

Brisbane City Council's comments on the *Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement (CRIS) (February 2021)* prepared by the Australian Government's Department of Infrastructure, Transport, Regional Development and Communications for public consultation.

Executive Summary

Section / Question	Comments
Executive Summary	Nil comment

Chapter 1: Introduction

Section / Question	Comments
The <i>Disability Standards for Accessible Public Transport</i> (Transport Standards) 1.1.1 The Transport Standards are legally binding 1.1.2 The Transport Standards apply to public transport conveyances, infrastructure and premises	<ul style="list-style-type: none"> • There is merit in considering a national reporting framework for public transport operators to report fleet types and accessibility features. • There is also merit in a national database to share successful accessibility features so operators can look to continually improve accessibility outcomes as new public transport fleet is purchased to replace retiring fleet.
Reviews of Transport Standards	<ul style="list-style-type: none"> • The transport standards need to be reviewed in conjunction with the standards designed to support people with disabilities. As technology and standards develop, the transport standards need to maintain flexibility for timely and relevant updating. Examples include changes in mobile phone technology that improve access for people with sight and hearing impairment. • Current transport standards require hard infrastructure solutions that are costly to implement and maintain and provide minimal customer benefit due to advancements in personal technology. • In addition, a lack of standards for mobility devices makes it impossible to provide a public transport solution for every possible mobility device on the market. As there is no limit on mobility device dimensions and manoeuvrability, it isn't possible for all mobility devices to access allocated spaces on public transport.
The problem with the current Transport Standards 1.3.1 Insufficient clarity 1.3.2 Insufficient flexibility 1.3.3 Compliance issues	Regarding 1.3.1, the review processes are well overdue. Significant investment continues to be made to meet deadlines for upgrades when the process to review how money is being spent (benefits) has not been well tested and learnings have not updated design codes.

Chapter 2: This Regulation Impact Statement

Section / Question	Comments
Purpose and scope	The principles of co-design and performance-based standards will align the <i>Disability Standards for Accessible Public Transport 2002 (DSAPT)</i> with the built form environment and building industry.
Governance arrangements for reform	Nil comment

Chapter 3: Initial areas of reform

Section / Question	Comments
Table 3: 16 areas of reform	<ul style="list-style-type: none"> • For an average person, 'priority seating' and 'allocated space' in transit mean the same. Any other terminology for 'allocated space' may help understand the critical importance of allocated space or call it 'manoeuvring areas and appropriate circulation space' as in the <i>Public Transport Conveyance Manual</i>, 2.5.3. • Please consider including an area of reform in Phase 2 of the CRIS that addresses boarding and alighting conveyances as a separate area of discussion. Anecdotal feedback suggests that this is one aspect of the whole of journey that creates as much anxiety as 'mobility & safety' in conveyances.

Chapter 4: Staff training and communication

Section / Question	Comments
Nature and extent of the problem	Nil comment
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment
Which option do you prefer: regulatory, non-regulatory or status quo?	<p>A regulatory approach will be the preference when the co-design challenges indicated below can be resolved. In the interim a non-regulatory approach is preferred.</p> <p>Council supports the inclusion of 'co-design' as a principle but would like to highlight some concerns.</p> <ul style="list-style-type: none"> • Will the disability sector have the capacity (in numbers) to cater to the demand created? • Will the sector have a formalised fee structure for people with lived experience and 'subject matter experts' who do not necessarily have formal qualifications as a consultant? • What negative or positive impacts will there be if there is a monopolisation of training delivery by larger, national organisations? At a local level, do organisations become competitors to provide training services? • How is quality of training ensured?
What disability awareness training do you provide to frontline and back of house staff?	<ul style="list-style-type: none"> • The induction of all new bus operators to Council includes a full module on Customer Experience. This module covers a wide range of topics including the identification of customer groups, organisational customer service practices, Queensland Government's TransLink (TransLink) guidelines, inclusion and diversity, and the training is supported by practical activities and role plays. As part of the induction customer service module there are assessable elements to ensure that all staff have a clear and consistent understanding of the principles of customer service including an awareness of the diverse range of customers who utilise Council public transport services. The assessable elements also include recall service techniques to adapt to the varied needs of customers for inclusive transport. • Council also produces and issues a Bus Operator Handbook which is designed to provide an accessible point of reference and guidance to all operators around policies and procedures relevant to their role. The Bus Operator Handbook contains information on customer service standards; assistance animals; mobility aids and allocated spaces; ramp operation and usage; and tips for assisting customers. • Additionally, bus operators undergo 'refresher' training on a semi-regular basis. In 2017-18, a one-day refresher course focused on Customer Excellence. It was delivered to all (approx. 2,100) bus operators face to face and launched the five Customer Expectations principles which were based on market research about what our customers wanted. The market research unpacked the customer journey in four stages and highlighted the behaviours that our customers expect. In 2018-19, the refresher course focused on Driving Excellence, which included highlighting the impacts of driving behaviours on customer groups, including those in mobility devices. • Council's <i>Code of Conduct</i> and values underpin all interactions with customers (internal and external). These principles are embedded in training, communications, strategy documents and individual performance plans. As an organisation focused on service delivery, Council mandates that every employee undertakes a 'Customer Focus Vision Awareness' training course (delivered either online or face to face). <p>Council's <i>A City for Everyone: Inclusive Brisbane Plan 2019-2029</i> outlines the following action.</p> <ul style="list-style-type: none"> • Pg 20: Provide a review of bus operator training to ensure staff continue to meet everyone's needs. Timing of delivery is yet to be determined.
What processes are in place to ensure staff interacting with the public are aware of the needs of people with disability and transport accessibility?	See above details of training and the bus operator handbook.
What processes are in place to make sure staff involved in design, policy and procurement undergo disability awareness or	<ul style="list-style-type: none"> • Whilst Council does not have any formal training in place, Council's mandatory customer focus training does emphasise the diversity of Council's customers and the foundational principles of the <i>Code of Conduct</i> and Council's Values. • Learning and Development staff have participated in a 'Day in the Life' experience with Vision Australia which provided some valuable insights into the experiences of people with vision impairment using public transport.

