

Australian Human Rights Commission

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29 July 2022

Our ref: D22/98688

Dear Australian Human Rights Commission,

Submissions Received on Application for temporary exemptions to the DSAPT by the City of Ryde Council

I refer to your email dated 17 June 2022 regarding the submissions received from interested stakeholders for Council's Exemption report to the *Disability Standards for Accessible Public Transport 2002* ('DSAPT') published on the Human Rights Commission's website.

City of Ryde would like to acknowledge receipt of submissions from the following Organisations:

- 1) Australian Federation of Disability Organisations (AFDO) and the National Inclusive Transport Advocacy Network (NITAN)
- 2) Blind Citizens Australia (BCA)
- 3) Disability Council NSW
- 4) National Inclusive Transport Advocacy Network (NITAN)
- 5) Physical Disability Australia (PDA)

Council's temporary exemption report to Human Rights Commission is to primarily obtain a 34-month extension from 30 December 2022 to 30 October 2025. Council currently have a 5-year Plan commencing 2020 to ensure that all bus stops within the Ryde LGA meet DSAPT 2002 requirements. This extended time-frame is required for Council to undertake detailed planning and construction works which includes the survey of each site and development of a detailed design that will be reviewed by an access consultant prior to construction.

In preparation for Council's 5-year Plan to upgrade all bus stops within the Ryde LGA, Council undertook an extensive DSAPT compliance audit of all 723 bus stops. Following the audit, Council engaged an externally accredited access consultant to review the audit and prepare an exemption report to be submitted to the Human Rights Commission noting Council would not be in a position to meet the DSAPT requirements by the end of December 2022.

Council's current bus stop upgrade program prioritises various community facilities, aged care, disability service providers, hospitals, housing link, shopping centres, train stations, schools, TAFE & Universities (schedule 4 of the exemption report). 223 of these locations will take precedence as part of Council's 5-year Plan.

Council acknowledge the feedback received from various organisations in response to Council's exemption report exhibited on the Human Rights Commission's website. Council has reviewed the submissions and would like to liaise with the various organisations that have made submissions in relation to the exemption report. Council would be happy for an information session to be facilitated by the Human Rights Commission which would allow Council to address the concerns of the individual organisations.

Through the efforts and planning over the last 24 months which includes the extensive compliance audit of all 723 bus stops, Council's preparation and submission of the exemption report to the Human Rights Commission, and the DSAPT compliance 5-year plan, Council is highly motivated and committed to achieving DSAPT compliance by the end of October 2025. In addition, to the above-mentioned initiatives Council is planning to implement an online portal for submissions to made by the community for the upgrade of bus stops in line with the DSAPT. Council will consider these submissions as part of its prioritisation planning process.

Council requests that the Human Rights Commission consider the above-mentioned efforts and ongoing proactive engagement with the Commission to deliver DSAPT compliance for bus stops across the Ryde LGA, in its determination of Council's exemption report.

Should you have any enquires related to this matter, please feel free to contact the Acting Department Manager – Assets & Infrastructure, Mr Daniel Carneiro on Telephone [REDACTED].

Yours sincerely,

A handwritten signature in black ink.

Charles Mahfoud
Acting Director City Works