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Parramatta Light Rail

NSW Government

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Parramatta Light Rail, Level 10, 130 George Street, Parramatta NSW 2150

Monday, December 19, 2022

To Whom it May Concern,

Re. Response to Parramatta Light Rail – Stage 2 Consultation

Blind Citizens Australia (BCA) is the peak national representative organisation of and for the over 500,000 people in Australia who are blind or vision impaired. For nearly 50 years, BCA has built a strong reputation for empowering Australians who are blind or vision impaired to lead full and active lives and to make meaningful contributions to our communities. We write in response to the Environmental Impact Statement consultation.

### Our Concerns

In response to concerns about safety raised by members, BCA has strongly advocated about the access for people who are blind or vision impaired in relation to the Parramatta Light Rail (PLR), Stage 1. We have worked closely with Guide Dogs NSW/ACT in our advocacy on this issue.

As this project has moved to Stage 2, our concerns remain the same. We believe the removal of kerb ramps and the reliance on warning Tactile ground surface indicators (TGSIs) at an at-grade/flush finish crossing is not an effective or safe means to prevent people who are blind or vision impaired from walking straight out into an intersection or into the path of a light rail vehicle. We note that these at-grade/flush finish crossings (sometimes known as merged kerbs or shared zones) were born from an urban design theory that by taking away common elements of road design – such as kerbs, road surface markings, traffic signs and traffic lights – and creating a greater sense of uncertainty, drivers are likely to reduce their speed and be guided by “natural human interactions” such as eye contact, rather than artificial regulations. However, it is clear that this theory is fundamentally flawed and shows a distinct lack of awareness of the needs of pedestrians who are blind or vision impaired.

These safety concerns are compounded by the greater uptake of electric and hybrid vehicles and personal mobility devices (PMDs) – including e-scooters, electric unicycles, electric skateboards, electric roller skates, and hoverboards – all of which run silently. People who are blind or vision impaired rely on many factors to navigate a streetscape and road crossing independently and safely, and this environmental information has been used by people who are blind or vision impaired for decades, with specific skills and knowledge developed and taught by orientation and mobility specialists to help take advantage of the traffic flow information. But as a greater proportion of traffic consists of silent vehicles, much of this vital navigational information will be lost, while the risks of serious injury (or worse) for people who are blind or vision impaired will continue to rise.

Unfortunately, we have had both documented and anecdotal reports of people who are blind or vision impaired stepping out into the road and light rail corridor at both Parramatta and Sydney CBD. With near misses (and an under-reporting of incidents) we are aware that people are now actively avoiding these dangerous areas or having to travel accompanied.

People who are blind or vision impaired must be able to distinguish when the safety of the footpath ends and the danger zone of road and light rail commences. Generally, a compliant kerb ramp is the best indication of the transition from the safe footpath to the danger zone. A ‘compliant’ kerb ramp provides a gradient change which is detectable to the person. At this kerb ramp, a person who is blind or vision impaired can pause, assess the crossing situation, and then make their judgement for a safe crossing. The correctly aligned kerb ramp itself also helps with straight line navigation, allowing a person to walk straight across the road and not veer into the intersection.

We believe new infrastructure should be built to ensure inclusion and independence, not exclusion and danger. BCA shares Guide Dogs NSW/ACT’s concerns with the proliferation of this unsafe flush finish design, especially at intersections, and urge against its implementation in Stage 2 of PLR.

BCA stands ready to work with TfNSW and PLR to improve this unsafe design to ensure that people who are blind or vision impaired can access their communities and public transport with safety, confidence, and independence.

Sincerely,

Sally Aurisch – Chief Executive Officer

Blind Citizens Australia