

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

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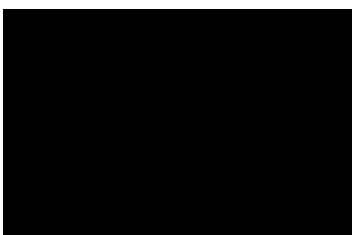
Credentials and Relevant Experience

I am a retired transport planner, specialising in urban transport, travel behaviour change, cycling, walking and universal access. My primary focus for much of my professional career has been on evidence-based policy development and evaluation.

In the mid-1990s, I led the team that developed the first Disability Access Plan for Public Transport (Going Out and Getting There: Action Plan for Accessible Public Transport for People with Disabilities in Perth) to be accepted by the Australian Human Rights and Equal Opportunity Commission. This plan and its initial implementation won the National Gold Medal Access Award for Transport and the overall Prime Minister's Access Award in December 2000.

I was an initial member, representing the Western Australian Government, of the National Working Group on Disability Standards, the work of which resulted in the Disability Standards for Accessible Public Transport, 2002.

I was a local government councillor (Town of Vincent, WA) from 1995 to 2009, during which time I helped establish and chaired the Town's Advisory Group on Disability (later Universal) Access. This Advisory Group included and directly involved people with disabilities and other community members as well as staff and elected council members.



Ian Ker
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Introduction

In 1996, after the launch of 'Going Out and Getting There', the 'Action Plan for Accessible Public Transport for People with Disabilities in Perth', I walked through central Perth with Elizabeth Hastings, the first Australian Disability Discrimination Commissioner. Elizabeth was in a wheelchair and pointed out to me a great many things that made movement difficult or impossible for her – but which I would scarcely have noticed, despite my having spent nearly two years working with people with disabilities on access issues.

As my wife and I have got older and developed various (admittedly relatively mild) mobility and sensory impairments, such issues have become more personal and more obvious.

In the 26 years since the first action plan for accessible public transport (was accepted by the Human Rights and Equal Opportunities Commission and the 20 years since The Accessible Public Transport Standards were introduced, there have been many changes to the technology and other opportunities available to public transport providers to make their infrastructure and services more accessible.

In particular, as various technologies become the 'norm', their cost comes down – a classic case being the low-floor bus. In the mid-1990s, a low-floor bus cost around 15% more than a conventional bus but, as low-floor has become the industry standard, economies of scale and standardisation have resulted in lower costs.

Others with more recent involvement than myself are better-placed to comment on matters of technology and how they should be reflected in *The Standards*. This submission is primarily concerned with improving the context within which public transport operates. Whether these are best addressed in *The Standards* directly or through other mechanisms is for the *Review* to determine.

Conceptual Model for Accessible Public Transport

The Accessible Public Transport Standards 2002 (the 'Standards') have played an important role in improving the availability of and access to public transport, not only for people with disabilities but also for a range of others including parents with young children and strollers and people with shopping trolleys or heavy luggage. It is still the case, however, that a single break in the accessible path is likely to make the journey infeasible for some or, if not discovered until after the journey has commenced, lead to severe difficulties in getting past the break, returning to the starting point or managing missed appointments or other commitments.

The Standards, understandably, deal with matters directly within the purview of providers of public transport infrastructure and services. However, for public transport to be genuinely accessible, the environment external to public transport also needs to be accessible.

Whilst there is a range of other standards that apply to this external environment, there appears to be no mechanism for co-ordination or integration with accessible public transport, other than through informal relationships between public transport and those responsible for the external environment (often local governments and State Road Authorities).

There is a need to facilitate (preferably ensure) better co-ordination between public transport providers and organisations responsible for the external environment passengers have to negotiate to get to public transport access points. How this might be achieved is an important issue for the Review.

Accessing Public Transport: Interfaces with External Infrastructure

To access public transport, especially those forms that have fixed routes and access points (bus stops, train stations), potential passengers have to travel through the surface street network. The extent and quality of pedestrian paths and road crossings, including ramps and traffic control, is crucial to the experience and even apparently minor problems can preclude access or substantially increase the physical and/or psychological effort required to do so.

