

Vision Australia Submission

**Creating Better Connections for Queenslanders: A Draft 10 Year Plan for Passenger Transport in Queensland**

Submission to: Queensland Government – Department of Transport and Main Roads

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Submission approved by: Chris Edwards, Manager Government Relations and Advocacy, NDIS and Aged Care, Vision Australia.

## Introduction

Vision Australia welcomes the opportunity to provide this submission to the Queensland Department of Transport and Main Roads, regarding the draft 10 year plan for passenger transport in Queensland. We commend the Queensland Governments commitment to ensuring that people with a disability have access to accessible public transport across the State. We are broadly supportive of the plan, however in this submission we have identified some areas where improvements could be made to ensure the needs of Queenslanders who are blind or have low vision are properly addressed so that they are afforded equitable access to public transport.

Vision Australia is currently conducting a client survey (“the survey”), exploring the experiences of people who are blind or have low vision with regard to electric scooters and other rideable vehicles on footpaths. While this research is not yet finalised, we have included some feedback from it within this submission.

# Incorporating Inclusiveness and Accessibility into all aspects of the Plan

*Creating Better Connections for Queenslanders: A Draft 10 Year Plan for Passenger Transport in Queensland* (“the plan”) identifies 5 key priorities and outlines 20 signature initiatives to be implemented by 2030 to deliver the Plan.

At present the plan includes accessibility as a separate priority, namely Priority 4 “Easy and Accessible”. While we welcome accessibility being identified as a key priority, it must be addressed and incorporated into the other 4 key priorities. A plan that puts the needs of its most vulnerable customers at its core will ultimately be a better plan for everyone

##### Key Priority 1 - Reliable and safe

, one of the focus areas within this priority is “running on time performance, stating:

*“Reliability is central to a positive passenger transport experience for customers. Customers want confidence that services will arrive and depart on time. They count on us to get them to the important things in their life such as work, school, university, or health services. When a passenger transport service arrives late, or does not arrive at all, it is not just an inconvenience. It can have significant consequences including lost pay, or missed job interviews, university exams or medical appointments.”*

However, for people who are blind or have low vision, reliability takes on an extended meaning, far greater than just whether a vehicle arrives on time. For example, even if passenger transport arrives on time, it remains unreliable, as they are unable to access information to locate and identify the vehicle, and as a result may miss, or board the incorrect vehicle, , and subsequently not make it to those important appointments mentioned and suffer the consequences.

With regard to the safety aspect of this priority, Government must recognise the importance of safety in emergency preparedness for people who are blind or have low vision, and that they investigate technology and other solutions for how people who need assistance can be identified at transport hubs in the event of a service disruption or an emergency. Information about service disruptions or alternative service notifications need to be provided to passengers in an accessible format. In a developing emergency situation, direct assistance from staff trained in guiding people who are blind or have low vision is essential.

##### Key Priority 2 - Responsive to Changing Community Needs

When delivering this priority, it is critical that the Queensland Government consider in their local planning that many people who are blind or have low vision are limited to low incomes, due to systemic employment barriers and reliance on pensions and benefits as their sole means of income. This in turn limits choice with regard to where they live geographically, due to housing affordability issues. Therefore, this is an important consideration when mapping housing trends for people with a disability for planning purposes, and addressing transport disadvantage for people who are blind or have low vision.

##### Key Priority 3 – Seamless End to End Journey

Many people who are blind or have low vision arrive at, or depart from, a station or stop by walking, or by taxi or ride share, or in some instances, community transport. With the emergence of new technologies and on-demand transport options, the accessibility needs of people who are blind or have low vision need to be taken into account.

This priority in the plan refers to last mile options, including scooters, presumably electric scooters, it states:

*“Scooters are now providing additional first and last mile options in some parts of the state. In both cases TMR has developed new regulations to ensure customer safety.”*

Electric Scooters have posed significant concerns for people who are blind or have low vision in a variety of ways, from poor driver behaviour and the speed of e-scooters passing pedestrians who are blind or have low vision, which negatively impacts on orientation and confidence, to discarded e-scooters presenting an obstacle and falls risk to pedestrians who are blind or have low vision. These issues stem from the use of footpaths as shared pathways with vehicles, which is an ongoing barrier for our community in safely accessing the last mile of the journey. Over 84% of survey respondents highlighted that they feel less safe accessing footpaths since the introduction of e-scooters and other rideables.

