

17 November 2023

3P Advisory Stakeholder Consultation
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Re: Metro Tasmania: Accessibility and Inclusion Plan Consultation

Thank you for the opportunity to make a submission in relation to your current community consultation.

The Tasmanian Council of Social Service (TasCOSS) is the peak body for the community services industry in *lutruwita*/Tasmania. Our Vision is of one *lutruwita*/Tasmania, free of poverty and inequality, where everyone has the same opportunity. Our Mission is to challenge and change the systems, behaviours and attitudes that create poverty, inequality and exclusion, to ensure all Tasmanians have equal opportunity to live a good life.

Across the state, Tasmanians have spoken to us about the importance of affordable, accessible and reliable public transport in order to access services, employment, education and recreation. This is reflected in our framework *A Good Life*,¹ which includes the domain ‘Getting where you need to go’ identified as an area of significant concern in communities throughout the state.

Many participants in *A Good Life* consultations pointed out how frustrating it can be to struggle to get to employment, education, health and other support services, shops, socialising and Tasmania’s natural beauty:

“[I need] reliable, affordable access to supermarkets, playgrounds.”

“We have great fishing and beaches—if you can get to them. I don’t have a car.”

Tasmanians face significant barriers in accessing transport services, with limited access compared to other states and territories across Australia.² Transport disadvantage is also more likely to be experienced, or experienced more acutely, by those people or communities who already experience other barriers, such as those residing in remote locations, experiencing financial difficulty or with disability. These issues are particularly relevant for Tasmania, as we have the highest proportion of people with disabilities and long-

¹ [A Good Life: A Wellbeing Framework for Tasmania](#) is a project undertaken by TasCOSS, based on a number of community consultations throughout Tasmania which posed the question, “What do you need for a good life?”. The project identified key priorities for Tasmanians, which has allowed TasCOSS to identify goals, targets and descriptors for engaging in policy development and advocacy.

² According to the Bureau of Infrastructure and Transport Research Economics’ Access to Public Transport indicator, which measures the proportion of dwellings within 400 metres of a public transport stop with a service every 30 minutes from 7am to 7pm on a normal weekday.

term health conditions in Australia,³ high rates of people and families experiencing poverty,⁴ and many remote or rural communities with limited transport access.

Physical Accessibility

Public transport, and in particular bus services, must be accessible for people most vulnerable to transport disadvantage. This includes Tasmanians living with disabilities, elderly people, any person with mobility issues and younger people who are not yet eligible to drive and those who cannot afford a vehicle.

Tasmanians living with disabilities — over 26% of our population — experience particular barriers to public transport, multiplying other forms of exclusion and disadvantage that prevent their full participation in social, cultural and economic opportunities.

Whether due to cost, availability or accessibility, transport disadvantage means reduced opportunities to participate in education, training or work. This not only affects individual wellbeing, but that of the state as a whole.

Bus stops and shelters

While acknowledging bus stops and shelters are not within the control of Metro, they do directly relate to bus access. Without accessible bus stops and shelters, many Tasmanians will continue to be unable to use Metro services, despite the excellent compliance of the bus fleet with the Disability Standards for Accessible Public Transport (DSAPT).

Although commitments have been made to ensuring fully accessible buses and shelters by the end of 2022, many bus stops and shelters are still not compliant with the DSAPT.⁵ According to the 2019 Australian Infrastructure Audit, only 37.5% of bus stops were compliant in Tasmania.

We strongly recommend the prioritisation of upgrades to ensure compliance with disability standards. Metro could take a lead on advocating for compliance and directly support community groups and organisation seeking these improvements.

Remote or regional Tasmanians

Most Tasmanian public transport routes — particularly rural services — are characterised by limited hours and frequency of operations, geographic scope, and connectivity, and non-Metro bus services are notably more expensive than Metro services.

³ According to ABS figures from 2018, 1 in 4 (26.8%) Tasmanians have a disability and 1 in 3 (37.5%) Tasmanians have long term health conditions.

⁴ See, for example, Dropping off the Edge at <https://www.dote.org.au/tasmania>.

⁵ For information about the standards, see Australian Human Rights Commission, 'Guideline for promoting compliance of bus stops with the Disability Standards for Accessible Public Transport 2002' (December 2010) accessed at <https://humanrights.gov.au/our-work/disability-rights/publications/guideline-promoting-compliance-bus-stops-disability>.

A recent report focusing on the lived experience of Tasmanian transport users has found that the current public transport system upholds disadvantage, particularly in relation to place. According to Dr Lisa Stafford, '[f]or people outside cities, public transport costs more, there are fewer services, reliability and availability is poor, and travel times are longer.'⁶

This was echoed in our recent consultations with communities across the state on the impact of the cost of living crisis. As one participant in Deloraine told us:

*"...god forbid if you miss the bus, the last one's about 5 o'clock. Don't miss the bus. There's no other way home."*⁷

Information about Services

According to Dr Lisa Stafford's report, a key factor prohibiting the use of public transport relates to difficulties planning trips, including confusing and/or poor access to information and technology, and the disconnection and complexity of making a trip.⁸ These concerns were also raised in a report from the Youth Network of Tasmania (YNOT),⁹ which made the recommendation to review the useability of the Metro app and online timetable, as well as implementing a 'real-time' alert system with accurate arrival times on the app and at bus stops.

