



11 May 2012

Les Wielinga
Director General
Transport for NSW
NSW Long Term Transport Master Plan
18 Lee Street
Chippendale NSW 2008

By email: masterplan@transport.nsw.gov.au

Dear Mr Wielinga,

About the Disability Council NSW

The Disability Council NSW is established under the *NSW Community Welfare Act 1987* to provide advice to government about issues affecting people with disability in NSW. The Council has 14 members who were recently appointed by the NSW Government for a period of up to four years. For more information about the Council please visit the website at: www.disabilitycouncil.nsw.gov.au.

Context

I am pleased to respond on behalf of the Council to the NSW Long Term Transport Master Plan Discussion Paper. I understand the plan will be developed over the next 12 months through a process of research and consultation with key stakeholders and is intended to address key issues, challenges and customer needs for the next 20 years.

Council representatives participate in Transport for NSW's Accessible Transport Advisory Committee (ATAC), which provides an important forum for identifying and considering the myriad of limitations the current transport system poses for people with disability. The Council also participates in the Customer and Community Advisory Group for the 'NSW Long Term Master Plan'. The Council is aware of the consultations being carried out by Transport for NSW and encourages that the development of the Master Plan reflects the views of people with disability, the work of ATAC in developing Transport for NSW's Disability Action Plan and the NSW Implementation Plan for the National Disability Strategy.

Why transport is important

Access to transport is one of the foundation considerations of citizenship, along with education, healthcare, and housing. Transport plays a pivotal role in providing the means for people to access education, employment, services and cultural life. People with disability have an equal right to an accessible transport system. However, there are significant structural, financial and attitudinal barriers that prevent equal access. The consequence of this inequity is the severe disadvantage people with disability experience in accessing employment, community, recreation and tourism, building relationships and realising dreams and desires.

People with disability represent approximately 20% of the population. It is vital that there is equitable and universal access to mainstream services delivered by Transport for NSW and other agencies if we are to truly value citizenship and achieve the NSW Government's vision for Australia to become a socially inclusive society.

The Council therefore believes that this important planning process should adopt the following Article of the UN Convention on the Rights of Persons with Disability (to which Australia is a signatory), as one of its core principles:

Article 9 Accessibility

1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:

(a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces;

There is no doubt that since the introduction of the Disability Discrimination Act's Standards on Accessible Public Transport in 2002 there has been considerable improvement in the accessibility of the transport system. However, much more needs to be done and the Long Term Master Plan provides an opportunity to address the transport systems shortcomings and thereby improve outcomes for people with disability and the community as a whole.

The Council is aware that Transport for NSW is seeking comments from other organisations in the disability sector. The purpose of this submission is to provide insights into some aspects of how the current transport system affects the lives of people with disability. While we highlight some disability specific issues, the Council would like to emphasise that transport accessibility should be an integrated part of the whole transport plan rather than as a separate disability issue over the next 20 years.

Discussion Paper Questions

In this submission, the Council has addressed some of the key issues for people with disability. These cover one or more of the focus areas in the NSW Transport Long Term Master Plan Discussion Paper. For people with disability the most important considerations are:

- 1. Putting the customer first – to design the transport system around the needs and expectations of the customer.*
- 2. How should accessibility and social equity be improved? Is the current system equitable, affordable and accessible to all? Which areas require improvement?*
- 3. Innovative use of taxi and hire car services – How can use of taxis and hire cars complement community bus services to deliver services better tailored to the specific needs of individuals and groups in the community?*
- 4. Effective cross agency co-ordination – How can the NSW Government work effectively with other Agencies and networks to improve outcomes for people with disability? Which particular Agencies are critical partners for NSW for Transport in working collaboratively to meet the needs and preferences of customers?*
- 5. The 20 year challenge - What are the current and future transport needs of the community as the population grows to more than 9 million people in 2031? What transport services will be required to support an increasingly ageing population?*

This submission will firstly outline some general principles of transport accessibility, including issues for people with disability in rural and remote areas, before discussing transport barriers specific to people with mobility and hearing loss impairments.

