

**28 February 2025**

Department of Transport

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To Whom it May Concern,

## Strategic Regional Integrated Transport Plans

Thank you for the opportunity to comment on the nine **Strategic Regional Integrated Transport Plans**.

### About PWDA

**People With Disability Australia** (PWDA) is Australia's national peak disability organisation, representing the 1 in 6 Australians with disability. We are the leading disability rights advocacy and representative organisation and the only national cross-disability organisation representing the interests of people with all kinds of disability. We are a not-for-profit and non-government organisation, and our membership is comprised of people with disability and organisations primarily constituted by people with disability, including the [PWDA Board](#) and many members of [our staff](#).

PWDA is represented in national working groups to reform the disability transport standards, on the NSW Accessible Transport Advisory Council and in work to co-design disability standards in Aviation. We are keen to ensure that more people in NSW have accessible public transport that enables them to reach work, education, services and social opportunities. This is especially important for people with disability, who are more likely than the non-disabled population to be unable to operate a private motor vehicle.

## The problems

A range of things are needed to make existing public transport more accessible. People who use wheelchairs and mobility assistance devices require step-free transport infrastructure and vehicles that enable their access, including when transferring out of their wheelchair is not viable. For people with intellectual, communication, sensory or psychosocial disabilities and neurodivergent people, information about public transport, wayfinding, booking, and the travel process needs to be made accessible using braille, hearing loops, Easy Read and formats that allow assistive communication technologies to be used. Additionally, the inclusion of signage that shows the hidden disabilities sunflower, and education for staff, will ensure that those with non-apparent/hidden disabilities can access a safe transport option. Guide dog and assistance animal handlers need to have their right to access public transportation with their animal respected.

However, for people in rural and regional NSW there may be little-to-no useable public transport. People needing a wheelchair accessible taxi struggle with poor levels of availability and reliability in some communities, or complete non-availability in others. Requiring public transport standards reform to improve accessibility has no impact on communities that have no public transport to start with.

In some parts of rural and regional NSW community transport can provide accessible travel for some journeys, but services are limited. Currently these services are unable to be used should a person need to evacuate in an emergency. Previously people with disability who required accessible services may have been expected to relocate away from rural and regional NSW to access them. However, current rental vacancy rates in regional NSW are **0.9% and 1.8% for greater Sydney** record **high rental rates** make this impossible. It is imperative therefore that accessible public transport networks are provided in rural and regional NSW as soon as possible.

People with complex needs in rural or regional communities **struggle to obtain the specialist healthcare** they need or the evidence required to get on the NDIS or access foundational supports. This is compounded by a lack of accessible public transport and wheelchair accessible taxis being unreliable or non-existent in much of rural and regional NSW. For communities like Riverina Murray on an interstate border where the nearest specialist healthcare may be interstate, travel discounts and service planning also makes this travel even more expensive and difficult.

## Recommended solutions

PWDA recognises the government's objectives in the Draft Plans: Starting with Country, Well-located housing and successful places, A thriving and diversifying economy, A safe transport network, Resilient networks, Net zero emissions, but it is "Access to transport for all" that is the key issue for people with disability. This objective does not actually spell out the need for public transport to be accessible, but this is the pressing concern for all people with disability.

## Investing for Wellbeing

PWDA appreciates that making public transport more accessible requires significant investment, and there is a need to prioritize. We recommend that the **NSW Performance and Wellbeing Framework** be applied to selection of priorities.

## Transport Oriented Design

Wherever Transport Oriented Development (TOD) Precincts are planned to align with key transport hubs such as the development around Morriset station, PWDA recommends that all homes are built to the **Silver Livable Design Standard**, in line with the **Building Better Homes Campaign**. This will help reduce housing discrimination for people with disability and help more people age in place rather than prematurely being placed in aged care. We call on the NSW Government to increase the proportion of housing allocated in any TOD Precinct to public housing to 50% until the housing list is cleared. Currently **9,428 applicants are waiting on the priority list in NSW and 46,904 applicants** are waiting on the general list, and waiting times in most of the relevant allocation zones range from 5-10 years to 10+ years.

## Affordability settings

We also call on the NSW Government to set affordability standards to meet the needs of people who live on social security payments. Anglicare Australia's 2024 **Rental Affordability Snapshot** has identified that of 45,115 rental listings, none were affordable for a person living on Youth Allowance, only 3 share-houses were affordable for a person on JobSeeker, 31 rentals were affordable for a person on the Disability Support Pension, 89 were affordable for a person on the Age Pension and 289 were affordable for a person on full time minimum wage.

Some developers and housing providers define housing as 'affordable' because its rent is set at a discount compared with the market. At a median weekly rent of **\$670 per week** in this region, even a 25% discount would only lower weekly costs to \$502. We call for rent for this social housing to be set at **no more than 30% of a person's income**, in line with the Australian Housing and Urban Research Institute's settings.