For this reason, the *WA Action Plan for Accessible Public Transport in Perth* stated (p10):

“An accessible public transport system must also include access to the system (*footpaths and bus stops, ferry, bus and train stations*) access for accessible vehicles (some traffic calming devices potentially impede or prevent access for low-floor vehicles or produce motion which can be dangerous for people with disabilities), information about the system (eg for the sight- or hearing-impaired) and service provider who are aware of and respond to the needs of people with disabilities.”

At the very least, bus stops should be connected to an accessible pedestrian path, but this is not always the case. The stop shown below is one of five consecutive stops along a 2km stretch of road – none of which has a connecting accessible pedestrian path and only one of which has a ramped crossing point of an admittedly wide and busy road.

For users of bus services, it is, of course, necessary to cross the road to or from one of the (access or egress) bus stops, which will be on opposite sides of the road, to complete the journey. On the road shown below, there is only one signalised intersection in the 2km and this has neither pedestrian crossing

markings nor a pedestrian phase in the signals. Whilst there are a few ramped crossing points (with median cuts), the width of the road and the volume and speed of the traffic (70km/hr speed limit) make crossing at them, without signal protection, a hazardous experience for anyone, let alone someone with a mobility or sensory impairment.



Better co-ordination is required with agencies external to public transport to ensure that otherwise-accessible public transport boarding points can be reached through accessible pedestrian facilities.

Location, Design and Use of Bus Stops

Most low-floor route service buses have ramp access/egress only at the front door. People with various disabilities (eg minor mobility impairment, vision and other sensory impairment) or accompanying children or carrying heavy baggage might not require the ramp and may use the rear door to exit the vehicle.

In either case, it is important that the vehicle is stopped close to and parallel to the kerb, to avoid uncertainty about the location and height of the landing point for the alighting passengers. This requires that the length of a marked bus bay on the roadway be long enough to allow buses to manoeuvre safely and conveniently to a position close to and parallel to the kerb – which would be facilitated by positioning the actual boarding point at the exit end of the marked bus bay.

However, the Standards appear to explicitly exclude matters related to the design and layout of bus bays (including those that are simply delineated areas on the roadway rather than where the bus moves out of the roadway itself into an embayment), presumably on the grounds that road markings are not the responsibility of public transport providers.

1.18 Infrastructure

- (1) **Infrastructure** is any structure or facility that is used by passengers in conjunction with travelling on a public transport service.
- (2) **Infrastructure** does not include any area beyond immediate boarding points (for example, bus stops, wharves, ranks, rail stations, terminals).

The design and functioning of bus stops, including the dimensions and marking of bus bays on the roadway, should be reviewed to ensure that buses are able to stop close to and parallel to the kerb (where there is one) to minimise vertical and horizontal gaps at both front and rear doors.

Temporary Situations and Diversions

There are many reasons why road authorities, local governments and public utilities (gas, water/sewerage, electricity, telecoms/NBN) may need to dig up or otherwise disrupt parts of the road and footpath networks.

When access is precluded for motor vehicles (ie complete or partial road closure), detours are established and signed well in advance. However, when this occurs on a pedestrian path, often the only indication is a sign close to the actual works directing pedestrians to ‘use other footpath’ – with no consideration to whether there is a safe and accessible place to cross the road. I have even seen instances where a ‘use other footpath’ sign was set up but there was no footpath on the other side of the road.