Putting the customer first – to design the transport system around the needs and expectations of customers

Commuters want to be able to “Get to where I want to go, quickly, safely and at a reasonable cost, during both peak times and off peak times”.

People with disability need to have confidence in the transport system that it will take them where they need to go in order to participate in employment, education, health services, recreation and other activities in their community. Many people with disability are not able to drive and depend on readily available, accessible and cost-effective public transport, as their only means of transport, to be able to participate as equal citizens of a socially inclusive society around them.

The lack of confidence in the system, that accessible services aren't always available, that services aren't accessible 100% of the time and that people with disabilities will be treated with dignity by Transport NSW staff and other commuters when using the system means that many people with disabilities are unable to

reliably use public transport or face quite significant fears and challenges when attempting to do so.

The lack of appropriate transport services not only exacerbates isolation, but also presents major barriers to accessing employment opportunities, education, health care and community services that are taken for granted by the system designers and service operators. The design of the transport system also needs to take account of a large pool of potential customers who currently are not accessing public transport, to ensure the NSW Transport Master Plan will not have built-in structural discrimination for people with disability, their families and carers.

Like other commuters, the needs and expectations of people with disability can vary significantly depending on where they live, where they work or go to school, the level and nature of impairment, the availability of specialist, family and community supports and other factors. The transport needs of people with disability are similar to others in the community such as parents with prams, older Australians and people with temporary mobility and visual impairments. These needs include provision of comprehensive information services and integrated service delivery. Fundamentally, the transport system should be designed to accommodate the needs of an increasingly diverse population with a diverse range of needs, rather than singling out people with disability as a special needs group.

The design of the transport system must be based on a detailed understanding of the current and potential obstacles and barriers faced by diverse groups in the population that would otherwise undermine the effectiveness of the Long Term Master Plan. For this reason, it is critical that people with disability be consulted early in the design phase of any proposed changes to the transport system. It is equally valuable that people with disability are listened to during the early implementation phase of any changes to measure the effect of the changes or improvements to the transport system.

Transport needs of people with disability in regional, rural and remote areas

The Council makes the following observations regarding transport for people with disability in regional, rural and remote areas:

- People with disability are less likely to drive than people without disability, and therefore more reliant on public transport.
- Regional and rural areas have significantly less public transport options available, and in some cases are being reduced (for example the northern rivers train line is being closed). While there may be broader economic reasons behind closure, there is a disproportionate impact on people with disability because of their increased reliance on public transport.
- The costs of public transport for people living in regional areas are significantly higher than in cities. As many people with disability are already living on low incomes (in Australia people with disability are half as likely to be employed as people without disability, and 45% of people with disability in Australia live in or near poverty more than double the OECD average) these higher costs

create a disproportionate burden when compared to many other people without disability in the community.

- Very limited times of operation are common in regional and rural areas, with only school bus runs available to outlying communities; and often no evening service timetables.

Transport for NSW must address the transport needs of people with disability, their families and carers living in regional, rural remote areas, including indigenous communities. The social and economic disadvantages already faced by people with disability are compounded by the sparse and inequitable distribution of transport services outside of metropolitan areas, particularly for those who rely on transport services to access other essential services such as health care.

The Council considers that people with disability generally, and more particularly in rural and remote areas are likely to be disadvantaged by limited, if any, access to appropriate transport services and therefore at a greater risk of social exclusion.

Transport accessibility in rural and remote areas is also a factor of the sparse distribution of services across less populated areas. People with disability and their families routinely have to travel significant distances in order to access services. This additional distance exacerbates the inaccessibility of the system.