Safety Measures

Safety has been identified as an issue of concern in recent reports. Dr Stafford notes that there are several safety-related reasons limiting public transport use in Tasmania, including difficulties getting to bus stops (due to unsafe surfaces or the impact of seasonal weather conditions such as black ice), feeling unsafe and/or uncomfortable waiting for a bus in environments without shelters, seats or lighting, and feeling unsafe during bus trips (for example, due to crowding, limited security on and around buses, and not knowing where to get off due to lack of real time/visual and auditory prompts).¹⁰ YNOT also found that personal safety was impacting young Tasmanians' use and experience of public transport, noting that many young people feel unsafe on buses because of bullying and bad behaviour of other passengers, perceived unsafe driving, or bus conditions services.¹¹

⁶ Dr Lisa Stafford, 'Trips Not Made: Addressing transport disadvantage experienced by disabled people and young people in Tasmania's outer urban and regional communities – summary report' (March 2023), accessed at <https://www.anglicare-tas.org.au/trips-not-made/>.

⁷ Cited in TasCOSS, 'Budget Priorities Statement - Wellbeing First: A budget proposal to ease the cost of living and invest in the long-term wellbeing of Tasmanians' (2023-2024).

⁸ Dr Lisa Stafford, 'Trips Not Made: Addressing transport disadvantage experienced by disabled people and young people in Tasmania's outer urban and regional communities – summary report' (March 2023), accessed at <https://www.anglicare-tas.org.au/trips-not-made/>.

⁹ Youth Network of Tasmania (YNOT), 'Tasmanian Youth Forum 2021: Transport' (September 2021), accessed at <https://www.ynot.org.au/policy-and-advocacy/reports>.

¹⁰ Dr Lisa Stafford, 'Trips Not Made: Addressing transport disadvantage experienced by disabled people and young people in Tasmania's outer urban and regional communities – summary report' (March 2023), accessed at <https://www.anglicare-tas.org.au/trips-not-made/>.

¹¹ Youth Network of Tasmania (YNOT), 'Tasmanian Youth Forum 2021: Transport' (September 2021), accessed at <https://www.ynot.org.au/policy-and-advocacy/reports>.

There is also a strong need for all bus services to ensure connecting passengers' successful transfer between services. Tasmanians have shared discouraging stories about some passengers being dropped off at the wrong stop to catch a connecting service and others being dropped off without any effort to ensure that their connecting service had not already left.

Other Challenges

Price

Tasmanians on low incomes face a range of barriers to getting where they need to go, including the price of public transport. Increased commuting during Metro's five-week trial of free bus services in March 2022 is evidence of the potential impact of reducing financial barriers to public transport. Free travel for those on low incomes, including students, seniors and concession card holders, would greatly reduce the cost barrier faced by many Tasmanians.

Ongoing consultation and engagement

Those who are the most impacted by transport disadvantage should have the most say in how public transport services are designed.

Genuine and ongoing consultation and feedback with communities and those experiencing disadvantage must be undertaken to understand the challenges and identify the solutions that will deliver a more sustainable, equitable and inclusive public transport system.

There is a strong need for adequate public consultation before schedules are changed. Transport operators do not always understand the impact of changes on their clients. There is also a need for better public consultation in relation to what routes and times wheelchair-accessible busses will follow.

Recommendations

TasCOSS recommends the following to improve transport access and ease cost of living pressures impacting Tasmanian households:

- Invest in physical and digital accessibility upgrades, including but not limited to, walkable safe bus stops, real time and easy to use bus information, video and audio notices on buses and at bus stops.
- Expand the existing public transport network throughout Tasmania.
- Prioritise compliance with DSAPT and directly support community groups and organisations leading this advocacy.
- Introduce free public transport for students, seniors, concession card holders and Tasmanians on low incomes.
- Work with diverse public transport users to address transport disadvantage.

Conclusion

An effective public bus service is crucial for a healthy, vibrant and productive community. Inclusive transport is safe, accessible, sustainable, reliable and affordable for all Tasmanians. Making Metro travel more inclusive will remove barriers to greater patronage, in particular for low income Tasmanians and those experiencing other forms of disadvantage.

Access to public transport, including Metro buses, is regularly raised as a barrier to employment, education and training, as well as to accessing basic services including groceries, healthcare, childcare, other support services and social activities.

Increasing bus patronage will remove cars from the road, reducing both congestion and vehicle emissions. It will also save Tasmanians money on servicing and refuelling their vehicles, money which can be redirected towards their grocery bill, their rent/mortgage or other essential services.

Please do not hesitate to contact our office if you have any questions in relation to the above.

Yours faithfully



Adrienne Picone
Chief Executive Officer