Section / Question	Comments
transport accessibility awareness training?	
Can you provide any details concerning costs incurred and time taken by staff to undergo current disability awareness training you have in place?	The delivery of Module 5 (Customer Experience) takes 5 hours and 45 minutes including assessment. It's difficult to break it down and separate exactly what qualifies as 'disability awareness' given it's presented in a broader context incorporating the disability and diversity elements. Every bus operator undertakes this training as part of their induction.
If staff disability awareness training was mandatory: <ul style="list-style-type: none"> • Would you be required to implement new training programs? • What costs would you incur? 	<ul style="list-style-type: none"> • This would be unlikely to result in a need for creation of new content. • Again, the mandated frequency of any refresher training would significantly impact the costs. We have approximately 2,400 employees and the nature of operational work is that where people are offline for training, there are costs incurred for backfilling so that bus services can continue to operate as per the timetable. The cost of training 2,400 drivers equates to approximately \$1 million for each half day training activity. • There may be costs in the development of new and fresh content to maintain currency of content and avoid repetition.
Are there examples of improved accessibility or improved customer service interactions as a result of recently implemented training programs or well-trained staff?	Customer feedback (commendations and complaints) are part of our day to day business and feedback is used to improve service outcomes through either individual performance conversations or more wholistic continuous improvement in our procedures which flow through to training delivery.
Are there any cases of complaints or other impacts on people with disability that you are aware of relating to staff training?	In September 2020, Council received customer correspondence via TransLink from a mother of a child passenger who has a non-visible disability. Council reviewed the training package and as a result has made changes to the training material to highlight awareness of non-visible disabilities.

Chapter 5: Mobility safety aid

Section / Question	Comments
Nature and extent of the problem	<ul style="list-style-type: none"> • The stated extent of the problem doesn't acknowledge that there is no national standard for mobility devices. People who purchase mobility devices expect that their mobility device can access public transport. Unfortunately, there are physical limitations on the size of the vehicle entry, space between the wheel arch and the load rating of the access ramp. With no national standard there is also no maximum limit on mobility device dimensions and manoeuvrability. Therefore, it isn't possible for all mobility devices that are currently available on the Australian market to access allocated spaces on public transport. • This section focuses on trains, buses and trams but does not mention ferries. Council suggests that consideration be given to include ferry operations in this section. • Council supports the analysis that different conveyances experience the issue of mobility safety aid differently.
Outcome to be achieved	<ul style="list-style-type: none"> • Please consider policy options that strengthen the conveyances that are already a preferred option, such as rail, as a priority and address other conveyances over time. • To support the above point, consider better data collection on the number and frequency of usage of allocated space and priority seating, time travelled, mapping the route, experience and incidents, if any.
Policy options to address the problem	Nil comment
Impact analysis	Nil comment

<p>Which option do you prefer: non-regulatory or status quo?</p>	<ul style="list-style-type: none"> The non-regulatory option is preferred, however there is a strong case for regulatory provisions to be made in the future as this would remove the ambiguity associated with the current guidelines which are only tested once a discrimination case is made against the operator. A non-regulatory option will see an added obligation on the operators and providers of public transport to be innovative and go for functional outcomes while a permanent solution is still being determined. Also, a non-regulatory option may allow flexibility of drivers' intervention or assistance where Occupational Health and Safety is not an issue and dwell time lost is not an issue.
<p>What has been your experience in facilitating travel of mobility devices and carers for people using a device on the network?</p>	<p>Council regularly carries mobility devices on services and the majority of these trips are safe and incident free, however there have been some instances where a device has tipped over when the bus took a corner or roundabout with some speed.</p>
<p>What mobility device restraining systems are used on your public transport conveyances?</p> <ul style="list-style-type: none"> How have these mobility device restraining systems affected the safe travel of people with disability? What was the cost of these systems? What data do you have on utilisation of restraining systems by people with disability when on-board? 	<ul style="list-style-type: none"> Council currently has a front passive restraint (known in the industry as an Ironing Board) and side wall passive restraint (flip-up seats). There is also the handrail on the window ledge to provide additional lateral support. No active restraints are currently fitted to any Council buses or ferries. Council believes that passive restraints provide a better overall experience for all passengers compared to active restraints in an urban bus fleet. The passive restraints provided are an effective measure to prevent mobility device movement on the front and wall side of the bus. However, movement of the mobility device to the aisle side of the bus can occur particularly for passengers who do not have sufficient upper body and arm strength to brace themselves with the handrail on the window ledge. The current cost of these systems is approximately \$600 per bus. Council has no data, but anecdotal feedback suggests mobility device users do not always position their device in the correct location or orientation for the passive restraints to be effective. This increases the risk of the mobility device moving, particularly when forward facing.
<p>What technical barriers or difficulties do you experience in implementing solutions which prevent tipping of mobility devices in both existing and new fleet?</p>	<p>Council has invested significant design effort and engagement with bus manufacturers to develop an effective passive restraint for the aisle side of the allocated spaces. There is currently not a suitable restraint on the market and hence Council is currently developing a solution. The two issues impacting the feasibility of an effective passive restraint are:</p> <ol style="list-style-type: none"> Adjacent aisle side passive restraints protrude into the aisle and prevent mobility devices accessing the allocated space. The huge diversity of mobility device types and sizes with no standard currently available that defines the requirements of mobility devices that are suitable for public transport travel. Retrofitting of active restraint systems in buses is costly as there is insufficient sub-floor or wall structure to use as anchorage mounts. This requires the floorboards of the bus to be removed to add additional structure at significant expense. <p>Council's <i>A City for Everyone: Inclusive Brisbane Plan 2019-2029</i> outlines the following action.</p> <ul style="list-style-type: none"> Pg 20: Partner with industry bodies to help develop and improve safety standards when securing wheelchairs, mobility devices and prams, as well as assistance animals when travelling on buses. Timing of delivery is yet to be determined.
<p>What are the barriers, operational costs and other considerations that may arise if staff are required to assist customers in utilising an active restraint system?</p>	<p>The increase in dwell times required to fit and remove active restraints is one key consideration which impacts the efficient on-time running of public transport. Additionally, most active restraint systems cannot be fitted by the user and hence require driver assistance which impacts the user's independence. These devices can also introduce unintended risks such as slip, trip and choke hazards for passengers.</p>
<p>What alternative mitigations have you implemented to address the risks associated with mobility aids tipping or sliding out of allocated spaces while in transit?</p>	<p>Council driver training focuses on smooth, safe driving and customer service. Signage is also fitted to buses to show the correct orientation and placement of mobility devices for optimal safety in transit. Mobility device users are also advised (via signage) to apply the brake of the device.</p>

<p>Have mobility device users on your public transport conveyances had accidents where the device has slipped or toppled over?</p> <ul style="list-style-type: none"> • What methodologies have been implemented to minimise or reduce the likelihood of further incidents occurring? 	<p>Yes, approximately one to two incidents are reported each year. These incidents range from slippage to falling over. Despite several trials, no alternate device or aid has been successful in reducing the risk, maintaining current levels of accessibility and being retrofittable to the fleet.</p>
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Chapter 6: Priority seating