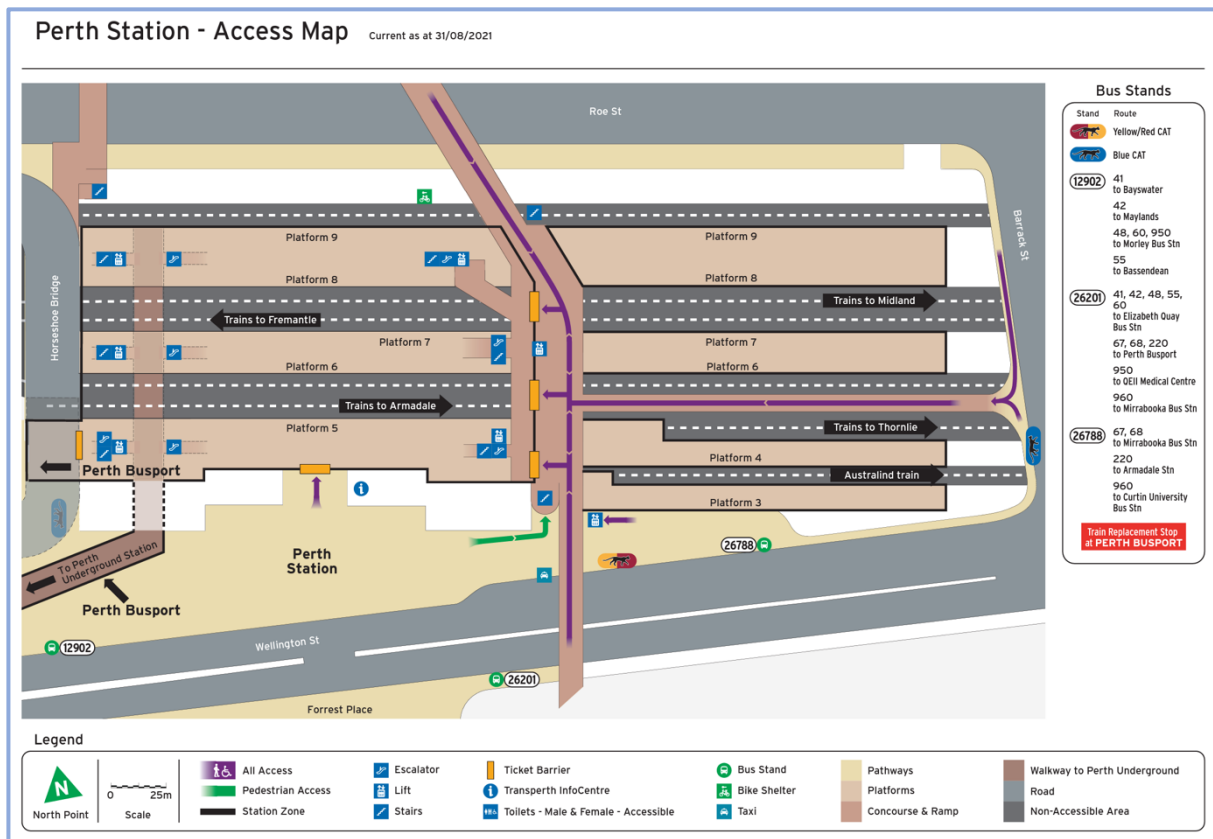


Traffic management organisations and people need greater awareness of disability issues, including the provisions of the *Disability Discrimination Act, 1992*, to ensure maintenance of continuous access paths when works are being carried out, especially in the vicinity of bus stops and train stations. Whilst this might be beyond the strict scope of *the Standards*, it could be included as an ‘Advice Note’.

The same applies to all accessible paths within the public transport system. Accepting that there are constraints when it comes to alternative accessible paths within vehicles, the *Standards* could usefully incorporate requirements for alternative accessible access when the primary path is unavailable for any reason, as this might well be best addressed through modification of the design of public transport infrastructure.

For example, Perth (WA) Train Station provides lift, escalator and step access-only to platforms 6,7,8 and 9, which serve the Fremantle and Midland lines – and will serve the Airport/Kelmscott and Ellenbrook lines when these are completed.

These new lines will substantially increase the number of passengers using those platforms.



Platforms 3 (Bunbury), 4 (Thornlie) and 5 (Armadale) have level access from the street. Platforms 1 and 2 (Perth Underground – serving Joondalup and Mandurah) have two lifts between platform and concourse and, while there is only a single lift between the concourse and the Murray Street Mall, there is alternative (albeit longer) accessible route via platform 3 to the street.

