Australian Government

Department of Infrastructure, Transport, Regional Development and Communications

Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement

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Executive summary

The Disability Standards for Accessible Public Transport 2002 (the 'Transport Standards'), made under the *Disability Discrimination Act 1992* (DDA), seek to remove discrimination for people with disability in relation to public transport services, including trains, trams (including light rail), buses, ferries, aircraft, taxis and dial-a-ride services.[1] The Transport Standards are designed to provide certainty to providers and operators of public transport services and infrastructure about their responsibilities under the DDA.

It is estimated that there are approximately 4.4 million people with disability in Australia, or around 17.7 per cent of the total population.[2] To improve public transport accessibility and meet the requirements of the DDA, state and territory governments and private operators have made significant investments. For example, the NSW Government has invested $2 billion since 2011 on improving accessibility of public transport. The Queensland Government's annual program value has grown to approximately $50 million in improving network efficiency, customer access and integration.

The effectiveness and efficiency of the Transport Standards are reviewed every five years. The second review, undertaken by the then Department of Infrastructure and Regional Development in 2012, has as a key recommendation to 'modernise' the Transport Standards. The Australian Government recognised that, after more than a decade since their adoption, the Transport Standards may not be meeting the current and future needs of people with disability, nor provide sufficient flexibility or guidance to transport operators and providers to practically fulfil their obligations under the DDA. As such, the Australian Government supported the review's recommendation to modernise and improve the Transport Standards.

The modernisation process is being undertaken in two stages of proposed amendments to the current Transport Standards. The first stage of proposed amendments is the subject of this Consultation Regulation Impact Statement (Consultation RIS). These proposed amendments are intended to increase the flexibility and clarity of the Transport Standards, and are based on extensive consultation and research. The second stage of amendments (to be considered in a subsequent Consultation RIS) will include those amendments that are likely to be more complex and time-consuming to develop and implement.

The proposed amendments have been developed in consultation with the National Accessible Transport Steering Committee (the Steering Committee) and the National Accessible Transport Taskforce (the Taskforce). Collectively, these bodies include representatives from the disability community, government and the public transport industry. The proposed amendments consist of 16 pragmatic and incremental areas of reform, plus updates to Australian Standards references in the Transport Standards. These areas of reform are described and outlined in Chapter 3.

Each area of reform is analysed in the following chapters with proposed status quo, regulatory and non-regulatory options for consultation.

[1] Section 1.14 of the Transport Standards provides that a dial-a-ride service is a service that is usually operated by a small bus, which services a local community and operates on flexible routes that allow passengers to be picked up and dropped off at their front doors.

[2] Australian Bureau of Statistics, *Survey of Disability Ageing and Carers (SDAC)* 2018, accessed on 08/02/2021 <www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>.

We are considering:

- whether mandatory requirements for staff training will improve the public transport experience of people with disability
- if further information on safety measures is required to better contain the movement of mobility aids on buses, light rail and trams while they are in motion
- changing the way we calculate the number of priority seats required on a public transport vehicle to accommodate the increasing numbers of passengers requiring priority seating
- if further clarity is required to ensure allocated spaces are clear of obstructions and functional and are exclusively reserved for mobility aids
- how to ensure digital information screens and design requirements meet the needs of people with disability
- amending lift accessibility requirements to align with the Premises Standards 2010 and the National Construction Code and including maintenance provisions
- adopting a minimum standard for website accessibility to improve the delivery of service information to people through websites and other online systems
- establishing a framework for public transport operators and providers to communicate well, and in a variety of formats, during planned and unplanned disruptions
- how to clarify the distinct requirements of gangways used to access ferries, including the effects of tidal changes on access
- including requirements to provide conveniently located assistance animal toileting areas within, or adjacent to, key public transport infrastructure
- developing emergency egress provisions for people with disability in relation to public transport infrastructure
- including requirements so ramps and walkways provide fit for purpose accessways during peak times and emergency egress, and to deter their misuse as stopping areas
- how to address inconsistencies between the Transport Standards and the National Construction Code for wayfinding
- if clarity is required about the use directional tactile ground surface indicators in public transport environments
- including requirements for the design and delivery of accessible passenger loading areas such as drop off/pick up points and taxi ranks
- including provisions ensuring public transport information is provided in multiple formats and not solely through online methods
- aligning Australian Standards references in the Transport Standards with current Australian Standard references.

This Consultation RIS is seeking views on whether the proposed options would deliver on the objectives of the DDA to eliminate discrimination as far as possible against people with disability and whether they

would enable transport operators and providers to increase the level of compliance with the Transport Standards and reduce uncertainty.

Please see below for instructions on how to provide feedback to the Department of Infrastructure, Transport, Regional Development and Communications.

You can provide your responses by:

- Completing an online survey on our website
- Emailing DisabilityTransport@infrastructure.gov.au
- Calling 02 6274 6188
- Writing a submission in response to our full Consultation Regulation Impact Statement
- In writing addressed to the below:

Disability and Transport Standards Section

Land Transport Policy Branch

Department of Infrastructure, Transport, Regional Development and Communications

GPO Box 594

CANBERRA ACT 2601

For more information about the Transport Standards, or to complete detailed surveys, visit our website www.infrastructure.gov.au/transport/disabilities.

Abbreviations

Abbreviations

Abbreviation	Description
ABS	Australian Bureau of Statistics
ACT	Australian Capital Territory
AHRC	Australian Human Rights Commission
ADR	Australian Design Rules
AFDO	Australian Federation of Disability Organisations
DDA	*Disability Discrimination Act 1992*
Transport Standards	Disability Standards for Accessible Public Transport 2002 (Transport Standards)
NSW	New South Wales
NT	Northern Territory
Qld	Queensland
RIS	Regulation Impact Statement
SA	South Australia
Department of Infrastructure	The Department of Infrastructure, Transport, Regional Development and Communications
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
WA	Western Australia

Chapter 1: Introduction

The Disability Standards for Accessible Public Transport 2002 (Transport Standards) were created to enable public transport operators and providers to remove discrimination from public transport services.[3] The Transport Standards are required to be reviewed every five years to ensure they remain efficient and effective, and are fit for purpose to meet the current needs of Australian society.

This Consultation Regulation Impact Statement (Consultation RIS) will look at 16 initial areas of reform aimed at modernising the Transport Standards ensuring:

1. The removal of discrimination against people with disability is the central focus.
2. The full spectrum of solutions for modernisation can be considered.

These initial reform areas are considered less complex for implementation in the short-term. A second stage of amendments, which are expected to be more complex, will be considered through a similar process. A Consultation RIS for the second stage is anticipated to be released in 2022.

Currently, there is limited data and evidence available for all of the reform areas to conduct a thorough cost benefit analysis (CBA). The purpose of this Consultation RIS is to collect more data and to ascertain the magnitude of the reform areas through public submissions. Once the Consultation RIS process is complete, a CBA will be undertaken for the Decision RIS.

This chapter outlines:

- The purpose of the Transport Standards and their context in the current legislative framework.
- The outcome of the second review of the Transport Standards.

1.1 The Disability Standards for Accessible Public Transport (Transport Standards)

The Transport Standards are one of the three disability standards formulated by the Attorney-General under section 31(1) of the *Disability Discrimination Act 1992* (DDA). The DDA seeks to eliminate discrimination as 'far as possible' against people with disability. Public transport is a service covered by the DDA.[4] Under section 31 of the DDA, the Attorney-General has the power to formulate standards in relation to any area in which it is unlawful under the Act for a person to discriminate against another person on the ground of a disability of the other person. There are currently three standards made under the DDA, which aim to provide more detail on rights and responsibilities about equal access and opportunity for people with a disability.

The other two standards are:

1. The Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards) aim to provide people with disability dignified and equitable access to buildings and provide certainty to industry that they are complying with the DDA.
2. The Disability Standards for Education 2005 (Education Standards) clarify the obligations of education and training providers, and seek to ensure that students with disability can access and participate in education on the same basis as other students.

[3] Section 1.2 of the Transport Standards.
[4] Section 1.2 of the Transport Standards.

Australia is also party to the Convention on the Rights of People with Disabilities (CRPD). The CRPD requires countries to ensure and promote the full realisation of all human rights and fundamental freedoms for all persons with disability without discrimination of any kind on the basis of their disability. In Australia, the CRPD is incorporated through legislation, policy and programs at federal and state and territory levels, including through the DDA and its Standards.

The purpose of the Transport Standards is to enable public transport operators and providers to remove discrimination from public transport services.[5] Transport is a key enabler for people with disability as it allows them to access work, community, education and healthcare services. People with disability are ten times more likely than those without disability to rate their health as poor, highlighting the need for increased access to healthcare services.[6] Employing a nationally consistent level of standards for public transport will improve clarity around requirements for all public transport operators and providers and will provide certainty for people with disability to enable them to feel safe and secure during their public transport journeys. It will also allow Australia to take advantage of economies of scale when purchasing or producing public transport infrastructure and conveyances.

An accessible public transport system is also important for planning for Australia's ageing population. The proportion of people aged over 65 is currently 15 per cent and is projected to grow to 21 per cent of a significantly larger overall population by 2066.[7] People's travel patterns change at different stages of their life. For example, retirees who no longer travel to work may travel instead to more dispersed locations for leisure and access to services such as healthcare. Older people rely more on public transport when road safety requirements place limits on their driving and are more likely to travel in off-peak periods than younger commuters. Older people and people with disability are particularly vulnerable and are at greater risk of experiencing social isolation and loneliness.

The Transport Standards were first released on 23 October 2002 and subsequently amended in 2004, 2005 and 2011. The Minister for Infrastructure, Transport and Regional Development has responsibility for the Transport Standards.

1.1.1 The Transport Standards are legally binding

The Transport Standards are legally binding for public transport providers and operators. Section 32 of the DDA states that 'it is unlawful for a person to contravene a disability standard'.

The main mechanism for enforcement and compliance is through a complaints process. Individuals can lodge unlawful discrimination complaints with the Australian Human Rights Commission (AHRC). The AHRC has the power to investigate and attempt to conciliate complaints of disability discrimination. If the conciliation is unsuccessful, in certain cases an individual can commence legal proceedings regarding the complaint in the Federal Court of Australia or the Federal Circuit Court.

In light of the challenges associated with replacing or retrofitting existing public transport assets on long replacement cycles, the Transport Standards contain progressive compliance timeframes between 2007 and 2032, summarised in Table 1. However, it is difficult to monitor the progress of compliance with the Transport Standards, as there is no mandatory national compliance reporting.

[5] ibid

[6] Australian Institute of Health and Welfare (2018). Australia's Health 2018. Australia's health series no. 16.

[7] Australian Bureau of Statistics, Population Projects, Australia, 2017 (base) – 2066 (Cat. No. 3222.0). Available <https://www.abs.gov.au/AUSSTATS/abs@.nsf/mf/3222.0>.

Table 1: Target compliance to the Transport Standards

Compliance year	2007	2012	2017	2022	2032
Target compliance	25%	55%	80%–90%	100% Except rolling stock[8] which is set at 90%	100% Applies only to rolling stock

Source: Transport Standards, Schedule 1.

The targets shown in the table are averaged across the range of conveyances, premises and infrastructure.

1.1.2 The Transport Standards apply to public transport conveyances, infrastructure and premises

The Transport Standards apply to public transport conveyances, infrastructure and premises. Compliance is the responsibility of Australia's transport providers and operators across all jurisdictions. Modes of public transport which are subject to the Transport Standards include train, tram, light rail, bus and coach, ferry, aircraft and taxi services, as well as dial-a-ride services.[9] Definitions of key terms in the Transport Standards are outlined in Table 2.

Table 2: Important definitions for interpreting the Transport Standards

Term	Definition
Premises	Premises are structures, buildings or attached facilities that an operator provides for passenger use as part of a public transport service (e.g. train stations, ferry terminals, airports).
Infrastructure	Infrastructure is any structure or facility that is used by passengers in conjunction with travelling on a public transport service (e.g. train platforms, ferry wharves, airport terminals).[10]
Conveyances	A conveyance includes any of the following, to the extent that they are used to provide a public transport service: aircraft, buses or coaches, ferries, taxis, trains, trams, light rail, monorails, rack railways; and any other rolling stock, vehicle or vessel classified as public transport within its jurisdiction by regulation or administrative action of any Government in Australia.[11]
Operator	An operator is a person or organisation (including the staff of the organisation) that provides a public transport service to the public or to sections of the public. A public transport service may have more than one operator.

[8] Rolling stock includes locomotives, carriages, wagons, or other vehicles used on a railway.

[9] Section 1.14 of the Transport Standards provides that a dial-a-ride service is a service that is usually operated by a small bus which services a local community and operates on flexible routes that allow passengers to be picked up and dropped off at their front doors.

[10] Infrastructure does not include any area beyond immediate boarding points (for example, bus stops, wharves, ranks, rail stations, terminals).

[11] A conveyance does not include charter boats (including water taxis), limousines (including chauffeured hire cars) and self-drive rental cars.

Term	Definition
Provider	A provider is a person or organisation that is responsible for the supply or maintenance of public transport infrastructure. A provider need not be an operator.
Public transport service	An enterprise that conveys members of the public by land, water or air, and includes both publicly and privately owned services.

Source: Transport Standards, Part 1.

1.2 Reviews of the Transport Standards

Part 34 of the Transport Standards requires the Minister for Infrastructure, Transport and Regional Development, in consultation with the Attorney-General, to review the efficiency and effectiveness of the Transport Standards within five years of them taking effect, with subsequent reviews to be undertaken every five years. The first five-year review commenced in 2007 with the final report and Australian Government response released in June 2011. The second five-year review commenced in 2012 with the final report and Australian Government response released in July 2015. The third five-year review is currently underway and commenced in 2017. In the context of reviews, effectiveness and efficiency are defined as:

- Effectiveness refers to how well the Transport Standards have been able to reduce or remove discrimination against people with disability when accessing public transport.
- Efficiency refers to the costs operators and providers incur in making the required changes to comply with the Transport Standards. This involves designing the Transport Standards so they avoid imposing avoidable burdens, while still achieving the Government's desired policy objectives.

The second review's first recommendation was to modernise the Transport Standards. This called for the Australian Government, jointly with state and territory governments, to commence a process for updating and modernising the Transport Standards, which resulted in this Consultation RIS.[12]

1.3 The problem with the current Transport Standards

The purpose of the Transport Standards is to enable public transport operators and providers to remove discrimination from public transport services.[13] The 2012 review of the Transport Standards concluded that whilst the standards had overall been effective in reducing discrimination, they are not optimal in their current form.[14] It recognised that there is currently insufficient flexibility or guidance for operators and providers to fulfil their obligations under the DDA in some instances, which can lead to:

- Situations where adopting certain provisions may not lead to an optimal outcome for people with disability, which reduces the effectiveness of those provisions.
- Situations where it is impractical or unfeasible for transport operators and providers to comply with certain provisions, which reduces the efficiency of those provisions.
- Situations where there can be inconsistent outcomes and errors with interpreting and navigating the Transport Standards.

12 Department of Infrastructure, *Transport Standards review*, July 2015, p. 125.
13 Transport Standards, section 1.1.
14 Department of Infrastructure, *Transport Standards review*, July 2015, p. 10.

The effectiveness of the Transport Standards is vital for people with disability to fully engage and participate in the community. Without sufficient accessibility, people with disability could experience social exclusion, increased travel times and costs, reduced employment opportunities and a higher risk of safety incidents. The key stakeholder groups affected by the effectiveness and efficiency of the Transport Standards are:

- The disability community, including people with disability, their carers and representatives. This group is mainly affected by the effectiveness of the Transport Standards.
- Public transport providers and operators, which are publicly or privately owned. This group is mainly affected by the efficiency of the Transport Standards.
- Local governments, who own and manage public transport infrastructure such as bus stops.

1.3.1 Insufficient clarity

In previous reviews it has been noted that some provisions of the Transport Standards lack clarity, which increases uncertainty for public transport operators, providers and the disability community. The lack of clarity in the current Transport Standards includes:

- Some provisions where the requirements and intentions are unclear or do not provide definitive guidance.
- Some provisions referencing older Australian Standards such as AS1428.2 (1992). This Australian Standard in particular is referenced in over 30% of the Transport Standards prescriptive technical standards.
- Some inconsistencies between the Transport Standards and the Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards), largely due to referencing of different Australian Standards.

This can reduce the effectiveness and efficiency of some provisions in the Transport Standards, through:

- Increasing the costs of interpreting and navigating the standards, for public transport providers and operators, people with disability and their representatives.
- Increasing the risk of public transport operators and providers and government unintentionally purchasing or funding non-compliant conveyances, infrastructure and/or premises.

The 2012 review also recognised the current approach of referencing Australian Standards in the Transport Standards can make interpretation of the requirements difficult for operators and providers and people with disability. In addition, many of the Australian Standards referenced are not purpose-designed for the transport sector and often do not translate well for transport conveyances and infrastructure.[15]

1.3.2 Insufficient flexibility

Although the Transport Standards contain a mix of requirements, they are generally prescriptive in nature. This reflects their intention to provide greater certainty and guidance for public transport providers and operators who have obligations under the DDA.[16]

[15] Department of Infrastructure, *Transport Standards review*, July 2015, p.158.
[16] Department of Infrastructure, *Transport Standards review*, July 2015, p. 87.

The 2012 review of the Transport Standards determined there is insufficient flexibility in the current standards. It recommended the standards be amended to provide more flexibility for different public transport modes and operating environments.[17] This would allow public transport operators and providers to more effectively deliver accessible services under the DDA in line with the compliance requirements.

Insufficient flexibility in the current Transport Standards can lead to situations where adopting certain provisions may not lead to an optimal outcome for people with disability. This reduces the effectiveness of those provisions. For example, certain provisions prescribe only one option for transport providers and operators, where there may be an alternative option that improves public transport accessibility for people with disability.

1.3.3 Compliance issues

It is challenging to monitor the progress of compliance with the standards as compliance reporting is not required. However, the cost of compliance is also significant. For example, the NSW Government has invested $2 billion since 2011 on improving accessibility of public transport. The Queensland Government's annual program value has grown to approximately $50 million in improving network efficiency, customer access and integration.

Additionally, there is limited data available on complaints by people with disability to the AHRC to indicate their satisfaction with the accessibility of public transport. This has limitations as an accurate indicator due to the cost and time barriers for people with disability to make a complaint.

[17] Department of Infrastructure, *Transport Standards review*, July 2015, p.10.

Chapter 2: This Regulation Impact Statement

This chapter outlines:

- The purpose and scope of this Consultation Regulation Impact Statement
- Governance arrangements for the reform

2.1 Purpose and Scope

This Consultation RIS looks at 16 initial areas of reform to the Transport Standards with the purpose of canvassing the options for reform in order to determine the relative costs and benefits of these options. The reforms aim to deliver updated and modernised standards with the removal of discrimination against people with disability as the central focus. In August 2019, the former COAG Transport and Infrastructure Council agreed to four principles to guide the reforms:[18]

1. People with disability have a right to access public transport
   The Transport Standards pursue the removal of discrimination against people with disability first and foremost. The reform process pursued must place people with disability at the centre of their consideration.

2. Accessibility is a service, not an exercise in compliance
   An accessible public transport network anticipates and responds to the varying needs of its customers with disability. This requires thinking beyond compliance with minimum standards and toward a focus on accessibility as a service. The reform process should be open to engaging with opportunities to develop best practice, rather than minimum prescriptive standards.

3. Solutions should meet the service needs of all stakeholders and be developed through co-design
   The new approach should learn from the past modernisation process, which primarily focused on the current individual standards and how they can be amended. This limited the range of solutions to those that fit within the existing framework. The new approach should be open to considering performance-based standards and/or functional outcomes; jurisdictional and modal specific standards; prescriptive standards; or other innovative solutions.

4. Reform should strive for certainty without sacrificing best functional outcome
   Certainty, both legal and in relation to service provision, is important for all stakeholders. However, transport operators and providers who take only a minimum standard interpretation of the Transport Standards in fact face greater risk of failing to meet the objectives of accessible public transport. This is because minimum standards do not always achieve the best functional outcomes for people with disability and can result in an unintended discriminatory outcome.

There are two key deliverables for the reforms which were agreed by Transport Ministers, with the deliverable 1 reform amendments expected to be ready in late 2021. The legislative amendments for an extensively revised version of the Transport Standards are expected to be finalised in 2023.

At present, there is no preferred option between the non-regulatory, regulatory and status quo options. The purpose of the consultation process is to gather feedback as to which option will achieve the best outcome for all 16 areas of reform.

[18] Department of Infrastructure, *Reform of the Disability Standards for Accessible Public Transport 2002*, https://www.infrastructure.gov.au/transport/disabilities/reform/index.aspx

For amendments to updating the references to Australian Standards (Chapter 20), there are no options proposed, rather, we are seeking feedback and comments on the proposed changes.

2.2 Governance arrangements for the reform

The National Accessible Transport Steering Committee (Steering Committee) was formed to oversee the reforms at a high level and ensure a national perspective is achieved. This acknowledges that the DDA and its accompanying disability standards, as maintained by the Australian Government, are the primary legal force for the elimination of disability discrimination.

The Steering Committee is comprised of senior officials from the Commonwealth Attorney General's Department, the Australian Human Rights Commission, Queensland, South Australia and New South Wales state governments, and is chaired by the Commonwealth Department of Infrastructure, Transport, Regional Development and Communications. The Steering Committee provides oversight and direction to the National Accessible Transport Taskforce (the Taskforce) and reports to the Infrastructure and Transport Senior Officials Committee (ITSOC).

The Taskforce, chaired by the Department of Transport and Main Roads Queensland, is comprised of technical experts from the disability community, governments and industry. This recognises that state, territory and local governments have expertise and close relationships with people with disability and industry.

The decision makers for this Consultation RIS, the subsequent Decision RIS and the overall amendments of the Transport Standards are Commonwealth, state and territory transport ministers.

Chapter 3: Initial Areas of Reform

This chapter outlines the 16 areas of reform which are considered in detail in the following chapters of this Consultation Regulation Impact Statement.

Table 3: 16 areas of reform

Image	Description
	**Staff training and communication** Public transport providers and operators have a responsibility to ensure that their staff are proficient in interacting with customers in ways which do not discriminate against people with disability. While the Transport Standards infers this approach, there is no specific reference to staff training and communication. Part 37 of the Transport Standards Guidelines 2004 (No.3) (the Guidelines) provides brief guidance to public transport operators concerning (i) staff attitude; (ii) orientation and education programs; and (iii) customer service programs.
	**Mobility aid safety** Passengers in conveyances, particularly buses and trams, are sometimes subject to significant displacement forces during starts, stops and turns. At times, mobility aids will unexpectedly slide or tip out of allocated spaces and into the aisle when these forces are suddenly experienced. The Transport Standards currently provides for containment of movement of a mobility aid towards the front and side of a conveyance.
	**Priority seating** The number of passengers with disabilities and other groups in need of special assistance has increased in recent years and will continue to grow as the population ages. The Transport Standards currently designates at least two priority seats in various conveyances. The disability community has raised this requirement as being inadequate.
	**Allocated spaces in transit** Allocated spaces for wheelchairs or scooters are provided on the understanding that people with wheelchairs or on scooters have priority access to them. However, they are not exclusively reserved for mobility aid devices. While the Transport Standards refers clearly to priority seating, there is minimal reference to allocated spaces.
	**Digital information screens** As the technology around digital displays has been introduced and adopted heavily since the introduction of the Transport Standards, there is often ambiguity and uncertainty on what is required to be delivered in order to meet the needs of people with disability or what is compliant. This has been reflected in submissions on the past reviews of the Transport Standards.
	**Lifts** There is a misalignment between the lift accessibility requirements in the Transport Standards when compared to the Premises Standards and the National Construction Code. This includes limitations with the type of lifts that can be used and not requiring larger lifts when they travel numerous levels or catering for stretchers in emergencies. Other limitations include several inferior audible and visual indication requirements. Also, where a lift is the sole method of access between levels there can be times where the lift is unavailable due to scheduled maintenance or unplanned repairs that will result in a denial of service for people with disability.

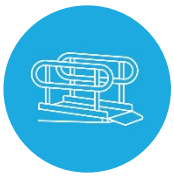
Image	Description
	**Website accessibility** Many people with intellectual disability have difficulty navigating and comprehending websites due to the plethora of information displayed on screens as well as the complex sentences, syntax and unfamiliar jargon that are prominent features of websites. However, the current Transport Standards do not reflect industry standards around minimum requirements for website accessibility.
	**Communication during service disruption** Unplanned service disruptions are challenging for operators and customers alike. Currently, the Transport Standards refers to 'general information', but lacks a definition of what this term constitutes. As a result, there is a lack of communication consistency across operators and modes of transport during service disruptions which may negatively impact and fail to deliver equal access to information for all service users.
	**Gangways** Section 6.5 of the Transport Standards identifies 'gangways' as 'ramps connected to pontoon wharves'. These types of gangways have unique design constraints imposed by the tidal environment. Tides affect the slope of ramps connecting pontoon wharves to land. On occasions, an unusually high tide may cause the ramp to be too steep for unassisted access. In its current form, the Transport Standards do not allow for the cyclical alteration of gangways and treadplate slope.
	**Assistance animal toileting facilities** The number of assistance animals in Australia is growing due to the extent to which they enable people with disability to engage in social, civic and economic activities. However, the lack of appropriate and conveniently located areas for assistance animals to be toileted means people who use assistance animals are often required to venture away from their path of travel to locate an appropriate toileting area for their animal.
	**Emergency egress** The current Transport Standards detail requirements on being able to access facilities and services. However, the requirements for a customer to safely and easily exit transport infrastructure, such as a bus or train platform, in emergency situations is not explicitly covered. In addition, the provision of safe egress is not well understood by operators, designers and people with disability.
	**Fit for purpose accessway** The concept of an access path to allow movement of passengers through premises and infrastructure is implicit in many sections of the Transport Standards. However, some sections are relevant only to particular situations. Also, the Transport Standards do not specify requirements for fit for purpose accessways or how to accommodate pedestrian flows at peak times and during emergency egress from infrastructure or premises.
	**Wayfinding** Wayfinding provisions are fragmented and do not provide sufficient guidance to designers and managers to ensure a holistic wayfinding strategy. While the Transport Standards provide several elements for wayfinding, there are a few gaps which exist. They include limited braille and tactile signs associated with toilets compared to the Premises Standards and the National Construction Code. There is also a need for more clarity regarding tactile ground surface indicators and limited luminance contrast requirements along internal access paths and ground surfaces that form part of an access path.

Image	Description
	**Tactile ground surface indicators** The current Transport Standards do not include requirements regarding directional tactile ground surface indicators, which places more challenges on people with vision impairments to navigate through transport precincts.
	**Passenger loading areas** The current Transport Standards do not make provisions for the design and delivery of accessible passenger loading areas such as drop off/pick up points and taxi ranks. This impacts the ability for passengers to arrive safely, unload from the mode of transport and move through the environment without barriers, limiting the participation of people with a disability in public transport.
	**Multiple formats of information** The Transport Standards comprises requirements relating to the provision of information which must be accessible to all passengers. However, there is no specific reference to providing information in other formats, including through digital platforms.

Chapter 4: Staff training and communication

4.1 Nature and extent of the problem

There are currently no regulatory requirements for staff training in the Transport Standards.

Disability awareness training is internationally recognised as a key component of providing accessibility, both in public transport and in other sectors. For example, Canada has regulations for transport personnel training for the assistance of people with disability for staff who interact with the public, with requirements for regular refresher training and reporting on training.[19] Frontline and managerial staff training is also a key component of the UK Inclusive Transport Strategy. [20] The Australian Government's Disability Standards for Education 2005 recommends that timely, relevant and ongoing professional development is provided to staff to ensure they are equipped with the knowledge and skills to enable students with disability to participate in educational programmes or services.[21]

Several articles (4, 8, 9 and 20) in the Convention on the Rights of Persons with Disabilities make reference to parties eliminating discrimination and implementing training programs for stakeholders and staff on how to best assist and support people with disability to access their services, including transportation.

The interactions between staff and customers with disability can affect the extent to which people with disability access public transport. A number of public transport operators and providers already deliver disability awareness training to staff and there are requirements for disability awareness training in some state-based legislation. Where public transport employees, platform staff and call centre/booking staff provide empathetic and exemplary service, this assists people with disability undertake successful public transport journeys.

Inclusion of provisions relating to disability awareness training and how best to support customers with disability in the Transport Standards will reinforce a continuous improvement approach to accessible public transport.

4.2 Outcome to be achieved

Positive training of public transport staff, in particular those concerned with customer service, is seen as a critical part of developing confidence for people with disability in using public transport and achieving accessibility outcomes.

To counter any direct or indirect discrimination that may arise in the context of public transport, it is recommended that the Transport Standards make provisions for the obligations of providers and operators for staff induction and professional development on disability awareness and rights.

This Consultation RIS is aimed at ascertaining what the current training gaps are and what mechanisms (including the cost) are available to address these issues.

[19] Accessible Transportation for Persons with Disabilities Regulations 2009 (Canada), Part 1 Personnel Training for the Assistance of Persons with Disabilities.
[20] Department for Transport (2018) *The Inclusive Transport Strategy: achieving equal access for disabled people* Department for Transport, United Kingdom at https://www.gov.uk/dft, accessed on 30 September 2020.
[21] Australian Government Department of Education Skills and Employment Disability Standards for Education 2005 at https://www.education.gov.au/disability-standards-education-2005, accessed on 30 September 2020.