As stated by a survey respondent:

*“They (e-scooters) are far scarier now and cause anxiety. I have nearly been hit on the Southbank walkway in Brisbane with a fast moving scooter”*

And another:

*“People with e scooters seem to be exempt from any form of pedestrian awareness or courtesy”*

*And another:*

*“They block footpaths and force my dog guide and I to go onto the road to get around them which is very dangerous”*

Further, over 60% of respondents said they have been involved in an accident or near miss with and e-scooter or other rideable, the following highlighting some of our client’s experiences:

*“I was walking on the footpath during the day and went to change direction when a person on an e-scooter zipped past, very nearly knocking straight into me. In the aftermath, as they carried on unfazed, I was left to feel unsafe and as if it was my fault”.*

*And;*

*“an E scooter came around a corner and collided with me. I fell, my dog guide yelped because I yanked the lead accidentally as I fell and the scooter rider just rode off. I was not badly injured, but nobody checked. I limped about 2 km home and felt very upset. There is nothing police or council are prepared to do about it.”*

*And;*

*“On many occasions I have tripped and fell over e scooters, causing me to badly scrape hands, and losing cane”.*

Moreover,driving e-scooters do not provide viable last mile options for people who are blind or have low vision for obvious reasons, so any plan that takes accessibility and the needs of people who are blind or have low vision seriously must think beyond e-scooters.

The Smart Ticketing technology that will be delivered under this priority impacts on our community in so much as that the mobile phone app and payment systems also need to be accessible to those people who have low vision, but are not eligible for a Vision Impaired Travel Pass (VITP). For those who hold a VITP, the pass needs to be incorporated into planning so that people holding this pass can easily access fare gates and transport hubs.

This priority also refers to the global phenomenon of Mobility As A Service (MAAS), it states:

*“The boundaries are also blurring between public and privately-operated services, leading to new approaches to working with industry. ‘MAASS provides holistic, optimal and people-centred travel options to enable end-to-end journeys to be planned, booked and paid for by the user as a single charge or through a subscription model.”*

It will be important for government to work with industry providers and the disability sector to ensure that accessibility for people who are blind or have low vision in the provision of transport services is mandated in awarding contracts and entering partnerships with private entities.

The Seamless End to End Journey priority in this Plan also refers to Personalised Transport Reforms in Queensland, it states:

*“The advent of new ridesharing services led to a* [*reform of Queensland’s legislation for personalised transport*](https://www.tmr.qld.gov.au/business-industry/Taxi-and-limousine)*. The new regulatory framework strengthens safety standards for the industry, encourages innovation and greater choice and ensures accountability. There are now 400 companies and nearly 16,000 licence holders approved to provide rideshare services across the state.”*

At present Queenslanders who are blind or have low vision are eligible for subsidised taxi travel through the Taxi Subsidy Scheme (TSS) which provides half price fares up to an amount of $50 per trip. In order to offer true choice to people using this scheme, the subsidy needs to be extended to ride share so that people wishing to access personalised transport services more broadly are not limited to taxi travel only. This extension of the subsidy from taxis to ride share was recently achieved in Victoria.

This priority also references new on demand transport services, in particular:

*“New technology to book, plan, dispatch, and pay for on demand public transport services is currently being trialled in Hervey Bay and will be rolled out to relevant services across the state to make it easy for customers to get on board and use on demand public transport services to connect with the broader public transport network.”*

And:

“New *on demand public transport services will roll out over the next 10 years starting with the Gold Coast trial in 2022. “*

People who are blind or have low vision must be extensively consulted in the accessibility and functionality of these new technologies and modes of transport, in terms of accessible booking processes, alerts regarding on demand transport arrival and identification of correct on demand transport arrival and drop off locations. The built environment needs to cater to on demand transport in terms of wayfinding measures so that people who are blind or have low vision can find and navigate easily to the next mode of transport.

##### Key Priority 4 – Easy and Accessible

This priority does not identify where the statistics appearing under the heading “Accessible fleet and infrastructure in Queensland as at 2019”have been derived from. It may be that these figures are measured against compliance with the Disability Standards for Accessible Public Transport (DSATP), or the figures may derive from customer satisfaction surveys. It also does not specify in which way the listed items are accessible, for example does it refer to the physical environment, and does it measure accessibility for all disability groups, an if so, which proportion reflects the blind and low vision community.