When the sole accessible access to key parts of public transport infrastructure is a single lift or other mechanical device (eg travelator), mechanical faults or power failures

The Standards should include requirements to ensure availability of alternative accessible paths or, where this is not possible, appropriate assistance within public transport infrastructure when primary paths are not available. Activities (such as maintenance) that preclude use of a single accessible path should, whenever possible, be undertaken out of public transport service hours.

Invisible Disabilities

Many disabilities, especially sensory ones, are not immediately ‘visible’. The value of the provision of an accessible physical public transport system can be substantially reduced if staff who deal directly with the public do not have the knowledge or skills to act appropriately in such circumstances.

The Standards relate to infrastructure, vehicles, services and information. They do not specifically address the roles of public transport staff in facilitating use of or access to those features of the public transport system.

The *Action Plan for Accessible Public Transport for People with Disabilities in Perth* specifically acknowledged (p23) that partly because public transport [at that time] was inaccessible to many people with disabilities, staff had limited experience in relating to people with disabilities as customers and that training which did not cover issues adequately could result in inappropriate operator behaviour. Whilst progressive improvements to and experience with accessibility will have reduced the extent to which this might be a problem, it is still desirable that staff training and awareness be adequately reflected in the requirements for accessible public transport.

It is essential that all staff who interact with public transport users are aware of the purpose of universal access features and how to respond to the needs of individuals who do not have a visible disability as well as those who do.

Conclusions

There has been a large amount of improvement in the accessibility of public transport over the past 20-25 years. This has been driven by:

- the Australian Disability Standards for Accessible Public Transport, 2002;
- Disability Action Plans developed by Federal, State, local government and private sector public transport providers;
- International developments in technical and design requirements for public transport vehicles (bearing in mind that the majority of Australian public transport vehicles are imported) and, correspondingly, infrastructure.

The Standards, understandably, deal with matters directly within the purview of providers of public transport infrastructure and services. However, for public transport to be genuinely accessible, the environment external to public transport also needs to be accessible.

It is often not clear whether matters that are not specifically mentioned in *The Standards* are covered by other standards, such as the Building Code of Australia or Austroads Road Design Standards. In such circumstances, it is all-too-easy for important issues to disappear into the cracks between such requirements. This submission has identified several such areas:

- There is a need to facilitate (preferably ensure) better co-ordination between public transport providers and organisations responsible for the external environment passengers have to negotiate to get to public transport access points. How this might be achieved is an important issue for the Review.

- Interfaces with External Infrastructure. Better co-ordination is required with agencies external to public transport to ensure that otherwise-accessible public transport boarding points can be reached through accessible pedestrian facilities.
- Location, Design and Use of Bus Stops. The design and functioning of bus stops, including the dimensions and marking of bus bays on the roadway, should be reviewed to ensure that buses are able to stop close to and parallel to the kerb (where there is one) to minimise vertical and horizontal gaps at both front and rear doors.
- Temporary Situations and Diversions. Traffic management organisations and people need greater awareness of disability issues, including the provisions of the *Disability Discrimination Act, 1992*, to ensure maintenance of continuous access paths when works are being carried out, especially in the vicinity of bus stops and train stations. Whilst this might be beyond the strict scope of *the Standards*, it could be included as an 'Advice Note'.
- Temporary Situations and Diversions. *The Standards* should include requirements to ensure availability of alternative accessible paths or, where this is not possible, appropriate assistance within public transport infrastructure when primary paths are not available. Activities (such as maintenance) that preclude use of a single accessible path should, whenever possible, be undertaken out of public transport service hours.
- Invisible Disabilities. Many disabilities, especially sensory ones, are not immediately 'visible'. It is essential that all staff who interact with public transport users are aware of the purpose of universal access features and how to respond to the needs of individuals who do not have a visible disability as well as those who do.

Whether these are most appropriately addressed by specific incorporation into *The Standards* or by reference to (and, if necessary, modification to) such other standards and requirements is something the Review should consider.