Section / Question	Comments
<p>Nature and extent of the problem</p>	<p>Section 31.1 of the DSAPT states priority seating for ‘conveyances’ only, not ‘infrastructure’ or ‘premises’. So, it needs to be clarified whether priority seating for ferry terminals and bus stops is required. If additional priority seating is required on ‘conveyances’ due to more users, there may be a flow on impact to ‘premises’ or ‘infrastructure’ priority seating. It may be useful to review conveyances and infrastructure priority seating together.</p> <p>In addition to the description provided in the CRIS, Council identifies that additional factors are:</p> <ul style="list-style-type: none"> • people whose inability or disability is not apparent to other passengers may require some form of assistance from the driver or self-advocacy in claiming a priority seat • lack of information or signage on the outside of the conveyance informing customers of the number of priority seats available in the conveyance.
<p>Outcome to be achieved</p>	<p>Nil comment</p>
<p>Policy options to address the problem</p>	<p>Nil comment</p>
<p>Impact analysis</p>	<p>Nil comment</p>
<p>Which option do you prefer: regulatory, non-regulatory or status quo?</p> <ul style="list-style-type: none"> • For the number of priority seats in the regulatory option, do you prefer: option 1, option 2, option 3 or option 4? 	<p>Council currently provides four priority seats in a standard 12.5 metre rigid bus with a total capacity of approximately 79 passengers. This is two more than required by DSAPT. Hence, option 2 or option 3 is preferred.</p>
<p>How many priority seats are provided on your conveyances?</p> <ul style="list-style-type: none"> • Considering the current requirements for priority seating, what has been your experience in the use and availability of these seats? • What is the impact of providing more than the required number of priority seats (more than 2 per conveyance)? 	<ul style="list-style-type: none"> • Council provides four priority seats in a standard 12.5 metre rigid bus. Council also has a designated “Courtesy Seat” in all buses which is a “one and a half wide” seat immediately behind the front door on the nearside for passengers who need forward visibility or direct communication with the driver. • There can occasionally be a requirement for optimum forward vision and/or direct communication with the driver (see ‘Courtesy Seat’ above). The position of this seat in the bus and its proximity to front wheel arches typically necessitates mounting on a raised plinth, which makes it more difficult to access than priority seating. For some passengers, the use of priority seating may be waived in favour of this seat, despite accessibility challenges, depending on their individual needs. • Upgraded ferry terminals provide priority seating facilities on the pontoon, fixed walkway and waiting area where applicable.

Section / Question	Comments
<p>If you have or were to install additional priority seats, what upfront and ongoing costs associated would you incur?</p> <ul style="list-style-type: none"> How will this impact associated operational issues? 	<p>There would be an approximate \$20 additional upfront cost per seat at the time of bus purchase. There would be no impact on bus operations.</p>
<p>What challenges would you face if the Transport Standards made it mandatory for upholstery or material (colour/luminance) of priority seats to contrast with regular passenger seating?</p> <ul style="list-style-type: none"> What upfront or ongoing costs would you incur? What benefits would be achieved? 	<ul style="list-style-type: none"> A benefit would be the greater awareness of priority seating for applicable passengers. No negatives have been identified. Council already provides this feature on our bus and ferry fleet. At Council ferry terminals, signage is used to designate priority seating rather than changing bench seating materials. It is a semi-outdoor environment that needs to be easily washable whereas specifying material/upholstery would be an ongoing maintenance issue. Use of contrasting colours in the seat element would mean gaps in seating materials and inefficiency in design.
<p>How do you address circumstances where an individual refuses to vacate a priority seat for a person with a disability?</p>	<ul style="list-style-type: none"> In rare circumstances where individuals refuse to vacate priority seats, the operator will ask the individual to vacate the seat. If this is unsuccessful the operator will help the person requiring assistance to find another seat. <p>Council's <i>A City for Everyone: Inclusive Brisbane Plan 2019-2029</i> outlines the following action.</p> <ul style="list-style-type: none"> Pg 21: Deliver on-board campaigns to educate patrons about priority seating. Timing of delivery is yet to be determined.

Chapter 7: Allocated spaces in transit

Section / Question	Comments
<p>Nature and extent of the problem</p>	<ul style="list-style-type: none"> There is no national standard for mobility devices. People who purchase mobility devices have an expectation their mobility device can access public transport. Unfortunately, there are physical limitations on the size of the vehicle entry, space between the wheel arch and the load rating of the access ramp. With no national standard there is no maximum size limit on mobility devices for dimensions and manoeuvrability. Therefore, it isn't possible for all mobility devices that are currently available on the Australian market to transit to the allocated spaces or fit in the allocated spaces. Clarity is needed on the use of the term 'in transit'. Is it the person or the conveyance in transit? A suggested alternative is 'Allocated spaces on conveyances'. As with 'Priority seating', section 7.1 should acknowledge the issue of hidden disabilities and passenger behaviour to vacate or keep allocated spaces clear.
<p>Outcome to be achieved</p>	<p>Nil comment</p>
<p>Policy options to address the problem</p>	<p>Consider the following addition into the prescriptive elements.</p> <ul style="list-style-type: none"> Two lists of specified items that are allowable to encroach into the clear space up to 1,500 mm height, and what is allowable in between 1,500-2,000 mm.
<p>Impact analysis</p>	<p>Nil comment</p>

Section / Question	Comments
Which option do you prefer: regulatory, non-regulatory or status quo? <ul style="list-style-type: none"> For the regulatory option, which sub-option do you prefer: option 1, option 2, option 3 or option 4? 	Regulatory sub-option 3 is the preferred option for public transport fleet. Council supports the four prescriptive elements to be inserted into the DSAPT. Please include definitions on what can intrude into the vertical space up to 1,500 mm and separately, between 1,500-2,000 mm.
Given the current requirements for allocated spaces what is your experience in the customer use of these facilities?	<ul style="list-style-type: none"> There is insufficient length at 1,300 mm to suit larger mobility devices. A length between 1,450-1,600 mm would be more suitable. A standard needs to be developed that defines the requirements for mobility devices that are suitable for travel on public transport. Anecdotally, peak travel times do impede access to allocated spaces for people with disability.
How would operators and providers be impacted if the Transport Standards made it mandatory for access paths that lead to allocated spaces to be free of obstruction by protruding objects, for allocated spaces to be clustered close to door vestibules or passenger areas and to accommodate larger mobility aids?	There would be minimal impact, however, this would be dependent on the design of each bus type and any requirement to retrofit. It may result in the loss of two passenger seats.
What upfront and ongoing costs would you incur if these changes became mandatory?	There would be no impact if there is no loss of passenger seating.
How do you address circumstances where an individual refuses to vacate an allocated seat for a person with a disability?	On the rare occasions when this occurs the operator will ask the passenger to vacate the allocated seating area. The operator wouldn't commence vehicle operations until the passenger in the mobility device could access the allocated area.