##### Key Priority 5 – Environmentally Sustainable

The emergence of electric vehicles has, and will continue to have, a negative impact on the accessibility of transport and pedestrian safety for people who are blind or have low vision, unless sufficient attention is focused on the safety concerns. This priority aims to deliver a greener fleet, reducing emissions of buses, taxis and rideshare, by 2030.

The introduction of electric/hybrid vehicles has posed a significant challenge for people who are blind or have low vision. In particular, these quiet vehicles are very difficult for people who are blind or have low vision to detect and respond to as they are unable to rely on their other sensory modalities, such as hearing, both to identify when a transport vehicle has arrived, and when it is safe to cross roads. Vision Australia commissioned a study in conjunction with Monash University to explore the impact of electric vehicles and cyclists on pedestrians who are blind or have low vision. Of the total participant sample, 35% reported having experienced either a collision or near collision with an electric/hybrid vehicle. Further, 74% of respondents reported that the introduction of electric/hybrid vehicles onto Australian roads has reduced their confidence to walk and cross roads. These results are relevant in terms of the increased use of electric vehicles as public transport, and the whole of journey, which includes the pedestrian experience. In this way, the research is directly relevant to the Seamless End to End Journey and the environmentally sustainable priority in the Plan. Further information about this research can be found here (Link to ‘The Impact of Electric /Hybrid Vehicles and Bicycles on People who are Blind or Have Low Vision’ on Vision Australia’s Position Statements webpage.

##### New and Emerging Technologies

Over the next 10 years new and emerging technologies will impact on the travel experience of all passengers, including those who are blind or have low vision. This may include the advancement of existing technology such as mobile phone apps and beacon technology, and may extend to wearable devices or technologies built into the physical environment and driver communication systems. It is essential that proposed new and emerging technologies are inclusive of, and accessible to, people who are blind or have low vision.

There is a need to ensure that existing technology is accessible, however there is an opportunity to harness technology platforms in the next 10 years that will assist people who are blind or have low vision to achieve equal access to transport information and ease of independent travel. For example, extensive provision of audio information and enhanced technology to support wayfinding within the built environment.

It is recommended that a disability impact assessment be undertaken each time new and emerging technologies are incorporated into plans for transport projects in Queensland.

It is also recommended that the Queensland Government engage in consultation and user testing with the blind and low vision community in the development of new and emerging technologies.

In order for Queensland transport to keep up with emerging technology, it is imperative that Government funding grants are made available to stakeholders to enhance existing technologies and develop new technologies that will advance the accessibility of the transport experience for people who are blind or have low vision.

##### Queensland Bus Travel

***Current bus travel barriers***

Bus travel in Queensland remains one of the most challenging forms of transport for people who are blind or have low vision. At present the way potential passengers identify the arrival of the bus, and identify the journey route and destination of the bus is based on visual information. For people who are blind or have low vision, the sound of the bus motor is the key indicator that a bus has physically arrived at the bus stop, but they are unable to see the route number and destination which is displayed in print format on the arriving bus. They are subsequently unable to identify whether it will enable them to reach their destination.

This problem is exacerbated at busy busway stations, where a number of buses arrive and depart simultaneously, and are positioned at various locations along a busway platform.

Currently, due to lack of accessibility, people who are blind or have low vision may need to use direct assistance, including the following:

* Navigate to, and identify the emergency assistance button located within the built environment of a bus station, and speak to an operator, disclose their blindness or low vision and any mobility equipment they may or may not use. This information is then relayed through the driver communication network to alert the driver of the next bus with the desired route number that a person who is blind or has low vision is waiting at a particular bus stop or busway;
* Use a personal mobile phone to call the Brisbane City Council, and speak to an operator, disclose their blindness or low vision and any mobility equipment they may or may not use. This information is then relayed through the driver communication network to alert the driver of the next bus with the desired route number that a person who is blind or has low vision is waiting at a particular bus stop or bus way;
* Physically hold a printed sign displaying their desired bus route number and hope that the driver of the desired route sees the sign and is able to pull up in front of the person who is blind or has low vision;
* Identify and engage the direct assistance of a Customer Service Officer if they are staffing that particular bus stop or busway station at that particular period of time; and
* If a person who is blind or has low vision hears the sound of a bus motor arrive, and a bus door open, the person either boards the bus and asks the driver the route number and destination, or remains on the platform and loudly presents the question into the open bus door. This method has become more problematic with the change to boarding procedures due to the pandemic, which involves the front bus door located next to the driver remaining closed, while the rear bus door opens for boarding.

