



Dedicated to a better Brisbane

13 June 2023

Director, Disability and Transport Standards, Land Transport Policy
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
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Dear Sir/Madam

Thank you for the opportunity to provide a submission on the *2022 Review of the Disability Standards for Accessible Public Transport 2002* (Transport Standards) (the 2022 Review) released in December 2022.

Brisbane City Council's (Council) Vision for Brisbane is for an accessible and connected city. This is expressed throughout Council's strategic documents including *A City for Everyone: Inclusive Brisbane Plan 2019-2029* and the *Transport Plan for Brisbane – Strategic Directions* (Transport Plan).

Council has demonstrated its commitment to this vision, and its awareness of the obligations it has to remove discrimination from public transport services under the Transport Standards, as it continues to plan and deliver improvements to the accessibility of its public transport network for all.

While Council acknowledges there is still work to be done, it believes that it has proven to be effective as demonstrated by the management and operation of a public transport network that currently includes:

- more than 6000 bus stops
- more than 1200 buses
- 29 ferry vessels
- 22 ferry terminals.

Over the past eight years Council has made a significant investment in upgrading our bus stop network to ensure it is safe, meets current legislative standards and is accessible to people of all abilities.

These bus stop upgrades are part of a rolling program across Brisbane, and part of Council's commitment to create a well-connected and accessible public transport network for all users. Approximately 81% of our network has been upgraded as of June 2022, with planning underway to upgrade the remaining eligible bus stops.

100% of Council's bus fleet are compliant with the Transport Standards. These low-floor vehicles allow easy access for all passengers, and have:

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- level access through the front door instead of steps
- ramp access for wheelchair or mobility device access, with a maximum capacity of 300 kilograms
- two designated spaces for wheelchairs or mobility devices up to 1300 mm long and 800 mm wide.

Council's significant investment since the 2011 floods, including works under the joint Australian Government-State Natural Disaster Relief and Recovery Arrangements (NDRRA), has improved accessibility, connectivity and flood resilience of Brisbane's ferry terminal network. Some of the achievements in this time include delivering new accessible terminals and upgrading of existing terminals to meet the Transport Standards.

Council is committed to providing targeted training to relevant staff to ensure that awareness and application of the Transport Standards occurs throughout the organisation. Council currently conducts mandatory disability awareness training for all bus drivers, and "Core Inclusion" mandatory training modules are planned to be included for Council officers to further improve capability and awareness in this space.

Council also provides a range of services to assist people with disabilities access public transport. This includes the visually impaired passenger telephone service for passengers with a visual impairment that require assistance to access a Council bus service. Passengers can call Council on 07 3403 8888 and provide the location, route and time of the service they intend to catch to receive travel information.

Anecdotal feedback from Council bus drivers and other officers indicates that satisfaction with Council's services is high for people with disabilities accessing and using public transport services.

Council is aware that the ongoing modernisation reform process for the Transport Standards has its own objectives and guiding principles and is separate to the 2022 Review. However, the Australian Government has acknowledged there are linkages between the reform process and the 2022 Review, and that findings and feedback from the reform process will be incorporated into the 2022 Review.

On this basis, I have attached Council's submission on the reform of the Transport Standards from 2021 and 2022 which provide additional information and recommendations on areas of the Transport Standards and associated guidelines which would benefit from improvement.

In addition to the feedback provided in these previous submissions, Council would like to provide the following suggestions to further improve the effectiveness of the Transport Standards:

- Development of a central repository for sharing learnings on the application of the Transport Standards would be beneficial given there is currently some inconsistent application across agencies.
- Amendments to *Chapter 15: Fit for purpose accessways* and *Chapter 16: Wayfinding* of the Transport Standards that ensure adequate verge and pavement widths at the pedestrian entry points from the street and path connections to key generators and destinations.

Pedestrian entry points to train stations and major bus stations/stops should ideally have a minimum two metres of unobstructed pathway width along the street verge to the entry and exit points. At stations with increased levels of pedestrian access and egress, a minimum 2.4 metres of unobstructed pathway width is preferred at pedestrian entries to facilitate circulation. Connecting paths should be a minimum of at least 1.8 metres.

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- Development of a national standard for mobility devices that are suitable for public transport. It is not possible for all currently available mobility devices to transit to the allocated spaces, fit into the allocated spaces and travel with appropriate safety.

Introducing a standard that defines the maximum dimension and minimum manoeuvrability requirements for mobility devices that are suitable for travel on public transport would greatly improve customer service, safety and dignity for passengers.

- Introduction of an aisle side passive restraint would greatly improve passenger safety and confidence when using bus public transport. Council currently has a front passive restraint (known in the industry as an ironing board), a side wall passive restraint (flip-up seats), and a handrail on the window ledge to provide additional lateral support.

However, mobility devices can still move toward the aisle, particularly for passengers who do not have sufficient upper body and arm strength to brace themselves using the handrail. Council has invested significant design effort and engagement with bus manufacturers to develop an effective passive restraint for the aisle side of the allocated spaces.

Council believes that much has been done across all levels of government to remove barriers for people with a disability wanting to use public transport, but improvements to the Transport Standards will help this to happen.

Council looks forward to continuing to work with the Australian and Queensland Governments on future improvements to the Transport Standards.

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Yours sincerely

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Colin Jensen
CHIEF EXECUTIVE OFFICER

Att. 2021 Submission on Reforms of the Disability Standards for Accessible Transport 2002 - May 2022
Att. 2022 Submission on Reforms of the Disability Standards for Accessible Transport 2002 - May 2022