Chapter 8: Digital information screens

Section / Question	Comments
Nature and extent of the problem	The problem statement doesn't acknowledge the challenges of maintaining long-term public transport assets (buses have a 20-25 year lifespan) and rapid changes in technology. Technology solutions are available to provide in vehicle route displays, next stop announcements etc. While these solutions can be fitted to new fleet, it isn't feasible to retrofit these solutions to existing fleet. To make these solutions compliant, they need to be supported with other technologies such as hearing augmentation (hearing loops) which are cost prohibitive to install. A staged approach to retrofitting should be considered which allows new technologies to be introduced that improve the passenger experience for the majority of passengers. Implementation of associated technologies such as hearing augmentation can be included as older vehicles are replaced with new vehicles. This section should also provide reference to audio formats or text to audio functionality.
Outcome to be achieved	Clearer guidance could be given to use of digital information as a substitute or adjunct to traditional timetabling etc. Ferry timetables by virtue of volume have small print – electronic/digital information or links via apps could be more useful.

Policy options to address the problem	Peak bodies (TransLink) could be responsible for digital information.
Impact analysis	Nil comment
Which option do you prefer: regulatory, non-regulatory or status quo?	Regulatory as it removes ambiguity and allows for standardisation across the industry.
What are the benefits for operators and providers associated with installing digital displays with functional requirements which are user friendly for people with disability?	<ul style="list-style-type: none"> All passengers get the benefits associated with digital announcements and Next Stop information provided by this medium. This will improve the passenger experience and improve the efficiency of the service. Digital displays can provide real time updates on services which gives a greater level of service for passengers and manages expectations better. Customer feedback on the ferry network is that the timetables can be difficult to interpret due to the number of services throughout the day. There is also some confusion as to the CityCat's express services. With more than 200 languages being spoken in Brisbane homes, digital displays may offer the opportunity to provide information in multiple languages, which would benefit residents and visitors who are non-English speaking. <p>Council's <i>A City for Everyone: Inclusive Brisbane Plan 2019-2029</i> outlines the following action.</p> <ul style="list-style-type: none"> Pg 50: Provide Council information in multiple formats (e.g. Easywords) and languages (including Auslan), particularly for key information related to transport, rates, dispute resolution and complaint processes, public health, disaster preparedness, safety and local by-laws. This action is currently being implemented.
<p>What are the barriers associated with installing digital displays to meet the needs of people with disability?</p> <ul style="list-style-type: none"> What are the upfront and ongoing costs associated with installing digital displays with functional requirements which are user friendly for people with disability? How do you currently specify design outputs to meet the needs of people with disability for digital display systems within your current networks? 	<ul style="list-style-type: none"> If digital displays are being provided for an improved passenger experience, these will need to be supported by GPS/wayfinding technology. Commercial wayfinding technologies doesn't support road infrastructure solutions that are dedicated to bus operations only. This includes busways, bus lanes, bus slip lanes and dedicated bus stop infrastructure. To implement next stop announcements, development of commercial GPS solutions will be required to support accurate public transport solutions. Clarity may be required to assist manufacturers and operators to understand what circumstances require visual display information to be duplicated or augmented with audible information. Digital displays need to be managed at network level with a live link to actual services or in such a way that people can read next services as well as look and plan ahead. This really needs to be rolled down from peak bodies such as TransLink. Council is not aware if there is good guidance on how best to reach the greatest number of users. Upfront and maintenance costs associated with installing devices at ferry terminals are likely to be high due to durability rating required for such a device located within a marine environment. Ongoing connectivity could be amalgamated with existing 3G/4G modems at terminals for CCTV/Public Wi-Fi. Consideration needs to be made for useability for all types of disabilities. <p>Council's <i>A City for Everyone: Inclusive Brisbane Plan 2019-2029</i> outlines the following action.</p> <ul style="list-style-type: none"> Provide next-stop information for passengers on board the Brisbane Metro. Timing of delivery is yet to be determined.
With rapid changes in digital screen technology, what are the potential barriers in adopting the prescriptive regulatory requirements proposed that may inhibit implementation of future innovative digital screen solutions?	<ul style="list-style-type: none"> The supportable lifespan of digital information equipment compared to the (longer) expected lifespan of vehicles may necessitate upgrade or replacement of the equipment one or more times during the life of the vehicle. This may introduce additional asset maintenance/lifecycle costs. Ferry terminals are in a harsh marine environment so there may be challenges in durability as well as connectivity to live information. Consistency in maintaining design and content between premises, conveyances and hardware based on different suppliers, operators and different technologies being adopted over time.

Section / Question	Comments
Nature and extent of the problem	Unexpected lift maintenance denies service to those requiring access where an alternative path of travel is less suitable or impossible to use. Lifts located in public places are susceptible to vandalism which can result in interruptions to services. Where located in an outdoor environment, additional operational and maintenance challenges and costs arise.
Outcome to be achieved	Council supports intended alignment of provision of lifts with the <i>Disability (Access to Premises – Buildings) Standards 2010</i> and <i>National Construction Code 2019</i> . Provision for access to a second lift should be regulatory in public transport premises of specific scale and nature and where other forms of accessible egress is not provided for any reason.
Policy options to address the problem	Nil comment
Impact analysis	Nil comment
Which option do you prefer: regulatory, non-regulatory or status quo?	<ul style="list-style-type: none"> • A regulatory approach is preferred. • Consider increasing the proposed lift floor dimensions of ‘not less than 1,600 mm wide by a clear depth of 2,000 mm’, to ‘not less than 1,600 mm wide by clear depth of 2,070 mm’ to allow a 180-degree turn by wheelchair users as well as accommodating stretchers.
When lifts are installed what are some of the key considerations to determine the most appropriate product? <ul style="list-style-type: none"> • Do you have current lift specifications or standard designs? • Which standard do you currently comply with? 	Nil comment
What are the impacts of harmonising the Transport Standards lift requirements with those of the NCC/Premises Standards?	Consistency and predictability for users.
If the Transport Standards lift requirements are updated to align with the NCC/Premises Standards requirements, what upfront and ongoing extra costs are likely to be incurred to meet these new requirements?	Nil comment
If lifts are required to be updated to align with the NCC/Premises Standards, how long will a lift be out of service?	Consider the addition of automated notification system to the maintenance area for response and action (e.g. ‘Internet of Things’).
Do contractual lift maintenance and repair timeframes stress the fastest possible return to service?	Nil comment