**Case Study:**

Sharon is 24 years old and has low vision, she visits a friend at the Mater Mother’s hospital and wishes to catch a bus from the Mater Hill busway station to Browns Plains. She is unable to identify the route numbers of the buses arriving and departing along the Mater Hill busway platform. Multiple buses arrive and depart simultaneously. She walks around the bus station, using the vision she has, to attempt to locate the emergency assistance button but is not successful. Her mobile phone battery is out of charge. She cannot find a staff member, if in fact there is one staffing the station at this time, as she cannot see if people are wearing a uniform, or a staff badge. In her handbag she has a bus route number printed out in large print on an A4 piece of paper. However, she is reluctant to hold the paper up in front of her in the hope that arriving bus drivers will see the number and alert her to the correct bus. She is aware that holding the sign advertises to others on the platform and surrounds which bus she intends to board. She has a 10-minute walk back to her unit at the end of the bus trip and is worried about her personal safety if strangers are given information and knowledge about which bus, she will take and her disability, as she feels this makes her vulnerable.

##### Emerging bus travel barriers

The emergence of silent vehicles, including the upcoming Brisbane Metro electric bus fleet, presents significant safety challenges, and some new opportunities, for passengers who are blind or have low vision.

Due to the fact that electric vehicles are silent, the current key indicator of a bus’s arrival, the sound of the bus’s motor, is not available to people who are blind or have low vision. An alternative means of alerting a potential passenger is required to be developed so that the blind and low vision community have access to this bus arrival information.

If the new fleet of buses continue to have journey information like route numbers and destination displayed in print format only, on the side or front of an arriving bus, potential passengers who are blind or have low vision will continue to experience current barriers to bus travel and be unable to identify route and destination information. This means they will be forced to continue to engage direct assistance in the less-than-ideal ways listed above.

A new opportunity that has been created with the incoming fleet of electric buses is an on board audio announcement feature which will enable people who are blind or have low vision , once they have identified and boarded the correct bus, to access audio information along a journey. While this will be of great benefit to some Brisbane passengers, for those who continue to travel on non-Metro Brisbane buses, or those outside of Brisbane, they will continue to travel without this on board journey information and may have to access direct assistance from the driver. In cases where audio information on board is not available, people who are blind or have low vision may request driver assistance to identify their location and their desired stop. However, as the driver is busy, both concentrating on driving and boarding and disembarking passengers, drivers may forget to make audio announcements or alert people who are blind or have low vision to their desired stop. We are aware of cases where the person is then forced to disembark at an unfamiliar stop and cross a road, which may not have a pedestrian crossing, to board a bus going in the opposite direction, in order to reach their desired stop and location.

##### International example:

In 2020 Transport for London (TFL) began an innovative new bus sound trial in London’s electric bus fleet. With the safety concerns of people who are blind or have low vision in mind, TFL developed the sound in conjunction with key sector representatives, such as Guide Dogs for the Blind, and other representative groups. The sound is played through special speakers at the front of the bus to ensure people are aware of ele4ctric and hybrid vehicles when they are moving at slow speeds. The sound plays until the bus reaches 12 mph, when reserving, or when it’s stationary at a bus stop. Further, the pitch of the sound varies with speed. The artificial bus sound is part of a wider acoustic vehicle alerting system (AVAS) that will be mandatory for all new ‘quiet’ running vehicles as of September 2021.

##### Conclusion

While we believe that the draft 10 year plan in its current form provides a good starting point, and commend the Queensland Government for their commitment to providing equitable and accessible public transport for all, we strongly believe that much more work needs to be done to ensure that the plan is inclusive of the needs of all Queenslanders, including people who are blind or have low vision. In this submission we have offered suggestions for how the plan can be improved, and we look forward to working closely with TMR to help bring this about.

## About Vision Australia

Vision Australia is the largest national provider of services to people who are blind or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision or have a print disability, and their families.

Vision Australia service delivery areas include:

* Registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment;
* Assistive/Adaptive Technology training and support;
* Seeing Eye Dogs;
* National library services, early childhood and education services and Feelix Library for 0-7 year olds;
* Employment services;
* Production of alternate formats;
* Vision Australia Radio network including a national partnership with Radio for the Print Handicapped;
* NSW Spectacles Program; and
* Government advocacy and engagement.

We work collaboratively with governments, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation.

Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia, to strengthen the voice of the blind community.