

Michael Small  
Australian Human Rights Commission  
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28 July 2010

**Re: Proposed guideline for accessing compliance of bus stops with the Disability Standards for Accessible Public Transport 2002**

Dear Michael,

Western Sydney Community Forum welcomes the opportunity to provide feedback on the Australian Human Rights Commission *Proposed Guideline for assessing compliance of bus stops with the Disability Standards for Accessible Public Transport 2002*.

Western Sydney Community Forum (WSCF) is the Western Sydney regional peak organisation which provides regional leadership, facilitates collaborative action and develops resources to enable community organisations to effectively address issues relating to social justice and social inclusion. Funded by Transport and Infrastructure, WSCF has a long involvement connecting the community sector with transport issues.

WSCFs transport work predominantly focuses on alleviating transport disadvantage, which results in a large portion of our work being undertaken with older people and people with a disability. Accessible bus stops are thus a core component of our work. Therefore, WSCF is broadly supportive of the Australian Human Rights Commissions proposed guidelines as a mechanism to facilitate and support bus infrastructure providers to comply with the Disability Standards for Accessible Public Transport 2002.

Through the work WSCF has undertaken to improve bus stop infrastructure a few issues have been identified as barriers to ensuring accessible bus stop infrastructure is implemented in a timely and equitable manner. The core issue identified concerns the accountability and responsibility of Local Council in meeting the Disability Standards for Accessible Public Transport. This relates to ***Section 7: Priorities for upgrading of bus stop within the Guidelines***.

The provision of infrastructure at the bus stop is a local government obligation in NSW. In late 2009, Western Sydney Community Forum (WSCF) contacted councils across Western Sydney; including Blacktown, Liverpool, Auburn, Bankstown, Parramatta, Fairfield, Baulkham Hills, Blue Mountains, Holroyd, Penrith, Campbelltown, Woolondilly and Camden. The aim was to obtain data on Council's bus stop infrastructure budgets as well as data on the status of bus stops (how many; comply with Disability Standards for Accessible Public Transport have seating, lighting, timetables and shelters etc). Unfortunately, majority of Councils were unable to supply us with the information. It is apparent that bus stop infrastructure funding appears under varying budget

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lines such as 'advertisement' and that data on bus stop infrastructure status is collected in an 'ad hoc' manner.

The Local Government and Shires Association assert:

*"There appears to be an absence of consistent data available on the extent of the infrastructure issue facing Local Government and the degree to which councils are planning, progressing or implementing the Transport Standards"<sup>1</sup>*

Specifically, the lack of:

- Clear 'bus stop infrastructure' budget lines within Council budget detailing the budget allocated for bus stop infrastructure, including specific allocations for seating, lighting, signage, accessibility and pathways
- Clear and universal descriptions of whose responsibility in each council it is to implement the standards. It is also crucial to detail where this responsibility starts and finishes. Our experience with the Standard 'access path to/from adjacent footpath or roadway' has shown us that the responsibility for this can be spread across multiple council departments, including the department responsible for pathways, the department for bus stops and the department for cycle paths)
- Publically available data on the percentage of bus stops which are accessible across all local council areas, including a list of all bus stops in the area.

Are all viewed by WSCF as a significant impediment to the universal implementation of accessible bus stops.

WSCF would welcome the Australian Human Rights Commission support for a mechanism to be implemented to ensure transparent accountability for all of the above.

Should any clarification or further information be required please do not hesitate to contact our Amy Williams on 9687 8937 [amyw@wscf.org.au](mailto:amyw@wscf.org.au).

Sincerely,



Mary Waterford  
Executive Officer  
Western Sydney Community Forum.

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<sup>1</sup> Local Government and Shires Association NSW, *Submission to the Review of the Disability Standards for Accessible Public Transport 2002*, last accessed March 2010 (no longer available online)