4.3 Policy options to address the problem

Status quo

The status quo option would maintain the current provisions in Transport Standards and Disability Standards for Accessible Public Transport Guidelines 2004 (the Transport Standards Guidelines). Part 37 of the Transport Standards Guidelines provides guidance to public transport operators concerning staff attitude, orientation, education and customer service programs:

Section 37.1 Attitude of staff

1) The Disability Standards assume that operators of public transport premises and infrastructure will ensure that their staff are proficient in interacting with passengers in ways that do not discriminate against people with disabilities.

2) Attitude is one of the main barriers to non-discriminatory access for people with disabilities. To counter any inherent discrimination in the provision of public transport services, it is recommended that staff orientation and education programs include components on disability awareness and rights.

Section 37.2 Orientation and education programs

Staff orientation and education programs should enable staff to provide assistance that is helpful without being patronising in language, attitude or actions.

Section 37.3 Customer service programs

Some appropriate inclusions in customer services programs are awareness education of the difficulties a passenger with disability may face at different stages of a journey and training in the use and upkeep of accessible features such as boarding.

Non-regulatory option

The non-regulatory option would result in amendments to the existing Transport Standards Guidelines and *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide) with further guidance material to strengthen the outcomes to be achieved.

The proposed guidance material would include the following:

Wherever possible, transport providers and operators should aim to:

- conduct tailored training to meet the specific roles and responsibilities of staff, for example, customer service, bus drivers, railway platform, policy, procurement
- conduct a training refresher, which could take into account complaints by people with disability
- consult with people with disability, or groups representing people with disability, when developing training to ensure the appropriate content is included
- provide training with content that has been reviewed or verified by people with disability or organisations representing people with disability
- implement training for the trainers, which is conducted by people with disability

- conduct or co-present training with people with disability or with organisations representing people with disability
- conduct training which includes hypothetical scenarios of people with disability experiencing both positive and negative interaction with public transport staff.

Regulatory option

The regulatory option involves inserting a new section into the Transport Standards that is a performance requirement for staff training and communication. The new section would specify that:

Transport providers and operators must:

- conduct tailored training to meet the specific roles and responsibilities of staff, for example, customer service, bus drivers, railway platform, policy, procurement
- conduct a training refresher, which could take into account complaints by people with disability
- consult with people with disability, or groups representing people with disability, when developing training to ensure the appropriate content is included
- provide training with content that has been reviewed or verified by people with disability or organisations representing people with disability
- implement training for the trainers, which is conducted by people with disability
- conduct or co-present training with people with disability or with organisations representing people with disability
- conduct training which includes hypothetical scenarios of people with disability experiencing both positive and negative interaction with public transport staff.

The new section in the Transport Standards would be supported by further information in the amended Transport Standards Guidelines and include examples of accessibility awareness training and how people with disability can be directly involved in, and support the design of, the training.

4.4 Impact analysis

Status quo

Costs

Training currently provided by public transport service providers and operators would continue to cover the costs.

Benefits

There is no widespread benefit in maintaining the status quo (apart from training that is currently provided by public transport service providers and operators).

Non-regulatory option

Costs

Public transport service providers and operators who may adopt the non-regulatory option, and haven't previously provided disability awareness training, will incur costs in the initial design and delivery. It is

envisaged that some transport providers and operators may be able to adjust their existing training programs to ensure disability awareness training is covered and therefore, minimise additional costs in the future.

Benefits

The changes would benefit both public transport operators and people with disability by improving interactions between staff and people with disability. It would also benefit public transport operators and providers by providing clarity around staff training requirements. People with disability would benefit from the promotion of accessibility as a service and increased accessibility of public transport.

Regulatory option

Costs

Public transport service providers and operators who have not previously provided disability awareness training will incur costs in the initial design and delivery. It is envisaged that some transport providers and operators may be able to adjust their training programs to ensure disability awareness training is covered and therefore, minimise additional costs in the future.

Costs will also be incurred for labour hours lost for staff that are required to undertake mandatory training.

Benefits

The changes would benefit both public transport operators and people with disability by improving interactions between staff and people with disability.

It would also benefit public transport operators and providers by providing clarity around staff training requirements.

People with disability would benefit from the promotion of accessibility as a service and, therefore, increasingly access public transport.

Training will also be delivered in a nationally consistent framework.

4.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What experiences do people with disability have when interacting with frontline staff and employees of public transport networks, including when seeking assistance?
- How do public transport staff interact with people with disability?
    - How have these interactions affected the ability of people with disability to access public transport?
    - How have these interactions affected the sense of safety and confidence of people with disability to use public transport?
- How does disability awareness impact interactions with public transport staff?
    - How would mandatory disability awareness training impact interactions with public transport staff and overall experience with using public transport?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What disability awareness training do you provide to frontline and back of house staff?
- What processes are in place to ensure staff interacting with the public are aware of the needs of people with disability and transport accessibility?
- What processes are in place to make sure staff involved in design, policy and procurement undergo disability awareness or 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?
- If staff disability awareness training was mandatory:
    - Would you be required to implement new training programs?
    - What costs would you incur?
- Are there examples of improved accessibility or improved customer service interactions as a result of recently implemented training programs or well-trained staff?
- Are there any cases of complaints or other impacts on people with disability that you are aware of relating to staff training?

Chapter 5: Mobility aid safety

5.1 Nature and extent of the problem

Submissions to reviews of the Transport Standards have identified a need for further clarity and guidance for both operators and customers on the safety measures required by the Transport Standards for customers travelling in mobility aids whilst in transit. This issue is particularly relevant for buses, trams and light rail as passengers in these conveyances are sometimes subject to significant displacement forces during starts, stops and turns, which are a product of the dynamics of the street road environment. At times, mobility aids will unexpectedly slide or tip out of allocated spaces and into the aisle when these forces are suddenly experienced.

People with disability have indicated that they prefer solutions that allow them to travel independently. Any solutions proposed cannot negatively impact a passenger's independence and freedom of choice. The Transport Standards section 9.11 requires that 'an allocated space must contain movement of a mobility aid towards the front or sides of a conveyance'.

Australian Standards for both for active and passive restraints have been published:

- AS/NZS 10542.1:2015 Technical systems and aids for people with disability — wheelchair tie down and occupant-restraint systems Part 1: Requirements and test methods for all systems
- AS/NZS ISO 10865.1:2015 Wheelchair containment and occupant retention systems for accessible transport vehicles designed for use by both sitting and standing passengers — systems for rearward-facing wheelchair-seated passengers

However, neither of these Australian Standards are referenced in the current Transport Standards.

Active restraining systems are required in wheelchair accessible taxis (WATs), coaches and other conveyances in which all passengers are required to wear seat or safety belts. Bus, tram and light rail passengers are not required to wear seat or safety belts. Therefore, the use of any active restraint system (if provided) is at the passenger's discretion.

The provision of passive containment systems is the minimum requirement applicable to the allocated spaces of these conveyances, although operators are able to install active restraining systems at their discretion.

5.2 Outcome to be achieved

The outcome to be achieved is to contain movement of mobility aids on buses, light rail and trams while they are in motion. The revised Transport Standards would make provisions to ensure that containment and restraint systems to prevent mobility aids from tipping or sliding out of allocated spaces are installed in buses, trams and light rail. Clear technical specifications that are practicably implementable would allow operators to improve passenger safety and meet the requirements of the Transport Standards. Solutions will consider the operational and environmental context of transport services, including issues such as the bi-directional nature of trams and light rail or the corridors that they operate in (such as roadways), or operational conditions such as emergency braking.

5.3 Policy options to address the problem

Status quo

No change is made to the Transport Standards or the Transport Standards Guidelines. Section 9.11 of the Transport Standards outlines requirements regarding movement of a mobility aid in allocated space.

> **9.11 Movement of mobility aid in allocated space**
>
> An allocated space must contain movement of a mobility aid towards the front or sides of a conveyance.

The Transport Standards Guidelines provide further advice regarding restraints in Division 9.2.

> **Division 9.2 Restraints**
>
> **9.5 Active and passive restraining systems**
>
> The Disability Standards recognise the use of both active and passive restraining systems.
>
> **9.6 Active restraining systems**
>
> (1) An active restraint anchors a wheelchair or similar mobility aid into an allocated space. Anchorage belts are an example of active restraints.
>
> (2) Regulations that normally require passengers to wear safety belts apply equally to all passengers. This means that operators of services on which safety belts are mandatory must provide restraints for use by people with disabilities. Similarly, passengers need to use safety belts if they are compulsory, unless the passengers have a dispensation through normal channels.
>
> **9.7 Passive restraining systems**
>
> (1) A passive restraining system contains movement of a wheelchair to within an allocated space. A vertical surface that restricts the movement of a wheelchair is an example of a passive restraint.
>
> (2) An operator may rely on the sides of a conveyance, or a padded rail, to act as passive restraints against excessive sideways movement of a mobility aid. The allocated space could be located behind a bulkhead to prevent forward movement. The passive restraints bounding an area of this kind would then prevent a wheelchair from rolling or tipping.

Non-regulatory option

Guidance would be included in *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide) concerning mobility aids on conveyances. No changes to either the Transport Standards or Transport Standards Guidelines would be made.

This guidance would outline the following considerations for designers with regard to improving the safety of mobility aid users travelling on a conveyance, in particular, on buses, trams and light rail where they are subject to greater forward and lateral movements. The guidance would apply to conveyances included in section 9.11 of the current Transport Standards: buses (except dedicated school buses), trams and light rail.

Mobility aid movement on conveyances will vary. For example, a bus will have different movements compared to a tram. A designer would need to know what forces would make a person in a mobility aid tip forward, backward and sideways.

Content to be added to the Whole Journey Guide is as follows:

Mobility aids in transit

Mobility aids travelling in buses and trams experience different forces than other transport modes. This is due to the dynamic environment that these vehicles operate in and the risks associated with those environments (for example, travelling on roadways in mixed traffic).

The dynamic forces experienced in these vehicles can result in users of mobility aids tipping or sliding out of allocated spaces. Some causes of these forces are unavoidable. For example, sudden emergency braking to avoid a collision for buses and trams or the requirement to turn tight corners in a suburban street for buses. These actions can cause forward or side movements respectively and are distinct to each scenario.

Operators and providers should consider measures to minimise or contain the movement of mobility aids in allocated spaces when in transit. The type of forces and movements to be contained will be different for each mode and should be considered when developing solutions to contain movement. Containment of movement may be done by installing passive or active restraining systems.

An active restraint system anchors a mobility aid into an allocated space. Anchorage belts are an example of active restraints. Regulations that normally require passengers to wear safety belts apply equally to all passengers. This means that operators of services on which safety belts are mandatory must provide restraints for use by mobility aid users. Similarly, passengers need to use safety belts if they are compulsory.

A passive restraint system contains movement of a mobility aid within an allocated space. As section 9.7 of the Transport Standards Guideline provides, a vertical surface that restricts the movement of a mobility aid is an example of a passive restraint. Where a passive or active system is offered on a service and it is not a requirement for all other passengers to wear safety belts, the use of these systems is at the discretion of the user. It should also be noted that there may be technical constraints in adopting an active system as there is not a solution that may fit the needs of all users and device types.

Operationally, the use of any active restraining device may require that a customer is able to independently use the system without the assistance of staff. This is due to occupational health and safety issues for staff and impacts to service running that may result from requiring direct assistance in the use of these systems. Consideration should also include the potential development of restraint solutions that do not require intervention from the driver, passengers or the passenger's carer or companion. Again, this outcome may not address the needs and expectations of all users.

When considering solutions to contain movement in allocated spaces, operators and service providers may look to adopt requirements from Australian Standards such as AS/NZS ISO 10865.1:2015.

- AS/NZS ISO 10865.1:2015 Wheelchair containment and occupant retention systems for accessible transport vehicles designed for use by both sitting and standing passengers - Systems for rearward-facing wheelchair-seated passengers

It should be noted that AS/NZS ISO 10865.1:2015 requires users to face rearward, which is not preferred by some users. However, the requirement to face rearward offers better safety in being able to contain forward movement. Further, some trams and light rail vehicles can travel in both directions making the application of the requirement to face rearward difficult to achieve in all operational circumstances. In circumstances where compliance with AS/NZS ISO 10865.1:2015 is not

achievable or preferred by users, the development of an equivalent access solution determined through a co-design process is encouraged.

Regulatory option

There is no regulatory option proposed for this issue as part of the first stage of the reform process. However, it will be considered in the second stage.

The Department of Transport Victoria (DoT Victoria) previously commissioned an independent research organisation to undertake research into the various types of wheelchair restraints used on route buses both domestically and internationally. This research was undertaken as a response to a coroner's recommendation that related to the fitment of restraint systems on route buses. DoT Victoria was seeking to obtain data and evidence to support future recommendations on what specific type of restraint or containment system on route buses, if any, are appropriate.

The research undertaken delivered valuable information on the attitudes of passengers and operators towards the use of restraint and containment systems in locations where they are used, as well as attitudes of passengers and operators towards the potential use of these systems in places where they are not currently used. The research also provided information on the range of different restraint systems utilised in a number of countries around the world.

Unfortunately, what the research was not able to deliver was a body of data and evidence that would support any particular type of restraint or containment system being installed in route buses.

As a result of the findings of this research, DoT Victoria sought funding to undertake testing to establish the body of evidence that it found to be currently lacking. The current research now set to be commissioned by DoT Victoria will be for an independent research organisation to establish a body of data that will be analysed and used as evidence to support future recommendations around containment or restraint systems for its fleet of route buses.

The research will include a range of laboratory simulations, data collection and analysis, and may result in a limited trial of a select number of restraint or containment systems.

5.4 Impact analysis

Some transport operators have reported that incidents have occurred where persons in mobility aids have tipped over. It is not possible to clearly articulate the number of incidents as some data included anecdotal feedback to operators. Causes of the incidents vary, but are linked to factors such as emergency braking and the travelling position of the mobility aid. A few transport operators have undertaken action to address issues that may cause a mobility aid to tip. This includes programs such as jerk-reduction training to make travel more comfortable for customers including those travelling in a mobility aid. However, as trams and buses share the road with vehicles and pedestrians it was acknowledged that emergency braking and cornering will still be encountered.

Status quo

Costs

Maintaining the status quo would not involve any additional costs to providers other than those subject to the original cost/benefit RIS undertaken before the Transport Standards were introduced.

Benefits

There are no benefits with maintaining the status quo.

Non-regulatory option

Costs

For public transport providers and operators, there may be more investigation and up-front costs when attempting to implement best practice. As this option is advisory guidance, the cost to upgrade any existing vehicles will be dependent on the technical constraints of each conveyance/vehicle type. This may limit the adoption of a particular system and would be at the discretion of providers and operators. Where there are significant constraints, operators may choose not to make any changes until vehicles are replaced and therefore the cost associated would be the same as the status quo.

Mounts and active restraints for two mobility aids costs between $1,600 and $3,500 (GST exclusive). The costs to include an anchor system in design is around $2,000 to $2,500 (GST exclusive).

Factors that can impact costs include:

- There may be an increased cost to operators which is associated with additional dwell time to attach and un-attach active restraint devices and the need for drivers to conduct additional checks prior to taking a tram or bus into operation.
- There may also be initial costs incurred concerning staff training and customer education campaigns if an active restraining solution is adopted.
- Whether a restraining device is being incorporated into a new conveyance build or retrofitted. Retrofitting may involve more expense and would be reliant on strengthening works to the vehicle.
- Different conveyance types may require different systems which impacts costs and ongoing maintenance.

However, any compliance with the guidance is at the discretion of the operator and designer of the public transport service. As a result, no consistency or safety outcomes for people with disability can be guaranteed.

Benefits

Expanding the Whole Journey Guide is an opportunity to provide practical guidance to operators and designers in selecting a containment system for a service and how it may be applied through operations. Additional guidance may lead to more consistent application of best practice in relation to containment systems on public transport for transport providers and operators. It will also result in a more consistent travel experience for people with disability. A move away from passive, independent type systems may unintentionally result in additional barriers for people to travel independently. The discretionary use of any system will be reliant on the individual's choice to utilise the system available. As a result, it cannot be guaranteed that installation of a system will address and minimise the risk of persons being contained in transit.

Any operator or provider who applies a solution in alignment with the additional guidance would ensure that people with disability would be able to travel with more confidence on buses or trams.

5.5 Consultation questions

Questions for the disability community

- Which option do you prefer: non-regulatory or status quo?
- What experiences do people with disability have in travelling in a mobility device or travelling with someone using a device on buses, trams and light rail?
- What current mobility device safety systems are in place for public transport conveyances?
- Would mobility device users be receptive to the installation of active restraints in public transport conveyances?
    - What would be the benefits to mobility device users?
    - What are any disadvantages to mobility device users?
    - How will the installation of active restraints impact the likelihood or ability of people with disability to use public transport?
- Should the installation of active restraints in public transport conveyances be mandatory or discretionary?
    - Can you provide reasons for why it should be mandatory or discretionary?
- If an active restraint was available without assistance from staff, how likely are people with disability to use the system while in transit?
    - How would using an active restraint without assistance from staff impact an individual's experience?
- If device users have a negative experience in using mobility devices on a bus, tram or train, what mechanisms are in place to report the incident to industry or jurisdictions?

Questions for operators and providers of public transport

- Which option do you prefer: non-regulatory or status quo?
- What has been your experience in facilitating travel of mobility devices and carers for people using a device on the network?
- What mobility device restraining systems are used on your public transport conveyances?
    - 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?
- What technical barriers or difficulties do you experience in implementing solutions which prevent tipping of mobility devices in both existing and new fleet?

- 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?
- What alternative mitigations have you implemented to address the risks associated with mobility aids tipping or sliding out of allocated spaces while in transit?
- Have mobility device users on your public transport conveyances had accidents where the device has slipped or toppled over?
    - What methodologies have been implemented to minimise or reduce the likelihood of further incidents occurring?

Chapter 6: Priority seating

6.1 Nature and extent of the problem

Section 31.1 of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) requires public transport operators and providers to provide at least two priority seats on conveyances for 'passengers with disabilities and other groups in need of special assistance'.

The size of the cohort referred to in section 31.1 is substantial and is increasing as the population ages. Many in the public transport industry and the disability community have raised that the current Transport Standards requirements are inadequate. Providing a sufficient proportion of conveyance seating as priority seating is considered necessary to ensure access to public transport for those in need.

6.2 Outcome to be achieved

The minimum number of priority seats should be revised to reflect conveyance capacity, that is, the number of passengers the conveyances can accommodate. Most jurisdictions offer well in excess of the current minimum of two priority seats per conveyance and the appropriate proportion of priority seats should therefore be revised.

The Transport Standards should also provide further guidance on the placement and identification of priority seating. Priority seating should either be clustered as close to entrance doors and accessible facilities as practicable or to a consistently staffed location.

The value of priority seating colour and luminance contrasting with other seating in the conveyance to assist in its identification should also be explored.

Some operators provide, in addition to colour and luminance contrast, priority seats that are identified by signs having raised symbols, tactile text and braille equivalent. These signs are located immediately adjacent to the priority seating or as close as practicable.

In instances where passengers refuse to vacate priority seating, operators should be aware of their responsibilities and powers.

The use of fold-up seats for additional priority seats, in addition to the minimum number of compliant fixed seats, should be explored. Priority seats should be static rather than folding and should not impede access to allocated spaces.

Priority seats should have armrests on at least one side if practicable. This permits people who are frail or unsteady to rise or sit with greater support. The value of a space underneath priority seats that is enough to accommodate assistance dogs should also be explored.

6.3 Policy options to address the problem

Status quo

No change is made to the current Transport Standards or Transport Standards Guidelines text. Section 31.1 states the minimum number of priority seats required in various conveyances.

Non regulatory option

New guidance material on good practice designs for priority seats would be inserted into the Commonwealth's *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide).

The chapter would provide context and expanded informative material for priority seats. It also aims to further qualify the essential performance requirements that link together various Transport Standards elements to ensure a continuous accessible journey. This is relevant not only to priority seating, but to all the parts of the public transport environment.

Currently, the Whole Journey Guide only provides cursory description of priority seats and their availability. The following information is proposed as guidance material:

Priority seating

1. Number of priority seats per conveyance

Priority seating for passengers with disabilities and other people benefitting from priority seating, such as seniors and pregnant women, should be provided as a ratio of a conveyance's safe maximum passenger capacity.

Option 1 — For every 20 passengers or part thereof, one priority seat should be provided. Passenger capacity includes both seated and standing passengers. Minimum provision for conveyances should be two priority seats.

Option 2 — Not less than 5% of the passenger capacity should be provided. Passenger capacity includes both seated and standing passengers. Minimum provision for conveyances should be two priority seats.

Option 3 — For every 20 seats or part thereof, one priority seat should be provide to ensure that eligible passengers can access a priority seat without difficulty. Minimum provision for conveyances should be two priority seats.

Option 4 — A minimum number of priority seats should be provided to ensure that eligible passengers can access a priority seat without difficulty. Minimum provision for conveyances should be two priority seats.

2. Location of priority seats in a conveyance

Priority seating should be clustered as close as possible to either:

- entrance doors and accessible facilities; or
- the driver or a consistently staffed location.

3. Identification of priority seats

Priority seating should be identified by signs and have a minimum of 30% colour and luminance contrast with other seating in the conveyance. The contrast may include the entire chair or be limited to the upholstery.

Signage for priority seating should:

- have raised symbols, tactile text and braille equivalent.
- be located immediately adjacent or as close as possible to the priority seating.
- have 30% colour and luminance contrast with background surface.
- instruct passengers to vacate an identified priority seat if a passenger with a disability requires it.

4. Identification of passengers eligible for priority seats

Operators or providers may choose to issue people eligible for priority seating with a form of identification such as a lanyard. Passengers should not be obliged to participate in the identification program and their eligibility for priority seating should not be affected by non-participation.

5. Penalties for failing to vacate priority seats on request

State regulators may choose to issue penalties to passengers who refuse to vacate priority seats on operators' request.

6. Use of folding seats in allocated spaces as priority seats

Operators may choose to permit the use of folding seats in allocated spaces as priority seats if the designated priority seats are legitimately occupied. This use should not disadvantage passengers using mobility aids who legitimately occupy or require access to the allocated space.

7. Accommodation of assistance animals

Assistance animals should always travel with their handlers. A space underneath priority seats that is sufficient to accommodate standard sized assistance animals should be available.

6.4 Regulatory option

The Transport Standards is amended to provide a balance of prescriptive and performance requirements for priority seats in conveyances. The Transport Standards Guidelines would be updated to reflect the Transport Standards amendments.

The outcomes would be separated into prescriptive elements and performance-based and advisory elements. The prescriptive elements would be included in the Transport Standards, where compliance would be mandatory, and the performance-based and advisory elements would be incorporated and expanded upon in the Transport Standards Guidelines, which would be at the discretion of the transport operators and providers to implement.

Prescriptive elements to be inserted in the Transport Standards

1. Number of priority seats per conveyance

Priority seating for passengers with disabilities and other people benefitting from priority seating, such as seniors and pregnant women, must be provided as a ratio of a conveyance's safe maximum passenger capacity.

2. Location of priority seats in a conveyance

Priority seating must be clustered as close as possible to either:

- entrance doors and accessible facilities, or
- the driver or a consistently staffed location.

3. Identification of priority seats

Priority seating must be identified by signs and have a minimum of 30% colour and luminance contrast with other seating in the conveyance. The contrast may include the entire chair or be limited to the upholstery.

Signage for priority seating must:

- have raised symbols, tactile text and braille equivalent
- be located immediately adjacent or as close as possible to the priority seating
- have 30% colour and luminance contrast with background surface; and

- instruct passengers to vacate an identified priority seat if a passenger with a disability requires it.

4. Accommodation of assistance animals

Assistance animals must always travel with their handlers. A space underneath priority seats that is sufficient to accommodate standard sized assistance animals must therefore be available.

Four sub-options for determining the ratio have been identified:

Option 1—For every 20 passengers or part thereof, one priority seat must be provided. Passenger capacity includes both seated and standing passengers. Minimum provision for conveyances must be two priority seats.

Option 2—Not less than 5% of the passenger capacity must be provided. Passenger capacity includes both seated and standing passengers. Minimum provision for conveyances must be two priority seats.

Option 3 – For every 20 seats or part thereof, one priority seat must be provide to ensure that eligible passengers can access a priority seat without difficulty. Minimum provision for conveyances must be two priority seats.

Option 4 – A minimum number of priority seats must be provided to ensure that eligible passengers can access a priority seat without difficulty. Minimum provision for conveyances must be two priority seats.

Performance based and advisory elements to be inserted in the Transport Standards Guidelines

The Transport Standards Guidelines would include:

1. Identification of passengers eligible for priority seats

Operators or providers may choose to issue people eligible for priority seating with a form of identification. Passengers should not be obliged to participate in the identification regime and their eligibility for priority seating should not be affected by non-participation.

2. Penalties for failing to vacate priority seats on request

State regulators may choose to issue penalties to passengers who refuse to vacate priority seats on operators' request.

3. Use of folding seats in allocated spaces as priority seats

Operators may only use folding seats for priority seating in allocated spaces if:

- the folding seats do not disadvantage passengers using mobility aids who require the use of allocates spaces; and
- the minimum number of priority seats are provided as fixed seats elsewhere in the conveyance.

6.5 Impact analysis

Status quo option

Costs

The cost would be a lost opportunity to allocate an appropriate proportion of priority seats per conveyance. Qualitatively, this may result in suboptimal outcomes in some conveyances where only the minimum required priority seats were provided and a lack of consistency between operators and providers. The opportunity to better identify the priority seats and accommodate assistance animals, would also be forgone.

Benefits

No status quo benefits are obvious beyond the current Transport Standards requirements.

Non-regulatory option

Costs

Complying with the Whole Journey Guide is at the discretion of the operator or provider and is not mandatory. As the guidance in the Whole Journey Guide is not enforceable, operators and providers may choose to not implement suggested changes. This may result in fewer priority seats available for people who require them, disincentivising people with disability to travel on public transport and a national consistency of priority seating may not achieved. No qualitative costs for passengers are apparent for the non-regulatory option.

Benefits

Availability of priority seats on unbooked services for passengers who are eligible to use them would be maximised. For operators and providers, the adoption of the outcomes would provide enhanced certainty that their priority seat numbers and use meet both the Transport Standards requirements and public expectation.

Meeting the proposed guidance material is not envisaged to disadvantage passengers who do not require the use of priority seats.

Regulatory option

Costs

As changes to the allocation of priority seating will be mandatory, providers and operators who do not already comply with the priority seating arrangements are likely to incur upfront costs to install necessary seating. Costs above minimum compliance with the current Transport Standards need to be obtained. Furthermore, the unjustifiable hardship provisions in Transport Standards will impose a cost ceiling that will vary between projects, operators and providers.

Some providers and operators have expressed challenges associated with determining the necessary number of priority seating based on passenger occupancy versus seating numbers. This is because the occupancy capacity for some conveyances, for example buses, is determined by mass and not the number of passengers on board. Additionally, passenger occupancy may differ in 'crush loads' versus 'comfortable loads'.

Benefits

As changes to the allocation of priority seating will be mandatory, availability of priority seats on unbooked services for passengers who are eligible to use them would be expanded. For operators and providers, the proposed changes to the Transport Standards would provide certainty as well as national consistency that the priority seat numbers will meet both the legislative requirements and public expectation.

People with disability are able to access an increased number of priority seating on public transport conveyances. This will result in increased participation in society and community life as well as increased confidence in using public transport.

Clearer signage and luminance contrast will also improve clarity for users of public transport and it is likely that this will have a positive impact on people ensuring priority seating is made available for people with disability or those who require it.

6.6 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the number of priority seats in the regulatory option, do you prefer: option 1, option 2, option 3 or option 4?
- What experiences do people with disability have in identifying, reaching and accessing priority seats on conveyances (buses, trains, trams)?
- Section 31.1 of the Transport Standards currently requires two priority seats for each public transport conveyance. Is this number appropriate? If not, what would be a reasonable number of priority seats to be provided?
    - How will an increase in the number of priority seats change an individual's experience of public transport?
- What are the benefits and challenges of people with disability wearing identification so that public transport staff and other passengers could recognise and allow them access to priority seats?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the number of priority seats in the regulatory option, do you prefer: option 1, option 2, option 3 or option 4?
- How many priority seats are provided on your conveyances?
    - 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)?
- If you have or were to install additional priority seats, what upfront and ongoing costs associated would you incur?

    - How will this impact associated operational issues?
- 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?
    - What upfront or ongoing costs would you incur?
    - What benefits would be achieved?
- How do you address circumstances where an individual refuses to vacate a priority seat for a person with a disability?

Chapter 7: Allocated spaces in transit

7.1 Nature and extent of the problem

Passengers who use mobility aids are dependent on the availability and accessibility of allocated spaces in public transport conveyances to undertake public transport journeys.

Allocated spaces are provided on the understanding that people with mobility aids have priority access to them. In order to ensure maximum access to mobility aid users, access paths, manoeuvring areas and allocated spaces are required to be as clear and functional as practicable.

Further clarity is also needed to ensure that operators provide signs and/or inform customers that allocated spaces are priority for people using mobility aids.