How can down times for lift maintenance and repairs be made equivalent in metropolitan and regional areas? <ul style="list-style-type: none"> Where equivalence cannot be obtained, what would be a reasonable compromise timeframe for regional areas? 	Nil comment
What is the average response time for breakdown or entrapment in regional areas?	Nil comment

Chapter 10: Website accessibility

Section / Question	Comments
Nature and extent of the problem	Nil comment
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Consideration could be given to the statement 'The Accessibility Guidelines Working Group does not 'recommend that Level AAA conformance be required as a general policy for entire site because it is not possible to satisfy all Level AAA Success Criteria for some content'. Can examples of what content could be exempted provide clarity and consistency across different transport providers?
Which option do you prefer: regulatory, non-regulatory or status quo? <ul style="list-style-type: none"> For the regulatory option, do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4? 	A regulatory approach is preferred. Options 2 and 4 should include examples of what Web Content Accessibility Guidelines AAA items can be exempted, or alternatively, what items are mandatory.
Do your websites with information on public transport services meet website accessibility requirements as prescribed under Web Content Accessibility Guidelines (WCAG) version 2.0 AA? <ul style="list-style-type: none"> What are the barriers and challenges with meeting website accessibility requirements? 	Nil comment

Section / Question	Comments
<p>How do the current website accessibility requirements meet the needs of people with disability?</p> <ul style="list-style-type: none"> • How could website accessibility be improved? • What are the barriers to improving accessibility requirements for people with disability? • What is the nature of feedback you receive from people with disability regarding website content? 	<p>Nil comment</p>
<p>If the current website does not meet the AA requirements, what upfront and ongoing costs would you incur to meet the requirements?</p>	<p>Nil comment</p>
<p>If your websites were required to meet WCAG 2.1 AA requirements, what upfront and ongoing costs would you incur to meet the requirements?</p> <ul style="list-style-type: none"> • What barriers or operational impracticalities will you face in meeting the requirements? 	<p>Nil comment</p>
<p>If your websites were required to meet WCAG 2.0 AAA requirements, what upfront and ongoing costs would you incur to meet the requirements?</p> <ul style="list-style-type: none"> • What barriers or operational impracticalities will you face in meeting the requirements? 	<p>Nil comment</p>

Chapter 11: Communication during service disruption

Section / Question	Comments
Nature and extent of the problem	<ul style="list-style-type: none"> Suggest explicitly excluding emergency evacuation procedures and communications in the description. Consider detailing different issues and impacts when a conveyance develops a problem and is prevented from continuing on the journey, compared to planned or unplanned disruptions before passengers board the conveyance.
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment
Which option do you prefer: regulatory, non-regulatory option 1, non-regulatory option 2 or status quo?	A regulatory approach is preferred as it removes ambiguity and provides standardisation.
What feedback have you received from people with disability regarding communication methods in planned and unplanned disruptions? <ul style="list-style-type: none"> What key issues or themes can be identified? 	Anecdotally, feedback has been that staff should be available for direct assistance and information on site during an unplanned disruption, on top of other communication channels.
What types of communication do you use to communicate with people with disability regarding planned and unplanned transport disruptions?	<ul style="list-style-type: none"> Communication with passengers is provided by TransLink through their website, app, passenger and media announcements and notices at bus stops and ferry terminals. Council's Project Communications team provides suitable information to customers of ferry terminals which are to be affected by closures for upgrades or major maintenance. Messaging includes duration of closure and alternative transport arrangements. Council's Access and Inclusion team provides a 'clearing house' type pedestrian and public transport email alert to an opt-in group of local disability organisations and a small number of individuals. Most information distributed involves temporary obstructions to pedestrian infrastructure in the Brisbane CBD that assists people to plan their whole journey. Information from transport providers is re-broadcasted using this email mechanism. The process relies upon on the quality and timeliness of information being sent.
What additional costs have you incurred when applying and trialling additional communication methods as part of planned and unplanned disruptions?	Nil comment
How do your communication methods that you use or have trialled impact people with disability?	Project communications are distributed through letterbox drops, on-site signage throughout the network, Council website updates, Council Contact Centre information, TransLink website updates and announcements by ferry staff on vessels. The occasional person may not be made aware of planned or unplanned closures, but signage is installed at the location to provide details on alternative travel options.
How can communication be improved during planned and unplanned disruptions?	Nil comment
What barriers do you face to improving communication during planned and unplanned disruptions?	There is a risk of over dependency on apps and online communication that provides one-way information.

Section / Question	Comments
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Chapter 12: Gangways

Section / Question	Comments
Nature and extent of the problem	<p>Brisbane City Council has had a unique approach to the gangway issues. There are two key challenges.</p> <ol style="list-style-type: none"> 1. Complying with Section 6.1 of the DSAPT (Gangway landings). 2. Complying with section 6.5 of the DSAPT (Gangway slopes). <p>Gangway landings</p> <ul style="list-style-type: none"> • There is no reference in the DSAPT to gangways, so it is assumed that a gangway, under the DSAPT is '6.1 Ramps on access paths'. For compliance to section 6.1, the DSAPT refers to AS1428.2 (1992) Clause 8. Clause 8.1 General of AS1428.2 (1992) states "Walkways, ramps and landings shall comply with AS1428.1, with the following exceptions and additional requirements:" Of particular relevance is AS1428.1 (1992) Clause 8.1(b) relating to spacings between landings for ramp (gangway) various gradients. In a tidal environment a fixed design gangway could never comply with that. However, Brisbane City Council has spent considerable effort and expense by designing self-leveling landings on gangways to fully comply with constantly flat landings as required by AS1428.2 (1992). So therefore, it has been proven that flat landings on gangways in a tidal environment are achievable. • On a side note, there is a discrepancy between the AS1428.1 Clause 10.3 (c) and AS1428.2 Clause 8.1(b) for distances between landings. • The use of ballast-controlled pontoons could be an option, however this introduces additional unnecessary capital, maintenance, and operations costs. In addition, in the event of equipment failure, the ferry terminal is likely to have to be closed until a repair is undertaken. <p>Gangway slopes</p> <ul style="list-style-type: none"> • On the issue of standard tidal charts, in Queensland the official tidal charts are published by Maritime Safety Queensland, which is an agency within the Queensland Department of Transport and Main Roads. • The broader issue is compliance "...with section 6.1 for at least 80% of the high and low tide levels...". Firstly, how is the 80% determined? Standard tidal planes have theoretical maximum 'Highest Astronomical Tide (HAT)' and minimum 'Lowest Astronomical Tide (LAT)', however while tides are cyclical, they are not purely sinusoidal and the difference between a high tide and low tide on any given day is not the same as the previous day nor the next day. Compliance is not achieved by simply designing a gangway to be compliant between HAT and LAT for 80% of the time. For compliance 80% of the time, a statistical analysis of every high and low tide for 12 months is required for a gangway to truly comply. The challenge for areas with very large tidal variations, i.e., greater than 4 m, is that to comply with the DSAPT, gangways become very long which then introduces considerable cost and impedes on the navigable area body of water in front of the ferry terminal. Brisbane has a maximum tidal range of 2.9 m with gangway length in the order of 25 m. <p>There has been very little testing in terms of user feedback as to what constitutes better accessibility and it is also different for different user groups. Original <i>Disability Discrimination Act 1992</i> ferry terminal upgrades took a simple approach to 1 in 14 slopes 80% of time. Anecdotal feedback suggest that these upgrades were a massive improvement over the facilities they replaced. Evolution to articulated gangways has provided a higher standard again in the sense it provides the intermediate (articulated) landings. They do, however, add significant additional cost and a level of complexity that increases maintenance. Reviewers should seek specific feedback from user groups to guide future standards. These could perhaps be 'deemed to comply' or 'minimum', and then levels above that may be justified for very high use facilities. There have also been design evolutions related to having internal (compliant) ramping on pontoons to use 1 in 20 slope solutions with handrails both sides to provide 'non-articulated' approaches to compliance. These solutions should also be tested with user groups to give better design flexibility.</p>
Outcome to be achieved	A better understanding of user experience influencing design outcomes and options.
Policy options to address the problem	This area should consider the range of approaches that different agencies have adopted so there is legitimacy to solutions proposed. It may be that scalable approaches could be supported. However, it fundamentally requires some gauge of benefit outcome, i.e. there may be different approaches to 'compliant' solutions, but they may be of different value to end users.
Impact analysis	Nil comment