People particularly disadvantaged in their capacity to access to health and other services because of poor transport services include:

- Young people who have physically, and/or intellectual disability, dual diagnosis/mental health issues, or are using wheelchairs.
- People with challenging behaviours are often excluded from the transport system but no alternatives have been provided.
- Parents who have no transport and have child/children with a disability.
- Parents living in rural areas with children with disability and high support needs.
- People with disability, in group/supported accommodation.
- People with disability, their carers and families from non-English speaking backgrounds.

Rural families are distinctly disadvantaged with regard to transport needs. Travel costs are a great additional burden to rural and isolated families. Extra time spent travelling is an issue for rural areas for families. Travelling long distances for health services can impact on families' wellbeing and stress levels. Aboriginal people with disability living in rural and remote areas have continued to be particularly disadvantaged especially with issues of transport.

The Council recommends that the Government establish a partnership between NSW Ministry of Health, Ageing, Disability and Home Care, Transport for NSW and local Councils to develop a co-ordinated transport strategy to identify and address

the transport needs of people with disability in regional, rural and remote areas when accessing health services.

Such a partnership would have the capacity to consider the strategies that could bring health services to the people, rather than requiring people to travel long distances. It may also be relevant to consider linkages with strategies such as indigenous outreach services.

Critical Improvements in the provision of Taxi services for people with disabilities

Readily available, accessible, safe and cost-effective taxi services are essential for people with disability who are unable to independently use public transport or drive.

Research has highlighted the inequity of access to Wheelchair Accessible Taxis (WATs) from region to region. For example, in 2010 there were only five WATs in Newcastle and many areas of Sydney are under serviced. This leads to significantly greater wait times (often 1 to 2 hours) than those experienced by the general public.

Clearly the significant subsidy offered for WAT licences has not achieved effective supply.

Some practical suggestions to improve the response times of WATs are:

- Create a single/centrally managed booking line.
- Make better use of customer details on database, to avoid making numerous requests.
- Allow for SMS bookings.
- More active notification for the commuter if a WAT taxi is not available, particularly given the lack of alternative transport modes.
- Increase the minimum number of WAT licences as a percentage of the overall number of licences offered.

It is essential that all WATs comply with the Disability Standards for Accessible Public Transport before being approved. Failure to comply means that a standard wheelchair user cannot access the WAT. This is a poor outcome for both customers with disability and the taxi operator who thinks that they are getting an accessible taxi that will accommodate all wheelchair users. Safety features such as retractable over the shoulder lap sash belts should be a compulsory requirement for all WATs before being approved as such.

The subsidised cost of the taxi transport subsidy scheme (TTSS) system has not increased with the cost of living over the years. In fact, the TTSS in NSW has not increased since its inception but fares have regularly gone up. It is noted that other jurisdictions have a greater than 50% subsidy. Customers with disability using the system in 1981 received a significantly higher level of subsidy than customers in 2010. Quite simply, you cannot travel as far as you previously were able to for the \$30 subsidy. The individual has had to finance the gap between the subsidy and the

real cost of travelling or forgo travelling. This effectively privatises the cost of the only accessible public transport that some wheelchair users with high support needs have as they have no other access to public transport.

Feedback to the Productivity Commission inquiry into Disability Care and Support (2011), noted that for some people with disabilities their most significant ongoing expense is the high cost of transport to and from work for those totally reliant on using taxis and that this was a significant disincentive in obtaining and maintaining employment.

As an indication of the cost imposition on individuals who work full-time and require the use of WATs, one Council member recorded his travel expenses from 1999 to 2010. During the period he regularly worked in the City of Sydney and commuted from Terrey Hills. In 1999, the meter charge was between \$45 and \$50. In 2010 this meter fare was \$75-\$80. After allowing for the taxi subsidy, the cost of travel increased by around 250% or \$14,400 a year and created a major cost burden in maintaining transport to and from work. (The figures are based on 10 trips per week over 48 weeks.)