Some of the key issues include:

- The existing definition of 'allocated space' in the Transport Standards makes clear that the space is three-dimensional. Length and breadth are adequately dealt with, as are operator responsibilities where these cannot be achieved, but no mention is made of the vertical dimension, except for those prescribed for wheelchair accessible taxis (not included in this proposal).
- Allocated spaces are not exclusively reserved for mobility aids. Rather, they are simply provided on the understanding that people who have a disability are given priority access to them.
- In some instances, fold down seats, vertical stanchions and other fixtures intrude into the clear vertical space above the allocated space as marked on the conveyance or rail car floor. These intrusions effectively reduce the space available within the allocated space. While these fixtures are validly located immediately adjacent to the allocated space, they should not intrude into its vertical space.
- Only a horizontal grabrail at 800-900 mm above floor and a vertical forward excursion barrier (FEB) – commonly referred to as an 'ironing board' – of 250-280 mm width (centrally located at the front of the allocated space) are allowed to intrude in the vertical space.
- Compliant width access paths can become blocked by standing passengers and objects at peak times.

7.2 Outcome to be achieved

Access paths, manoeuvring areas and allocated spaces should have a vertical dimension that extends to the ceiling or roof of the conveyance or rail car.

Access paths, manoeuvring areas and allocated spaces should be co-located to the maximum extent possible.

Objects and fixtures, other than those designed to contain movement of a mobility aid and overhead handrails and hand grips provided for the safety of standing passengers, should not protrude into the three-dimensional allocated space, manoeuvring area or access path. Clear access paths as per Part 2.5 of the Transport Standards should also be required for access paths in Part 2.6.

If allocated spaces are consolidated, the access path leading to each space and the associated manoeuvring area for each should not be compromised. It is recommended that the Transport Standards should state more clearly that operators are to provide signs in allocated spaces and/or inform customers that allocated spaces are priority spaces for people using mobility aids in the same manner that they must inform passengers about priority seats.

In order to make it clearer that allocated spaces enjoy the same priority for passengers with a disability it is recommended to include them in the title of the Transport Standards Part 31.2 or to give them their own section in the Transport Standards Part 30.

7.3 Policy options to address the problem

Status quo

The Transport Standards requirements for access paths, manoeuvring spaces and allocated spaces in conveyances remain unchanged.

No change is made to the current Transport Standards text and no new guidance issued. Transport Standards Sections 1.11, 2.6, 2.7, 2.8, 8.7, 9.1, 9.7, 11.7, and 31.2, and Transport Standards Guidelines Sections 2.2, 2.3, 3.1, 3.2, 9.1, 9.2 and 9.3 will remain unchanged.

The Transport Standards currently covers conveyance allocated spaces in Sections 1.11, 9.1 and 9.7 and fixtures associated with conveyance allocated spaces in Sections 8.7 and 11.7.

Allocated spaces are acknowledged as three dimensional in the Transport Standards Section 1.11.

1.11 Allocated space

An allocated space is a three-dimensional space that can accommodate a wheelchair or similar mobility aid.

Horizontal dimensions are stipulated in the Transport Standards Section 9.1.

9.1 Minimum size for allocated space

The minimum allocated space for a single wheelchair or similar mobility aid is 800 mm by 1300 mm (AS1428.2 (1992) Clause 6.1, Clear floor or ground space for a stationary wheelchair).

Conveyances

except dedicated school buses and small aircraft

Consolidation of allocated spaces is encouraged in the Transport Standards Part 9.7.

9.7 Consolidation of allocated spaces

If possible, allocated spaces are to be consolidated to accommodate larger mobility aids.

Conveyances

Buses, except dedicated school buses

Ferries

Trains

Trams

Light rail

Objects permitted to intrude into an allocated space are detailed in the Transport Standards Sections 8.7 and 11.7.

8.7 Signals requesting use of boarding device

(1) Any signal for requesting the deployment of a boarding device must be located in an allocated space.

(2) If possible, a signal is to be placed according to the dimensions given in AS1428.2 (1992) Clause 11.4, Call buttons.

Conveyances

Buses, except dedicated school buses

Ferries

Trains

Trams

Light rail

11.7 Grabrails to be provided in allocated spaces

Grabrails that comply with AS1428.2 (1992) Clause 10.2, Grabrails, must be provided in all allocated spaces.

Conveyances

Buses, except dedicated school buses

Ferries

Trains

Trams

Light rail

The Transport Standards Guidelines touch lightly on allocated spaces in Section 9.2.

9.2 Buses

(5) The 'allocated' spaces may be used for other purposes. For example, if an allocated space is not required by a passenger with a disability, folding seats may be used to convert the allocated space to general seating.

The Transport Standards currently covers conveyance access paths in Sections 2.6, 2.7 and 2.8.

2.6 Access paths — conveyances

(1) Subject to subsection (3) and section 2.7, an access path that allows continuous and unhindered passage must be provided with a minimum width of at least 850 mm.

(2) Subsection (1) applies to doorways and stairs, and between entrances, exits, allocated spaces and other essential facilities for passengers using wheelchairs and other mobility aids.

(3) If the conveyance exists or is ordered before the commencement of this section, the minimum width may be reduced to 800 mm at any doorway restriction.

Conveyances

Buses

Ferries

Trains

Trams

Light rail

2.7 Minimum width between front wheel arches of bus

Between the front wheel arches of a bus, the minimum width of an access path may be reduced to 750 mm between floor level and a height of 300 mm.

2.8 Extent of path

(1) An access path must extend from the entrance of a conveyance to the facilities or designated spaces provided for passengers with disabilities.

(2) Up to 50 mm of an adjacent allocated space may be used as part of the access path.

(3) If an access path cannot be provided, the operator must provide equivalent access by direct assistance.

Conveyances

Buses

Ferries

Trains

Trams

Light rail

The Transport Standards Guidelines currently offer little advice for access paths on conveyances in Part 2, Access paths, as the emphasis is on Infrastructure and Premises.

2.2 Avoidance of hazards on access paths

Operators should avoid hazards created by poles, columns, stanchions, bollards and fixtures alongside access paths. For example, operators and providers should avoid the use of short posts to prevent delivery vehicles from driving onto parts of pedestrian areas. Similarly, they should avoid having commercial signs projecting from walls or portable 'sandwich' advertising boards.

Crowding in access paths is acknowledged, but clearing of the path when required is assumed:

2.3 Use for other purposes

Access paths are often used for other purposes, such as standing areas, but it is expected that passengers will be able to transit them and that they will be cleared for people with disabilities when required.

Priority use of allocated spaces is dealt with in the Transport Standards Section 31.2.

31.2 Information to be provided about vacating priority seating

Operators must inform all relevant passengers (by signage or similar systems) that they should vacate an identified priority seat or allocated space if a passenger with a disability requires it.

Conveyances

Buses

Ferries

Trains

Trams

Light rail

The Transport Standards Guidelines give operators an understanding of the assumption underlying section 31.2 in the Transport Standards, but no direct advice on how to inform passengers.

31.2 Vacating priority seats

The Disability Standards assume that operators will ensure that relevant passengers are informed of the need to vacate priority seats and spaces for people with disability.

The Transport Standards covers manoeuvring areas in conveyances in section 3.2.

3.2 Access for passengers in wheelchairs

(1) Passengers in wheelchairs or mobility aids must be able to enter and exit a conveyance and position their aids in the allocated space.

(2) If this is not practicable, operators must provide equivalent access by direct assistance.

Note See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

Conveyances

Buses, except dedicated school buses

Ferries

Accessible rail cars

Accessible tram cars

Accessible light rail cars

Guidance on manoeuvring spaces is provided in the Transport Standards Guidelines sections 3.1, 3.2, 9.1, and 9.3:

3.1 General

(1) The Disability Standards recognise that the space restrictions and design limitations of many conveyances can inhibit the movement of passengers using mobility aids such as manual and powered wheelchairs, scooters, walkers, braces, artificial limbs, canes and crutches. These design limitations include driver location, engine position and roof height restrictions.

(2) However, it is the intent of the Disability Standards to ensure that passengers of that kind can gain independent access.

(3) The Disability Standards therefore outline in performance terms how operators are to accommodate people using mobility aids.

3.2 Use for other purposes

Manoeuvring areas may be used for other temporary purposes, such as fare payment, as long as they remain available for use, if required, by passengers using mobility aids.

9.1 Assumptions underlying Disability Standards

(3) Mobility aid users may not be able to enter or exit an allocated space in a single manoeuvre, given the internal configurations of a conveyance.

9.3 Minimum dimensions

(3) It is strongly recommended that operators and providers offer additional area in allocated spaces, particularly extra length, and ensure that manoeuvring areas involving awkward angles of approach are provided similar consideration.

Non-regulatory option

A guidance chapter on good practice designs and performance requirements for access paths, manoeuvring spaces and allocated spaces in conveyances would be inserted into *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys (*the Whole Journey Guide*)*.

The Whole Journey Guide encourages policy makers, planners, designers, builders, certifiers and operators to think beyond compliance and the physical and governance boundaries of services and infrastructure and focus instead on people's accessibility needs across their whole journey.

The option would see no change to the current Transport Standards Sections 1.11, 2.6, 2.7, 2.8, 8.7, 9.1, 9.7, 11.7, and 31.2. Change would be limited to the Whole Journey Guide.

The Transport Standards Guidelines currently offer some guidance on access paths, manoeuvring spaces and allocated spaces in conveyances design in Sections 2.2, 2.3, 3.1, 3.2, 9.1, 9.2 and 9.3:

2.2 Avoidance of hazards on access paths

Operators should avoid hazards created by poles, columns, stanchions, bollards and fixtures alongside access paths. For example, operators and providers should avoid the use of short posts to prevent delivery vehicles from driving onto parts of pedestrian areas. Similarly, they should avoid having commercial signs projecting from walls or portable ‘sandwich’ advertising boards.

Crowding in any circumstance is acknowledged.

2.3 Use for other purposes

Access paths are often used for other purposes, such as standing areas, but it is expected that passengers will be able to transit them and that they will be cleared for people with disability when required.

Part 3 areas touches on limited manoeuvring space in conveyances:

General

(1) The Disability Standards recognise that the space restrictions and design limitations of many conveyances can inhibit the movement of passengers using mobility aids such as manual and

powered wheelchairs, scooters, walkers, braces, artificial limbs, canes and crutches. These design limitations include driver location, engine position and roof height restrictions.

(2) However, it is the intent of the Disability Standards to ensure that passengers of that kind can gain independent access.

(3) The Disability Standards therefore outline in performance terms how operators are to accommodate people using mobility aids.

3.2 Use for other purposes

Manoeuvring areas may be used for other temporary purposes, such as fare payment, as long as they remain available for use, if required, by passengers using mobility aids.

Section 9.1 also acknowledges that manoeuvring space on conveyances may be limited.

9.1 Assumptions underlying Disability Standards

(3) Mobility aid users may not be able to enter or exit an allocated space in a single manoeuvre, given the internal configurations of a conveyance.

Section 9.2(5) permits the use of folding seats in buses but neglects to state if they may intrude into the vertical space of the allocated space or may not intrude into the vertical space of the allocated space.

9.2 Buses

(5) The 'allocated' spaces may be used for other purposes. For example, if an allocated space is not required by a passenger with a disability, folding seats may be used to convert the allocated space to general seating.

Section 9.3 warns that future iterations of the Transport Standards may impose larger horizontal dimensions on allocated spaces, but is silent on vertical dimensions.

Currently the Whole Journey Guide provides minimal mention of access paths, manoeuvring spaces and allocated spaces in conveyances.

The non-regulatory option is to provide clear, concise guidance to enhance the current advice on access paths, manoeuvring spaces and allocated spaces in conveyances in the Whole Journey Guide. Aspects to be addressed include:

1. Vertical dimensions of access paths, manoeuvring areas and allocated spaces

Access paths, manoeuvring areas and allocated spaces in conveyances should have a vertical dimension that extends to the ceiling or roof of the conveyance.

2. Co-location of access paths, manoeuvring areas and allocated spaces

Access paths, manoeuvring areas and allocated spaces should be co-located to the maximum extent possible. This reduces travel distance and difficulty in sometimes crowded conveyances.

3. Objects permitted to intrude into the vertical space

Objects and fixtures should not protrude into the three-dimensional allocated space, manoeuvring area or access path. People using mobility aids or with vision impairments, as much as other passengers, can strike their heads, shoulders or arms on fixtures and fittings that intrude into the access path or allocated spaces of conveyances. They also have limited capacity to avoid these intruding objects. Limiting the objects that intrude into such spaces to essential safety fittings and communication devices will therefore enhance the safety of these passengers.

4. Manoeuvring area not to be compromised

If allocated spaces are consolidated, the access path leading to each space and the associated manoeuvring area for each should not be compromised. People using larger mobility aids appreciate the extra space for their aid afforded by consolidated allocated spaces. Operators and providers should therefore acknowledge the larger aids by not compromising access path or manoeuvring area dimensions in the allocated space consolidation design.

5. Informing other passengers of allocated space priority

Operators should clearly state through signs in allocated spaces and/or informing and educating other passengers that allocated spaces are priority spaces for people using mobility aids. Conflict over use of these allocated spaces is reduced if all passengers are aware of the function and intent of the allocated space. State regulators may choose to issue penalties to passengers who refuse to vacate allocated spaces on operators' request.

6. Use of allocated space for other purposes

An allocated space may be used for other purposes if it is not required for use by a passenger in a wheelchair or similar mobility aid. This includes the use of fold down seats, which may occupy the vertical space when folded down and occupied by seated passengers.

7. Continuous accessible journey

Accessible access paths, manoeuvring spaces and allocated spaces in conveyances are links in the chain of access paths that need to be travelled during a public transport journey. A broken link in the chain may prevent a successful journey. Designers should be aware that their work affects entire journeys when dealing with challenging local constraints.

8. Anticipating future demand

Operators and providers should at all times anticipate the future demand likely to be placed on public transport assets. Conveyances often have service lives extending over many decades. The demand over the expected life of the asset should therefore be the benchmark used when estimating space required to accommodate the mobility aids of an ageing population.

Utilising guidance in the Whole Journey Guide is at the discretion of the operator or provider.

The intended outcome is to enhance the current advice in Sections 2.2, 2.3, 3.1, 3.2, 9.1, 9.2 and 9.3 to give clear, concise guidance on the accessibility and clearance requirements for access paths, manoeuvring areas and allocated spaces in conveyances.

Regulatory option

The Transport Standards are amended to provide a balance of mandatory prescriptive and performance requirements for access paths, manoeuvring areas and allocated spaces in conveyances. The Transport Standards Guidelines would be updated to reflect and provide advice concerning the new regulatory requirements.

The option would see no change to the current Transport Standards Sections 1.11, 2.6, 2.7, 2.8, 8.7, 9.1, 9.7, 11.7, and 31.2, or the Transport Standards Guidelines Sections 2.2, 2.3, 3.1, 3.2, 9.1, 9.2 and 9.3. The outcomes to be achieved would be separated into the Transport Standards prescriptive elements, the Transport Standards performance-based elements and the Transport Standards Guidelines.

Prescriptive elements to be inserted in the Transport Standards

1. Vertical dimensions of access paths, manoeuvring areas and allocated spaces

Access paths, manoeuvring areas and allocated spaces in conveyances are three-dimensional spaces and must have a vertical dimension that extends unobstructed for at least 1500 mm above the floor or deck.

2. Access path 'swept path' dimensions

The access path connecting the accessible entrance to the accessible features of the conveyance, and connecting those accessible features, must be maintained as an 850 mm wide 'swept path'.

This 'swept path' may be relaxed to 750 mm between floor level and a height of 300 mm between the wheel arches of a low floor bus. The front wheel arches of the bus are the area forward and rearward of the axle that contains the front road wheels plus any supporting chassis structure.

3. Objects permitted to intrude into the vertical space

Objects and fixtures must not protrude into the three-dimensional allocated space, manoeuvring area or access path, except for specified items.

4. Use of allocated space for other purposes

An allocated space may be used for other purposes if it is not required for use by a passenger in a wheelchair or similar mobility aid. This includes the use of fold down seats, which may occupy the vertical space when folded down and occupied by seated passengers.

Four sub-options have been identified for the specified items that can intrude into the vertical space:

Sub-option 1—allocated space grab rails, a signal for requesting the deployment of a boarding device or overhead handrails and hand grips provided for the safety of standing passengers.

Sub-option 2—allocated space grab rails, a signal for requesting the deployment of a boarding device, overhead handrails and hand grips provided for the safety of standing passengers, or forward excursion barriers (ironing boards) complying with AS/NZS ISO 10865.1-2015.[22]

Sub-option 3—allocated space grab rails, a signal for requesting the deployment of a boarding device, overhead handrails and hand grips provided for the safety of standing passengers, or forward excursion barriers (ironing boards) and lateral excursion barriers[23] complying with AS/NZS ISO 10865.1-2015.

Sub-option 4 — any controls, grab rails, passive restraints or safety devices intended for use by any occupant of an allocated space, plus any safely located air-conditioning ducts or electrical conduits conforming to Australian Design Rules that do not restrict manoeuvring or carriage of a mobility device.

Performance based element to be inserted in the Transport Standards

1. Co-location of access paths, manoeuvring areas and allocated spaces

Access paths, manoeuvring areas and allocated spaces must be co-located to the extent practicable.

[22] ASNZS ISO 10865.1-2015 Wheelchair containment and occupant retention systems for accessible transport vehicles designed for use by both sitting and standing passengers — Part 1: Systems for rearward-facing wheelchair seated passengers

[23] [23] AS/NZS ISO 10865.1:2015 (p.2) excursion barriers: structures or devices designed to prevent the wheelchair from tipping, rotating or sliding into the center aisle or vehicle wall during transport.

2. Manoeuvring area not to be compromised

If allocated spaces are consolidated, the access path leading to each space and the associated manoeuvring area for each space must not be compromised.

3. Informing other passengers of allocated space priority

Operators must clearly state through signs in allocated spaces and/or informing and educating other passengers that allocated spaces are priority spaces for people using mobility aids.

Transport Standards Guidelines

The new Transport Standards Guidelines would contain the following parts:

1. Vertical dimensions of access paths, manoeuvring areas and allocated spaces

Access paths, manoeuvring areas and allocated spaces in conveyances must have a vertical dimension that extends to the ceiling or roof of the conveyance. Where this is not possible, the unobstructed vertical clearance above the conveyance floor must not be less than 1500 mm.

2. Co-location of access paths, manoeuvring areas and allocated spaces

Access paths, manoeuvring areas and allocated spaces must be co-located to the maximum extent possible. This reduces travel distance and difficulty in sometimes crowded conveyances.

3. Objects permitted to intrude into the vertical space

Objects and fixtures must not protrude into the three-dimensional allocated space, manoeuvring area or access path. People using mobility aids or with vision impairments, as much as other passengers, can strike their heads, shoulders or arms on fixtures and fittings that intrude into the access path or allocated spaces of conveyances. They also have limited capacity to avoid these intruding objects. Limiting the objects that intrude into such spaces to essential safety fittings and communication devices will therefore enhance the safety of these passengers.

4. Manoeuvring area not to be compromised

If allocated spaces are consolidated, the access path leading to each space and the associated manoeuvring area for each must not be compromised. People using larger mobility aids appreciate the extra space for their aid afforded by consolidated allocated spaces. Operators and providers must therefore acknowledge the larger aids by not compromising access path or manoeuvring area dimensions in the allocated space consolidation design.

5. Informing other passengers of allocated space priority

Operators must clearly state through signs in allocated spaces and/or informing and educating other passengers that allocated spaces are priority spaces for people using mobility aids. Conflict over use of these allocated spaces is reduced if all passengers are aware of the function and intent of the allocated space. State regulators may choose to issue penalties to passengers who refuse to vacate priority seats on operators' request.

6. Continuous accessible journey

Accessible access paths, manoeuvring spaces and allocated spaces in conveyances are links in the chain of access paths that need to be travelled during a public transport journey. A broken link in the chain may prevent a successful journey. Designers should be aware that their work affects entire journeys when dealing with sometimes challenging local constraints.

7. Anticipating future demand

Designers must at all times anticipate the future demand likely to be placed on public transport assets. Conveyances often have service lives extending over many decades. The demand over the expected life of the asset must therefore be the benchmark used when estimating space required to accommodate the mobility aids of an aging population.

The intended outcome is to introduce regulations in the Transport Standards and advice in the Transport Standards Guidelines that enhance the accessibility and safety of access paths, manoeuvring spaces and allocated spaces in conveyances.

7.4 Impact analysis

Status quo

Costs

The cost would be a lost opportunity to better define the nature, design and performance required for allocated spaces on conveyances and the access paths and manoeuvring areas associated with them. Qualitatively, this may result in suboptimal outcomes in some conveyances and a lack of consistency between jurisdictions and projects.

As there are no changes, costs in terms of design, fit out and maintenance will remain unchanged.

Benefits

No status quo benefits are obvious beyond the current Transport Standards benefits of the performance and prescriptive requirements.

As there are no changes to the status quo, benefits in terms of design, fit out and maintenance will remain unchanged.

Non-regulatory option

Costs

For operators and providers, the design process may become initially more onerous and expensive, but when accustomed to the new regime these costs are expected to diminish.

Initial consultation indicates that any changes to the prescriptive requirements of allocated spaces and access paths has the potential to impact operators and providers. If any reconfiguration is required, including relocation of articles such as tickets machines, this may cause a financial impact. Retrofitting may be limited to small changes such as repainting of the borders of allocated spaces or moving a hand rail, right through to relocating ticketing systems, and as such costs would be comparative to the level and complexity of retrofit required. Consideration would also need to be given to the impact of taking conveyances off the network whilst retrofitting is completed, which will also have financial impact and impact on the provision of services.

Benefits

Any operator or provider who constructs access paths, manoeuvring spaces and allocated spaces in conveyances in accordance with the guidance would ensure that conveyance accessibility would be maximised for passengers who have mobility impairments, as well as increased public confidence in the accountability of transport operators and providers.

The Whole Journey Guide provides context for and further qualifies the essential performance requirements that link together the various Transport Standards elements to ensure a continuous accessible journey. This is relevant not only to access paths, manoeuvring areas and allocated spaces in conveyances, but to all the parts of the public transport environment.

Regulatory option

Costs

Some jurisdictions are currently ensuring that access paths, manoeuvring areas and allocated spaces in conveyances meet the proposed regulatory option.

Whatever the full cost of meeting the outcomes might be, the Unjustifiable Hardship provisions listed in the Transport Standards will impose a cost ceiling that will vary from project to project and between operators and providers.

For operators and providers, the design and initial vehicle fit out process may become initially more onerous but when accustomed to the new regime, these costs are expected to diminish.

No quantitative costs for passengers are apparent.

Benefits

Accessibility of access paths, manoeuvring areas and allocated spaces in conveyances would be maximised and made nationally consistent to the extent possible. For operators and providers, the regulatory option would ensure that conveyance accessibility would be maximised for passengers who have mobility impairments, as well as increased public confidence in the accountability of transport operators and providers.

Other benefits may possibly be derived in relation to ensuring people with disability can access allocated spaces on public transport, resulting in increased participation in the workforce and community life.

7.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?
- What experiences do people with disability have in accessing allocated spaces on conveyances from the entry door?
    - What are the challenges people with disability face when accessing the allocated space (for example do objects project or protrude into the access path or is there enough space to permit turning into an allocated space)?
    - How will changes to requirements around access paths, manoeuvring areas and allocated spaces in conveyances affect individual's public transport experience?
- What are the experiences of people with disability where allocated spaces are occupied by people who do not vacate?
    - How have public transport operators responded to such circumstances?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, which sub-option do you prefer: option 1, option 2, option 3 or option 4?
- Given the current requirements for allocated spaces what is your experience in the customer use of these facilities?
- 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?
- What upfront and ongoing costs would you incur if these changes became mandatory?
- How do you address circumstances where an individual refuses to vacate an allocated seat for a person with a disability?

Chapter 8: Digital information screens

8.1 Nature and extent of the problem

In today's modern transport systems, public transport operators and providers are shifting to digital, dynamic systems which are often large and display detailed information to multiple users simultaneously. Increasingly, operators and providers are utilising digital information channels to provide static and dynamic information to customers. This allows operators and providers flexibility in the messaging they deliver compared to traditional signage formats.

The Transport Standards were developed on the assumption that all signage was small, static, involving limited information content and requiring external illumination. As digital display technology has been widely adopted since the introduction of the Transport Standards, there is often ambiguity and uncertainty around what is required to be delivered in order to meet the needs of people with disability or what is compliant with the Transport Standards. Additionally, there are requirements which are clear, but considered to be inappropriate or technically unfeasible when applied to digital displays. These concerns have been reflected in public submissions to reviews of the Transport Standards.

Whilst static signage continues to be relevant, particularly for the vision impaired who require Braille or tactile elements, the current Transport Standards do not consider digital displays.

8.2 The outcome to be achieved

Modernisation of the Transport Standards should include provisions and guidance for digital displays that specifically provide for the requirements of people with disability. The relevant Transport Standards section needs to differentiate static traditional signage formats, dynamic information provided through digital displays and information provided through traditional web based systems and applications. The new section will also consider the varying types of digital displays available (for example LED screens) as well as basic principles around heights and contrast requirements.

8.3 Policy options to address the problem

Status quo

Transport Standards requirements for static signs remain unchanged and will remain silent in relation to modern digital displays.

Furthermore, the relevant Transport Standards references below relate to static signs and are not always applicable for digital displays:

> **16.1 International symbols for accessibility and deafness**
>
> (1) The international symbols for accessibility and deafness (AS1428.1 (2001) Clause 14.2, International symbol and Clause 14.3, International symbol for deafness) must be used to identify an access path and which facilities and boarding points are accessible.
>
> (2) The colours prescribed in AS1428.1 (2001) Clause 14.2 (c) are not mandatory.
>
> (3) The size of accessibility symbols must comply with AS1428.2 (1992) Table 1.
>
> **16.2 Compliance with AS2899.1 (1986)**
>
> The illustrations and symbols prescribed in AS2899.1 (1986) must be used if applicable.

17.1 Height and illumination

Signs must comply with AS1428.2 (1992) Clause 17.1, Signs, Clause 17.2, Height of letters in signs and Clause 17.3, Illumination of signs and Figure 30.

17.2 Location — premises and infrastructure

Signs must be placed according to AS1428.2 (1992) Clause 17.4, Location of signs.

17.3 Location — conveyances

(1) If possible, signs are to be placed in accordance with AS1428.2 (1992) Clause 17.4, Location of signs and Figure 30.

(2) If the design of the conveyance prevents strict compliance, signs must be placed above the head height of passengers, whether they are sitting or standing.

(3) If used, destination signs must be placed above the windscreen.

17.4 Destination signs to be visible from boarding point

(1) Destination signs must be visible from, or available at, boarding points.

(2) They may be displayed on the conveyance or within the premises or infrastructure.

17.5 Electronic notices

(1) Presentations of words or numbers on electronic notices must be visible for at least 10 seconds, unless the electronic notice is for the purpose of ticket validation.

(2) If the electronic notice is for this purpose, the words or numbers on the notice must cease to be visible before the end of 10 seconds if the ticket validation device is used by another person within that time.

Non-regulatory option

The non-regulatory option involves updating *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide) to provide guidance on digital information screens and design considerations.

Content will be added to the Whole Journey Guide to recommend particular requirements in the design of digital screens. This would include recommendations and/or guidance on screen brightness, glare, location, font and typeface, polarisation of screens and information scrolling requirements.

For example, where digital screens are installed:

- Luminance – information provided on screens should consider contrast requirements of text and luminance of the screen.
- Glare – the location of digital information display screens should take into consideration environmental factors such as glare to ensure legibility of screens during different periods during the day. Design considerations of screen housings should minimise the impact of glare.

- Location – digital information display screens should consider the location where people are likely to wait for services or where they can be visible during transit in comfortable common viewing zones. Further, they should consider the customer crowding levels expected at each location. Screens should be visible from nominated accessible boarding points and waiting areas.
- Font and typeface – similar to requirements for static signage, fonts and typeface should consider viewing distance and should be sans serif typeface. Outputs and design elements should consider colour vision deficiencies and reduced vision acuity requirements.
- Polarisation - displays should be readable in the designed orientation whilst wearing polarised eyeglasses.
- Scrolling requirements – to remain visible for 10 seconds unless it is for ticket validation purposes (existing requirement in Transport Standards).

The requirements should provide a clear understanding of what is expected to assist in the provision of information to make it legible and accessible. The guidance should reflect changes in technology and would provide flexibility to allow for future technological development.

The Whole Journey Guide would also benefit from the inclusion of referencing AS EN 301 549:2016 - accessibility requirements suitable for public procurement of ICT products and services. It is intended for use by public authorities and other public sector bodies during procurement, to ensure that websites, software and digital devices are more accessible, so they can be used by persons with a wide range of abilities.

Regulatory option

The regulatory option would require the inclusion of performance requirements in the Transport Standards and Transport Standards Guidelines concerning digital screens and design requirements. This would be based on requirements prescribed in the Australian Standards 1428 suite of standards.

Section 27.1 of the Transport Standards currently provides that 'general information about transport services must be accessible to all passengers'. Where display screens are used on transport infrastructure, premises and conveyances, they must meet the following requirements:

- Luminance - The ISO standard 9241-303 Ergonomics of human-system interaction – Part 303: Requirements for electronic visual displays will apply to luminance calculation requirements.[24]
- Polarisation - displays must be readable in the designed orientation whilst wearing polarised eyeglasses.
- Location - line of sight to the display shall be maintained free of obstructions from defined viewing areas, inclusive of the display enclosure or housing.
- Font and typeface - the heights of letters given in Table 2 of AS 1428.2-1992 are interpreted as capital 'I' heights consistent with AS 1744 Standard alphabets for road signs. For viewing distances not specified in Table 2 of AS 1428.2-1992, the height (h) of letters in millimetres for arbitrary viewing distance (d) in metres is calculated as h = 3.2 x d.

