Metropolitan Transport Forum

Hon Gabrielle Williams MP
Minister for Public and Active Transport
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Introduction

The Metropolitan Transport Forum (MTF) is a transport interest group for Melbourne metropolitan local governments. The MTF has been established for over 25 years and has a membership of 26 metropolitan councils, and meets regularly to discuss transport topics of interest and relevance to local governments and their communities. The MTF also acts to liaise between local and state governments, and advocates on behalf of member councils on key transport issues of metropolitan significance. The MTF works closely with the Municipal Association of Victoria (MAV).

The MTF informs, researches and debates transport issues with metropolitan local governments throughout the year. Our strategic plan identifies three main areas of attention within the Victorian transport planning agenda:

Active – to achieve more funding for cycling and pedestrian infrastructure and projects that improve rider and walker safety;
Buses – to increase patronage on buses; and
Choice – to provide alternatives to private cars for the wider Melbourne community to move around Melbourne for recreation, employment and education.

In recent years we have held well attended transport related seminars on the challenges and opportunities facing the bus sector in metropolitan Melbourne with international and Australian speakers from the Department of Transport, academia and industry.

Part A comments on some gaps in the scope of the document. Part B of this submission addresses the questions posed in the draft Transport Accessibility Strategy.

PART A – document scope

MTF Supports the creation of a Transport Accessibility Strategy

Transport accessibility matters for large swathes of the Victorian community: they may have short or long term accessibility needs, be carers for people with needs, be parents, travellers, or simply people trying to get about the community to visit family, friends, study and work, but who do not have their own transport and need to travel with prams, strollers, luggage or shopping carriers.

The public transport system was designed decades ago with an especially narrow audience or male workers seeking to get to offices for a Monday to Friday, 9-5 job. Some adaptations have been made in more recent decades to assist students to get to and from schools and other education venues, but largely public transport has failed to keep up with evolving society.

The purpose identified in the draft Transport Accessibility Strategy (TAS) is to "focus on the accessibility for people for whom mobility can be a challenge" due to their age, cultural background or other differentiating factors, and in fact captures everyone. This breadth of inclusion is applauded.

Transport, and the ability to move about your city, is a fundamental right, especially as essential services become more distributed. Connectedness provides the deep foundation for a healthy community, and as the community ages connectedness becomes a vital part of quality of life. Failure to provide all sectors of the community with the dignity of autonomy, and the ability to make their own choices as to where and how they move about, greatly diminishes the lives of many people.

It is also acknowledged that while technology is providing new solutions and opportunities to make the community more inclusive, it is also largely designed for the "norm" of a professional able bodied male going to work or education, and not for the wider community with greater and more varied needs.

Technology is *not* equally available to all community members, perhaps due to economic circumstance and age, as well as physical and mental health circumstances, and so it is important that the TAS reflects the technological spectrum from "no technology" to "leading edge".

The strategy does not appear to include much data or statistics. For example, what is the current usage of the transport system by various demographic groups? Breaking down passenger information into such categories as age (child, adult, senior); gender; group (single, family, friendship) would provide a much deeper understanding of what the impediments to greater use of the system would be, and would better inform the actions required to deliver on the purpose.

The TAS must also cover the absolute necessity of maintaining systems once they have been installed. The transport system must work if not all the time, then 99% of the time for *everyone*. Some breakdowns are inevitable, but extended breakdowns should not be tolerated, and

contracts for services and infrastructure management must stipulate not just reliability of the bus/train/tram, but also the reliability of the supporting systems such as the hearing loop efficacy for deaf people, or the legibility of aids for vision impaired people. Maintenance contracts and infrastructure lease arrangements must stipulate extremely high levels of functionality, allowing only minimal down time.

Legislative requirements

The draft Strategy appears to avoid making any commitments to meeting the State's obligations under the Commonwealth Disability Discrimination Act of 1992 (DDA). The Act is listed as a legislative requirement, but no further explanation is provided of the State's intention to satisfy its requirement. This is considered to be a serious deficiency in the TAS.

The following comments are in response to the proposed framework outlines in the document, and the "boxed" questions included in the draft strategy.

Local Government responsibilities and abilities.
The first and last leg of journeys – footpaths

Budget constraints in LGAs.
This draft strategy touches on the first and last leg of journeys, noting that many of these first and last legs are located on roads under the management of local government. However, the strategy does not reflect on the considerable restrictions placed on local government when it comes to revenue, and the huge impact that the implementation of improvements would have.

Local governments (LGAs) have a relatively modest budget for DDA improvements, which is often utilised in simple parking access improvements. Even a modest objective of installing tactile indicators at all intersections would be more than local government budgets could deliver, let alone the creation of 1000s of kilometres of footpaths and refuge points in local roads. It is considered that constraints within the Local Government Act prevent LGAs from being able to deliver the improvements to footpaths and crossings described in this document.

