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# Accessibility of Tram Services

**Tabled 15 October 2020**



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## Audit objective

This audit looked at whether tram services are meeting the accessibility needs of passengers with mobility restrictions.

## What we looked at

We looked at whether the Department of Transport (or DoT) and Yarra Trams:

- Are meeting legislative requirements under the Disability Standards for Accessible Public Transport (DSAPT) to provide accessible tram infrastructure by 31 December 2022 and accessible trams by 31 December 2032.
- We also looked at whether DoT and Yarra Trams have a plan to make the tram network more accessible.

## Conclusion

Tram services are not meeting the needs of passengers with mobility restrictions. A low-floor tram needs to meet a level access stop to practically enable tram access for people with mobility restrictions, such as wheelchair users.

In 2018-19, only 15 per cent of tram services had a low floor tram departing from a level access stop.

DoT has not met the legislated targets for accessible tram infrastructure and there is no realistic prospect that it can comply by 31 December 2022.

DoT's lack of a finalised strategy or a funded plan means it does not know when all tram services will be fully compliant with the *Disability Discrimination Act* (DDA) and the DSAPT.

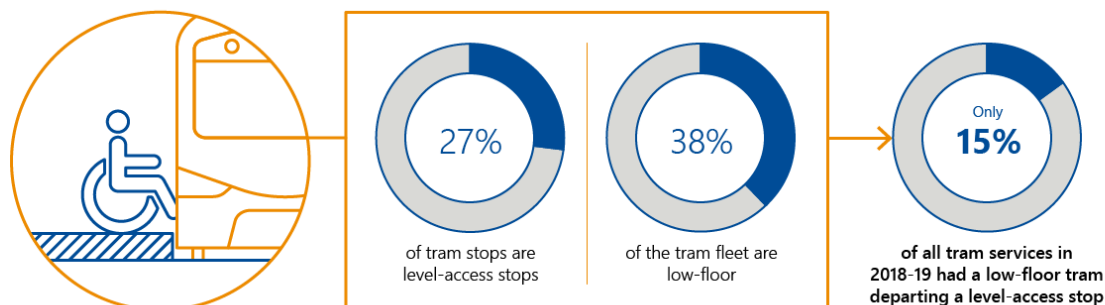
Non-compliance with Federal and state legislation poses a financial risk to the State due to possible rulings against it.

## Background

Federal and state legislation views accessibility from a perspective of avoiding discrimination. The federal DDA and the *Victorian Equal Opportunity Act* both make it unlawful for an operator or provider of public transport to discriminate against a person with disability.

The Federal DSAPT outlines design standards to ensure public transport is accessible. It gives public transport operators and providers certainty about how they can meet their DDA obligations.

## Issue 1: Accessibility of the tram network



Melbourne has the world's largest tram network consisting of 24 tram routes running on 250 kilometres of double track servicing 1 669 stops.

Upgrading tram stops to meet accessibility requirements can be complex. It involves coordination with local councils and road traffic authorities, and potential construction constraints due to heritage rules or site geography.

### Issue 1: Accessibility of the tram network

To date, DoT and YT have delivered level access tram stops to 27 per cent of the tram network.

When combined with 38 per cent of the tram fleet being low floor, our data analysis shows that only 15 per cent of all tram services in 2018–19 were accessible in a meaningful sense for passengers with mobility restrictions.

If DoT continues the current low floor tram delivery rate, our analysis shows it will not meet the 31 December 2032 target of 100 per cent accessible and DSAPT-compliant trams.

DoT has focused on implementing level-access stops and low floor trams. Although these are key practical enablers of DSAPT compliance, they alone do not fully meet DSAPT.

DoT does not know the true extent of its compliance with DSAPT because of gaps in the accuracy, completeness and reliability of its data.

### Issue 2: Plans to make the tram network more accessible

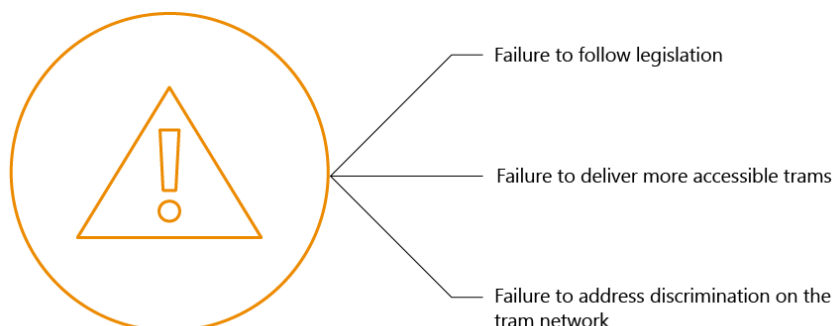
DoT does not have conclusive plans for how it will create an accessible tram network, 18 years after DSAPT was first enacted.

DoT's strategy to roll out level access stops will not be complete until June 2021. This leaves only a further 18 months to the DSAPT compliance deadline and 1 215 non-level access stops to be rectified at an estimated cost of \$2 billion.

DoT's failure to follow legislation and deliver accessible tram services means that it is not supporting all members of society to access Melbourne's tram network on a non-discriminatory basis.

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## Issue 2: Plans to make the tram network more accessible



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### Recommendations

We made 10 recommendations to DoT relating to:

- Tracking the tram network's level of compliance with DSAPT, commissioning legal advice and advising government on the implications of non-compliance
- Understanding the accessibility gap, and the costs and benefits of an accessible tram network
- Improving public information about accessible tram services
- Better aligning programs to maximise and improve accessibility outcomes