



Reforms of the Disability Standards for Accessible Public Transport 2002—Stage 2 Consultation Regulation Impact Statement

Thank you for the opportunity to provide comment as part of the *Reforms of the Disability Standards for Accessible Public Transport 2002—Stage 2 Consultation (Regulation Impact Statement)*.

Council is generally supportive of the proposed reforms and commends the Department on recognising the need to introduce these reforms.

Council's *Community Strategic Plan, Integrated Transport Strategy* and *Pedestrian Access and Mobility Plan* provide a series of principles in support of accessible public transport as part of a comprehensive movement network, which includes pedestrian paths connecting facilities to public transport.

These principles were also supported in community engagement during the development of Council's *Disability Inclusion Action Plan 2022-25*. Council heard of improvement yet continuing difficulty accessing public transport and that accessibility across public transport systems remains a critical priority in the realisation of peoples rights, social, cultural and economic participation and opportunity.

The proposed reforms are aligned with Council's key strategies (referred to above) and cover many of the issues associated with the creation of accessible public transport. It is considered that the reforms generally provide an acceptable level of guidance on the majority of accessibility issues encountered. In saying this Council requests ongoing comprehensive consultation and that the current reforms should be considered as a step in an incremental and fully integrated system of management of accessibility for public transport.

It is also considered that the current reforms would benefit from inclusion of the following:

- Recognition that the standards should be considered the absolute minimum, rather than the maximum, level of provision.
- While the standards set guidelines it is essential that the practical application of these standards be considered in a manner which prioritises the users' experience. Too often, in Council's experience, the provision of facilities for persons with disabilities is relegated to the leftover spaces rather than given priority. It is considered essential that provision of these facilities be prioritised and that the overall benefits for the community as a whole be recognised.
- Some sections of existing light rail services continue to rely on assisted boarding protocols (similar to the existing heavy rail). This is not always practical in high volume or high frequencies timetables. For light rail particularly this requires review to explore improvements that facilitate independent access.
- The new metro lines with level access between train and platform are much welcomed and positive developments. However greater guidance is needed on how people get to these more accessible options.
- It is essential that connectivity to public transport be considered as well as public transport itself. In this respect, Council requests that, consideration be given to providing more detailed guidance on the design of the associated pedestrian networks. Pedestrian paths should be treated as part of a comprehensive movement network providing access to and from public transport as well as adjacent facilities. This consideration should include

assurance of high levels of accessible connectivity between paths, facilities and transport nodes.

- Consideration should be given to the implications of emerging movement technologies and what these mean in the long term for the diversity of user types on pedestrian paths, particularly in relation to potential for increasing conflict between various path users. It is considered that additional attention should be given to achieving a realistic balance between different path user types with the view to ensuring that conflict is reduced, amenity increased, and place-making opportunities capitalised on.
- In relation to pedestrian paths consideration should be given to providing fully accessible rest areas and space for personal mobility device storage/waiting areas (including mobility scooters and wheelchairs) at public transport nodes.
- In order to fully support the public transport needs of people with disability and an ageing population, consideration is required of other affordable point to point transport, that waits and retrieves. This needs to be integrated into broader public transport offerings. The scale of trains and buses and their existing design do not meet the needs of people with higher disability support requirements and need to be complemented by more accessible options.
- Council has also become aware of increasing difficulties people experience in accessing taxis (including wheelchair accessible taxis) now that other ride share options have permeated the market and without the same level of accessibility offered. Consideration should be given to methods to improve this situation and promote a broader choice and equity.