[24] The requirements of section 17.3 in AS 1428.2-1992 are not applicable where light emitting displays are used (traditional luminance standard for static elements)

- Glare - display luminance shall be adjusted relative to ambient illumination to prevent discomfort and disability glare.
- Display requirements – to remain visible for 10 seconds unless for it is for ticket validation purposes (existing requirement in Transport Standards).

The Transport Standards Guidelines would be updated to reflect the new requirements and provide further guidance on their application. Specifically, guidance on:

- Location of digital screens - the recommended location of digital screens can be seen by passengers regardless of the access path they have used, and who are required to board in specific locations (e.g. designated boarding locations for passengers who require a boarding ramp).
- Display requirements – guidance will be provided on the use of the digital screens and the provision of information in multiple formats in the broader information planning process, so that passengers who are unable to read and comprehend the information on the digital screen are still able to access the information they need.

8.4 Impact analysis

Status quo

Costs

People with disability will continue to navigate through unclear requirements in the current Transport Standards surrounding digital information screen. Similarly, there will be sub-optimal outcomes for individual designers as they seek to resolve the issue on their own where there are uncertainties.

Benefits

There are no benefits in maintaining the status quo.

Non-regulatory option

Costs

Some providers and operators have indicated that the cost to update existing screen output requirements such as the appearance of the display screens is likely to be minimal as systems generally already have that capability. A one-off cost may be incurred to procure new screens, but this is relative to the screen type and size that would occur normally during procurement. However, given the non-regulatory option is not mandatory as it only seeks to update guidelines, the cost to providers and operators could be largely reduced if they choose not to amend existing screen output requirements. If providers and operators choose not to adopt suggested changes in the guidelines, there will still be uncertainty for people with disability to navigate information through digital screens.

Benefits

If guidelines are adopted, this option provides a positive benefit by providing certainty to both people with disability, as well as designers of digital screens concerning what is required. By adopting a non-mandatory option there is flexibility for future technology changes and innovation and gives operators and providers discretion in adoption. Improvements in digital information screens will also benefit the general public as they will make a passenger's trip more efficient and enjoyable.

Regulatory option

Costs

The cost to update the existing screen output requirements (for example, the appearance of the display) is considered minimal as the system generally already has that capability and would require a back end system change as opposed to changes to hardware. Upfront costs may be incurred to procure new screens, although this is relative to the screen type and size that would occur normally during procurement. One transport operator has mentioned that new public information displays costs approximately $50,000 per unit and that total compliance costs will depend on the number of screens required per location.

Benefits

This option would provide certainty as to the requirements for operators and designers of digital screens concerning requirements that are fit for purpose for people with disability. During consultation, a disability organisation identified that user-friendly digital information displays reduce anxiety. Good displays that are predictable allow users to undertake independent journeys without being required to seek direct assistance, resulting in increased confidence to continue using public transport. Improvements in digital information screens will also benefit the general public as they will make a passenger's trip more efficient and enjoyable. It will also ensure that the Transport Standards would include provisions and guidance for digital displays that are specific to meeting the needs for people with disability.

8.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How do people with disability use digital information displays at public transport sites and on public transport conveyances as part of their public transport journey?
    - How does this impact the public transport journey?
    - What experiences do people with disability have with digital information displays?
    - What display features worked well and what don't?
    - How could it be improved?
- How will digital displays with functional requirements which are user friendly for people with disability impact your likelihood or ability to use public transport?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What are the benefits for operators and providers associated with installing digital displays with functional requirements which are user friendly for people with disability?
- What are the barriers associated with installing digital displays to meet the needs of people with disability?

- 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?

- 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?

Chapter 9: Lifts

9.1 Nature and extent of the problem

The Transport Standards require lifts to comply with Australian Standard AS1735.12 (1999). This does not specify the type of lifts that can be used. Rather, AS1735.12 infers that only electric passenger lifts and electrohydraulic passenger lifts can be used for public transport premises and infrastructure, therefore limiting options available for designers. Other key issues include the size of the floor dimensions of AS1735.12 (1100 mm wide by 1400 mm deep) and inferior audible and visual indication when compared to the Premises Standards and the National Construction Code (NCC).

The Premises Standards and the NCC allow for larger lifts if they need to travel more than 12 m in height and the NCC also allows for space for a stretcher. On this basis, all lifts in public transport premises and infrastructure should allow a clear length of at least 2000mm and clear width of at least 1400 mm.

The NCC and the Premises Standards offer more lift type options for various applications that are more cost-effective than electric passenger lifts and electrohydraulic passenger lifts. Also, revising the Transport Standards to include enhanced audible and visual indication that are in the Premises Standards and the NCC will achieve harmonisation for people with disability as well as industry and designers.

In situations where a lift is the sole access path for passengers using mobility aids or who have another significant mobility impairment, the unavailability of the lift due to scheduled maintenance or unplanned repairs will result in a denial of service. The duration of the service denial will vary according to the extent of work required, the location of the lift (in either a metropolitan or regional area) and the contractual arrangements covering the lift.

9.2 Outcome to be achieved

The outcome to be achieved is to allow additional types of lifts to be used and further enhance accessible features for lifts in public transport facilities. There will also be a harmonisation of lift requirements between the Transport Standards, the Premises Standards and the NCC.

Lift maintenance and repair will be carried out in a timely manner that minimises service denial to people who have mobility impairments.

9.3 Policy options to address the problem

Status quo

The Transport Standards requirements remain unchanged without any additional lift requirements to align with the Premises Standards and NCC.

Currently lift compliance is outlined in Section 13.1 of Transport Standards:

> 13.1 **Compliance with Australian Standard – premises and infrastructure**
>
> Lift facilities must comply with AS1735.12 (1999).

Section 13.1 of the Transport Standards adopts AS1735.12 (1999) in its entirety, whereas the NCC and the Premises Standards only adopts specific parts of AS1735.12 (1999), as well as several other additional or varied access provisions.

The key discrepancy between the Transport Standards and the NCC/Premises Standards is the floor dimensions of a lift car. With the Transport Standards solely relying on AS1735.12 (1999), the minimum lift car internal dimensions for any lift needs to be 1100 mm wide by 1400 mm deep. The NCC and the Premises Standards adopt these dimensions for low rise buildings, as well as the provision of larger lift floor dimensions (1400 mm wide by 1600 mm deep) when a lift travels more than 12 m.

It is also worth noting that the NCC also allows for deeper lifts (with a clear length of 2000 mm) to accommodate a stretcher for buildings with an effective height of 12 m or more.

Aside from the lift car dimensions, generally lifts applicable under Transport Standards that comply with AS1735.12 (1999) will include more accessible features than lifts under the NCC and Premises Standards. However, there are some additional access features in the NCC and Premises Standards that are notable accessibility enhancements and are not currently included in the Transport Standards (e.g. additional audio and visual indication requirements). The discrepancy between the various standards can result in inferior accessible lifts used in public transport facilities.

The Transport Standards and Transport Standards Guidelines are silent on the matter of lifts being out of service due to maintenance or unplanned repairs.

The intention of this option is to maintain the status quo. As there is a discrepancy between the various standards that can result in inferior accessible lifts used in public transport facilities.

Non-regulatory option

Expand section 3.5.4 in *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide) to provide more specific detail on the additional lift accessibility enhancements to align with the Premises Standards and NCC to ensure best practice for accessibility.

The Whole Journey Guide encourages policy makers, planners, designers, builders, certifiers and operators to think beyond compliance and the physical and governance boundaries of services and infrastructure and focus instead on people's accessibility needs across their whole journey.

The intended outcome of this option is to enhance the current limited content in the Whole Journey Guide to give more detailed guidance on additional lift accessibility enhancements.

Specific access enhancements for lifts

To support best practice for accessibility to enhance lifts in public transport facilities and seek alignment with the Premises Standards and NCC, the following specific access provisions would be included in the Whole Journey Guide:

1. Highlight that Australian Standard AS1735.12 (1999) is the key standard adopted in the Transport Standards and recommend that the relevant sections of this standard are overridden by the following accessibility enhancements:

    (a) lift floor dimensions of not less than 1600 mm wide by a clear depth of 2000 mm to accommodate a stretcher, noting that lift sizes can be increased as necessary to meet high projected passenger numbers (AS1735.12 (1999) is currently limited to lift floor dimensions of not less than 1100 mm wide by 1400 mm deep for all lifts)

    (b) automatic audible information within a lift to identify the level (or platform) each time the car stops as per AS1735.12 (1999) for all lifts serving more than 2 levels (note that AS1735.12

(1999) is currently limited to having automatic audible information within lifts serving more than 3 levels)

(c) audible and visual indication at each lift landing to indicate the arrival of a lift car as per AS1735.12 (1999) for all lifts serving more than 2 levels (note that AS1735.12 (1999) is currently limited to having audible and visual indication at lift landings where there are three or more lifts in a bank)

(d) audible information and audible indication are provided in a range between 20 dB(A) and 80 dB(A) at a maximum frequency of 1,500 Hz (AS1735.12 (1999) is currently required to be in the range between 35 dB(A) and 55 dB(A)).

2. Allow the use of inclined lifts and small sized, low speed automatic lifts in limited applications in alignment with the NCC and the Premises Standards (lifts must not travel more than 12 m) in addition to the use of electric passenger lifts and electrohydraulic passenger lifts.

3. Lift downtime, whether for maintenance or repair, should be minimised as far as possible. Work should be scheduled for times that cause least disruption to people's travel.

Lift service contracts should state maximum acceptable downtime for scheduled maintenance and inspection work. This is particularly relevant in regional areas that do not have lift technicians or parts locally available.

When lifts are unexpectedly out of service, operators and providers should ensure that the lift is returned to service as quickly as circumstances permit. It is accepted that repairs in regional areas may take longer than in metropolitan areas, but contractual arrangements and operational procedures should be in place to minimise the downtime of the lift.

In regional areas that have no resident lift technicians, local fire and rescue service personnel who respond to passengers being trapped in stalled lifts should be trained in the safe means of extracting people without damaging the lifts. Damage to lifts during forced opening may extend the period during which the lifts are out of service.

To reduce the incidence of entrapments, lifts should be equipped with a battery backup system that provides sufficient power for a lift to proceed to the ground floor or suitable landing in the event of a power loss.

Whenever lifts are out of service operators and providers should ensure equivalent means for people reliant on the lift to continue their journey.

Regulatory option

The Transport Standards are amended to provide more specific detail on additional lift accessibility enhancements to align with the Premises Standards and NCC to ensure best practice for accessibility, as well as updating the Transport Standards Guidelines to ensure consistency with the new Transport Standards requirements.

The following specific access provisions would be included in Transport Standards:

1. Maintain Australian Standard AS1735.12 (1999) as the key standard adopted in Transport Standards and outline that the relevant sections of this standard are overridden by the following accessibility enhancements:

(a) lift floor dimensions of not less than 1600 mm wide by a clear depth of 2000 mm to accommodate a stretcher, noting that lift sizes can be increased as necessary to meet high projected passenger numbers (AS1735.12 (1999) is currently limited to lift floor dimensions of not less than 1100 mm wide by 1400 mm deep for all lifts)

(b) automatic audible information within a lift to identify the level (or platform) each time the car stops as per AS1735.12 (1999) for all lifts serving more than 2 levels (note that AS1735.12 (1999) is currently limited to having automatic audible information within lifts serving more than 3 levels)

(c) audible and visual indication at each lift landing to indicate the arrival of a lift car as per AS1735.12 (1999) for all lifts serving more than 2 levels (note that AS1735.12 (1999) is currently limited to having audible and visual indication at lift landings where there are three or more lifts in a bank)

(d) audible information and audible indication are provided in a range between 20 dB(A) and 80 dB(A) at a maximum frequency of 1,500 Hz (AS1735.12 (1999) is currently required to be in the range between 35 dB(A) and 55 dB(A)).

2. Allow the use of inclined lifts and small sized, low speed automatic lifts in limited applications in alignment with the NCC and the Premises Standards (lifts must not travel more than 12 m) in addition to the use of electric passenger lifts and electrohydraulic passenger lifts.

3. Lift downtime, whether for maintenance or repair, must be minimised as far as possible. Work should be scheduled for times that cause least disruption to people's travel.

4. Lift service contracts must state maximum acceptable downtime for scheduled maintenance and inspection work. This is particularly relevant in regional areas that do not have lift technicians or parts locally available.

5. When lifts are out of service unexpectedly, operators and providers must ensure that the lift is returned to service as quickly as circumstances permit. It is accepted that repairs in regional areas may take longer than in metropolitan areas, but contractual arrangements and operational procedures must be in place to minimise the downtime of the lift.

6. Whenever lifts are out of service operators and providers must ensure equivalent means for people reliant on the lift to continue their journey.

As part of this regulatory option, the Transport Standards Guidelines would be updated to supplement the new Transport Standards requirements. This would give context to both the detail of the regulatory option and the importance of enhanced requirements for lifts in the public transport environment.

9.4 Impact analysis

Status quo

Costs

The cost would be a lost opportunity to include more accessible enhancements to lifts in public transport facilities and align with the NCC and the Premises Standards. This may result in suboptimal outcomes and a lack of consistency between the various standards.

Although there is no data or costings sourced that supports this status quo option, there will be no change to the costs to lifts in terms of construction and maintenance.

Benefits

There are no obvious benefits with the status quo option.

Non-regulatory option

Costs

As adoption of the suggested access provisions in the Whole Journey Guide will only be discretionary for operators or providers, no national consistency of lifts can be guaranteed.

No qualitative costs for passengers are apparent. For operators and providers, the design process may become initially more onerous, but as they become more accustomed to the new design parameters, this qualitative difficulty will diminish.

Adopting this non-regulatory option is not envisaged to cause any environmental or aesthetic impacts.

Some jurisdictions are currently voluntarily installing lifts to a standard that would largely meet many of the suggested access provisions. Costs above minimum compliance with the current Transport Standards could be obtained.

As the suggested access provisions would be promoted as guidance, any extra costs imposed by meeting the outcomes would be at the discretion of the operator or provider installing the lifts.

Benefits

Any operator or provider who installs and maintains lifts as per the suggested access provisions in the Whole Journey Guide would ensure that accessibility for passengers with disabilities would be maximised, as well ensuring more consistency with the Premises Standards, the NCC and the intent of the DDA to eliminate discrimination. For operators and providers, the adoption of the proposed access provisions would provide greater certainty that their lifts comply with the current Transport Standards requirements and enhance accessibility.

Regulatory option

Costs

No qualitative costs for passengers are apparent. For operators and providers, the design process may become initially more onerous, but as they become more accustomed to the new design parameters, this qualitative difficulty will diminish.

Some jurisdictions are currently voluntarily installing lifts to a standard that would largely meet many of the suggested access provisions. Costs above minimum compliance with the current Transport Standards could be obtained.

It is envisaged that costs for new works would be minimal with difficulties expected with upgrading existing premises and infrastructure, but this is already a requirement with the current Transport Standards.

If there are particular site constraints that limit the ability to fully comply with the suggested access provisions, it is anticipated that the new Transport Standards will include performance-based options to help address these types of issues. Alternatively, if there are exceptionally difficult circumstances,

providers or operators could choose to rely on the unjustifiable hardship approach under the Transport Standards and the DDA.

Benefits

The adoption of the suggested accessibility and maintenance enhancements for lifts into the Transport Standards would ensure that accessibility for passengers with disabilities would be maximised, ensuring consistency with the DDA to eliminate discrimination, as well as the Premises Standards and the NCC. For transport operators and providers, the adoption of the proposed access provisions would provide certainty that their lifts meet the Transport Standards requirements and help to promote national consistency of lift design across public transport networks.

Where lifts are upgraded to ensure spatial dimensions can fit a stretcher, this will likely have positive health benefits for all people by improving access for health and emergency services.

9.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What experiences do people with disability have when using lifts at public transport sites?
    - What are the barriers to using lifts?
    - What are the impacts of using lifts?
    - What are some of the critical features of lifts?
- How could lifts around public transport sites be improved?
- How will these proposed changes to lift requirements affect your public transport experience?
    - How would they change your current interaction with lifts?
- What experiences do people with disability have when a lift is out of service for maintenance or repair?
    - What equivalent means of access were provided to you to continue on your journey?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- When lifts are installed what are some of the key considerations to determine the most appropriate product?
    - Do you have current lift specifications or standard designs?
    - Which standard do you currently comply with?
- What are the impacts of harmonising the Transport Standards lift requirements with those of the NCC/Premises Standards?

- 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?
- If lifts are required to be updated to align with the NCC/Premises Standards, how long will a lift be out of service?
- Do contractual lift maintenance and repair timeframes stress the fastest possible return to service?
- How can down times for lift maintenance and repairs be made equivalent in metropolitan and regional areas?
    - Where equivalence cannot be obtained, what would be a reasonable compromise timeframe for regional areas?
- What is the average response time for breakdown or entrapment in regional areas?

Chapter 10: Website accessibility

10.1 Nature and extent of the problem

Transport operators and providers are increasingly using websites and other online systems to communicate service information to customers. Generally, this can either be static information, such as general information in text form, or dynamic information such as trip planning tools. Websites allow operators and service providers to give passengers access to large amounts of information that offers a high level of flexibility unlike other information formats.

Initial consultation indicates that many people with intellectual disability have difficulty navigating websites, caused by the plethora of information displayed on screens, as well as difficulty in comprehending complex sentences, syntax and unfamiliar jargon. The current Transport Standards do not reflect industry standards concerning minimum requirements for website accessibility. Given there are different levels of accessibility, a minimum standard could be adopted to provide certainty to customers around access to information and to operators and service providers about their obligations to provide accessible information.

The *Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide) points to the need to address web content accessibility guidelines, and identifies the Website Content Accessibility Guidelines (WCAG) standard as part of the guidance on pre-journey planning. However, no specific level of WCAG compliance is identified and it is known that some service providers are currently not compliant with WCAG standards.

10.2 Address Web Content Accessibility Guidelines

Web Content Accessibility Guidelines 2.0 (WCAG) are an internationally recognised standard that documents how to make web content more accessible for people with disability. There are 12 guidelines organised under four principles: perceivable, operable, understandable and robust. Journey planning tools should meet each of these.[25]

The Australian Human Rights Commission noted in 2014:

> It has been widely recognised for over a decade that the Web Content Accessibility Guidelines (WCAG) developed by the World Wide Web Consortium (W3C) represent the most comprehensive and authoritative international benchmark for best practice in the design of accessible websites. There is still however a need for much more effort to implement accessible web design, by government, industry, and community organisations. In this context, it is noteworthy that the Australian Government, working in collaboration with the states and territories, has developed a Web Accessibility National Transition Strategy for improving the accessibility of government websites through a phased implementation of WCAG 2.0.[26]

WCAG 2.1 addresses changes to the web and how technologies can be used to enable equal access for all. These guidelines address accessibility of web content on desktops, laptops, tablets, and mobile devices. WCAG 2.1 builds on WCAG 2.0, which in turn built on WCAG 1.0, and is designed to apply broadly to

[25] Department of Infrastructure, Transport, Regional Development and Communications, (2017) The *Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys,* at https://www.infrastructure.gov.au/transport/disabilities/whole-journey/files/whole_of_journey_guide.pdf on 30 September 2020.

[26] https://humanrights.gov.au/our-work/disability-rights/world-wide-web-access-disability-discrimination-act-advisory-notes-ver

different Web technologies now and in the future, and to be testable with a combination of automated testing and human evaluation.

WCAG 2.0 AAA requirements builds upon the WCAG 2.0 AA but with more enhanced features. Some of these enhancements include:

- requirements for inclusion of Auslan interpretation when producing video content
- extended audio description and audio captioning of all multimedia
- enhanced contrast ratio requirements
- keyboard accessibility for all functions with no exceptions (for example interactive and operable components on the screen such as drop down menus)
- removal of flashing or pulsing media such as animations and additional explanations in simplified English for people with lower literacy levels (similar to Easy English requirements).

10.3 The outcome to be achieved

The objective of this change is to ensure that provision of information through websites is captured under the Transport Standards. The insertion of a section into the Transport Standards in relation to information provision should outline minimum requirements that websites should adopt in order to consider them accessible.

WCAG 2.0 has been developed by the W3C and provides recommendations for making web content accessible to a wide range of disabilities, including blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity and combinations of these. Web accessibility also benefits others, including people with a temporary disability, as well as improving accessibility for all users in general.

As a minimum, all information provision through websites should meet WCAG version 2.0 Level AA requirements.

10.4 Policy options to address the problem

Status quo

No change is made to the Transport Standards or Transport Standards Guidelines.

The standard would continue to not reflect current industry standards, meaning the accessibility of various providers and operators' websites will continue to be inconsistent.

State-based and federal policy would continue to apply concerning the requirement that government websites must conform to WCAG 2.0 Level AA at the minimum level.

Non-regulatory option

This option would see the current guidance on web content accessibility in the Whole Journey Guide expanded to include advice from the Australian Government on minimum website design. The guidance would recommend that the minimum level of WCAG compliance a transport provider or operator is

WCAG 2.0 AA with consideration for WCAG AAA for some elements of their web content where practicable. The following is an example of proposed wording in the Whole Journey Guide:

3.1 Pre-journey planning

3.1.7 Address Web Content Accessibility Guidelines (WCAG)

WCAG are an internationally recognised standard that document how to make web content more accessible for people with disability. There are 12 guidelines organised under four principles: perceivable, operable, understandable and robust. Journey planning tools should meet each of these.

Transport service providers are encourage to achieve WCAG 2.0 Level AA as a minimum to ensure content is accessible and is aligned to best practice. Where practicable service providers should also look to achieve compliance with WCAG 2.0 Level AAA, which includes enhanced features such as contrast ratios and multimedia requirements.

Government agencies should be aware of various state and federals policies that set minimum WCAG compliance requirements. For example, according the Accessibility National Transition Strategy, Australian Government agencies are required to meet the WCAG 2.0 AA requirements.

Developers should also be aware that as of June 2018, WCAG 2.1 was released as an interim update while a broader review is being undertaken. This includes 17 additional success criteria to address mobile accessibility, enhanced requirements for people with low vision and people with cognitive and learning disabilities.

The Australian Human Rights Commission has published World Wide Web Access: Disability Discrimination Act Advisory Notes for reference.

Regulatory option

The inclusion of mandatory prescriptive requirements in the Transport Standards regarding website accessibility.[27]

Sub-option 1 – Websites to meet WCAG 2.0 AA

This sub-option would see the Transport Standards amended to require that websites meet WCAG 2.0 level AA. This is aligned to the requirements that have applied to all federal, state and territory websites since 2012.

The Transport Standards would specify that websites that provide information on public transport services must be in compliance with WCAG 2.0 Level AA.

Sub-option 2 – Websites to meet WCAG 2.0 AAA

This sub-option would see the Transport Standards amended to require that websites meet WCAG 2.0 level AAA. This level of accessibility builds on AA level, with more specific requirements.

The Transport Standards would specify that websites that provide information on public transport must be in compliance with WCAG 2.0 Level AAA. However, in many areas it is understood that this may not be possible. The W3C does not 'recommend that Level AAA conformance be required as a

[27] A transition timeframe would need to be considered in any regulatory option similar to the four-year transition period allowed for following the endorsement of the Australian Government's transition to WCAG 2.0 in 2009.

general policy for entire sites because it is not possible to satisfy all Level AAA Success Criteria for some content'.[28]

Sub-option 3 – Websites to meet the current version of WCAG AA

This sub-option would see the Transport Standards amended to require that websites meet WCAG level AA in an up-to-date version (for example, version 2.1). Newer versions of the WCAG contain enhanced requirements which are considered industry best practice. On 11 August 2020, a working draft of WCAG 2.2 was released indicating that work had commenced on a newer version of the document. Sub-option 3 considers "future proofing" any requirements going forward. Furthermore, maintaining the AA requirement aligns with federal, state and territory policy regarding website accessibility.

The Transport Standards would specify that websites that provide information on public transport services must be in compliance with the latest version of WCAG Level AA, as and when they are updated.

Sub-option 4 – Websites to meet the current version of WCAG AAA

This option specifies the latest version of WCAG AAA as best practice. However, in many areas it is understood that this may not be possible. The W3C does not "*recommend that Level AAA conformance be required as a general policy for entire sites because it is not possible to satisfy all Level AAA Success Criteria for some content*".[29]

The Transport Standards would specify that websites that provide information on public transport must be in compliance with the latest version of WCAG Level AAA, as and when they are updated.

10.5 Impact analysis

Status quo

Costs

There is no financial cost associated with this option, current costs would continue to apply for transport operators. The opportunity cost associated with maintaining the status quo is a lost opportunity to address known issues concerning website accessibility.

Benefits

There are no obvious benefits with the status quo option.

Non-regulatory option

Costs

As this option is not mandatory, it may not fully address the problem, as providers and operators may choose not to implement the recommendations in the Whole Journey Guide. The downside of this option is that there is no regulatory requirement to meet WCAG compliance levels, and as such some operators may continue to not comply. If transport providers and operators choose not to implement these recommendations, the Transport Standards would continue to not reflect current industry standards, meaning the accessibility of various providers and operators' websites would continue to be inconsistent.

[28] https://www.w3.org/TR/UNDERSTANDING-WCAG20/conformance.html
[29] https://www.w3.org/TR/UNDERSTANDING-WCAG20/conformance.html

If recommendations are adopted, for non-government service providers who do not currently meet this level of compliance, conforming to new requirements is expected to incur costs.

The cost to audit and update websites to meet WCAG AAA will be greater than the indicated cost for both the initial change and ongoing operational costs for content to meet WCAG AA requirements.[30]

Benefits

This option provides guidance to designers of websites with clear guidance on the expected level of accessibility in alignment with other government requirements. People with disability will benefit by having a consistent level of accessibility when accessing information related to transport services through websites.

For Government owned and operated transport websites, this is unlikely to represent a change as this has been a requirement for all federal, state and territory websites since 2012. The COAG Online Communication Council has endorsed WCAG 2.0, requiring all federal, state and territory websites to conform to WCAG 2.0 at Level A by the end of 2012.[31]

Regulatory option

Costs

For non-government service providers who do not currently meet this level of compliance, meeting this recommendation is expected to come at some cost. Through targeted consultation, it was advised that it may cost up to $10,000 for an audit of WCAG 2.0 compliance and up to $40,000 for changes to be implemented. This does not account for ongoing costs associated with maintaining this standard.

The cost to audit and update websites to meet WCAG AAA will be greater than the indicated cost for both the initial change and ongoing operational costs for content to meet WCAG AA requirements. It should be noted that the extent of this cost to meet WCAG AAA is unknown.

A transport operator has commented that:

> A review of online audit providers identifies that the initial audit fees for the review of existing websites range between $3,000 (simple) to $10,000 (complex). These audits identify the level of compliance of existing websites to WCAG Version 2.0 AA and identify actions needed to update the website to achieve compliance. The cost of upgrading a website to ensure compliance with WCAG 2.0 AA will vary significantly across operators. Based on the short turnaround timeframes associated with this review process, it is very difficult to identify indicative costs to upgrade or rebuild websites…there would be time, resource and cost issues associated with ensuring compliance with WCAG 2.0 AA. A detailed audit of websites will enable a better understanding of the costs required to move to WCAG 2.0 AA and then through to WCAG 2.0 AAA.

For sub-options 2 and 4 specifically, these options would represent industry best practice, but may not be possible. For instance, the Accessibility Guidelines Working Group does not 'recommend that Level AAA conformance be required as a general policy for entire sites because it is not possible to satisfy all Level AAA Success Criteria for some content'.[32]

[30] It should be noted that the extent of this cost to meet WCAG AAA is unknown.
[31] https://humanrights.gov.au/our-work/disability-rights/world-wide-web-access-disability-discrimination-act-advisory-notes-ver
[32] https://www.w3.org/TR/UNDERSTANDING-WCAG20/conformance.html

Benefits

The benefit of the regulatory option is that it is mandatory, and as such, operators must comply with the requirements. The intended outcome of this option is to establish clear, practical requirements for the development of transport websites for the purpose of providing service information that can be accessed by people with disability.

A benefit of the inclusion of this requirement is that all transport operators, not just government agencies, would be required to meet the minimum level of website accessibility.

Consideration must be made regarding how the information will be used. For example, if multimedia is proposed to be used on a mobile device, it may not be beneficial to include an Auslan interpreter.

10.6 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?
- How do people with disability use websites to access information on public transport services?
- What are the benefits and challenges of using websites to access information?
    - How could websites be improved to meet the needs of people with disability?
- How will improved website accessibility impact individual's public transport experience?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?
- 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?
    - What are the barriers and challenges with meeting website accessibility requirements?
- How do the current website accessibility requirements meet the needs of people with disability?
    - 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?
- If the current website does not meet the AA requirements, what upfront and ongoing costs would you incur to meet the requirements?
- If your websites were required to meet WCAG 2.1 AA requirements, what upfront and ongoing costs would you incur to meet the requirements?

    - What barriers or operational impracticalities will you face in meeting the requirements?
- If your websites were required to meet WCAG 2.0 AAA requirements, what upfront and ongoing costs would you incur to meet the requirements?
    - What barriers or operational impracticalities will you face in meeting the requirements?

Chapter 11: Communication during service disruption

11.1 Nature and extent of problem

Public transport service disruptions, both planned and unplanned, are challenging for people with disability and transport operators and providers alike. These disruptions include cancellation of services, temporary unavailability of a train line or bus route, weather related disruptions, vehicle breakdowns, replacement of a train with a bus service, or evacuation of a vehicle, depot or station due to an emergency.