Section / Question	Comments
Which option do you prefer: regulatory, non-regulatory or status quo?	<p>Regulatory options with the following suggestions to the policy options.</p> <ol style="list-style-type: none"> 1. Gangway definition explanation – Agreed. 2. Minimisation of gangway gradients – Agreed. Leave as 80% as a compromise to keep the length of the gangways to a minimum, especially for extreme tidal environments. The 80% needs to be clearly defined as ‘at least 80% of the tides over a period of 12 months’ and not 80% between HAT and LAT. Refer to commentary in section 12.1 above. 3. Nationally consistent chart datum and tide tables – or State Government approved tide tables. 4. Accessibility enhancements for lower tides – Agreed. 5. Gangways affected by extreme tidal regimes – Agreed. 6. Continuous accessible journey – There needs to be a definition of when the journey starts and stops, i.e., starts at the ferry terminal entrance or passenger drop off zone and finishes once on board the ferry? Designing of a ferry terminal is separate from designing a ferry and the access to the terminal from a passenger drop-off zone. <p>Tactile Ground Surface Indicators (TGSIs) – Agree to comply with AS1428.4.1 for the shore/jetty end. For the pontoon end, compromise that the TGSIs are placed on the pontoon in a location that is 150 mm from the treadplate at its closest point in the tidal cycle, i.e., when the gangway is perfectly horizontal.</p> <p>Council’s preference would be an evidence-based approach, seeking the views of users or groups, testing different approaches to design and then providing guidance as to what would be better/best practices and fit for purpose.</p>
How successful is the Transport Standards in providing clarity on technical and functional requirements for accessibility of gangways connecting to ferry pontoons? <ul style="list-style-type: none"> • How could the Transport Standards be improved to reflect best practice? 	<ul style="list-style-type: none"> • The issue is that the DSAPT references AS1428.1 and AS1428.2 were written for static buildings, and therefore do not deal with the issue of tidal influences very well. Council would prefer to see the requirements for gangways described more technically in the DSAPT itself rather than referring to AS1428.1 and AS1428.2. • Council’s recommendation would be to do evidence-based consultation and provide guidance on acceptable solutions. Benchmarking and sharing ideas should be promoted. Design guides should help designers to share learning. • Council’s recommendation would be to co-design processes with people who have a lived experience of disability and organisations that represent them would provide bespoke solutions to the challenge of providing access in a highly dynamic environment. A co-design approach builds shared understanding between users and providers, and ultimately provides acceptance of the solution.
What are the potential upfront or ongoing costs associated with providing clarity on technical requirements to reflect best practice?	<ul style="list-style-type: none"> • The cost to design and construct a gangway with self-levelling landings is not prohibitive, however if an entire network of ferry terminals (such as Sydney, Moreton Bay Islands or Brisbane) needs to be upgraded to meet these new DSAPT then that would be a substantial cost to the ferry terminal owner/operator. • A best practice approach may be seen as an overreach. Technical support should be provided to provide mandate for simpler solutions and approaches presumably so that a greater number of facilities could be improved at transport network level, as well as a lead for ‘best practice’ for facilities not part of DSAPT, but contributing to public infrastructure, e.g. river access facilities for pleasure and tour boat pick up and drop off.
What are the core differences between a fixed ramp and a gangway from a design and use perspective?	Without self-levelling landings, a gangway could not comply with the slope and landing requirements of AS1428.2 1992. It is a dynamic, not static, problem. There is also often a need to have fixed ramping to get down to a level where the tide influence of gangway take-off point commences. For Brisbane River tides this does bring much of the built structure close to the harsh marine conditions. Design codes also consider impact of global warming which means over the longer term the take-off point level either needs to be adjusted or it will be in the wave tide environment more often.

Chapter 13: Assistance animal toileting facilities

Section / Question	Comments
Nature and extent of the problem	Nil comment
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment

Section / Question	Comments
Which option do you prefer: regulatory, non-regulatory or status quo?	<ul style="list-style-type: none"> • A regulatory approach is preferred. • Point 4 (Public spaces) should include taps and hygiene bags along with rubbish bins.
What considerations do you currently make for people traveling with an assistance animal on public transport?	Nil comment
What (if any) assistance animal toileting areas have you constructed on your public transport network or facilities?	Nil comment
What designs did you consider and what were the deciding factors that led you to your final design?	Nil comment
What features are available to users within or immediately outside the area?	Nil comment
What materials did you use for the construction of the area/s? To what extent did the locations/environments where the area/s were constructed determine the type of materials used?	Nil comment
What was the cost (or foreseeable cost) to construct the area/s?	Nil comment
What is the cost (or foreseeable cost) to maintain and clean the area/s?	Nil comment