Planning legacy issues.
Planning guidelines which for decades have not demanded that developers of estates create footpaths remain in place, and have resulted in 1000's of kilometres of local streets where the only place to walk with a wheelchair or a pram *is on the road*. In some places footpath gradient and crossfalls would not meet DDA standards, and could never be retrofitted to those standards.

Further, local government is extremely constrained by the Road Management Act which allocates authority for even the simplest change to the road surface to the State, even if it is to be funded by local government. Typically requests for lower speed limits, traffic treatments, new signal infrastructure, crossings, are rejected.

Delivery of these necessary improvements can only be achieved if significant funding is provided by the State, and much more authority is delegated to local government.

Traffic priority – freight vs accessibility – change project scope from "area on a map" to "outcome delivered".

Current DTP practice on almost every road is to prioritise freight over safety improvements. Local government requests to redirect trucks away from schools and shopping precincts (areas with high pedestrian numbers) are rejected as adversely impacting the freight economy. Failure to deeply embed the prioritisation of access concerns for all road users will result in a continuation of what at best might be a patchwork of safer more accessible areas, but all likely crisscrossed with hostile freight focussed routes, effectively making the safety improvements moot, as a route is only safe if it is end to end.

Delivering accessible transport solutions requires a major shift in how projects and services are viewed. Project scopes should no longer be seen in an area drawn on a map, but must be reconsidered to be about the achievement of the objectives along a route. For example, the upgrade of access to a station may be only part of a suite of changes required to ensure genuine accessibility – which would also include the interchange to the bus stop on the far side of a major road – thus warranting the construction of a new crossing, and a lowering of the speed limit to 40kph, and the redirection of freight routes away from highly volume passenger areas.

PART B – questions posed in the draft strategy

Section 3 - "The Problem"

The provision of information should be considered to be just the start of addressing the accessibility needs of the community. It is an important step, but information on its own will be insufficient to the creation of a more accessible transport system. Knowing that you will have to wait 3 hours for the next fully accessible service to your destination will mean that you are able to close how and where to spend that time, but it does not replace the benefit of being able to use the transport system as freely as the "norm".

It does not reflect that people with accessibility needs spend considerably more time using transport services, and in many cases spend more of their time accessing other services such as medical services, social services, and so the impact of delays on their lives is vastly more significant than on the privileged norm.

While this section describes the necessary steps for all users to gain equal value, (confidence, respect, comfort, ease of use, design) the absence of any statistics or data reduces the criteria to motherhood statements.

3.1.1 – Planning a journey
Given that the effort to access transport is much greater for disabled and older people, communication about interruptions, and service changes is critical. The impact on this segment of the community is much larger than on the able bodied community.

3.1.2 First and Last Leg of a Journey
It is agreed that the first and last legs of journeys are important. However, the responsibility for footpaths is not solely local governments. Much public transport runs along roads managed by the Department of Transport and planning, and footpath provision is often determined in accordance with VCAT hearings on development applications.

Road crossing improvements are often sought on DTP assets, and are rejected. These roads carry larger volumes of traffic, with higher proportions of freight, and are a much greater impediment to confident access to the transport system than local roads under the control of councils. The impact on local government planning is discussed further in this submission.

3.1.3 Interchanges
The discussion about interchanges is supported, particularly the importance of communications. It is considered that improving the physical infrastructure is of highest priority to ensure that access is to all services at all locations.

3.2 Current Transport Network

This section only lightly touches on the inadequacies of the current transport network. Properly quantifying the work yet to be done will better demonstrate the scale of the entire transport accessibility challenge, and establishment of project timelines and costs.

Section 4 – Policy and Strategic Context

The proposed objectives *(that the transport system: inspires confidence; values all users; and is easy to use)* are not considered sufficient. The transport system must be reliable, safe, dependable and allow for future upgrades within contract life, and within the design life of assets and the decision making in design and operation and must be transparent.

This section misses the opportunity to describe some actual actions and aims. Simply saying "more" and "increased" and "greater" suggests that the provision of a single adapted footpath will be sufficient to claim success. It is considered that this form of aim is woefully insufficient, and is inappropriate to be the basis of a strategy which reaches over many years.

It is strongly urged that numerical targets be included in the aims such as

- "500 % increase in access to transport";
- "Reduction in accessibility gaps by 75% by 2033"
- "upgrading of 5 existing spaces each year to conform with universal design standards"
- "20% increase in number of people with mobility needs on each for of public transport"

Section 5 Our Approach

5.1 Vision – "Do we have the vision right?"

The Vision must include a completion date. The Vision should clearly state the Victorian Government's objective of complying with the DDA (Cth) of 1992. This strategy, and the consultation process involved in developing it must not be construed as community acceptance that the DDA obligations can be deferred or avoided.