A planned disruption is generally well managed with advance notice and alternative arrangements can be put in place and communicated to minimise interference. However, unplanned disruptions are generally more challenging as information about the nature of the disruption and alternate arrangements can be difficult to source and communicate in a timely manner. When disruption occurs, people may not be aware of the situation, how they should respond, and whether there are alternative arrangements in place for them to complete their journey. Conversely, no disruption is the same so when an unplanned disruption occurs, transport operators and providers are under time pressure to quickly understand what has occurred so they can promptly identify, implement and communicate a solution to minimise impact on customers. Feedback from people with disability note that disruptions are highly stressful and the possibility of disruption is a significant barrier to their participation in public transport journeys.

Currently, the Transport Standards provides guidance in relation to access to 'general information', but it lacks specific guidance on communication with customers during planned and unplanned service disruptions. At present, communications systems are typically the responsibility of the operator or provider, however essential communications channels are managed by the relevant jurisdictional agencies. A lack of coordination of systems across jurisdictions often results in disparate and bespoke communication systems introduced at the operator level.

The availability of information at unstaffed locations also continues to be a challenge, most significantly, when passengers are required to take alternative routes or transport modes. This means that the traditional forms of communication, such as customer service announcements are not always available but equally, not all transport stations, stops or depots are necessarily equipped to make customer service announcements.

11.2 Outcome to be achieved

Establishment of a clear framework with practical guidance to assist public transport operators and providers to communicate well during planned and unplanned disruptions.

Recognising that disruptions can be varied, the framework should not be overly prescriptive, and provide practical and flexible guidance which can be adopted for differing scenarios. Consideration is also needed with regard to how information can be transmitted across regional and remote areas, as opposed to a metropolitan area. For example, providing information in multiple formats is challenging at an unstaffed station or bus stop in a regional area.

11.3 Policy options to address the problem

Status quo

No change is made to the current Transport Standards and no new guidance materials are developed relating to communication during planned and unplanned disruptions.

Part 27 of the Transport Standards currently refers to 'general information' but lacks a definition of what constitutes 'general information' or the potential formats of this information. See below:

> **27.1 Access to information about transport services**
>
> General information about transport services must be accessible to all passengers.

In addition, the Transport Standards Guidelines include the following advice on information:

> **27.2 Formats for providing information**
>
> (1) Operators and providers should expect requests for information in formats such as standard or large print, Braille, audio, touch-tone telephone, TTY and on-line computer or disks.
>
> (2) Passengers should anticipate that certain formats may only be available from certain outlets. For example, while bus drivers may provide oral information on timetables and bus routes, they should not be expected to have alternative format timetables on hand.
>
> (3) If it is not possible for operators or providers to supply information in a particular format, passengers may expect assistance to be provided to enable them to use documentation in the available formats, for example, the provision of a photocopy enlargement of a timetable.
>
> (4) However, essential travel and safety information, such as emergency instructions on aircraft, must be available in an accessible format or direct assistance must be given.
>
> (5) Operators could choose to announce scheduled stops as one way of informing passengers of their whereabouts during a journey.

Non-regulatory option

The non-regulatory option could be delivered in two ways:

1. Inclusion of a dedicated chapter in the *Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide).

OR

2. Development of a stand-alone guideline.

Either option would be beneficial for people with disability, transport providers and government agencies alike.

The Whole Journey Guide currently includes elements about communicating during disruptions. However, the information is not detailed and is dispersed throughout the document. For example:

> **3.2.5 Temporary Works**
>
> Alternative ways to communicate changes and detours, or a combination of measures, should also be considered, for example temporary fencing in place of bollards.
>
> Consideration should also be given to how temporary changes and diversions are communicated so people can be informed about changes that may affect their journey.
>
> **3.4.7 Passenger communications**
>
> To enable people with disability to communicate with a driver or service provider in the same way as other passengers, communication options should be matched with passenger needs.

3.7.2 Communication

Communicating disruptions should be across multiple platforms.

Ideally communications systems need to integrate the disruption notification across the whole journey and its parts—journey start to end and back to the start again. In practical terms, this would integrate notification of pathway disruptions due to council road works, or utility company works, which result in public transport system and interchange disruptions.

Specifically, the guidance material for either option would:

- include separate sections for communication during planned disruptions and unplanned disruptions
- detail the different communication mechanisms for disruptions available and the benefits/limitations of each
- provide examples or case studies from providers where alternative communication solutions have been used in disruptions with success
- include a matrix to specify communication mechanisms (visual, audio, apps) and the suitability of these methods for different types of disabilities (visual impairment, hearing impairment and cognitive disabilities) and scenarios (planned/unplanned disruptions).
- provide insights from a range of people with disability (mobility, sensory, intellectual, cognitive, psychosocial conditions/impairments) to highlight common challenges experienced in accessing the transport network and suggested approaches to remove these barriers.

Regulatory option

The regulatory option would include a new performance-based requirement in the Transport Standards specifying:

1. During planned disruptions, operators and providers must continue to provide information in a variety of formats that specifically communicate details of the disruption and alternate travel options. Information must be provided in a variety of formats with a reasonable amount of notice and communication. Information must not be provided solely through digital platforms or channels.
2. During unplanned disruptions, operators and providers must provide information in a variety of formats as timely and as reasonably practicable.
3. Where information cannot be provided in an accessible format or in a timely manner, information may be provided through direct assistance.

These requirements do not apply in scenarios where control is transferred to emergency services or another third party, for example a fire evacuation, when communication and operational decisions are not within the control of transport operators and providers.

To address the lack of guidance on how to communicate during planned or unplanned disruptions, it is proposed that additional guidance be provided in the Transport Standards Guidelines as outlined in the non-regulatory option above.

The following definitions would also be incorporated into the Transport Standards:

- **Planned disruptions**: an event that impacts the normal operation of a public transport service that has been instigated by an operator or provider. For example, routine maintenance, road works, construction, and cleaning.
- **Unplanned disruptions**: an event that impacts the normal operation of a public transport service that has been instigated by factors outside of the reasonable control of an operator or provider. For example, vehicle breakdown, power outage, collision, police incident, fire, weather and natural disasters.

11.4 Impact analysis

Status quo

Costs

If the status quo is retained, an inconsistent approach to communications during disruptions will be maintained for people with disability. From a transport operator and government agency perspective, a lack of guidance on how to communicate with customers during planned or unplanned disruptions will also continue.

Benefits

There are no benefits in maintaining the status quo.

Non-regulatory option

Costs

As for operators and providers, initial consultation indicates that the use of direct visual and audio messaging within a bus from a central control function is limited, although the technology exists to support a broader roll out. Bespoke systems are expensive when considering visual and audio messaging as stand-alone product offerings. The costs of these systems vary significantly and includes a capital and ongoing maintenance and service access costs.

The availability of information at unstaffed locations is limited, especially when passengers are required to take alternative routes or transport. As such, traditional forms of communication, such as announcements and messaging on passenger information display screens, is not always available. A service operator has been able to overcome some of these challenges with usage of third party staff, however this is a costly exercise when changes to station precincts can last many months and is also not a practical quick solution during an unplanned disruption.

Benefits

Guidance around communication during planned and unplanned service disruption will provide clarity and consistency, which may lead to reduced customer complaints and higher customer satisfaction levels.

Better communication methods will reduce the time required for journey planning and lead to greater independence and confidence of people with disability planning their journey and whilst travelling.

Consistency of communication during disruptions will empower customers with disability to independently access the information they need to improve their individual travel requirements. People with disability will also benefit from consistency in communication between different modes of transport.

Collectively, this will provide an improved customer experience for various travel modes and increase accessibility overall.

Regulatory option

Costs

For people with autism and/or anxiety, loud noises and large crowds can create intense confusion and anxiety. Poor communication during unplanned disruptions can lead to future avoidance of public transport in preference for more expensive rideshare services instead.

As for operators and providers, initial consultation indicates that the use of direct visual and audio messaging within a bus from a central control function is limited, although the technology exists to support a broader roll out. Bespoke systems are expensive when considering visual and audio messaging as stand-alone product offerings. The costs of these systems vary significantly and includes a capital and ongoing maintenance and service access costs.

The availability of information at unstaffed locations is limited especially when passengers are required to take alternative routes or transport. As such, traditional forms of communication, such as announcements and messaging on passenger information display screens, is not always available. A service operator has been able to overcome some of these challenges with usage of third party staff, however this is a costly exercise when changes to station precincts can last many months and is also not a practical quick solution during an unplanned disruption.

Benefits

Public transport operators and providers of all transport modes will be positively impacted if the Transport Standards provides flexible guidance and does not become too prescriptive or overly ambitious.

Clear performance standards that articulate the requirements for operators and providers during both planned and unplanned disruptions will provide certainty and confidence for passengers and transport providers alike. Furthermore, defining the different requirements for providers and operators in both planned and unplanned situations acknowledges the challenges they face in maintaining the provision of accessible information, whilst simultaneously addressing the disruption.

Access to information during disruptions will build confidence in travelling passengers and enable enhanced decision making pre and mid-journey. This will encourage passengers who are anxious about their ability to respond to changing travelling conditions to continue to use transport services during uncertain times, for example, weather events and in locations of construction and road works.

11.5 Consultation questions:

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory option 1, non-regulatory option 2 or status quo?
- What experiences do people with disability have with planned and unplanned disruptions relating to public transport?
    - How do planned and unplanned disruptions impact the public transport experience of people with disability?

- What communication methods relating to planned and unplanned disruptions on public transport currently work for people with disability and why?
- What communication methods during planned and unplanned disruptions do not work and why?
    - What could be improved?
- How will improved communication methods for planned and unplanned disruptions affect your sense of safety and security in using public transport?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory option 1, non-regulatory option 2 or status quo?
- What feedback have you received from people with disability regarding communication methods in planned and unplanned disruptions?
    - What key issues or themes can be identified?
- What types of communication do you use to communicate with people with disability regarding planned and unplanned transport disruptions?
- What additional costs have you incurred when applying and trialling additional communication methods as part of planned and unplanned disruptions?
- How do your communication methods that you use or have trialled impact people with disability?
- How can communication be improved during planned and unplanned disruptions?
- What barriers do you face to improving communication during planned and unplanned disruptions?

Chapter 12: Gangways

12.1 Nature and extent of problem

Gangways connect to ferry pontoons and have unique design constraints imposed by the tidal environment. The Transport Standards identifies gangways as static ramps and walkways, referring to them in Part 6.5 as 'ramps connected to pontoon wharves'.

The failure of Transport Standards to recognise the cyclical alteration of gangway and treadplate slope makes full compliance impossible. Among other issues:

- Required landings on ramps and walkways are not feasible unless self-levelling landings or ballast-controlled pontoons that rise on request are employed.
- The horizontal extension of handrails that are required at the top and bottom of ramps cannot be maintained as the angle of the gangway changes.
- Treadplates encroach on and recede from Tactile Ground Surface Indicators (TGSIs) as the gangway moves across the pontoon during tidal change.

There is also a tendency to regard gangways as separate to ramps and walkways, and to provide these gangways without any landing or other means to reduce effort required to transit at low tides. Particularly for passengers who have mobility impairments, this makes gangways less accessible and less safe than other access paths listed in section 2.1 due to the effort required to ascend or descend a steep gangway that has no rest points.

Some ambiguity as to what 'standard tide charts' means also exists. AS 3962—2001 Guidelines for design of marinas cite lowest astronomical tide (LAT) as the chart datum from which gangway gradient is usually calculated. The tide data is derived from the Australian National Tide Tables.[33]

12.2 Outcome to be achieved

Gangways will be clearly defined with specifications distinct from those of static ramps and walkways, and will be treated as access paths rather than pontoon ramps. This will provide clarity for industry and align with the terminology used by industry, which will in turn lead to better outcomes for people with disability.

Industry will have a clear understanding of the access needs on gangways of people with disability and design to suit the need. This will then allow people with disability to have easier access to ferry pontoons.

Performance-based solutions such as self-levelling landings or ballast-controlled pontoons could be used to provide industry with flexibility.

The chart datum point from which the slope of the gangway 'for at least 80% of the high and low tide levels' was calculated will be clearly stated. The source of the chart datum should be the Australian National Tide Tables (AHP 11) rather than standard tide charts.

The use of TGSIs or other tactile warnings at gangways will be clarified including whether they are required on shore only or on shore and on pontoon.

[33] Australian Hydrographic Office 2020, *Australian National Tide Tables,* accessed on 19 October 2020, <http://www.hydro.gov.au/prodserv/publications/antt.htm>

It will be recognised that in some locations that experience extreme tides, maintaining a 1:14 gangway gradient over 80% of the tide range would be impossible. In these locations a process of co-design to reach an Equivalent Access solution will be required.

12.3 Policy options to address the problem

Status quo

Transport Standards requirements for 'pontoon ramps' remain unchanged.

No change is made to the current Transport Standards text and no new guidance issued.

The Transport Standards currently covers access paths in Part 2. It identifies walkways, ramps and landings in section 2.1.

> **2.1 Unhindered passage**
>
> (1) An access path that allows unhindered passage must be provided along a walkway, ramp or landing.
>
> (2) An access path must comply with AS1428.2 (1992) Clause 8.1.
>
> **Premises**
>
> except premises to which the Premises Standards apply
>
> **Infrastructure**
>
> except airports that do not accept regular public transport services

Gangways are identified as 'ramps connected to pontoon wharves' in section 6.5.

> **6.5 Slope of ramps connected to pontoon wharves**
>
> The slope of a ramp connected to a pontoon wharf must comply with section 6.1 for at least 80% of the high and low tide levels listed in standard tide charts.
>
> **Infrastructure**
>
> - Pontoon wharves

Specifications for ramps are stated in Part 6.1.

> **6.1 Ramps on access paths**
>
> A ramp on an access path must comply with AS1428.2 (1992) Clause 8.
>
> **Premises**
>
> except premises to which the Premises Standards apply
>
> **Infrastructure**
>
> except airports that do not accept regular public transport services

The Transport Standards Guidelines also define gangways as ramps and acknowledge the effect of 'unusually high' tides.

6.3 Ramps connecting pontoon wharves

Tides affect the slope of ramps connecting pontoon wharves to land. On occasions, an unusually high tide may cause the ramp to be too steep for unassisted access.

Non-regulatory option

A guidance chapter on good practice designs for gangways would be inserted into *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide) to better articulate the performance requirements for gangways.

The option would see no change to the current Transport Standards sections 2.1, 6.1 and 6.5. Change would be limited to the Whole Journey Guide.

The Transport Standards Guidelines currently offer little guidance on gangway design apart from Part 6.3:

Part 6 Ramps

6.3 Ramps connecting pontoon wharves

Tides affect the slope of ramps connecting pontoon wharves to land. On occasions, an unusually high tide may cause the ramp to be too steep for unassisted access.

The Transport Standards Guidelines should also reference the Whole Journey Guide, as a gangway chapter in this can provide context and an expanded informative material for gangways. It could further qualify the essential performance requirements that link together the various Transport Standards elements to ensure a continuous accessible journey. This is relevant not only to gangways, but to all the parts of the public transport precincts.

Currently, the Whole Journey Guide provides no direct mention of gangways and touches only briefly on tides.

The Whole Journey Guide could be enhanced to give clear, concise guidance on gangway definition, design and required performance. Using the guidance material is at the discretion of the operator or provider and no national consistency of gangway accessibility can be guaranteed.

The chapter would contain the following information:

1. Gangway definition

Gangways should be viewed as access paths that are distinct from static ramps and walkways. In tidal environments gangways vary in gradient according to the tidal cycles. This cyclical variation of gradient introduces problems for designers as the specifications for ramps and walkways differ according to access path gradient.

Based on the definition of gangways in AS 3962-2001 Guidelines for design of marinas, clause 1.3.25, a gangway should be regarded as a structure that provides pedestrian access between a fixed jetty or shore and a floating structure.

2. Minimisation of gangway gradients

A performance aim for gangways is to minimise gradients at all tides in order to make the access path as accessible as possible. The specification of a 1:14 gangway gradient 'for at least 80% of the high and low tide levels' is offered as a concession for site specific technical difficulties rather than defining an optimal performance outcome.

3. Nationally consistent chart datum and tide tables

The chart datum point from which the slope of the gangway 'for at least 80% of the high and low tide levels' is calculated is derived from the Australian Standard: AS 3962-2001 Guidelines for design of marinas, Clause 1.3.15 of AS 3962 defines chart datum as 'the datum used on Australian hydrographic charts and other hydrographic surveys for the specific region'.[34]

The source of the tidal ranges derived from chart datum should be the Australian National Tide Tables (AHP 11).[35]

4. Tactile ground surface indicators and gangway

Tactile ground surface indicators (TGSIs) enhance safety and wayfinding for passengers who have vision impairments. The location of TGSIs at the shore or jetty end of the gangway should conform to the ramp requirements of AS 1428.4.1-2009. Installation of domed buttons on the handrails 150 mm from the handrail termination at both ends of the gangway should confirm with AS 1428.2-1992, Clause 10.1.1.

The movement of the gangway treadplate over the pontoon surface with the rise and fall of the tide prevents compliance with AS1428.4.1. To achieve consistency at the pontoon end of the gangway designers may consider one of the following options:

Option 1—installing the TGSIs on the gangway treadplate.

Option 2—co-design a TGSI solution with the disability community representatives and local users who have disabilities. The solution should be implemented in a timely manner with a review time frame to be agreed during the co-design process.

5. Accessibility enhancements for lower tides

At some lower tide levels, particularly at the lowest 20% of the tidal range, gangways may be unavoidably steep and so challenge some passengers who have mobility impairments. Self-levelling landings on the gangway or ballast-controlled pontoons that can ameliorate the gangway gradient will be of assistance to these passengers at lower tides.

6. Gangways affected by extreme tidal regimes

In some locations that experience extreme tides, maintaining a 1:14 gangway gradient over 80% of the tide range will be impossible. In these locations, a process of co-design to reach an Equivalent Access solution should be considered.

7. Continuous accessible journey

An accessible gangway is one link in the chain of access paths that must be travelled during a public transport journey. A broken link in the chain may prevent a successful journey. Designers should be aware that their work affects entire journeys when dealing with sometimes challenging local constraints.

[34] This datum usually corresponds to the level of LAT.

[35] Australian Hydrographic Office 2020, *Australian National Tide Tables,* accessed on 19 October 2020, <http://www.hydro.gov.au/prodserv/publications/antt.htm>

Regulatory option

The Transport Standards are amended to provide mandatory prescriptive requirements and the Transport Standards Guidelines are updated with performance-based and advisory elements to support the proposed new regulations.

Prescriptive elements to be inserted into the Transport Standards

1. Gangways to be defined as access paths

Gangways will be deemed access paths in Transport Standards section 2.1 and referenced in section 6.5 as 'gangways' rather than pontoon ramps. The definition of access paths in Transport Standards section 1.9 'Access path: An access path is a path that permits independent travel for all passengers within public transport premises, infrastructure or conveyances.' will remain unchanged.

2. Gangway definition

Gangways will be defined based on AS 3962-2001 Guidelines for design of marinas, Clause 1.3.25 and Figure 1.8: 'Gangway: A structure that provides pedestrian access between a fixed jetty or shore and a floating structure'. This definition will have an added qualifier: 'In tidal environments gangways vary in gradient according to the tidal cycles.

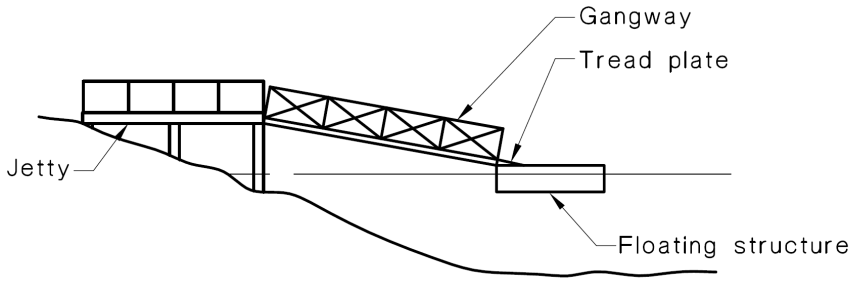


FIGURE 1.8 GANGWAY

3. Gangway maximum gradients

Providers and operators must ensure that gangways maintain a 1:14 gradient either:

over the entire range of the high and low tide levels; or

for at least 80% of the high and low tide levels

4. Nationally consistent chart datum and tide tables

The chart datum point from which the slope of the gangway 'for at least 80% of the high and low tide levels' is calculated will derived from AS 3962-2001 Guidelines for design of marinas, clause 1.3.15: 'Chart datum (CD), The datum used on Australian hydrographic charts and other hydrographic surveys for the specific region.[36]

[36] This datum usually corresponds to the level of LAT.

The source of the tidal ranges derived from chart datum will be the Australian National Tide Tables (AHP 11).[37]

5. TGSIs associated with gangways

The location of TGSIs at the shore or jetty end of the gangway will conform to the ramp requirements of AS1428.4.1. The movement of the gangway treadplate over the pontoon surface with the rise and fall of the tide prevents compliance with AS1428.4.1. To achieve consistency at the pontoon end of the gangway operators and providers must install the TGSIs on the gangway treadplate. Installation of domed buttons on the handrails 150 mm from the handrail termination at both ends of the gangway must confirm with AS 1428.2-1992, Clause 10.1.1.

Advisory elements to be inserted in the Transport Standards Guidelines

The Transport Standards Guidelines would contain the following advice:

1. Gangway definition explanation

Gangways are access paths that are distinct from static ramps and walkways. In tidal environments gangways vary in gradient according to the tidal cycles. This cyclical variation of gradient introduces problems for designers as the specifications for ramps and walkways differ according to access path gradient.

Based on the definition of gangways in AS 3962-2001 Guidelines for design of marinas Clause 1.3.25, a gangway should be regarded as a structure that provides pedestrian access between a fixed jetty or shore and a floating structure.

2. Minimisation of gangway gradients

Gangway design must minimise gradients at all tides in order to make the access path as accessible as possible. The specification of a 1:14 gangway gradient 'for at least 80% of the high and low tide levels' is offered as a concession for site specific technical difficulties rather than defining an optimal performance outcome.

3. Nationally consistent chart datum and tide tables

Ensuring nationally consistent outcomes for gangway gradients requires an agreed chart datum point. The chart datum point from which the slope of the gangway 'for at least 80% of the high and low tide levels' is calculated is derived from AS 3962-2001 Guidelines for design of marinas, clause 1.3.15. Drawing on an established industry standard introduces no onerous requirements and permits a 'business as usual' approach to gangway gradient.

The source of the tidal ranges derived from chart datum is the Australian National Tide Tables (AHP 11). These are the nationally consulted tables and introduce no new or unreasonable requirements to the Transport Standards.

4. Accessibility enhancements for lower tides

At some lower tide levels, particularly at the lowest 20% of the tidal range, gangways may be unavoidably steep and so challenge some passengers who have mobility impairments. Self-levelling

[37] Australian Hydrographic Office 2020, *Australian National Tide Tables,* accessed on 19 October 2020, <http://www.hydro.gov.au/prodserv/publications/antt.htm>

landings on the gangway or ballast-controlled pontoons that can ameliorate the gangway gradient will be of assistance to these passengers at lower tides.

5. Gangways affected by extreme tidal regimes

In some locations that experience extreme tides, maintaining a 1:14 gangway gradient over 80% of the tide range will be impossible. In these locations a process of co-design to reach an Equivalent Access solution should be considered.

6. Continuous accessible journey

An accessible gangway is one link in the chain of access paths that must be travelled during a public transport journey. A broken link in the chain may prevent a successful journey. Designers should be aware that their work affects entire journeys when dealing with sometimes challenging local constraints.

12.4 Impact analysis

Status quo

Costs

The cost would be a lost opportunity to better define the nature, design and performance required for gangways. Qualitatively, this may result in suboptimal outcomes at some locations and a lack of consistency between jurisdictions and projects.

Costs in terms of construction and maintenance will remain unchanged.

Lack of certainty on which tide levels section 6.5 refers to — whether spring, neap or astronomical tide range — can result in unacceptably steep gangway gradients at spring or astronomical low tides if the neap low tide datum is the point of reference. This diminishes the accessibility of gangways at certain times.

Benefits

No status quo benefits other than any derived from current requirements is apparent.

Benefits in terms of construction and maintenance will remain unchanged.

Non-regulatory option

Costs

For operators and providers, the design process may become initially more onerous and involve additional up-front costs, but when accustomed to the new regime this qualitative difficulty will diminish. This has been the experience in Brisbane, Queensland where the cost and design imposts on gangways for flood recovery terminals on the Brisbane River have dramatically reduced as the designers became accustomed to the new regime.

Benefits

Any operator or provider who construct gangways in accordance with the guidance would ensure that gangway accessibility is maximised for passengers who have mobility impairments as well as enhance certainty that gangways meet both the Transport Standards requirements and public expectation.

Regulatory option

Costs

For operators and providers, the design and construction process may be initially more onerous with possible extra costs incurred upfront. However, when accustomed to the new regime, costs will diminish.

Benefits

The regulatory option will ensure that gangway accessibility for passengers who have mobility impairments is maximised and meet Transport Standards requirements and public expectations.

People with disability will also have increased ability to undertake public transport journeys by ferry, resulting in increased participation in the workforce and community.

12.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What are the experiences of people with disability in utilising gangways to access ferries?
- How can gangways to access ferries be improved?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How successful is the Transport Standards in providing clarity on technical and functional requirements for accessibility of gangways connecting to ferry pontoons?
    - How could the Transport Standards be improved to reflect best practice?
- What are the potential upfront or ongoing costs associated with providing clarity on technical requirements to reflect best practice?
- What are the core differences between a fixed ramp and a gangway from a design and use perspective?

Chapter 13: Assistance animal toileting facilities

13.1 Nature and extent of the problem

The *Disability Discrimination Act 1992* (the DDA) acknowledges that assistance animals can be used by people to alleviate the effects of their disability. The DDA defines an assistance animal as a dog or other animal that is accredited under a law of a State or Territory or by a prescribed training organisation, or an animal trained to assist a person with a disability to alleviate the effects of that disability and also meets the standards of hygiene and behaviour that are appropriate for an animal in a public place.[38]

Historically used as guide dogs by people who are blind, assistance animals are now more widely used by other people with disability or health conditions to enable them to access their community and to engage in social and economic activities. Assistance animals are used to alleviate the effects of many disabilities and health conditions including, but not limited to, blindness or vision impairment, deafness or hearing impairment, diabetes, epilepsy, post-traumatic stress disorder, autism and anxiety.

Whilst the use of assistance animals can remove some barriers for people with disability, the lack of appropriate and conveniently located sites for these animals to be toileted poses a barrier that can deter or prevent travel on public transport. Also, the individuals utilising assistance animals will often need to venture away from their intended path of travel to locate an appropriate toileting area for their animal. This can often increase the risk of death or serious injury to the individual due to them having to potentially cross a road or overcome obstacles that they would ordinarily not have to overcome if there was an appropriate and conveniently located assistance animal toileting area available to them. Seeking out appropriate sites away from public transport locations could also result in services being missed.

Anecdotal evidence suggests that the number of assistance animals in Australia is growing due to the extent to which they enable people with disability to actively engage in social and economic activities. The National Disability Insurance Scheme (NDIS) is also providing funding for some types of assistance animals as being reasonable and necessary support for people in the scheme. This is also contributing to the increase use of these animals.

The location of assistance animal toileting areas would need to be carefully considered in cases where it is not practicable to be within, or adjacent to, all public transport infrastructure. Some examples include:

- Kerb-side tram and bus stops (typically just a flag on a footpath identifying a tram or bus stop).
- 'Easy Access' tram stops used in Melbourne's tram network (these are ramps on the roadway that extend from the edge of the footpath).
- 'Safety Zones' or platform tram stops located in the middle of roadways.

In addition to these examples, many footpaths do not allow enough safe space for assistance animal toileting areas. Similarly, with infrastructure on roadways there are often challenges with the topography of roadways and the very limited availability of space. Generally, where there are compliant ramps, access paths, priority seating, waiting and boarding areas, there may not be adequate residual space for an assistance animal toileting area. If there are situations where specific infrastructure would benefit from having assistance animal toileting facilities, but will be difficult to achieve, then equivalent access or consultation with people with disability can still be used to find an appropriate solution for that particular situation.

[38] Section 9(2), *Disability Discrimination Act 1992*

Careful consideration would also need to be given to the location of any future assistance animal toileting areas to ensure they do not place the handler or animal at any greater risk when accessing the facility. The Transport Standards do not provide for assistance animal toileting areas, so there is an opportunity to address this gap.

13.2 Outcome to be achieved

The outcome sought is to provide conveniently located assistance animal toileting areas within, or adjacent to, key public transport infrastructure for handlers of assistance animals. These facilities need to be clearly identifiable by people of all abilities and be appropriately maintained and serviced to provide a clean and hazard free environment for those needing to utilise the facilities.

Assistance animal toileting areas should be located within or near public transport infrastructure that provides access to a variety of key destinations and not necessarily based on the patronage of a specific station or stop. Some examples include:

- Areas where there is a particularly high demographic of people with disability.
- Transport nodes that provide access to major public hospitals, university campuses, sporting venues, arts and theatre precincts, tourist destinations and the like.
- Transport nodes at major transport interchanges (same or different transport modes) across both metropolitan and regional areas.

