In addition, many tram vehicles are not DDA compliant in terms of low floors and adequate space to move within the vehicle. This has significant impacts including:

- Discriminating against those not able to board and move about a tram. This can limit or prevent engagement in the community, reduce independence, and force the use private and/or more expensive transport options.
- Putting people at increased risk of road injuries.
 - Non DDA compliant kerbside tram stops are more dangerous. Drivers ignore or forget to give way to people boarding or alighting from trams or drive too quickly in their vicinity making it very dangerous for those with limited mobility or low or no vision who cannot check for oncoming vehicles or quickly move out of the way.
 - There is low, and perhaps decreasing, awareness amongst drivers of the need to give way to trams and the consequences of not doing so. There is a need for driver education and increased visibility of tram stops e.g. with on-road line marking.
 - There is also a lack of data, such as CCTV, to support the prosecution of drivers that do not comply with road rules at tram stops.

PTV website

The PTV website is poorly set-up for screen reader software used by people with low or no vision.

Train Stations

The design of many stations and surrounding precincts are not accessible. For example the gradient of the ramp at Armadale Station is not DDA compliant and there is no lift, making it inaccessible for some.

There are also problems at stations that have been recently upgraded. For example South Yarra Station and level-access tram stop (upgraded in 2021). Despite the upgrade there are obstructions (e.g. non-consolidated traffic signals, lighting and signs) between the station entrance, tram stop and signalised pedestrian crossing making it less easy to navigate for people with low or no vision.

Some train stations also have a large gap between the platform and the carriage making it a hazard for all users, and particularly those with low vision and reduced mobility.

Signage

Poor contrast on wayfinding, directional signage and visual electronic display boards at tram stops and train stations also make it harder for people with low vision. For example, at South Yarra Station the electronic display boards have a white background with thin black text, which is difficult for people with low vision to see. Bold white text on a black background, such as at Richmond Station in Melbourne, is easier to read.

Audio Visual Announcements

Many tram, train and bus vehicles do not have audio and visual announcements advising of the next stop; and sometimes when the vehicles are equipped, the feature malfunctions, announcing or displaying the wrong stop/station. It is essential that these features are universally rolled out,



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regularly tested and maintained, and designed to be more resilient and robust. Vancouver and Barcelona were highlighted by committee members as good examples.

In addition, the PTV/Yarra Trams Apps should have audio announcement or vibration functions to alert those using the journey mapping that they are close to their stop/destination. CityMapper has a vibration alert indicating when you are approaching your stop.

Council officers and members of Stonnington Disability and Access Committee welcome the opportunity to provide the feedback above.

Please contact [REDACTED] Coordinator Community Planning by email:
[REDACTED] or [REDACTED] should you require any further information.

Yours sincerely

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