The longer the delivery of DDA compliant public transport takes to achieve, the longer it will take for Victoria to take advantage of the economic and social gains of a more inclusive transport system.

5.2 Objectives – Are these the right objectives? Is there anything missing?

The implied order of importance should be reversed, starting with "is easy to use", then "values all users", then "inspires confidence". The current order seems to be prioritised in order of easiest to tackle, rather than improving the accessibility of the transport system for users.

Missing objectives include:

- Choice: Users should have a choice of modes, if only to ensure that disruptions have less impact.
- Time as well as Economic Equity: Users should experience the system equally, and have comparable travel times regardless on accessibility considerations.

5.3 Principles – Do these principles address the most important things for how we make transport more accessible?

The listed principles do not include any sense of aiming to take leadership in correcting the deficiencies in the Victorian transport system.

The principles do not provide any urgency or basis for taking action.

The principle "embrace new ways of doing things" alludes to innovation, this could be much stronger.

There should also be a commitment to transparency in decision making to ensure that people with access needs, wherever, they live are able to understand the decision making process.

Section 6 – Strategic Directions

The proposed objectives (That the transport system: inspires confidence; values all users; and is easy to use) are not considered sufficient.

The transport system must be reliable, safe, dependable and allow for future upgrades within contract life, and within the design life of assets and the decision making in design and operation and must be transparent.

These objectives are not currently included in the draft TAS.

Objectives must be measurable, and be annually reported for all users in various demographic groups.

6.1 Assets
"Will these strategic directions make transport assets accessible?"

This section should indicate the commitment to providing the resources, budget allocation over multiple years, and might include the development of new Victorian enabling legislation to elevate the delivery of the requirements as a multi location project, across the metropolitan area, or along tram routes as a major transport project such as for the Suburban Rail Loop.

It is essential that access considerations include consultation with the community at the earliest stages of the design. While it is noted that there have been considerable improvements to project outcomes over the last decade, the access community's needs will continue to expand

as services and technology presents. This means that simple "tick the box" approaches, which may satisfy Standards, is unlikely to be considered adequate by the community. Early, and continuing consultation with the access community will ensure that the designs meet the access community's needs.

The "strategic direction" must state that <u>all</u> PT assets must be accessible by 2032 and that connections between assets will also be accessible – this includes timetabling of connecting services (eg trains to buses) to reflect slower travel times for some users.

6.2 Journeys
"Will these strategic directions make journeys more accessible?"

The discussion in this section is too high level.
Accessibility should be deeply embedded in all aspects of transport services, with a view to ensuring that journeys are not just *possible*, but that they are reliable, safe, and dependable; and that alternate journeys are able to be undertaken without significant additional time or cost on the traveller, regardless of their access needs.

The language in this section implies that not all services will be accessible. This is not acceptable, and would not be in compliance with the DDA.

Organisation Culture and Public Behaviour
"Will these strategic directions create a greater awareness of accessibility needs to build a more inclusive culture?"

The outcomes in this section are supported.

However, they must enhance the objectives of reliability, safety and flexibility.

6.3 Organisation cultures and public behaviour.
"Will these strategic directions create a greater awareness of accessibility needs to build a more inclusive culture?"

The outcomes in this section are supported.

However it is considered that "impressions" is a completely inadequate indicator of the success of a campaign. Properly designed research inquiries of random and anonymised users should be used to assess whether campaigns are achieving their ends.

The stated result that "35% of respondents (commercial passenger vehicle drivers) said this campaign changed their views on transporting passengers with disability" completely misses the point that their views may have little influence over the experience of the actual passengers, and cannot be construed as having any meaningful benefit to passengers. While this information may be of some value within DTP, it is of little value to the travelling community.

6.4 Information and Innovation.

"Will these strategic directions meet information needs so that people can plan their journeys more easily?"

The outcomes in this section are supported.

However, the inclusion of information about virtual tours (which are only available for 32 stations) is dismaying. It does not reflect any significant improvement in experience for the accessible needs community. The value to people with accessibility needs is probably extremely low.

More useful in this section would be objectives about assisting all users when system disruptions occur. This is particularly important when lengthy shut downs are planned such as for LXRP projects. It should be possible for users to be able to register their needs, and to receive information on how they can still reliably and safely use the transport system.

Section 7 – Identifying Upgrades that will make the greatest impact.
"Is there a better way to identify upgrades that will have the greatest impact"

The categories proposed here are not considered to be appropriate. It is expected that serious safety risks will be immediately addressed, and do not require an Accessibility Strategy to ensure they are attended to promptly and effectively. To use this strategy as a framework to address prioritisation (ie deferral of some) of long overdue legislative compliance obligations is not appropriate.