## The Draft Hunter Strategic Regional Integrated Transport Plan

PWDA completed the questionnaire, but unfortunately this **transport plan** failed to address the:

- Inaccessibility of public busses for many people who use mobility assistance, or who cannot see bus numbers
- Unreliability and the infrequency of services that makes bus travel impractical for most journeys, and double or triple the time taken to travel by private motor vehicle
- Choice of coaches to replace trains during trackwork, which excludes wheelchair users
- Need for improved wayfinding and legibility of the network for people who are blind or have low vision, and people who are deaf or hard of hearing
- Need for a network plan that serves key retail, health, education and employment precincts in Newcastle and the Hunter, rather than being focused around an office worker's commute to Sydney CBD on weekdays
- Total lack of effective service to many communities
- Need to provide viable public transport options *before* removing parking or installing high-cost parking metres. Failure to do this in Newcastle has driven people away from previously popular retail and entertainment areas
- Unavailability and unreliability of wheelchair accessible taxis, making it impossible for many people with disability to reach work or other time sensitive appointments
- Need for all people with disability to be able to access accessible public transport to evacuate from their community ahead of a disaster or emergency. There is an

urgent need for mapping and prioritisation of accessible transport in the many parts of Newcastle and the Hunter that have none.

There are opportunities to improve public transport infrastructure by:

- Expanding the rail network through upgrading rail routes previously used for coal and freight, enabling them to be used for passengers
- Converting disused rail corridors that are not currently viable to become part of the rail network into rail-trails. This enables more people who use mobility assistance devices to move safely and access more of the country, whilst also preserving these corridors as public assets for future use. These corridors could also enable more people to travel between towns and areas using mobility assistance devices
- Providing staffing at train stations to make travel safer, especially at night
- Upgrading pedestrian crossings to ensure signalization, better lighting and intersection timing to allow the safe crossing of wheelchair users and elders at areas around key transport hubs,
- Providing wheelchair accessible transport services to enable access to cycle tourism areas such as rail-trails as these are often some of the few fully accessible ways to access parts of regional NSW
- Upgrading stations increasing them in land release areas and increasing service frequency along the Hunter Rail Line, aligned with land releases
- Ensuring all road developments include fully accessible active transport provision as the lack of footpaths, curb ramps and safe crossings continue to be a barrier to use or accessing train stations and bus stops by people with disability and parents with prams
- Extending ferry services to more communities as this is usually a more accessible form of travel than a bus, isn't impeded by traffic, does a better job of accommodating mobility assistance devices, prams, bicycles and luggage, is a form of transit with higher capacity than trains and busses, can run more frequently than trains and busses, is easier to install supportive infrastructure like terminals than

stations and stops integrated into the roadway, and passengers report enjoying this form of public transport the most

- Continuing to improve train services to deliver day return trips between Tamworth and Newcastle, and to plan integrated services to enable journeys to key health, education and business precincts
- Improving public transport services to better connect the Hunter with Newcastle Airport, particularly from Newcastle, Port Stephens, Forster and Taree
- Recognising that many key passenger attractors are not well served or accessible from many communities including John Hunter Hospital, Newcastle University, Charlestown and Kotara retail precincts and that many journeys are to local education, retail and health precincts but that these journeys are un-served
- Mapping all the areas a wheelchair user can reach on the network and then plan how to fix the majority of journeys which are currently are impossible
- Implementing timetabling, booking and wayfinding in accessible formats

The rest of NSW faces similar issues to those explicitly outlined for the [Draft Hunter Strategic Regional Integrated Transport Plan](#). We have prepared the table below to summarise additional or different issues and concerns.

N = non-existent, S= seldom runs, I = inaccessible, U= Unreliable, F= fails to connect to key attractors, WAT = Wheelchair accessible taxi P= Poor Infrastructure M = More services locations needed

	<b>Buses</b>	<b>Bus service</b>	<b>Train</b>	<b>Train Service</b>	<b>Ferry</b>	<b>Ferry Service</b>	<b>Active Transport</b>	<b>Transport Information</b>	<b>WAT</b>
<b>South East and Table Lands</b>	I, U	I, U, F	U	U, F	N	N	P	I	N in most

<b>Strategic Regional Integrated Transport Plan</b>									area s
	<b>Buses</b>	<b>Bus service</b>	<b>Train</b>	<b>Train Service</b>	<b>Ferry</b>	<b>Ferry Service</b>	<b>Active Transport</b>	<b>Transport Information</b>	<b>WA T</b>
<b>Central Coast</b>	I	U, S, F		S, F	M	M	P		U
<b>Central West &amp; Orana</b>	F, U, M	F, U, M	S, F, M	S, F, M	N/A	N/A	N, I, F, P		N
<b>Far West</b>	N, F	N, F	N, F	N, F	N/A	N.A	P, F		N
<b>Illawarra &amp; Shoalhaven</b>	S,U,F	S, U, F	S, U, F	S, U, F	N	N	P, F		
<b>New England &amp; Northwest</b>	N	N	N	N	N/A	N/A	P. F		N

<b>North Coast</b>									
<b>Riverina-Murray</b>	U, F, P	P, U	P, N	P, N	N/A	N/A			N

Yours sincerely



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