Examples of specific barriers for people with mobility impairment

The availability of accessible buses, trains and ferries is meaningless if access to and from the bus stop, train station or wharf is inaccessible. It is critical that the design of the transport system takes account of the areas surrounding the bus stop or train station to ensure accessibility.

Accessibility means that commuters with mobility impairment are readily and *consistently* able to *independently* use the facilities and services provided.

The consequences of changing a transport mode to increase accessibility need to be fully considered. For example, the redesign of some buses to enable the accommodation of wheelchairs and prams has resulted in making them less accessible and safe for other mobility impaired people because there are less hand holds, especially when drivers don't wait until the person is safely seated before taking off.

Similarly people with disabilities are reluctant to change modes due to the risk that the next mode of transport will reliably be accessible.

Accessibility of transport is not only about the physical design of the vehicles, but also about availability and reliability, and the ability of people to feel confident that they can complete their journey safely and soundly. Many people with mobility impairments have given up on the public transport system either because it isn't available where or when they need it, is not accessible or is accessible for only part of the whole journey.

The system as a whole is inaccessible if just one component in the chain of situations encountered during a journey is inaccessible.

Access issues for people with hearing impairment

Customer service takes many forms and presents many challenges for people with hearing loss which is the most frequent sensory deficit in the population. One in six Australians is affected by hearing loss (Access Economics, 2006). This is expected to increase to one in four by 2050 as the population ages.

Hearing loss can have a profound effect on a person's capacity to communicate and can lead to depression, anxiety and isolation. These difficulties are exacerbated when a person with hearing loss is confronted by difficulties in accessing information about public transport.

Transport for NSW promotes its phone number 131 500 as a point of contact. For people with hearing loss phone communication is problematic and in the case of noisy environments (such as reporting incidents on trains or buses) can be most difficult and frustrating. The instalment of a text based or SMS option by which to access information and contact Transport for NSW would be a relatively simple and inexpensive change in meeting the needs of people with hearing loss, and improve the customer service response for many who need an alternative option to phoning 131 500.

A complaint system that provides only one point of access to the feedback team again presents challenges. The promotion of the 131 500 number seems to take precedence over all other communication options. Recent attempts to get a response from the advertised TTY line were fruitless.

The visual displays at many train stations are welcome for people with hearing loss. However, changes in service availability or emergency notifications are rarely or inconsistently displayed, leaving a person with hearing loss unable to determine what is happening. The potential risks to a person's safety and successful travel experience are significant as a result of the lack of communication. Hearing induction loops installed in some trains rarely seem to be operational at the point where the technology is needed, and/or the announcers don't articulate their messages clearly and consistently.

The ferry wharfs at Circular Quay provide an example of accessible transport for people with hearing loss. The ticket booths have a hearing loop installed and the visual displays on the wharfs provide clear and concise information. Most other destinations don't provide anything like this level of accessibility.

Conclusion

The need to ensure that Long Term Transport Master Plan is accessible to the significant percentage of NSW citizens who have a disability is self-evident. The Master Plan should also recognise that the expected growth in this cohort will significantly outstrip average population growth rates over the next 20 to 50 years.

Fundamental transformation in policy is underway in both State and Federal spheres via the NSW Governments *Person Centred Approaches* for disability service provision combined with the proposed *National Disability Insurance Scheme* and the *National Disability Strategy* which itself singles out accessible transport as a key

focus area. The success of each of these strategies in creating a better life for people with disabilities, particularly via accessible communities, relies significantly on accessible transport as a key enabler. At the same time the roll-out of these strategies will also generate additional demand for accessible transport as people with disabilities become more empowered regarding how and where disability services are provided and they are more able to exercise their ability and right to live independently.

Thank you for the opportunity to make a submission. The Council looks forward to continuing our positive relationship with Transport for NSW to help deliver these much needed improvements in the transport system.

Yours faithfully

A handwritten signature in black ink, appearing to read 'C. Beckett', with a stylized flourish at the end.

Cain Beckett, FAICD
Chair, NSW Disability Council