The aim is to establish clear criteria for the location of assistance animal toileting facilities with respect to how they are placed across public transport networks. If these facilities were located based purely on customer patronage data, a negative outcome could include the clustering of assistance animal toileting facilities at locations with higher patronage numbers at consecutive locations while potentially leading to none being located for considerable distances in other areas.

To provide a high level of customer service, there is a need to ensure that assistance animal toileting facilities are cleaned and maintained on an ongoing basis.

13.3 Policy options to address the problem

Status quo

The Transport Standards requirements remain unchanged without any provisions for assistance animal toileting areas.

This option maintains the status quo with no changes to the current Transport Standards text and no new guidance material issued, including the Transport Standards Guidelines. Currently, there are no provisions for assistance animal toileting areas in the Transport Standards.

Non-regulatory option

The non-regulatory option would include a dedicated section on assistance animal toileting areas into *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide). This would expand on the 'beyond compliance' case study concerning Brisbane Airport in the current version of the guide. Therefore, it is appropriate to include a dedicated section as outlined below.

Specific provisions for assistance animal toileting areas

1. Acknowledgement that transport operators and providers should consider the inclusion of conveniently located, safe and appropriate assistance animal toileting areas to help remove barriers for individuals using assistance animals to access the public transport network.

2. Transport operators and providers need to ensure there is a reasonable distribution of assistance animal toileting area across the public transport network, noting that it is not expected that such facilities will be located at all locations across the network. Where there are significant gaps in the location of assistance animal toileting areas to public transport services, the transport operator or provider could consider the installation of these facilities in appropriate locations to ensure reasonable coverage.

3. The installation of assistance animal toileting areas at public transport infrastructure should include the following:

   (a) A fenced or an enclosed area that has an accessible and self-closing entrance (e.g. pool fencing with a self-closing gate or a room with a self-closing door).

   (b) The enclosed area is no less than 4 m^2 that is level and free of any hazards and obstacles.

   (c) Have more than one ground surface type within the area (e.g. outdoor areas- synthetic grass, natural grass, bark chips, gravel and concrete; indoor areas – synthetic grass and concrete) whereby any ground surface used has a coverage of at least 25% of the area.

   (d) Have appropriate shading from direct sunlight to ensure a ground surface temperature that is always safe for animals.

   (e) Provide supply of animal toilet bags, a rubbish bin and water supply.

   (f) Provide consistency of layouts across the public transport network, where practicable.

   (g) Include wayfinding signage in accessible formats to highlight the location of the area and the features within the area.

   (h) Ensure there is a maintenance regime set up by operators and providers to regularly clean and maintain the area to ensure there are no hazards for animals and handlers.

4. Allow operators and providers to rely on suitable assistance animal toileting areas in public areas if they are within proximity of public transport services and include the following features:[39]

   (a) Have a surface of either grass, bark, dirt, gravel or other similar surfaces.

[39] The reliance upon assistance toileting areas in public areas can present difficulties for operators and providers as they may not have complete control to achieve the desired outcomes (for example, council-owned park will require consent from councils to make changes to their asset, such as adding a new bin). Although this could be a problematic situation, this is already a reality with some parts of the current Transport Standards. For example, section 2.2 of the Transport Standards requires an access path to comply with clause 7 of AS1428.2-1992, where such access paths could be located outside the public transport environment, such as council-owned footpaths linking public transport services.

(b) Have a clear space no less than 4 m^2 that is reasonably level and free of any hazards and obstacles.

(c) Has a public rubbish bin within proximity of the area for the disposal of animal waste.

5. In determining the suitability of assistance animal toileting areas, operators and providers should conduct targeted stakeholder consultation, including with people with disability who use assistance animals, to assess the suitability of public transport premises/infrastructure or nearby public areas. In assessing public transport premises/infrastructure locations for this purpose it should be recognised that some existing sites will have constraints due to limited space, property boundaries, heritage restrictions or topographical features that may make it impracticable or unsafe to provide an assistance animal toileting area. There may even be some cases where new sites may be difficult to implement assistance animal toileting areas, but these would be expected to be less frequent than existing sites. In any case, transport operators and providers may consider that an unjustifiable hardship defence to any discrimination complaint could be appropriate if there are no suitable locations in nearby public areas.

6. Public transport operators or providers should consider providing information that details the location of the closest assistance animal toileting areas to public transport services to customers in accessible formats. This includes how to locate facilities at public transport premises/infrastructure and facilities in public areas outside the public transport environment.

Regulatory option

The Transport Standards are amended to provide requirements for assistance animal toileting areas to ensure best practice for accessibility. The Transport Standards Guidelines are updated to reflect the regulatory change and provide further advice.

The Transport Standards to include the following:

1. Public transport operators or providers must provide conveniently located, safe and appropriate assistance animal toileting areas at a public transport site if a suitable assistance animal toileting area in a public space is not available in close proximity.

2. Public transport operators or providers must ensure there is a reasonable distribution of assistance animal toileting area across the public transport network, noting that it is not expected that such facilities will be located at all locations across the network. Where there are significant gaps in the location of assistance animal toileting area to public transport services, the transport operator or provider must install these facilities in appropriate locations to ensure reasonable coverage.

3. The installation of assistance animal toileting areas at public transport premises or infrastructure must include the following:

(a) A fenced or an enclosed area that has an accessible and self-closing entrance (pool fencing with a self-closing gate or a room with a self-closing door).

(b) The enclosed area is no less than 4 m^2 that is level and free of any hazards and obstacles.

(c) Have more than one ground surface type within the area (for example, outdoor areas - synthetic grass, natural grass, bark chips, gravel and concrete; indoor areas - synthetic grass and concrete) whereby any ground surface used has a coverage of at least 25% of the area.

(d) Have appropriate shading from direct sunlight to ensure a ground surface temperature that is always safe for animals.

(e) Provide supply of animal toilet bags, a rubbish bin and water supply.

(f) As far as practicable, provide consistency of their layouts across the public transport network.

(g) Include wayfinding signage in accessible formats to highlight the location of the area and the features within the area.

(h) Ensure there is a maintenance regime set up by operators and providers to regularly clean and maintain the area to ensure there are no hazards for animals.

4. Suitable assistance animal toileting areas in public spaces, if they are within close proximity of public transport services, must have the following features:[40]

(a) A surface of either grass, bark, dirt, gravel or other similar surfaces.

(b) A clear space no less than 4 m^2 that is reasonably level and free of any hazards and obstacles.

(c) A public rubbish bin within proximity of the area for the disposal of animal waste matter. A reasonable distance to be considered would be no more than 100 metres.

5. In determining the suitability of the distribution of assistance animal toileting areas, operators and providers must conduct targeted stakeholder consultation, including with people with disability who use assistance animals, to assess the suitability of public transport premises/infrastructure or nearby public areas

6. Transport operators and providers must consider providing information that details the location of the closest assistance animal toileting areas to public transport services to customers in accessible formats. This includes how to locate facilities at public transport premises/infrastructure and facilities in public areas outside the public transport environment.

[40] The reliance upon assistance toileting areas in public areas can present difficulties for operators and providers as they may not have complete control to achieve the desired outcomes (For example, council-owned park will require consent from council to make changes to their asset, such as adding in a new bin). A reasonable distance of such public areas from a main entry point of public transport premises/infrastructure should be no more than 200 metres. Although this could be a problematic situation, this is already a reality with some parts of the current Transport Standards. For example, section 2.2 of Transport Standards requires an access path to comply with Clause 7 of AS1428.2-1992, where such access paths could be located outside the public transport environment, such as council-owned footpaths linking public transport services.

The provision of an assistance animal toileting area within a transport location will be supported by guidance to be provided in the Transport Standards Guidelines. The Guidance would include the following:

1. In assessing public transport premises/infrastructure locations for the purpose of determining the suitability of distribution of assistance animal toileting areas, it should be recognised that some existing sites will have constraints due to limited space, property boundaries, heritage restrictions or topographical features that may make it impracticable or unsafe to provide an assistance animal toileting area. There may even be some cases where new sites may be difficult to implement assistance animal toileting areas, but these would be expected to be less frequent than existing sites. In any case, transport operators and providers may consider that an unjustifiable hardship defence to any discrimination complaint could be appropriate if there are also no suitable locations in nearby public areas.

13.4 Impact analysis

Status quo

Costs

Given this option does not prescribe any specific requirements for assistance animal toileting areas to be provided and made available within the transport network environment, there would be no direct costs associated with this option.

Benefits

There is no benefit for this option as the installation and provision of these areas will continue to be carried out entirely at the discretion of the operator or provider due to a lack of specific requirements within the Transport Standards.

Non-regulatory option

Costs

Capital costs associated with the establishment of these areas will vary depending on the specific location.

As an indication, operators and providers should consider the following costs provided by a Victorian transport operator who installed five outdoor assistance animal toileting areas at key train stations across their network in 2019:

- **Capital costs:** The capital cost of installing the outdoor assistance animal toileting areas came to an overall total of $150,000 for five train stations.
- **Operating costs:** The operator indicated that cleaning and maintenance costs associated with the five outdoor assistance animal toileting areas was absorbed into the already existing cleaning and maintenance contracts for the respective train station locations at no additional cost.

The above cost estimate did not include any structural or major surface preparation works.

Benefits

For people with disability who use assistance animals, operators and providers will be able to incorporate the provision of assistance animal toileting areas into future upgrades across their transport network. More toileting areas at a greater number of transport locations could lead to greater accessibility to the network for people who use assistance animals, as well as reducing discrimination against people with disability.

Relative to the cost of transport infrastructure, the capital cost of installing an assistance animal toileting area represents an inexpensive way of increasing the accessibility of a transport network for people using assistance animals and to remove discrimination. The adoption of this option will not compel authorities or operators to install assistance animal toileting areas; however, it will provide the clear guidance for them to better understand the costs of delivering these facilities across their transport network. It may also result in more assistance animal toileting areas being installed in the future.

The additional guidance in the Whole Journey Guide may result in increased provision of assistance animal toileting areas for future upgrades across transport networks. More toileting areas at a greater number of transport locations can lead to greater accessibility to the network for people who use assistance animals as well as reducing discrimination against people with disability.

Regulatory option

Costs

Capital costs associated with the establishment of these areas will vary depending on the specific location.

As an indication, operators and providers should consider the following costs provided by a Victorian transport operator who installed five outdoor assistance animal toileting areas at some key train stations across their network in 2019:

- **Capital costs:** The capital cost of installing the outdoor assistance animal toileting areas came to an overall total of $150,000 for all five train stations.
- **Operating costs:** The operator indicated that cleaning and maintenance costs associated with the five outdoor assistance animal toileting areas was absorbed into the already existing cleaning and maintenance contracts for the respective train station locations at no additional cost.

The above estimate did not include any structural or major surface preparation works.

For public transport operators or providers, the design and construction process may be initially more onerous with possible extra costs incurred upfront. Minor ongoing costs may be incurred in relation to maintaining the toileting areas.

Benefits

For people with disability who use assistance animals, operators and providers will incorporate the provision of assistance animal toileting areas into future upgrades across their public transport network. More toileting areas at a greater number of transport locations can lead to greater accessibility to the network for people who use assistance animals as well as reducing discrimination against people with disability.

Relative to the cost of transport infrastructure, the capital cost of installing an assistance animal toileting area represents an inexpensive way of increasing the accessibility of a transport network for people using

assistance animals and to remove discrimination. The adoption of this option will require operators and providers to install assistance animal toileting areas in some additional transport locations, increasing the accessibility of the transport network and leading to greater social and economic participation of people with disability who use assistance animals.

Benefits may possibly be derived in relation to people with assistance animals having increased ability to undertake public transport journeys, resulting in increased participation in the workforce and community.

The addition of specific provisions to the Transport Standards and the Transport Standards Guidelines will provide clear requirements for operators and providers to better understand the costs and benefits associated with delivering these facilities at key transport locations across their transport networks and will result in more assistance animal toileting areas being installed in the future.

13.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What experiences do people with disability have in traveling on public transport with an assistance animal with regards to toileting?
- How does assistance animal toileting areas not being available impact an individual's public transport journey?
- What are the risks when attempting to locate a suitable place to toilet your assistance animal?
- What features or design elements of assistance animal toileting areas are good and not so good?
- If an assistance animal toileting area was available on the public transport network, would people with disability use it, or seek an alternative location to toilet an assistance animal? If so why?
    - How will this affect an individual's access to public transport and confidence to use public transport?
- What transport precincts or locations would most benefit having an assistance animal toileting area available?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What considerations do you currently make for people traveling with an assistance animal on public transport?
- What (if any) assistance animal toileting areas have you constructed on your public transport network or facilities?
- What designs did you consider and what were the deciding factors that led you to your final design?
- What features are available to users within or immediately outside the area?
- 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?

- What was the cost (or foreseeable cost) to construct the area/s?
- What is the cost (or foreseeable cost) to maintain and clean the area/s?

Chapter 14: Emergency egress

14.1 Nature and extent of the problem

The Transport Standards make no provisions for emergency egress from public transport infrastructure, premises or conveyances.

Emergency egress requirements for building premises are covered under the Disability (Access to Premises-Buildings) Standards 2010 (Premises Standards). However, the Premises Standards do not make provision for associated safety and technical issues relating to public transport infrastructure.

Bus stops or tram stops that may involve Local Government or private property, may also introduce additional complexities to design and construction and therefore impact emergency planning in relation to infrastructure.

Infrastructure that involves locations where movement of passengers may be restricted via fencing or environmental factors that would impact passengers' ability to safely leave the location, would require additional emergency egress consideration.

In addition, the provision of safe egress is not well understood by operators, designers and people with disability. However, an emergency has been defined by the NSW Government as 'an actual or imminent event that endangers or threatens life, property or the environment and calls for a significant and coordinated response'.

14.2 Outcome to be achieved

The outcome of this proposal will see the development of emergency egress provisions for people with disability in relation to public transport infrastructure (bus stops, tram stops etc.). Considerations of emergency egress from conveyances will be undertaken in the second stage of the Transport Standards reform process.

The proposed reforms will provide guiding examples to increase understanding of emergency egress by operators, providers, designers and people with disability in relation to transport infrastructure. This approach will consider modal specific requirements for transport infrastructure such as bus and tram stops that are not covered by emergency egress requirements in the Access to Premises Standards, and how these scenarios may impact people with disability. This may include physical and operational measures to ensure passengers with disability are treated in a manner that is both dignified and safe.

Consideration would be given to how a customer is informed of egress procedures both during pre-planning and in transit. Similar to accessible information requirements, this would be provided in a range of formats.

Signage requirements for identifying egress points also needs to be considered. Consistent application of colours and messaging across modes and networks will assist customers to understand what to reasonably expect at different public transport sites.

Communications during these scenarios becomes critical. Instructions for egress need to be easily understood by all individuals including people with disability and provide accurate direction to minimise the risk of injury or death.

14.3 Policy options to address the problem

Status quo

The Transport Standards do not currently reference provisions for emergency egress and this issue will continue to go unaddressed for public transport infrastructure not covered under the Premises Standards.

Non-regulatory option

The non-regulatory option will include guidance on emergency egress related to public transport infrastructure in *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide)**.**

The proposed guidance material would include the following elements:

- Passengers should have at least two accessible egress routes that lead away from bus stops, bus interchanges, tram stops and other public transport facilities located within a road reserve.
- Consultation with local councils should be conducted, particularly where public transport infrastructure interfaces with council land.
- Co-design processes should be conducted to ensure that the needs of people with disability who may experience emergency situations have been considered.
- Emergency services such as fire and police should have management procedures in place to address emergency egress as transport operators or service providers do not take the lead in passenger evacuation during life threatening emergencies.

Case studies or examples would be included in the guidance material to demonstrate best practice emergency egress scenarios.

Regulatory option

The regulatory option will include a section within the Transport Standards, supported by the Transport Standards Guidelines, to articulate the performance requirements of egress for infrastructure.

A new section applicable only to infrastructure would be included to articulate the following:

- Passengers must have at least two accessible egress routes that lead away from all public transport infrastructure, or premises that do not form part of a premise that has a building class.
- Paths of travel must consider the required number and dimensions appropriate to consider people with mobility aids and vision impaired persons using a white cane or accompanied by an assistance animal.

The Transport Standards Guidelines would articulate the importance of consultation with land owners in developing egress solutions and emergency management planning. For example:

- The provision of safe egress as part of the development of emergency management planning will include:
    - Consultation with local council where public transport infrastructure interfaces with council land.

- Consultation with Emergency Services (including Police, Fire or Ambulance) as Emergency Services are accountable for evacuating passengers in an emergency and have processes and procedures in place to do so. This can be supported via the aforementioned safety in design processes that operators may engage in, in the design and construction of infrastructure.

Further guidance should be provided concerning co-design processes with end users, particularly people with disability. The Transport Standards Guidelines could also reference the Australian Human Rights Commission's Equivalent Access Guidelines for further information on effective consultation and co-design processes.

14.4 Impact analysis

Status quo

Costs

There are no changes to cost with this option. Emergency egress from infrastructure will continue to be delivered in an ad-hoc manner for people with disability which may lead to unsafe situations for people with disability.

Benefits

There are no tangible benefits for people with disability.

Non-regulatory

Costs

The provision of additional infrastructure or associated information to people with disability about emergency egress may incur additional costs.

Other parties such as local councils and private land owners may also experience additional costs associated with the delivery of new or modified infrastructure.

As the non-regulatory option is not mandatory, transport operators and providers may choose to not implement suggested changes in the guidelines. This would limit the potential costs incurred on transport operators and providers; however, it will not provide certainty for people with disability about what to expect in an emergency situation.

Benefits

This would provide a positive benefit and guidance to both people with disability and designers of infrastructure on what is required to facilitate emergency egress. While the non-regulatory option is not mandatory, it is intended to establish a clear understanding of what is expected to facilitate egress in an emergency situation.

Regulatory

Costs

The provision of additional infrastructure or associated information to people with disability about emergency egress may incur additional cost in most cases. This Consultation RIS seeks to obtain further information regarding costs incurred to transport operators and providers.

Benefits

This would provide a positive benefit to both people with disability and designers of infrastructure on what is required to facilitate egress. This would be mandatory, but given that it is high level performance based outcome, allows designers flexibility to consider local conditions.

This would also ensure that the safety of people with disability is carefully considered from the beginning.

14.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- If there is an emergency at a public transport site, what is required to ensure that people with disability can safely evacuate?
- What is the experience of people with disability who have been in an emergency situation at a public transport site?
- What is the experience of people with disability who have experienced an emergency situation in other premises?
    - What lessons can be learnt from that experience?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How can emergency egress be accommodated through the use of the existing provisions of access paths?
- 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?
- What are your policies and procedures in place for emergency situations?
- How do you manage emergency evacuation incidents at your public transport infrastructure sites?
    - What lessons can be learnt from these experiences?
- 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?

Questions for access industry professionals

- How can emergency egress be accommodated through the use of the existing provisions of access paths?
- What considerations are important to achieve successful emergency egress for people with disability at public transport infrastructure such as bus stops and tram stops?
- Are there best practice examples in achieving successful emergency egress for people with disability? Can you give examples?
- What are the known gaps in achieving successful emergency egress for people with disability?

- What are foreseeable barriers or difficulties in trying to adopt egress requirements for people with disability at public transport infrastructure sites?

Chapter 15: Fit for purpose accessways

15.1 Nature and extent of the problem

'Fit for purpose' accessways must have the capacity to allow for safe, timely egress of passengers from infrastructure or premises. At all times, a 'fit for purpose' access path must remain accessible to those who require it for its intended ingress and egress function and must be designed in a way to ensure direct navigation and not to have an alternative, or perceived function as a gathering or meeting space.

People with mobility impairments have raised that when ramps or walkways are co-located with stairs, they sometimes provide a path of travel inferior to the stairs that are designed to be the 'main pedestrian traffic route/branch'.

The Transport Standards does not specify requirements for 'fit for purpose' accessways or how to accommodate pedestrian flows at peak times and during emergency egress from infrastructure or premises.

15.2 Outcome to be achieved

The Transport Standards and other guidance material should provide assist designers with how best to achieve 'fit for purpose' accessways to ensure equal access for people with disability.

Ramps and walkways as part of public transport infrastructure must have dimensions appropriate to pedestrian demand at peak times and during emergency egress, rather than being provided with minimalist (but compliant) dimensions. Furthermore, they must be designed to deter misuse through people gathering, resting, smoking or socialising at the head of the ramp or walkway or along its access path.

Where practicable, ramps and walkways should be the primary access path, with stairs (if required) being the secondary accessway. Rather than stairs not being 'the sole means of access' it should be emphasised that stairs are permitted as a concession to site constraints and to the preference of a subset of people with disability who prefer stairs to ramps. Where ramps and walkways are installed, they should have the capacity to accommodate pedestrian flow at peak times, with stairs regarded as the 'overflow' path of travel.

Additional architectural options are needed to deter people from resting around or on ramps that are co-located with stairs. These options include signs, provision of alternate and more appropriate seating areas and designated smoking areas or the like, away from walkways, ramps, and stairs.

15.3 Policy options to address the problem

Status quo

No change is made to the current Transport Standards text and no new guidance issued.

The Transport Standards currently covers access paths in Part 2. It identifies walkways, ramps and landings in section 2.1.

> **2.1 Unhindered passage**
>
> (1) An access path that allows unhindered passage must be provided along a walkway, ramp or landing.

(2) An access path must comply with AS1428.2 (1992) Clause 8.1.

Premises

except premises to which the Premises Standards apply

Infrastructure

except airports that do not accept regular public transport services

Section 2.3 allows access paths to branch into 'parallel tracks' but sets certain conditions on this. Capacity to absorb pedestrian flow at peak times or during emergency egress is not among these conditions unless 'equal convenience' is allowed this interpretation.

2.3 - Path branching into two or more parallel tracks

If an access path branches into two or more parallel tracks:

(a) the ends of each track must be on the main pedestrian traffic routes; and

(b) the parallel tracks must have equal convenience and be located as close as practicable to the main pedestrian branch.

Premises

except premises to which the Premises Standards apply

Infrastructure

except airports that do not accept regular public transport services

Section 2.4(1) of the Transport Standards provides 1200 mm as minimum width for an access path. The 1200 mm width has a 6 metre limit before an 1800 mm wide passing space is required (sections 4.1 and 4.2).

2.4 Minimum unobstructed width

(1) The minimum unobstructed width of an access path must be 1200 mm (AS1428.2 (1992) Clause 6.4, *Width of path of travel*).

(2) However, the minimum unobstructed width of a moving footway may be 850 mm.

Premises

except premises to which the Premises Standards apply

Infrastructure

except airports that do not accept regular public transport services

4.1 Minimum width

A passing area must have a minimum width of 1800 mm (AS1428.2 (1992) Clause 6.5 (a), Passing space for wheelchairs).

Premises

except premises to which the Premises Standards apply

Infrastructure

except airports that do not accept regular public transport services

4.2 Two-way access paths and aerobridges

(1) A passing area must be provided at least every 6 metres along any two-way access path that is less than 1800 mm wide (AS1428.2 (1992) Clause 6.5 (b), Passing space for wheelchairs and Figure 3).

(2) A passing area is not required on an aerobridge.

Premises

except premises to which the Premises Standards apply

Infrastructure

except airports that do not accept regular public transport services

Effectively, any access path longer than 6 metres is likely to be 1800 mm wide unless constrained by legitimate technical issues. At busy locations, despite being conveniently located, 1800 mm access path width may not be sufficient to accommodate pedestrian flows at peak times and during emergency egress.

Universal design principles are briefly acknowledged in section 2.1(3) of the Transport Standards Guidelines:

2.1 General

(1) The concept of an 'access path' is used in the Disability Standards to specify requirements for independent movement of passengers through premises and infrastructure. The existence of an access path is implicit in many sections of the Disability Standards.

(2) Because the Disability Standards cater for people with many types of disabilities, and a variety of services, some sections are relevant only to particular situations.

(3) The consequence is that while a common path is preferable, an access path may have to be duplicated in some locations.

Non-regulatory option

The non-regulatory option would see no change to the current Transport Standards sections 2.1, 2.3 and 2.4. Change would be limited to *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole Journey Guide).

Transport Standards Guidelines section 2.1(3) offers some guidance on ensuring access paths are fit for purpose, however no advice on the serviceability of the accessible path versus the stairs is provided:

Part 2 Access paths

Section 2.1 General

(1) The concept of an 'access path' is used in the Disability Standards to specify requirements for independent movement of passengers through premises and infrastructure. The existence of an access path is implicit in many sections of the Disability Standards.

(2) Because the Disability Standards cater for people with many types of disabilities, and a variety of services, some sections are relevant only to particular situations.

(3) The consequence is that while a common path is preferable, an access path may have to be duplicated in some locations.

Pedestrian flows at peak times and during emergency evacuations are not acknowledged. The Transport Standards Guidelines should be explicit in order to leave no matter ambiguous.

The Guidelines should also reference the Whole Journey Guide's 'Fit for purpose access path' chapter as this can provide context and expanded informative material for access paths. It could further qualify the essential performance requirements that link together the various Transport Standards elements to ensure a continuous accessible journey. This is relevant not only to access paths, but to all the parts of the public transport environment.

Currently, the Whole Journey Guide provides no direct mention of the impact of crowding on access paths or of inappropriate use of access paths.

The information to be included in the Whole Journey Guide may comprise the following:

1. Universal design principles

Designers should strive for access paths that conform to universal design principles as far as possible. This not only ensures access path serviceability at peak times and during emergency egress but simplifies wayfinding.

2. Access paths to have appropriate dimensions

People with disability are particularly vulnerable to crowds. Crowds may even deter their use of or entry into a public space. Ramps and walkways as part of public transport infrastructure should have dimensions that allow safe convenient passage at peak times and equivalent distance to a place of safety. Guidance will be provided to encourage access paths to conform to the pedestrian Level of Service discussed in Fruin (1987).[41]

3. Priority of access paths

Where practicable, ramps and walkways should be the primary access path, with stairs (if required) being the secondary accessway. Rather than stairs not being 'the sole means of access' they should be permitted as a concession to site constraints and to the preference of that subset of people who have disability who prefer stairs to ramps.

4. Prevention of misuse of access paths

In recognition of their importance, access path placement and design should include additional architectural options to encourage people to stand or rest away from ramps or walkways that are co-located with stairs. These options include signs, provision of alternate and more appropriate seating areas and designated smoking areas or the like, away from walkways, ramps, and stairs.

Asset managers may also consider management regimes appropriate to keeping access paths navigable at peak times and during emergencies. For example, advertising signs, coffee carts, charity

[41] Fruin J. (1987) *Pedestrian Planning and Design*, Elevator World, Northwestern University.

collectors and people distributing sample products might be located out of the access path. Designated smoking areas away from access paths might also be considered.

5. Continuous accessible journey

Fit-for-purpose access paths are links in the chain of situations that must be negotiated during a public transport journey. A broken link in the chain or a link that deters some users may prevent a successful journey. Designers should be aware that their work affects entire journeys when dealing with sometimes challenging local constraints and strive for universal design outcomes if possible.

6. Anticipating future demand

Designers should at all times anticipate the future demand likely to be placed on public transport assets. Infrastructure and premises often have service lives extending over many decades. The demand over the expected life of the asset should therefore be the benchmark used when estimating passenger flow at peak times and during emergency egress.

Regulatory option

The regulatory option would see no change to the current Transport Standards sections 2.1, 2.3 and 2.4. Rather, new mandatory prescriptive and performance-based elements would be inserted into the Transport Standards as follows:

Prescriptive elements to be inserted in Transport Standards

1. Access paths to be the principle pedestrian path of travel

- Ramps and walkways must be the sole access paths provided; or
- Ramps and walkways must be the principal path of travel and have primacy in pedestrian capacity over stairs; or
- Ramps and walkways co-located with stairs must not have less than 50% the pedestrian capacity of the stairs at peak times and during emergency egress.

2. Access paths to be kept clear at all times

Ramps, walkways and the circulation and manoeuvring areas associated with their entrances and exits must be kept clear of furniture, displays and retail features:

- at all times; or
- during the operational hours of the particular infrastructure.

Performance based element to be inserted in the Transport Standards

1. Access paths to have appropriate dimensions

Ramps and walkways must allow passengers with disability to enter or leave public transport nodes at peak times or evacuate during emergencies with the same convenience and in the same timeframes as passengers using other routes such as stairs.

Transport Standards Guidelines

The Transport Standards Guidelines will be amended to reflect the proposed regulatory change and will contain the following parts.

1. Universal design principles

Designers should strive for access paths that conform to universal design principles as far as possible. This not only ensures access path serviceability at peak times and during emergency egress but simplifies wayfinding.

2. Access paths to have appropriate dimensions

People with disability are particularly vulnerable to crowding. Crowds may even deter their use of or entry into a public space. Ramps and walkways as part of public transport infrastructure should have dimensions that allow them safe convenient passage at peak times and equivalent distance to a place of safety. Guidance will be provided to encourage access paths to conform to the pedestrian Level of Service discussed in Fruin (1987).[42]

3. Priority of access paths

Where possible, ramps and walkways should be the primary access path, with stairs (if required) being the secondary accessway. Rather than stairs not being 'the sole means of access' they should be regarded as a concession to site constraints and to the preference of that subset of people with disability who prefer stairs to ramps.

4. Prevention of misuse of access paths

In recognition of their importance, access path placement and design should include additional architectural options to encourage people to stand or rest away from ramps or walkways that are co-located with stairs. These options include signs, provision of alternate and more appropriate seating areas and designated smoking areas or the like, away from walkways, ramps, and stairs.