Chapter 14: Emergency egress

Section / Question	Comments
Nature and extent of the problem	<ul style="list-style-type: none"> • This section only mentions bus and tram stops. Is further consideration to be made for ferry terminals? • In addition, a busway station will have very different requirements than a bus stop on a residential street.
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment

Section / Question	Comments
Which option do you prefer: regulatory, non-regulatory or status quo?	A regulatory approach is preferred, primarily because this option asks the transport provider to engage the disability community and other key stakeholders such as emergency services, to use co-design to develop appropriate process and procedures as well as influence design of the built environment.
How can emergency egress be accommodated through the use of the existing provisions of access paths?	<ul style="list-style-type: none"> • Patrons can be evacuated via the existing access paths at bus stops. Bus stations are managed by TransLink. • Access paths on ferry terminals are clear and wide to provide quick evacuation out of the facility (to land).
How do you currently accommodate and design for emergency situations at public transport sites (trams and bus stops), for example signage with emergency egress options?	Upgraded ferry terminals have emergency egress signage and lighting.
What are your policies and procedures in place for emergency situations?	Nil comment
How do you manage emergency evacuation incidents at your public transport infrastructure sites? <ul style="list-style-type: none"> • What lessons can be learnt from these experiences? 	Nil comment
What are the complexities and additional costs in being able to provide emergency egress at public transport sites which are not covered by the Premises Standards?	Whilst all bus stops have concrete pads not all have connecting footpaths.

Chapter 15: Fit for purpose accessways

Section / Question	Comments
Nature and extent of the problem	Nil comment
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment
Which option do you prefer: regulatory, non-regulatory or status quo?	<ul style="list-style-type: none"> • A regulatory approach is preferred. • It could be difficult to achieve the minimum unobstructed width and minimum width for passing area at a constrained site. The type of obstruction needs to be clarified (i.e. fixed or not fixed).

Section / Question	Comments
<ul style="list-style-type: none"> For 'access paths to be the principle pedestrian path of travel' do you prefer: option 1, option 2 or option 3? For 'access paths to be kept clear at all times' do you prefer: option 1, option 2 or option 3? 	<ul style="list-style-type: none"> Council prefers option 2. Ramps and walkways must be the principal path of travel and have primacy in pedestrian capacity over stairs.
Where stairs and ramps are co-located, what have been the observed customer behaviour or feedback that has been received about their functionality?	Nil comment
How are accessways at public transport sites designed in to ensure direct / straight navigation that is safe and provides timely egress of passengers at all times ('fit for purpose')? <ul style="list-style-type: none"> At what point do you decide to provide both stairs and ramps when designing transport infrastructure? 	Both stairs and ramps are provided at bus stops located on a very steep verge.
How would you improve accessways at public transport sites so that they are 'fit for purpose'? <ul style="list-style-type: none"> What upfront costs would you incur? 	A good understanding of the usage of accessways, such as patron versus pedestrian and volume of pedestrians, will help to improve accessway at public transport sites. This will help to determine bus stop infrastructure (i.e. seat and shelter), street furniture location, etc.

Chapter 16: Wayfinding

Section / Question	Comments
Nature and extent of the problem	The description of the nature and extent of the problem only refers to physical wayfinding infrastructure and lacks consideration of digital technologies that are emerging and can support wayfinding.
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment
<ul style="list-style-type: none"> Which option do you prefer: regulatory, 	A regulatory approach is preferred.

Section / Question	Comments
non-regulatory or status quo?	
<ul style="list-style-type: none"> How successful is the Transport Standards in providing enough information to designers and planners to assist in providing good wayfinding? How can the Transport Standards be improved? 	Nil comment
<ul style="list-style-type: none"> What do you see are the features of good wayfinding approaches to public transport sites? What feedback have you had from people with disability regarding your current wayfinding provisions? 	<ul style="list-style-type: none"> TransLink undertook a trial of braille plates at number of bus stops in Brisbane CBD and received positive feedback. Feedback from residents is that consistency in the design and location of amenities and features is needed across different conveyances and premises.
<ul style="list-style-type: none"> What are the impacts of working with people with disability to develop wayfinding approaches? 	This will allow the designer to have a good understanding of what they need and to provide fit-for-purpose design. However, it needs to be on a site-by-site basis.
<ul style="list-style-type: none"> What are the issues public transport operators and providers face when trying to implement good wayfinding strategies? 	Nil comment
<ul style="list-style-type: none"> If the following proposed new requirements are adopted in the Transport Standards, what do you see are the upfront and ongoing costs compared with meeting existing requirements? Braille and tactile requirements as prescribed in in the National Construction 	Implementing braille plates at each bus stop may mean J-Poles need to be replaced with blade sign or existing J-Pole or timetable cases will need to be modified. As Brisbane has more than 6,000 bus stops in the network, changes to existing infrastructure would have significant cost implications.

Section / Question	Comments
<p>Code and Premises Standards;</p> <ul style="list-style-type: none"> Specified provisions of Australian Standard AS 1428.4.2 concerning building and room identification; and Wider use of minimum 30 % luminance contrast requirements as currently required under Transport Standards Section 2.5 Poles and obstacles 	

Chapter 17: Tactile Ground Surface Indicators (TGSIs)

Section / Question	Comments
Nature and extent of the problem	Clarification/guideline on implementing TGSIs on shared paths is required as TGSIs can be a safety hazard to cyclists.
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment
Which option do you prefer: regulatory, non-regulatory or status quo?	Nil comment
What policies or guidelines are in place for the installation of directional TGSIs in and around public transport sites?	Usually guided by AS1428.4.1:2009.
<p>How do you apply the requirements for directional TGSIs?</p> <ul style="list-style-type: none"> What are the barriers in applying the requirements? 	Nil comment
<p>What data do you collect relating to complaints, the incidents of slips, trips and falls and the extent to which they are attributed to the lack of or placement of TGSIs?</p> <ul style="list-style-type: none"> What feedback have you received from people with disability regarding the 	Maintenance is very important. Colour contrast slowly reduces over time. TGSIs installed with adhesive do not last long and create trip hazards.

Section / Question	Comments
use of TGSIs on the transport network?	
If AS1428.4.1:2009, Standards Australia's most recent requirements for TGSIs are adopted, what are the upfront and ongoing costs associated with meeting these new requirements, especially in relation to the application of directional TGSIs?	Nil comment
What other wayfinding tools and cues do you currently implement for people with vision impairment?	In non-transport related public spaces, Council is considering a trial of beacon technology to assist wayfinding for people with vision impairment. Since 2012, the 'Step-Hear' system has been in place in the Queen Street Mall and complements the Braille Trail.