More appropriate categories could be based on the potential number of users of an asset, eg:

- Use of stop to access hospitals, schools, community meeting places/centres, shopping centres, sports grounds, entertainment places (these might indicate the number of people who will benefit from the improvement)
- Locations where routes and modes connect/intersect

The example of impact ratings is not considered appropriate. Both ramps do not meet standards, and therefore in both cases the legal risk of non compliance is equivalent.

Section 8 – Implementation and evaluation

8.1 Implementation
The indication that a replacement Action Plan will come into effect after 2024 is not considered to be adequate. This document is a plan to have plan. It is not a plan to implement a plan. Consequently the achievement of genuine equity for people with access needs is pushed even further into the medium or even long term future.

The absence of genuine strategic objectives is particularly apparent.

8.2 Evaluation and Reporting

8.2.1 Evaluation
The three proposed measures are:

1. Whether the overall network is accessible.

   This is likely to be "Fail" for many years, even decades.

   Alternate measure:
   - Progress on each transport route (end to end of service) towards 100% accessibility. This should include interchange locations to connecting services.

2. How well people with disability consider the transport system is meeting objectives.

   A quantitative measure should be considered rather than a qualitative measure.

   Alternate measures:
   - How many people with access needs are using the system.
   - Are they using the system equally through the day (eg peak, shoulder, evening)

3. Counting the number of accessibility improvements to the transport system.

   Alternate measure:
   - Progress on each transport route (end to end of service) towards 100% accessibility. This should include interchange locations to connecting services.

8.2.2 Reporting

It is noted that the Accessible Transport Advisory Committee, and Chief Accessibility Advocate are nominated as effective reviewers of the implementation. This approach is considered to be inadequate.

Reporting against much more stringent measures should be publicly available at least annually. Where targets are not being achieved, clear responsibility must be allocated to ministers and departments to improve the results.

Conclusions

The MTF supports the development of a Transport Accessibility Strategy for Victoria.

However, this framework fails to demonstrate how compliance with legal obligations on the Commonwealth Disability Discrimination Act of 1992 will be met. It offers no Action Plan, timeline of mechanism for the delivery of this important social infrastructure.

No new resources are identified, and the prioritisation mechanism proposed seems to propose that safety corrections and repairs due to lapses in maintenance or damage could be considered as part of the delivery of DDA compliance.

The "problem" is poorly described. The challenges faced by people with accessibility needs are not outlined, and the width of the gap between how access needs are not met, and the desired end point is not described in any meaningful quantifiable terms.

The policy and strategic context section is underdeveloped and should contain explicit goals in both time and standard to be achieved.

It is strongly urged that numerical targets be included in the aims such as

- "500 % increase in access to transport";
- "Reduction in accessibility gaps by 75% by 2033"
- "upgrading of 5 existing spaces each year to conform with universal design standards"
- "20% increase in number of people with mobility needs on each for of public transport"

The principles outlined in the document do not include taking leadership, urgency, innovation, or transparency.

The transport system must be reliable, safe, dependable and allow for future upgrades within contract life, and within the design life of assets. Decision making processes and considerations in design and operation and must be transparent. This document should include measurable objectives, and annual reporting of progress against those goals.

More appropriate categories to prioritise projects could be based on the potential number of users of an asset, eg:

- Use of stop to access hospitals, schools, community meeting places/centres, shopping centres, sports grounds, entertainment places (these might indicate the number of people who will benefit from the improvement)
- Locations where routes and modes connect/intersect

It is noted that for transport infrastructure under the management and responsibility of local government, the scale of the capital works required to deliver compliance, especially when the legacy of footpath free subdivisions over many decades is considered will require that works in LGAs be funded by the State, as the rate revenue is insufficient to deliver the works.

The MTF considers that an entirely new approach to project management of this project is warranted. It is proposed that the project be considered to be a multiple site Major Transport Project, and the powers of the MTPIA be used to manage and deliver the project (as the LXRP projects have been over the last decade).

Accompanying this potential change would also be a quantum shift in how projects are scoped, to ensure that the infrastructure delivered is not a white elephant, or an island of accessibility cut off from its users by a limited view of where the project boundaries lie. Project scopes should expand to include attributes such as speed limits, as well as new infrastructure.

Lastly it is noted that local government is extremely resource constrained, yet is responsible for many 1000's of kilometres of streets which potentially require new infrastructure. Any TAS expecting a greatly expedited delivery of accessibility infrastructure must be accompanied by significant funding to local government to deliver these works.

I would be pleased to meet with you to discuss this submission and can be contacted at mtf@mtf.org.au.

Cr Jonathon Marsden
Metropolitan Transport Forum Chair

Cc President of MAV