Asset managers may also consider management regimes appropriate to keeping access paths navigable at peak times and during emergencies. For example, advertising signs, coffee carts, charity collectors and people giving out sample products might be located out of the access path. Designated smoking areas away from access paths might also be considered.

5. Continuous accessible journey

Fit-for-purpose access paths are links in the chain of situations that must be negotiated during a public transport journey. A broken link in the chain or a link that deters some users may prevent a successful journey. Designers should be aware that their work affects entire journeys when dealing with sometimes challenging local constraints and strive for universal design outcomes if possible.

6. Anticipating future demand

Designers should at all times anticipate the future demand likely to be placed on public transport assets. Infrastructure and premises often have service lives extending over many decades. The demand over the expected life of the asset should therefore be the benchmark used when estimating passenger flow at peak times and during emergency egress.

[42] Fruin J. (1987) *Pedestrian Planning and Design*, Elevator World, Northwestern University.

15.4 Impact analysis

Status quo

Cost

The cost would be a lost opportunity to better define the nature, design and performance required for access paths capable of accommodating pedestrian flows at peak times and during emergency egress. Qualitatively, this may result in suboptimal outcomes at some locations and a lack of consistency between jurisdictions and projects.

Benefits

No status quo benefits are obvious beyond the current benefits.

Non-regulatory

Costs

For public transport operators and providers, the design process may become initially more onerous and incur costs. Costs imposed by meeting the outcomes would be at the discretion of the operator or provider constructing the access path. However, as these requirements are not mandatory and will be reflected in guidelines only, such costs can be limited to the extent that service providers and operators choose to make such amendments. If operators and service providers do not choose to construct access paths in line with the guidelines, this may limit the improvement for accessibility and may not improve the public transport experience for people with disability.

Updating the guidance may impose minimal additional costs in certain circumstances. This has been the experience in Brisbane, Queensland where the construction costs for access paths that are a part of the Cross River Rail project are seen as negligible. The universal design principle was taken. In Victoria, the Level Crossings Removal project is also utilising universal design principles in the rectification and construction work.

No costs for passengers are apparent.

Benefits

People with disability will have improved access to public transport infrastructure, resulting in increased participation in the workforce and life of the community.

Any public transport operator or provider who constructs access paths in accordance with the guidance would ensure maximised accessibility for passengers who have mobility impairments during peak times and emergencies. The adoption of the outcomes as guidance would also provide enhanced certainty that access paths meet both the Transport Standards requirements and public expectation.

Some jurisdictions are currently voluntarily building fit-for-purpose access paths to a standard that would largely meet the outcomes proposed. Potentially, by constructing fit-for-purpose access paths that have accounted for projected future demand, asset owners avoid future costs imposed by any upgrade work required on the access paths.

Regulatory

Costs

As these requirements are mandatory, the upfront design and build process for public transport operators and providers may be more onerous and incur costs. Financial or other considerations in making accessways the primary or sole path of travel in the rail environment, are slightly more challenging where there is a requirement to go over or under train lines. Due to the height requirements of overpass ramps, they are often long and require one or multiple turn backs to achieve an appropriate gradient. Ensuring that there is ease of egress for significant numbers of people, meet fire safety evacuation requirements and address all users requirements within the geography of a station environment whilst maintaining a ramp gradient that is appropriate would be challenging.

Significant upgrades require funding from governments to complete. In Victoria there has been a significant amount of works completed over the last 5 years and more planned over the coming 5-10 years. It is unlikely that this would be able to be implemented quickly and easily.

Whatever the full cost of meeting the outcomes might be, the unjustifiable hardship provisions the in Transport Standards will impose a cost ceiling that will vary from project to project and between operators and providers.

Benefits

People with disability will have improved access to public transport infrastructure, resulting in increased participation in the workforce and life of the community.

Operators or providers who construct fit-for-purpose access paths would ensure that access path accessibility for passengers who have mobility impairments would be maximised at peak times and during emergencies. The adoption of the outcomes would allow greater certainty that access paths meet the Transport Standards requirements.

As these requirements are mandatory, the updated requirements may serve to defray future costs. Rectification work on access paths that prove inadequate for future increased pedestrian flow would hopefully be avoided.

15.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the ‘access paths to be the principle pedestrian path of travel’ regulatory options, do you prefer: option 1, option 2 or option 3?
    - For the ‘access paths to be kept clear at all times’ regulatory options do you prefer: option 1, option 2 or option 3?
- What is the experience of people with disability when entering or exiting public transport infrastructure where both stairs and ramps have been co-located?
- What causes a blocked accessway for people with a disability at public transport sites?
- What is the impact of a blocked accessway at public transport sites for people with disability?

- What makes a public transport site accessway safe and ensures direct navigation for timely egress at all times ('fit for purpose') for people with disability?
    - How does a 'fit for purpose' accessway meet the needs of people with disability?
    - How will 'fit for purpose' accessways impact the public transport experience of people with disability?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - 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?
- Where stairs and ramps are co-located, what have been the observed customer behaviour or feedback that has been received about their functionality?
- 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')?
    - At what point do you decide to provide both stairs and ramps when designing transport infrastructure?
- How would you improve accessways at public transport sites so that they are 'fit for purpose'?
    - What upfront costs would you incur?

Chapter 16: Wayfinding

16.1 Nature and extent of the problem

Wayfinding is important to people who are blind or have low vision, as it is difficult to access most visual cues available to people without disability to assist with their wayfinding needs. Good wayfinding cues are also imperative for people with intellectual or cognitive disability, people who have difficulty orienting themselves in unfamiliar environments and people who may not read or understand English.

While the current Transport Standards covers several elements for wayfinding, such as symbols, signs, the use of tactile ground surface indicators (TGSIs) and lighting, the broader range of elements necessary to ensure good wayfinding, particularly in infrastructure and premises such as airports and rail stations, are not covered.

People with disability have provided feedback that the current Transport Standards do not provide adequate wayfinding guidance or specifications to assist people with a range of disabilities to independently and effectively navigate their way to, within or out of transport related infrastructure and premises.

Currently there is no single standard or guideline that offers a consistent, integrated approach to providing information for people with disability concerning wayfinding. Inconsistencies between the Transport Standards, the general provisions of the Disability (Access to Premises – Buildings) Standards 2010 (the Premises Standards) and Part H2 of the Premises Standards result in a lack of clarity.

16.2 Outcome to be achieved

The outcomes sought are:

1. The adoption of the current braille and tactile requirements in the National Construction Code, Volume One, Building Code of Australia 2019 (NCC) and Premises Standards, including the additional NCC requirements for exits (not in the Premises Standards).
2. Emphasising the need to adopt the existing requirements to install tactile ground surface indicators at the top and bottom of step ramps in passenger use areas of transport related buildings and infrastructure as this is currently ambiguous in the Transport Standards.[43]
3. The identification of any other existing elements of the Transport Standards relevant to wayfinding that are inconsistent with current and most recent compliance requirements to ensure consistency including, for example, braille and tactile signage at all toilets and rooms and spaces with hearing augmentation systems.
4. The adoption of specified provisions for tactile and braille information in AS 1428.4.2 Table C.1 (Buildings: Class 9b and Class 10a - building entrances) and Table C.2 (Buildings: Class 9b and Class 10a - facilities normally used by passengers including entries and exits to platforms, tram stops, bus stops, ticket purchase areas and check in areas, boarding or waiting rooms and customer assistance facilities) relating to building and room identification.
5. The adoption of a requirement for minimum 30% luminance contrast between internal floor and wall surfaces and between internal columns and wall or floor surfaces along continuous accessible paths of travel (note the Transport Standards already requires obstacles that directly abut an access path to have 30% luminous contrast with the background).

[43] AS1428.2 (1992) Clause 18.1, *Tactile ground surface indicators*

6. The adoption of a requirement for minimum 30% luminance contrast between external ground surfaces and street furniture/fixtures and between external columns and ground surfaces along external areas that also form part of a continuous accessible path of travel (note the Transport Standards already requires obstacles that directly adjoins an access path to have 30% luminous contrast with the background).

The referencing in either the Transport Standards Guidelines or *The Whole Journey: A guide for thinking beyond compliance to create accessible public transport journeys* (the Whole of Journey Guide) or a specific wayfinding guideline which references material in AS 1428.4.2 appendices for designers, planners and facility managers on the relationship between wayfinding elements and their importance in providing an integrated, consistent and intuitive wayfinding environment.

16.3 Policy options to address the problem

Status quo

The status quo option maintains the current Transport Standards provisions.

The Transport Standards currently contain provisions regarding wayfinding in a fragmented way in various parts including:

- Section 2.5 provides for luminous contrast on access paths and obstacles that adjoin them.
- Section 6.1 provides for the use of TGSI on ramps.
- Section 13.1 which deals with lifts.
- Sections 14.2 and 14.3 provide for TGSI and contrasting strips on stair nosings.
- Section 15.1 deals with raised tactile (but not braille) identification signage for accessible toilet facilities.
- Part 17 provides for height and illumination, location (including at points of change in direction) for signs and visibility and raised taxi registration numbers.
- Part 18 provides for location and design of TGSI.
- Section 20.1 which provides for lighting levels.
- Part 27 provides for access to information.

Non-regulatory option

This option would not involve any changes to the Transport Standards or Transport Standards Guidelines. However, additional wayfinding guidance would be inserted into the Whole Journey Guide. Alternatively, a specific wayfinding guideline could be developed to encourage consistency between the Transport Standards and NCC/Premises Standards.

The expanded wayfinding section in the Whole Journey Guide or the new wayfinding guideline, would provide valuable guidance for public transport operators and providers to improve independent transport usage and minimise discrimination against people with disability at public transport sites.

The wayfinding guidance in the Whole Journey Guide would include:

- Reference to NCC/Premises Standards, such as clause D3.6 (signage), Specification D3.6 (braille and tactile signs) and clause D3.8 (tactile indicators).
- Reference to Australian Standards AS1428.1 (2009) clauses 8.1, 8.2 and 9 as amended and AS/NZS1428.4.1 (2009) section 2 and 3 as suitable performance approaches to meeting Transport Standards obligations.
- Guidance on the need to install tactile ground surface indicators at the top and bottom of step ramps in passenger use areas of transport related buildings and infrastructure
- Guidance on the use of a minimum 30% luminance contrast between internal floor and wall surfaces and between internal columns and wall or floor surfaces along accessible paths of travel
- Guidance on the use of a minimum 30% luminance contrast between external ground surfaces and street furniture/fixtures and between external columns and ground surfaces along external areas that also form part of a continuous accessible path of travel.
- Reference to the Appendices A to G of AS 1428.4.2 as informative material aimed at providing designers, operators and providers with guidance on how to integrate wayfinding elements to achieve better outcomes for transport users.

If wayfinding guidance has any conflicts to any of the current prescriptive requirements of the Transport Standards, suitable performance-based approaches can be used to still meet the obligations under the Transport Standards (for example, equivalent access as in the current Transport Standards requirements).

Regulatory option

This option would make regulatory changes to the Transport Standards to address inconsistencies between the Transport Standards and NCC in relation to a range of matters concerning wayfinding and a change to the Transport Standards Guidelines by introducing several new wayfinding provisions covered in Appendix C of AS 1428.4.2 (2018) Means to assist the orientation of people with vision impairment - Wayfinding signs**.**

The enhanced wayfinding requirements will provide a clear regulatory framework to better help eliminate discrimination for people with disability using public transport.

The adoption of current NCC provisions in relation to signage and tactile indicators would improve consistency between the Transport Standards and the NCC and meet the guiding principles by applying best practice improving certainty and pursuing the best functional outcomes for people with disability.

The wayfinding regulatory changes would include:

- Replication of the current NCC clause D3.6 (signage), specification D3.6 (braille and tactile signs) and clause D3.8 (tactile indicators).
- Reference to Australian Standards AS1428.1 (2009) clauses 8.1, 8.2 and 9 as amended and AS/NZS1428.4.1 (2009) sections 2 and 3 as the appropriate technical specification references to meet Transport Standards obligations.
- A provision specifying a minimum 30% luminance contrast between internal floor and wall surfaces and between internal columns and wall or floor surfaces along continuous accessible paths of travel.

- A provision specifying a minimum 30 % luminance contrast between external ground surfaces and street furniture/fixtures and between external columns and ground surfaces along external areas that also form part of a continuous accessible path of travel.
- A provision specifying the installation of tactile ground surface indicators at the top and bottom of step ramps in passenger use areas of transport related buildings and infrastructure.

The Transport Standards Guidelines would also be updated to include reference to the appendices of AS 1428.4.2 (2018) as informative material aimed at providing designers, operators and providers with guidance on how to integrate wayfinding elements to achieve better outcomes for transport users.

16.4 Impact analysis

Status quo

Costs

People with disability would continue to experience limited independent access to public transport systems because the Transport Standards don't include the wayfinding features developed over the past 20 years. This includes elements such as signage, access path identification and our understanding of the way people with particular disability use orientation and mobility cues to access and negotiate through the built environment.

Benefits

There are no benefits for maintaining the status quo.

Non-regulatory option

Costs

Any public transport operator or provider who provides wayfinding in accordance with the guidance would ensure that wayfinding for people with vision impairment and others benefiting from clearer wayfinding information would be maximised. The adoption of the outcomes as guidance would provide enhanced certainty that wayfinding meets the Transport Standards requirements.

There are no apparent costs to people with disability.

Costings of applying current NCC requirements in relation to signage and tactile indicators was assessed through a RIS process as part of the introduction of the 2010 NCC and Premises Standards and was considered to be reasonable.

Benefits

Initial research suggests that many public transport operators or providers are already applying more recent approaches in the area of signage and tactile indicators.

Wayfinding for people with a vision impairment and others benefiting from clearer wayfinding information would be maximised and made nationally consistent to the extent possible. For public transport operators and providers, the adoption of the outcomes would provide enhanced certainty that their wayfinding provisions met both the Transport Standards requirements and public expectation.

Regulatory option

Costs

For public transport operators and providers, the provision of enhanced wayfinding may be initially more onerous and incur costs.

Costings of applying current NCC requirements in relation to signage (including exit related braille and tactile signage) and tactile indicators was assessed through a RIS process as part of the introduction of the 2010 NCC and Premises Standards and was considered to be reasonable.

Step ramps in existing transport related buildings will be relatively uncommon and as a result costs to operators and providers will be low. Adoption and application of requirements and guidance listed in AS1428.4.2 (2018) appendices at the early design stage of a transport project will reduce any cost impact later in the development stage.

Initial research suggests that many transport operators or providers are already applying more recent approaches in the area of signage and tactile indicators.

Benefits

Wayfinding for people with vision impairment and others benefiting from clearer wayfinding information would be maximised and made nationally consistent to the extent possible. For public transport operators and providers, the adoption of the outcomes would provide enhanced certainty that their wayfinding provisions met both the Transport Standards requirements and public expectation.

Other benefits include having increased ability to undertake public transport journeys, resulting in increased participation in the workforce and the life of the community.

16.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What experiences have people with disability had with wayfinding? Can you provide examples?
    - How is wayfinding used?
- What are the good and bad features of wayfinding approaches taken by providers at public transport sites?
- What wayfinding guidance or support do people with disability rely on most to ensure they can safely navigate public transport sites?
- What needs to be done to improve wayfinding in public transport sites?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- 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?

- 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?
- What are the impacts of working with people with disability to develop wayfinding approaches?
- What are the issues public transport operators and providers face when trying to implement good wayfinding strategies?
- 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 Code and Premises Standards;
    - 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

17.1 Nature and extent of the problem

Some people with vision impairment use wayfinding cues such as directional and warning tactile ground surface indicators (TGSIs) to navigate independently. However, TGSIs have limitations as a wayfinding cue by only providing the user directions in a single pre-determined way.

The Australian Standard for TGSIs (AS1428.4.1:2009) make provision for directional TGSIs and infers that they are required to assist in wayfinding in the absence of other directional cues, such as hand rails and walls, in open air environments which can be followed by people with vision impairment through shorelining. Directional TGSIs are needed in the absence of such physical cues in the environment or where the installation of other permanent measures is technically not feasible (for example, in open air environments).

The current Transport Standards do not include requirements to assist people who are blind or have vision impairment to navigate through public transport precincts. This often leads to a poor understanding of what is required resulting in an inconsistent application or, in some instances, the absence of directional cues.

Some public transport providers have received advice from the disability community that directional TGSIs should not be used as they can become confusing and dangerous, particularly for mobility aid users. Therefore, it is important to consider what is required to minimise this discomfort, but also allow people with vision impairment to navigate independently to essential locations.

17.2 Outcome to be achieved

Update the Transport Standards to provide clarity on the minimum requirements for directional TGSIs in transport environments. This should reflect the updated provisions in the AS1428.4.1:2009, as well as the key facilities and transport options that people with vision impairment should be directed to and from when using these navigational cues.

Furthermore, directional TGSIs will ensure the system is legible and caters for the variance in the complexity of the wayfinding task for people with vision impairment.

People that utilise mobility aid devices and people with vision impairment should form part of the consultation and co-design processes undertaken by operators to provide a clear understanding on where they are likely to encounter directional TGSIs in public transport precincts.

17.3 Policy options to address the problem

Status quo

No change is made to the current Transport Standards or Transport Standards Guidelines.

Under this option, the Transport Standards would continue to provide guidance on the applications of warning TGSIs; however, will stay silent on directional TGSIs and more broadly, requirements to assist people who are blind or have vision impairment to navigate independently through transport precincts.

Part 18 of the Transport Standards currently outlines requirements regarding the application of TGSIs:

18.1 Location

Tactile ground surface indicators must be installed on an access path to indicate stairways, ramps, changes of direction, overhead obstructions below a height of 2000 mm, and hazards within a circulation space or adjacent to a path of travel (AS1428.2 (1992) Clause 18.1, Tactile ground surface indicators).

18.2 Style and dimensions

(1) The style and dimensions of tactile ground surface indicators must comply with AS1428.4 (1992).

(2) The stated dimensions may be reduced where a conveyance design does not provide the necessary area.

18.3 Instalment at accessible bus boarding points

Colour-contrasted tactile indicators must be installed at accessible boarding points at bus stops or in bus zones.

18.4 Instalment at railway stations

Colour contrasted tactile indicators must be installed at the edges of railway platforms as prescribed by AS1428.4 (1992) Clause 6.7.

18.5 Instalment at wharves

Colour contrasted tactile indicators must be installed at wharf edges as prescribed by AS1428.4 (1992) Clause 6.8.

The Transport Standards Guidelines provide further advice regarding TGSIs in section 18.1.

18.1 Dimensions of indicators

The Disability Standards provide for an operator to define key areas on an access path with tactile ground surface indicators for people with vision impairment. The dimensions of the spaces to be defined are detailed in AS1428.4 (1992).

Non-regulatory option

Update the Whole Journey Guide to provide guidance on the use of directional TGSIs. Additional information would also be included in the Transport Standards Guidelines.

TGSIs are discussed in the 'Wayfinding' section of the Whole Journey Guide:

3.5.2 Wayfinding

Wayfinding is important to enable people to exit a transport service, quickly orientate themselves and locate the boarding point for their next service or the exit.

Wayfinding takes into account all the cues people use to orientate themselves within an environment. This includes looking for known landmarks, knowledge from previous experiences at that (or a similar) location, indicators such as signage or tactile ground surface indicators (TGSIs), maps, apps, sounds, textures, contrasts, temperature, interaction with other people (including customer service staff) and other cues.

People with disability may rely heavily on some of these cues and find others to be of no use. For example, a person who is blind or has low vision may find they rely heavily on sounds, texture, temperature and TGSIs to navigate their way.

Proposed content to be included in the Whole Journey Guide comprises:

Directional Tactile Ground Surface Indicators

Tactile Ground Surface Indicators (TGSIs) are a wayfinding tool used by people with vision impairment in the absence of other cues in the environment.

There are two types of TGSIs which assist in providing warning cues or can be used to provide directional cues in the environment. Warning TGSIs consist of a series of raised truncated domes which are installed on the ground or floor surface. Warning TGSIs alert people with a vision impairment to approaching hazards and the need to consider the environment and investigate before proceeding.

Directional TGSIs consist of a series of raised bars which are installed on the ground or floor surface. Directional TGSIs give directional orientation to people with a vision impairment to navigate through an area, to an object or to a service.

Directional TGSIs should be used when there is a need to:

- Provide a safe route.
- Give directional cues to deviate from the regular path of travel to get to a key destination or facility such as boarding points, concourses and help or information points.
- Signal a point of entry/exit to a facility or pedestrian crossing.

When using directional TGSIs, it is important to consider that their use is minimised to avoid the potential impacts to other users which may find traversing over TGSIs difficult or uncomfortable.

Consistent application of all TGSIs, including directional TGSIs, is also an important factor as this makes them more intuitive for people with vision impairment using these cues.

TGSIs are just one cue used in the environment and have a discrete purpose. Directional TGSIs are just one form of point to point navigation. The use of TGSIs does not preclude other systems or cues in the environment that may be used to provide guidance such as providing shore lines, continuous handrails or other assistive technology solutions. Rather they form part of a suite of cues used in the environment that may assist people with vision impairment.

Proposed content to be included in the Transport Standards Guidelines are as follows:

- The wayfinding solution implemented by a service provider (including the use of TGSIs) should be developed through a co-design process to ensure the functionality of the solution meets the needs of end users, and is fit for purpose.
- Any infrastructure or equipment installed as part of the accessibility design solution should be appropriately maintained throughout the life of the asset to ensure:
    - Ongoing functionality of the asset.
    - Ongoing safety of the asset. This is particularly important for assets installed at ground level such as TGSIs which could present a safety hazard if not properly maintained.

The requirements would not be mandatory, but would provide a clear understanding of what is expected to assist vision impaired customers access the services of public transport without precluding innovation.

Regulatory option

The regulatory option includes mandatory prescriptive and/or performance requirements in the Transport Standards and Transport Standards Guidelines.

This option would see content added to the Transport Standards to define the requirement for the use of directional TGSIs, adopting the requirements of AS1428.4.1:2009.

Changes will include design requirements and additional guidance on where it is expected that directional TGSIs may be used to assist vision impaired customers to navigate transport facilities in the absence of other wayfinding cues. Importantly, these requirements would also establish where directional TGSIs are not required due to the potential to interfere with mobility aids or create confusion for people with vision impairment. Changes to the use of warning TGSIs are not part of the scope of this Consultation RIS and any amendments to the relevant sections would be dealt with in future amendments.

Prescriptive: Include the following requirements in the Transport Standards (Currently Part 18):

- Where used, the design of warning tactile ground surface indicators must comply with the design with AS1428.4 (2009) Clause 2.3.2 Design requirements.
- Where used, the design of directional tactile ground surface indicators must comply with the design with AS1428.4 (2009) Clause 3.3.2 Design requirements.
- Where directional TGSIs are used in the absence of other wayfinding cues, they must be installed in accordance with AS1428.4 (2009) Clause 3.2.1 General, Clause 3.2.3 Placement and Clause 3.3 Change of Direction.

This option would also require an update to the Transport Standards Guidelines to ensure consistency with changes to the Transport Standards. It will be important to address the key areas (for example, amenities, help points, concourses) that passengers with a disability may need to access and the techniques and directional assistance required to navigate within a transport precinct.

Proposed content to include in the Transport Standards Guidelines are as follows:

Directional TGSIs

Directional TGSIs should be used when there is a need to:

- Provide a safe route.
- Give directional cues to deviate from the regular path of travel to get to a key destination or facility such as boarding points and help or information points.
- Signal a point of entry/exit to a facility or pedestrian crossing.

The use of Directional TGSIs should be minimised through good design and provision of other natural wayfinding cues such as provision of shorelines.

The placement of TGSIs should consider the safest and most efficient route for people with vision impairment to assist in navigation and orientation whilst minimising the impacts to other passengers.

17.4 Impact analysis

Status quo

Costs

If the status quo is maintained, passengers with a disability will continue to experience sub-optimal outcomes in navigating transport precincts. For example, incorrect layout of TGSIs can be a danger to vision impaired users. There may be a combination of directional and warning TGSIs at a crossing point for an intersection that leads a person to the centre of the intersection rather than directly across the street.

Benefits

There are no benefits in maintaining the current approach of Transport Standards regarding directional TGSIs.

Non-regulatory

Costs

Installing TGSIs will incur costs for public transport operators and providers. A Victorian public transport operator estimates that it is approximately $110 per metre to install TGSIs along a platform edge. Whilst this cost estimate is related to warning TGSIs, it is comparable when considering the cost of supply and installation of directional TGSIs within transport precincts. TGSIs require an appropriate surface to be installed correctly so additional costs may be incurred to resurface an area. This cost may be significant, and in the case of platforms can have flow on impacts for other parts of the platform infrastructure.

Benefits

The non-regulatory option provides a positive benefit by establishing clear, practical guidance to both people with disability and designers of transport infrastructure on the use of directional TGSIs.

Clear guidance will also facilitate safe access to public transport in alignment with the policy objectives of the Transport Standards reforms.

Regulatory

Costs

Installing directional TGSIs will incur costs for transport operators and/or providers. A Victorian public transport operator estimates that it is approximately $110 per metre to install TGSIs along a platform edge. TGSIs require an appropriate surface to be installed correctly so additional costs may be incurred to resurface an area. This cost may be significant, and in the case of platforms can have flow on impacts for other parts of the platform infrastructure.

Benefits

Providing clear requirements for directional TGSIs will benefit public transport operators, providers and designers, including situations where there is an interface between various parties and land-owners.

Clear requirements will also facilitate safe access to public transport.

17.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How do people with disability interact with directional TGSIs?
    - What are the benefits?
    - What are the challenges?
    - How should they be applied in public transport networks?
- What are the experiences of people with disability where tactile installations have been done well or poorly at public transport sites? This may include particular product/material types.
- If the proposed regulatory approach is adopted, how will this impact your decision to travel by public transport and the overall transport experience?
- If directional TGSIs are adopted in the absence of other cues, what key facilities or destinations are required to be identified as a minimum?
- In the absence of directional TGSIs, how can guidance to facilities be provided through technology solutions such as smart phone applications?
    - Are there any barriers that need to be considered in a technology approach?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What policies or guidelines are in place for the installation of directional TGSIs in and around public transport sites?
- How do you apply the requirements for directional TGSIs?
    - What are the barriers in applying the requirements?
- 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?
    - What feedback have you received from people with disability regarding the 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?
- What other wayfinding tools and cues do you currently implement for people with vision impairment?

Questions for access industry professionals

- Which option do you prefer: regulatory, non-regulatory or status quo?

- How will meeting the requirements of AS1428.4.1:2009 affect the disability community?
- What are the barriers in trying to adopt requirements for TGSIs, including directional TGSIs in transport precincts?

Chapter 18: Passenger loading areas

18.1 Nature and extent of the problem

Taxis, ride share services and personal vehicles provide an integral role in connecting people.

The Transport Standards facilitate the delivery of accessible facilities and infrastructure. However, the provisions do not extend to enabling passengers to safely arrive, depart, unload, load and move throughout the public transport precincts. Environments with insufficient amenity for passengers to feel safe can limit their participation in the community.

Generally, a lack of access to safe loading areas can be a problem, especially for wheelchair accessible taxis (WATS). The lack of appropriate drop off areas are also problematic and often dangerous. For instance, mobility aid users are often dropped off on kerbs at busy intersections due to unavailability of appropriate kerb access.

18.2 Outcome to be achieved

The addition of provisions into the Transport Standards for the design and delivery of passenger loading areas as they relate to conveyance access, and their role in the whole-of-journey approach (first and last mile).

Also harmonisation of the Transport Standards and existing Australian Standards with adaptation of best practice outcomes would be achieved for people with disability in passenger loading areas. This would be a standalone section with the same set of requirements for public loading areas (private vehicle loading and unloading), ride share and taxi areas.

18.3 Policy options to address the problem

Status quo

This option maintains the status quo with no changes to the current Transport Standards and no new guidance material is issued.

Passenger loading areas, such as drop off/pick up points and taxi ranks will continue to be not specifically addressed in the Transport Standards. However, there is an inference that loading areas need to be accessible by applying the boarding points and kerb requirements in section 8.1 of the Transport Standards.

> **8.1 Boarding points and kerbs**
>
> (1) Operators and providers may assume that passengers will board at a point that has a firm and level surface to which a boarding device can be deployed.
>
> (2) If a kerb is installed, it must be at least 150 mm higher than the road surface.

As taxis are a conveyance that falls within the application of the Transport Standards, any passenger loading areas used by taxis, such as drop off/pick up points and taxi ranks, should be accessible. As there are no specific details on what constitutes an accessible passenger loading area, there are inconsistent and poor accessibility outcomes.

As private vehicles and ride share vehicles are not covered by the Transport Standards, technically drop off/pick up points that are dedicated to these vehicles do not need to be accessible under the Transport

Standards. However, as drop off/pick up points can also be used by taxis, they should also be accessible. Again, as there are no specific details on accessible passenger loading areas in the Transport Standards, there are inconsistent and poor accessibility outcomes.

Non-regulatory option

The non-regulatory option would result in expanding sections 3.3.5 and 3.5.6 in the Whole Journey Guide to provide more specific detail on accessible passenger loading areas to ensure best practice with a whole-of-journey approach.

The Whole Journey Guide includes sections on drop off/pick up points (section 3.3.5) and kiss-and-ride/taxi facilities (section 3.5.6). These sections have limited content and it may be appropriate to include more specific access provisions as outlined below.

Passenger loading areas definition

Various terms are used for passenger loading areas such as drop off/pick up points, kiss and ride facilities and taxi facilities.