Chapter 18: Passenger loading areas

Section / Question	Comments
Nature and extent of the problem	<ul style="list-style-type: none"> This perhaps should or could include boarding points for ferries – the gangplank bridges, the pontoon and vessel. The vessels are however subject to a range of load conditions including number of passengers, fuel load etc. Ferries and ferry terminals have two unique issues when complying with Section 6.4 of the DSAPT 'Slope of external boarding ramps'. The issue has to do with different freeboards* of ferries and ferry terminal pontoons. <ol style="list-style-type: none"> While every effort is made during the design process of ferries and ferry terminals, it is not always possible to standardise the freeboards of all vessels and all ferry terminal pontoons, so that they are at the same freeboard. This is particularly the case for ferries where the design of a ferry has many other safety, regulatory, engineering and operational aspects that need to be complied with outside of the DSAPT requirements, that also affect the vessel design freeboard range. In addition, freeboards of ferries vary depending on the number of passengers and how much fuel/water/sullage is on board at any one time. Ferry terminal pontoon freeboards also vary throughout the day depending on waiting passengers and tidal currents. Balancing these two constraints is challenging in a dynamic tidal environment and full compliance with section 6.4 of the DSAPT is not always possible of 1:8 for unassisted access and 1:4 for assisted access. A suggestion is to apply the 80% of time compliance similar to that applied to gangways. Through development assessment of private development, Council assesses passenger loading areas for buses and taxis, in particular boarding points and kerb design associated with development. There is a lack of specific guidance for assessing officers currently available. Specific guidance provides more certainty for applicants, is ultimately less costly because they know what to design for and finally relies on less technical expertise for assessing officers who may not be specialists in this area. There are generally not issues for CBD development or on major high frequency routes due to firm and level kerb. However, in highly populated city frame areas and along major transport routes, conflicts frequently arise between development and existing bus stops. <p>It is suggested that the reform agenda consider:</p> <ol style="list-style-type: none"> Clearer specific access provisions for passenger loading areas The case example that these provisions should address is the conflict between proposed driveway crossovers and existing bus stops. Secondly the impact of temporary verge closures for construction of the development conflicting with existing bus stops. The standards provide no guidance where an as-of-right driveway crossover is necessary for development where there is no way to maintain a 150 mm minimum kerb as suggested in the consultation draft. Clearer specific access provisions for accessible paths of travel to and from transportation stops in the public realm

Section / Question	Comments
	<p>The case example that this should address is that of a city frame or middle-ring redevelopment that necessitates footpath works extensive enough to isolate an existing bus stop from reasonable access. There is no head of power for Council to resolve this conflict at the approval phase. Council has a construction management taskforce to monitor development construction to try to resolve such practical matters, but this is harder to address once construction has commenced.</p> <p>*Freeboard for a ferry and ferry terminal pontoon is defined as the height of the boarding gate above the waterline. Freeboards are not static and vary throughout the day depending on several factors.</p>
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment
<p>Which option do you prefer: regulatory, non-regulatory or status quo?</p> <ul style="list-style-type: none"> For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2 or sub-option 3? 	Nil comment
<p>What considerations do you currently make when designing passenger loading facilities?</p> <ul style="list-style-type: none"> What feedback have you received regarding the use of passenger loading facilities? 	<p>During design, passenger loading zones are located as close as possible to the principal pedestrian entrance and includes at least one kerb ramp to access the footpath from the carriage way. Feedback from the community is that unauthorised parking and overuse by commercial vehicles diminishes the use as a safe passenger set down area.</p>
<p>If passenger loading can only be provided on one side of a public transport premises or infrastructure, what is the impact on passengers?</p>	Location should have a safe crossing within a short walking distance.
<p>In the circumstances where passenger loading can only be provided on one side, what are the reasons why?</p>	Nil comment
<p>Bearing in mind the various national, state and local government guidelines on the layout of taxi ranks and passenger loading zones, what is the optimum layout of a taxi rank or passenger loading zone?</p>	Nil comment
<p>How successful are AS2890.6-2009 and AS2890.5-2020 in</p>	<p>The standards can be improved by linking accessible taxi ranks and passenger loading bays with a safe and continuous access path to the entry of the premises or the intended destination.</p>

Section / Question	Comments
providing good templates for the design of accessible taxi ranks and passenger loading bays? • How can this be improved?	
What costs would you see associated with ensuring that the Transport Standards requires all taxi ranks and passenger loading zones at public transport premises and infrastructure to be accessible?	Nil comment

Chapter 19: Provision of information in multiple formats

Section / Question	Comments
Nature and extent of the problem	Nil comment
Outcome to be achieved	Nil comment
Policy options to address the problem	Nil comment
Impact analysis	Nil comment
Which option do you prefer: regulatory, non-regulatory or status quo?	Nil comment
What alternative formats of information, other than online formats, do you utilise?	Nil comment
What information do you currently produce in alternative formats that is readily available for a customer on request for content that is available only through digital means?	Nil comment

Section / Question	Comments
<p>What type of requests do you receive from people with disability for alternative formats of information that is provided online that are not readily available?</p> <ul style="list-style-type: none"> • How do you meet these requests? • What are the barriers you face in being able to meet these requests? 	Not transport specific, but most requests for alternative formats are for Auslan. Council will provide an Auslan interpreter free of charge, but it needs to be booked in advance.
What are the costs associated with providing information in alternative formats when only provided in online content?	Nil comment
How do you receive complaints from customers with a disability relating to the provision of information?	Not transport specific, but usually by direct call or letters.
How can communication methods with people with disability be improved?	<ul style="list-style-type: none"> • Communication can be improved with face to face communication or by telephone if appropriate. There is often an added layer of caution or nervousness by service providers in general to engage directly with people with disability. Direct and personalised communication allows for unique circumstances to be understood and solutions identified. • In addition, it is noted that Queensland Rail station ticket counters have hearing loops installed, that need to be activated on request by a customer. Communication could be improved by removing that additional step for customers with a hearing impairment.

Chapter 20: Amendments to references to Australian Standards

Section / Question	Comments
Objectives	Nil comment
List of Amendments to the Transport Standards	Nil comment
<p>Do you support the changes to the references to Australian Standards?</p> <ul style="list-style-type: none"> • If not, which changes do you not support and why? 	Nil comment
Do you find domed buttons at the end of a staircase to be helpful as a warning indicator?	Nil comment
Would it be helpful if section 21.2 (Controls – passenger-operated devices for opening and closing doors) and section 21.3 (Controls – location of	Nil comment

Section / Question	Comments
passenger operated controls for opening and locking doors) in the Transport Standards are consolidated as a single provision?	