

Reforms Disability Standards for Accessible Public Transport 2002 stage 2 consultation (Page 285 to 295):

Submission

Consider:

1. Remove the term 'Hail and Ride'. Clarify that the kerb height at bus stops must be at least 150mm (6 inches), but should be an ideal height of 210mm (8 inches) to make it easier for disabled passengers to board when the bus has been kneeled.
2. Please create a new section for on-demand and personal public transport services stipulating that they can stop at any location (as long as it is safe to do so), with the exception of significant interchanges e.g. shopping centres where there should be dedicated areas with kerb ramps to allow rear loading into vans.

Reason:

Since the 2002 standard, public transport has changed dramatically with new ride share, on-demand and personalised public transport services that can be booked using apps, online or by phone that may use a small van with a wheelchair lift.

The term 'Hail-and-Ride' in Australia and the UK is the term for a public bus service with set bus stops which has a bus stop flag with a level surface around it. This may include bus zone signs, timetables, seats and a shelter using standard 12.5m, 14.5 and 18m buses or in the UK double-decker buses. Fifty years ago, the bus would have traveled along a set route and picked up passengers at any safe location along that route until accidents resulted in the installation of permanent bus stops. In Australia, by this year, one hundred percent of these buses must be fully accessible, including a wheelchair ramp and two wheelchair spots inside. Modern low-floor buses have a kneel function that enables the bus to lower the front door, and some buses only kneel a maximum of 60mm. If the kerb is 150mm, the disabled/elderly passenger still has to step more than 250mm to get on the bus and even more if the road slopes away from the curb. For reference, see the below definition of 'hail-and-ride' from the current disability standards.

Definition Page 12 of the current Disability Standards 2002

1.17 Hail-and-ride service: A hail-and-ride service is a service operated by a bus that follows set routes, but may stop for passengers at any safe point on the route.

Cost:

The cost of this change will be zero for operators and councils as the only time when it will be required is when a new bus stop is installed, and it does not have a kerb, or the kerb is less than 150mm, so it will need to be jackhammered up and replaced under the current standard.

If the bus operator and council select a new section of road to become a bus stop, then they would first check if it has a kerb higher than 150mm, if yes, then no cost is incurred. If the location has no kerb or is under construction, the plans would require the construction company to install a kerb 210mm (8 inches) for the length of the bus zone and then transition back to standard height after the boarding area.

Many disabled people do not use wheelchairs or walking sticks, and not until they need to step up a set of stairs and then it becomes difficult for them. A public bus driver cannot know if the intended passenger is disabled until they try to board the bus by holding onto the handrails and pulling themselves into the bus, then, it is too late to kneel the bus as it may cause a fall.

The minimum height of the kerb is not ideal for mass transit bus services, and this standard should reflect this by stating an ideal height of 210mm (8 inches). If the term 'hail and ride' is retained this will result in construction companies thinking that 150mm is the height the kerb must be. This means that when they replace damaged curbs which are the correct height, they will reduce the height to save concrete and create a trip hazard as the ground or narrow concrete strip near the road will slope down to the new lower kerb.

Around the world, many councils are raising the height of kerbs at bus stops, including installing a Kassel Kerb, which allows the bus to stop 50mm away from the footpath enabling wheelchair users and prams to roll straight into the bus without the deployment of the wheelchair ramp.