Passenger loading areas should be defined as vehicle spaces serving public transport facilities where passengers can embark or disembark from private vehicles, taxis and ride share vehicles. There should be an acknowledgement in the definition that passenger loading areas includes drop off/pick up points (that are also known as kiss-and-ride areas) and taxi ranks whereby private vehicles, taxis and ride share vehicles can all utilise drop off/pick up points. There should also be an acknowledgement that taxi ranks can be provided in addition to drop off/pick up points that are exclusively used by taxis.

Specific access provisions for passenger loading areas

1. If a single drop off/pick up point is provided to serve a public transport facility or precinct, it should be accessible and if more than one drop off/pick up point is provided, at least one should be accessible.

2. If a taxi rank is provided at a public transport facility or precinct, passengers should be able to embark or disembark from dedicated accessible taxi rank spaces. There are several options concerning the extent of access that need to be considered for taxi ranks, such as:

   (a) The first and last taxi rank space should be accessible.

   (b) The first, second and last taxi rank space should be accessible.

   (c) The first and last taxi rank space, as well as 1 space for every 4 spaces between the first and last space where there are more than 5 spaces, should be accessible.

3. If a passenger loading area is provided, an accessible drop off/pick up point or accessible taxi rank should:

   (a) Be within direct proximity of a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area. There are several options proposed regarding defining ‘direct proximity’, such as outlining that passenger loading areas should be located within a direct line of sight or within a certain distance. In terms of distance, some guidance can be taken from the table in clause 7(e) of AS1428.2-1992 that lists the ability of people with disabilities moving certain distances. Based on this

table, a distance of18 metres would suit 85% of people with disability – this could be a reasonable consideration to cover for most people with disability.

(b) Be located adjacent to a firm and level boarding area that joins an access path which links to a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area.

(c) Be arranged to avoid the need for passengers to cross any public road, private vehicular way or car park aisle to reach a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area.

(d) Comply with Australian Standard AS2890.5-2020 if it is an on-street passenger loading area.

(e) Avoid having on-street passenger loading areas on main roads with a preference to using service lanes, side streets or utilising off-street passenger loading areas where practicable. This is to accommodate the need for some people with disability who need assistance to embark or disembark and minimise hazards for many people who would be very vulnerable near busy roads, especially for people using mobility devices who would be below the line of sight of drivers travelling past a passenger loading area.

(f) Comply with Australian Standard AS/NZS2890.6-2009 if it is an off-street passenger loading area.

(g) Include warning TGSIs along the entire length of the passenger loading area as per clause 2.5 of AS/NZS1428.4.1-2009 where it joins a passenger loading area at grade (i.e. on the same level) or has a kerb or level change less than 150 mm.

(h) Include warning and directional TGSIs to indicate its location from a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area or other suitable passive guidance measures.

(i) Include a kerb ramp as per clause 10.7 of AS1428.1-2009 where a pedestrian area is delineated with a kerb or level change, whereby the kerb or level change must not exceed 190 mm high.

(j) Be identified with the international symbol of access, with directional wayfinding signage, and with the international symbol along the access paths to a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area.

It is likely that in many cases passenger loading areas may need to be located on private or local government-controlled land. This can present difficulties for operators as they may not have complete control to achieve the desired outcome and consent will be required from owners to make changes to their asset.

Although this could be problematic, this is already a reality with some Transport Standards requirements. For example, section 2.2 of the Transport Standards requires an access path to comply with clause 7 of AS1428.2-1992. One part of this clause states:

(a) Accessible paths of travel within the boundary of the site shall be provided from transportation stops, accessible parking and passenger loading zones, and public streets or walkways to the accessible building entrance they serve.

Regulatory option

This option includes a regulatory change to the current Transport Standards requirements to provide more specific detail on accessible passenger loading areas, as well as updating the Transport Standards Guidelines to ensure consistency with the new Transport Standards requirements.

As noted in the status quo and non-regulatory options, passenger loading areas, such as drop off/pick up points and taxi ranks, are not specifically mentioned in Transport Standards or the Transport Standards Guidelines, and the Whole Journey Guide has limited content on passenger loading areas. This can result in inconsistent and poor accessibility outcomes.

The intended outcome is to update the Transport Standards and the Transport Standards Guidelines to give more detailed guidance on passenger loading areas. This would include defining passenger loading areas and including specific access provisions to ensure best practice for accessibility with a whole-of-journey approach. As per the listed objectives of this deliverable, it would include outlining the extent of access of passenger loading areas, their location, their design by utilising existing Australian Standards, the interrelationship of entry points and access paths associated with public transport services and the use of tactile ground surface indicators (TGSIs) and wayfinding signage to identify locations.

Passenger loading areas definition

Various terms are used for passenger loading areas such as drop off/pick up points, kiss-and-ride facilities and taxi facilities.

Passenger loading areas should be defined as vehicular spaces serving public transport facilities where passengers can embark or disembark from private vehicles, taxis and ride share vehicles. There should be an acknowledgement in the definition that passenger loading areas includes drop off/pick up points (also known as kiss-and-ride areas) and taxi ranks whereby private vehicles, taxis and ride share vehicles can all utilise drop off/pick up points. There should also be an acknowledgement that taxi ranks can be provided in addition to drop off/pick up points that are exclusively used by taxis.

Specific access provisions for passenger loading areas

Even though the Transport Standards do not include any specific reference to passenger loading areas, the current Whole Journey Guide highlights several considerations with passenger loading areas, such as:

- Creating drop off/pick up points with access to public transport nodes
- Locating drop off/pick up points a suitable distance from public transport nodes
- Providing an accessible route for people with disability from drop off/pick up points and taxi ranks to ensure safe travel between roads and footpaths (including the need for level footpaths, kerb ramps, wayfinding information and cues)
- Considering that people with disability often need to be assisted by taxi or other drivers, especially in situations where motorised mobility devices need to embark or disembark.

Taking the above points from the Whole Journey Guide and expanding them to support best practice for accessibility, the specific access provisions that would be adopted in the Transport Standards to better define appropriate access for passenger loading areas are:

1. If a single drop off/pick up point is provided to serve a public transport facility or precinct, it must be accessible and if more than one drop off/pick up point is provided, at least one must be accessible.

2. If a taxi rank is provided at a public transport facility or precinct, passengers must be able to embark or disembark from dedicated accessible taxi rank spaces.

3. If a passenger loading area is provided, an accessible drop off/pick up point or accessible taxi rank must:

   (a) Be within direct proximity of a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area. There are several options proposed regarding defining 'direct proximity', such as stating that passenger loading areas need to be located within a direct line of sight or within a certain distance. In terms of distance, some guidance can be taken from the table in clause 7(e) of AS1428.2-1992 that lists the ability of people with disabilities moving certain distances. Based on this table, a distance of18 metres would suit 85% of people with disability – this could be a reasonable consideration to cover for most people with disability.

   (b) Be located adjacent to a firm and level boarding area that joins an access path which links to a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area.

   (c) Be arranged to avoid the need for passengers to cross any public road, private vehicular way or car park aisle to reach a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area.

   (d) Comply with Australian Standard AS2890.5-2020 if it is an on-street passenger loading area.

   (e) Avoid having on-street passenger loading areas on main roads with a preference to using service lanes, side streets or utilising off-street passenger loading areas where practicable. This is to accommodate the need for some people with disability who need assistance to embark or disembark and minimise hazards for many people who would be vulnerable near busy roads, especially for people using mobility aid devices, who would be below the line of sight of drivers travelling past a passenger loading area.

   (f) Comply with Australian Standard AS/NZS2890.6-2009 if it is an off-street passenger loading area.

   (g) Include warning TGSIs along the entire length of the passenger loading area as per clause 2.5 of AS/NZS1428.4.1-2009 where it joins a passenger loading area at grade (on the same level) or has a kerb or level change less than 150 mm.

   (h) Include warning and directional TGSIs to indicate its location from a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area or other suitable passive guidance measures.

   (i) Include a kerb ramp as per clause 10.7 of AS1428.1-2009 where a pedestrian area is delineated with a kerb or level change, whereby the kerb or level change must not exceed 190 mm high.

   (j) Be identified with the international symbol of access, with directional wayfinding signage, and with the international symbol along the access paths to a main pedestrian entry point of a public transport facility and any other interconnecting public transport boarding area.

Three sub-options for the number of taxi rank spaces that must be accessible have been identified:

Sub-option 1 - The first and last taxi rank space must be accessible.

Sub-option 2 - The first, second and last taxi rank space must be accessible.

Sub-option 3 - The first and last taxi rank space, as well as 1 space for every 4 spaces between the first and last space where there are more than 5 spaces, must be accessible.

It is likely that in many cases passenger loading areas associated with public transport services may need to be located on private or local government-controlled land. This can present difficulties for operators and providers as they may not have complete control to achieve the desired outcome. For example, a new train station replacing an old facility could have a drop off/pick up area adjacent to the train station in a council-owned car park where the train service provider is also seeking to upgrade the drop off/pick up area as part of the new works. As the drop off/pickup area is within council owned land, consent will be required from council to make changes to their asset.

Although this could be a problematic situation, this is already a reality with some parts of the current Transport Standards. For example, section 2.2 of Transport Standards requires an access path to comply with clause 7 of AS1428.2-1992. One part of this clause states:

(a) Accessible paths of travel within the boundary of the site shall be provided from transportation stops, accessible parking and passenger loading zones, and public streets or walkways to the accessible building entrance they serve.

As per the current Transport Standards requirements, there needs to be an access path from the entrance of public transport building to various elements, including passenger loading areas.

18.4 Impact analysis

Status quo

Costs

There is no financial cost to maintaining the status quo.

The opportunity cost of maintaining the status quo is a lost opportunity to address issues associated with the current Transport Standards.

Benefits

There are no benefits maintaining the status quo.

Non-regulatory

Costs

As adoption of the access provisions in the Whole Journey Guide will be discretionary for operators or providers, no national consistency of accessible passenger loading areas can be guaranteed.

No costs are apparent for passengers. For operators and providers, the design process may initially incur costs. However, the cost and design imposts to deliver accessible passenger loading areas is likely to reduce as the designers become accustomed to the requirements.

Benefits

Any operator or provider who constructs passenger loading areas as per the Whole Journey Guide would ensure that accessibility for passengers with disability would be maximised, as well as ensuring consistency with the intent of the *Disability Discrimination Act 1992* (DDA) to eliminate discrimination. The adoption of the access provisions would provide greater certainty that passenger loading areas also comply with existing Transport Standards requirements.

Regulatory

Costs

Some jurisdictions are currently voluntarily building passenger loading areas to a standard that would largely meet many of the suggested access provisions. It is envisaged that costs for new works would be minimal with difficulties expected with existing infrastructure or where the infrastructure (to build passenger loading areas to access public transport facilities) is on existing private land or local government-controlled land.

For operators and providers, the design process may initially incur costs. However, the cost and design imposts to deliver accessible passenger loading areas is likely to reduce as the designers become accustomed to the requirements.

Benefits

Updating the Transport Standards to include enhanced passenger loading areas will provide a clear regulatory framework to better help eliminate discrimination for people with disability using public transport. As part of this regulatory option, the Transport Standards Guidelines would also be updated for consistency of terminology and to supplement the new Transport Standards requirements. This would provide context to both the detail of the regulatory option and the importance of enhanced requirements for passenger loading areas in the public transport environment.

The adoption of the suggested access provisions for passenger loading areas would ensure that accessibility for passengers with disability would be maximised.

For operators and providers, the adoption of the proposed access provisions would provide enhanced certainty that passenger loading areas (both drop off/pick up points and taxi ranks) meet the Transport Standards requirements and help to ensure consistency of accessible passenger loading areas. Benefits for people with disability may also include reduced time loss, reduced injuries, increased confidence and independence.

If there are exceptionally difficult circumstances, providers or operators could choose to rely on the unjustifiable hardship provisions under the Transport Standards and the DDA.

18.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2 or sub-option 3?
- What experiences do people with disability have with alighting or loading at a taxi rank or passenger loading zone?

  - What are the challenges faced and why do they occur?
  - How can this be improved?
- What are the flow-on impacts for a person as a result of not being able to alight or load at a taxi rank or passenger loading zone?
- How many accessible passenger loading spaces (including taxi-specific) should be provided at public transport premises or infrastructure?
- If all taxi ranks and passenger loading zones at public transport premises and infrastructure were accessible, how would this affect the public transport experience of people with disability?
- What features are critical to making passenger loading zones accessible?
- If passenger loading can only be provided on one side of a public transport premise or infrastructure, what is the impact on passengers?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
  - For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2 or sub-option 3?
- What considerations do you currently make when designing passenger loading facilities?
  - What feedback have you received regarding the use of passenger loading facilities?
- If passenger loading can only be provided on one side of a public transport premises or infrastructure, what is the impact on passengers?
- In the circumstances where passenger loading can only be provided on one side, what are the reasons why?
- 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?
- How successful are AS2890.6-2009 and AS2890.5-2020 in 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?

Chapter 19: Provision of information in multiple formats

19.1 Nature and extent of the problem

Public transport operators and providers are increasingly using websites, smartphone applications (apps) and online systems to communicate either static or dynamic service information to customers. These systems offer flexibility in messaging whilst quickly providing substantial amounts of information to passengers compared to traditional information formats available on transport conveyances and within transport precincts. Online systems have a particular benefit for passengers in being able to allow for pre-journey planning from anywhere at any time.

The Transport Standards do not address online information, however they do make references to providing information in a customer's 'preferred format'. Section 27.1 of the Transport Standards requires general information about transport services to be accessible to all passengers.

Despite advances in technology and adoption of online systems and apps, not all customers have access to or the ability to use these systems. People with cognitive disabilities are particularly disadvantaged by their ability to access technology as a result of either financial or literacy barriers.[44] Therefore, it is important that people with disability are not further disadvantaged by not being able to access public transport service information that is provided solely through online systems.

The current Transport Standards do not provide clarity for operators and providers about what their obligations are in relation to providing information, nor do they provide certainty for people with disability that information will be available in multiple formats other than online systems and apps.

19.2 Outcome to be achieved

Update the Transport Standards to require the provision of information in multiple formats and that information is not solely provided through online digital means.

This will assist operators and providers in understanding their obligations in providing information to all people including those with disability. The outcome would also include guidance on the specific formats required. The aim is to provide greater certainty to people who cannot, for a range of reasons, use online systems and as a result, suffer disadvantage.

19.3 Policy options to address the problem

Status quo

Transport Standards requirements for the provision of information remain unchanged.

The current standards do not address online information however do make reference to providing information in a customer's 'preferred format'. The Transport Standards requires:

> **27.1 Access to information about transport services**
>
> General information about transport services must be accessible to all passengers.

[44] Lussier-Desrochers D, Normand CL, Romero-Torres A, et al. *Bridging the digital divide for people with intellectual disability*. Cyber Psychology. 2017, 11; Hoppestad B. *Current perspectives regarding adults with intellectual and developmental disabilities accessing computer technology*. Disability Rehabilitation: Assistive Technology. 2013; 8:190–194

27.2 Direct assistance to be provided

If information cannot be supplied in a passenger's preferred format, equivalent access must be given by direct assistance.

The Transport Standards Guidelines provide the following guidance regarding formats of information:

Part 27 Information

27.2 Formats for providing information

(1) Operators and providers should expect requests for information in formats such as standard or large print, Braille, audio, touch-tone telephone, TTY and on-line computer or disks.

(2) Passengers should anticipate that certain formats may only be available from certain outlets. For example, while bus drivers may provide oral information on timetables and bus routes, they should not be expected to have alternative format timetables on hand.

(3) If it is not possible for operators or providers to supply information in a particular format, passengers may expect assistance to be provided to enable them to use documentation in the available formats, for example, the provision of a photocopy enlargement of a timetable.

(4) However, essential travel and safety information, such as emergency instructions on aircraft, must be available in an accessible format or direct assistance must be given.

(5) Operators could choose to announce scheduled stops as one way of informing passengers of their whereabouts during a journey.

This option will see no change to the current requirements. It is expected that transport operators and providers will continue to increase the use of websites, smartphone apps and other online systems to communicate service information to customers without specific requirements to provide information in other formats. This will continue to disadvantage people who do not have access to online technology and cannot get information in alternative formats.

Non-regulatory option

The Whole Journey Guide will be updated and consolidated to clearly articulate the range of formats public transport information needs to be provided to people with disability.

3.1.2 Provide information in a range of formats

Currently, information about accessibility options is not always easy to find on transport and infrastructure provider websites. Communicating the availability of journey planning tools and assistance is an important whole-of-journey consideration.

Links to information and journey accessibility planning tools and assistance can be improved by these being consistently located on service and infrastructure providers' websites. User testing by people with disability should always be a design consideration in relation to online information.

It is recommended that information be provided in multiple formats to address the accessibility requirements of all users, and will need to include both technology based and more traditional formats. This will ensure that those who may not be able to access websites have general information available to them. General information includes but is not limited to timetables, routes, fare, payment methods, next stop information, next service information.

Simplicity is important for all users, but particularly for people who may have difficulty reading, who are deaf, those with a cognitive disability or those from non-English speaking backgrounds.

Regulatory option

The proposed regulatory option calls for the inclusion of mandatory prescriptive and performance requirements in the Transport Standards concerning alternative formats that must be used to provide information to customers.

A new section will be added to the Transport Standards to require that online information is not the sole means of information provision.

The Transport Standards currently includes the following in relation to information:

Section 27.1 Access to information about transport services

General information about transport services must be accessible to all passengers.

In addition to the above, the Transport Standards would specify additional requirements that allows for the provision of multiple formats and to what types of transport information this would be applicable to as a minimum. These include:

- General information for transport services cannot solely be provided in an online format such as a website.
- General information includes but is not limited to timetables, routes, fare, payment methods, next stop information, next service information.

The Transport Standards Guidelines would be amended to reflect and provide further advice on the new requirements

19.4 Impact analysis

Status quo

There is no financial cost of maintaining the status quo.

The opportunity cost of maintaining the status quo is a lost opportunity to address issues associated with the current Transport Standards.

Non-regulatory option

Costs

As this option is not mandatory, it may not fully address the problem, as providers and operators may choose not to implement the recommendations in the Whole Journey Guide and continue to provide information in limited formats. If transport providers and operators choose not to implement these recommendations, then there will be a lost opportunity to address issues in relation to provision of information in multiple formats which could improve the delivery of information to people with disability and improve their overall public transport experience.

Producing alternative formats for online material such as timetables or documents on an as needs basis is not costly whereas larger scale implementation of alternative information has a higher cost. As these guidelines are not mandatory, the cost incurred can be limited to the extent to which providers and operators implement the recommendations.

Benefits

Providing information in multiple formats will positively benefit people with disability who cannot use or have access to online systems as they will have the ability to access information in a method that suits their needs and have more certainty that this may be provided. Access to information will also allow people with disability to increase their ability to undertake public transport journeys, resulting in increased participation in the workforce and the community.

Regulatory option

Costs

A transport provider indicated that costs varied depending on the type of information, the format and delivery. Producing alternative formats for online materials such as timetables or documents on an as needs basis is not costly. Larger scale implementation of alternative format information at stations or on-board conveyances has a higher cost. As this option is mandatory, there will be limited scope for transport providers and operators to vary their level of implementation or the level of costs they will incur.

Timetable information can be challenging to display in a variety of formats for customers to access easily and readily other than in digital forms. Due to the size, amount and complexity of information in combination with the individual nature of someone's format requirements presenting this in alternative formats can be difficult. Braille or large print versions of timetables are large and cumbersome. Also due to the changing nature of the public transport environment having up to date information available when required can be most reliable online.

Benefits

As this option is mandatory, it will provide clarity around requirements for transport operators and providers and provide certainty for people with disability around expectations of provision of information. People with disability who previously may not have had the technical knowledge or the ability to independently access information through online systems will be able access the information they require to successfully undertake public transport journeys. Provision of accessible information to people with disability will result in greater access to public transport and increased economic and social participation.

Providing information in multiple formats will also likely have a positive benefit on the overall community and public transport users as information flow will be more accessible and assist in informing a user's public transport journey.

19.5 Consultation questions

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What is the critical information needed in a timely manner in order to make a successful public transport journey or trip?
- What are the current ways that information is received in relation to public transport services?
- What is the preferred format for people with disability? Is information available in this format?

- How do the format requirements change depending on the type of information (e.g. accessibility information and facility maps, timetables, service information)?
- What are the barriers in trying to access information on public transport services that is only online?
    - How does this impact an individual's ability to access information and affect your overall public transport experience?
- Have you had to ask for information to be supplied to you in another format that was only available online?
    - How was your request handled and how did the outcome meet your needs?
- How can communication related to public transport services be improved?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What alternative formats of information, other than online formats, do you utilise?
- 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?
- 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?
    - How do you meet these requests?
    - What are the barriers you face in being able to meet these requests?
- What are the costs associated with providing information in alternative formats when only provided in online content?
- How do you receive complaints from customers with a disability relating to the provision of information?
- How can communication methods with people with disability be improved?

Chapter 20: Amendments to references to Australian Standards

A number of Australian Standards references in the Transport Standards have been superseded by the release of new and updated Australian Standards. This chapter will discuss minor definition amendments and Australian Standards amendments with the aim of aligning the Transport Standards with current Australian Standards, Premises Standards and to harmonise language with the *Disability Discrimination Act 1992*.

You can access the Australian Standards at your local State or Territory Library. Alternatively, please contact the Department of Infrastructure, Transport, Regional Development and Communications for assistance (please refer to the Executive Summary of this Consultation RIS).

20.1 Objectives

- Update as many as possible of the Transport Standard's references to AS1428.2-1992 and AS1428.1-2001 to current Australian Standards, in a manner that imparts either no change in material outcome or only minor material changes.
- Migrate as many technical references from obsolete or withdrawn Australian Standards to current Australian Standards as possible.
- Align Transport Standards requirements with the Premises Standards where this gives favourable outcomes and achieves consistency.
- Harmonise Transport Standards terminology with the *Disability Discrimination Act 1992* where it differs.

20.2 List of Amendments to the Transport Standards

The tables below provide details on all proposed amendments.

Table 1: Part 2, Section 2.4, Minimum unobstructed width

Aspect	Description
Issue	**Part 2 Access paths** 2.4 Minimum unobstructed width **No change in material outcome**
Current text	**2.4 Minimum unobstructed width** (1) The minimum unobstructed width of an access path must be 1200 mm (**AS1428.2 (1992) Clause 6.4**, *Width of path of travel*). (2) However, the minimum unobstructed width of a moving footway may be 850 mm.
Recommended text	**2.4 Minimum unobstructed width** (1) The minimum unobstructed width of an access path must be 1200 mm. (2) However, the minimum unobstructed width of a moving footway may be 850 mm.
Ramifications	Minimum access path width is unchanged. Only the AS1428.2 reference is dropped from 2.4 (1). Section 2.4 (2) remains unreferenced.
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply

Aspect	Description
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 2: Part 3, Section 3.1, Circulation space for wheelchairs to turn in

Aspects	Description
Issue	**Part 3 Manoeuvring areas** 3.1 Circulation space for wheelchairs to turn in **Minor change in material outcome**
Current text	**3.1 Circulation space for wheelchairs to turn in** A manoeuvring area must comply with **AS1428.2 (1992) Clause 6.2,** *Circulation space for a 180 degree wheelchair turn*.
Recommended text	**3.1 Circulation space for wheelchairs to turn in** A manoeuvring area must comply with **AS1428.1 (2009) Clause 6.5,** *Circulation space for wheelchair turn.*
Ramifications	Space for 180-degree turns remains unchanged between AS1428.2 Clause 6.2 and AS1428.1-2009 Clause 6.5 (2070 mm x 1540 mm). Specifications for 90-degree turns are introduced (1500 mm x 1500 mm) via AS1428.1 (2009) Clause 6.5. The AS1428.1-2009 specifications are required in D3.1 of the Premises Standards.
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 3: Part 4, Section 4.1, Minimum Width

Aspects	Description
Issue	**Part 4 Passing areas** 4.1 Minimum width **No change in material outcome**
Current text	**4.1 Minimum width** A passing area must have a minimum width of 1800 mm (**AS1428.2 (1992) Clause 6.5 (a)**, *Passing space for wheelchairs*).
Recommended text	**4.1 Minimum width** A passing area must have a minimum width of 1800 mm (**AS1428.1 (2009) Clause 6.4**, *Passing space for wheelchairs*).
Ramifications	AS1428.2-1992 Clause 6.5 (a) and AS1428.1-2009 Clause 6.4 have identical width requirements.

Aspects	Description
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 4: Part 6, Section 6.4, Slope of external boarding ramps

Aspects	Description
Issue	**Part 6 Ramps** 6.4 Slope of external boarding ramps **No change in material outcome**
Current text	**6.4 Slope of external boarding ramps** The slope of an external boarding ramp must not exceed: (a) 1 in 14 for unassisted access (**AS/NZS3856.1 (1998) Clause 2.1.8 (e)** (including the notes)); and (b) 1 in 8 for unassisted access where the ramp length is less than 1520 mm **(AS1428.2 (1992) Clause 8.4.2 (a) and AS1428.1 (2001) Figure 8)**; (c) 1 in 4 for assisted access **(AS/NZS3856.1 (1998) Clause 2.1.8 (e))**.
Recommended text	**6.4 Slope of external boarding ramps** The slope of an external boarding ramp must not exceed: (a) 1 in 14 for unassisted access; (b) 1 in 8 for unassisted access where the ramp length is less than 1520 mm; and (c) 1 in 4 for assisted access**.**
Ramifications	Both the current and recommended text of Section 6.4 (b) refer to a 1:8 maximum slope where the ramp length is less than 1520 mm for unassisted access on a boarding ramp. • AS1428.2 clause 8.4.2 (a) refers directly to AS1428.1-2001, Figure 8, which stipulates a 1:8 maximum gradient and 1520 mm maximum length. AS1428.1-2009, clause 10.7.2 also has a 1:8 maximum gradient and 1520 mm maximum length.
Affected conveyances	All, except dedicated school buses and small aircraft
Affected premises	N/A
Affected infrastructure	N/A

Table 5: Part 9, Section 9.10, International symbol of accessibility to be displayed

Aspects	Description
Issue	**Part 9 Allocated space** 9.10 International symbol of accessibility to be displayed **No change in material outcome**
Current text	**9.10 International symbol of accessibility to be displayed** • (1) The floor area of an allocated space must: • (a) display the international symbol of accessibility; and • (b) be outlined in a flush contrasting strip 25 mm wide. (2) The colours prescribed in **AS1428.1 (2001) Clause 14.2 (c)** are not mandatory.
Recommended text	**9.10 International symbol of accessibility to be displayed** • (1) The floor area of an allocated space must: • (a) display the international symbol of accessibility; and • (b) be outlined in a flush contrasting strip 25 mm wide. (2) The colours prescribed in **AS1428.1 (2009) Clause 8.2.1 (c)** are not mandatory.
Ramifications	• The colour requirements AS1428.1 (2001) Clause 14.2 (c) and AS1428.1-2009 8.2.1(c) are identical—white symbol on Ultramarine B21 background. The DSAPT Section 9.10 (2) offers a relaxation from the use of these colours rather than requiring them.
Affected conveyances	Buses Trains Trams Light rail
Affected premises	N/A
Affected infrastructure	N/A

Table 6: Part 10, Section 10.1, Compliance with Australian Standard

Aspects	Description
Issue	**Part 10 Surfaces** 10.1 Compliance with Australian Standard **Moderate change in material outcome**
Current text	**10.1 Compliance with Australian Standard** (1) Ground and floor surfaces must comply with **AS1428.2 (1992) Clause 9**, *Ground and floor surfaces*. (2) **AS1428.1 Supplement 1 (1993) Clause C12** provides criteria for the selection of floor surfaces.

Aspects	Description
Recommended text	**10.1 Compliance with Australian Standard—Premises and Infrastructure** Ground and floor surfaces must comply with **AS1428.1 (2009) Clause 7** *Floor or Ground Surfaces on Continuous Accessible Paths of Travel and Circulation Spaces.*
Ramifications	AS1428.1-2009 Clause 7 provides more detail on abutment and levels than AS1428.2-1992 Clause 9 and AS1428.1-2001 Clause 12 but lacks the guidance on suitable surfaces for wet or dry locations found in AS1428.1-2001 Clause 12.AS1428.1 Supplement 1(1993) ha
Affected conveyances	Buses, except dedicated school buses Coaches Ferries Trains Trams Light rail
Affected premises	N/A
Affected infrastructure	N/A

Table 7: Part 10, Section 10.2, Slip resistance—Premises and Infrastructure

Aspects	Description
Issue	**Part 10 Surfaces** 10.2 Slip resistance—Premises and Infrastructure **Moderate change in material outcome**
Current text	**10.1 Compliance with Australian Standard** (1) Ground and floor surfaces must comply with **AS1428.2 (1992) Clause 9**, *Ground and floor surfaces*. (2) **AS1428.1 Supplement 1 (1993) Clause C12** provides criteria for the selection of floor surfaces.
Recommended text	**10.2 Slip resistance—Premises and Infrastructure** **SA HB 198 (2014) Table 3a and 3b** provides slip resistance values for the selection of floor and pavement surfaces for premises and infrastructure.
Ramifications	• SA HB 198-2014 *Guide to the specification and testing of slip resistance of pedestrian surfaces* covers slip resistance requirements for both indoor and outdoor premises and infrastructure. Table 3A applications and values have been determined by the Australian Building Codes Board for use in regulations based on the National Construction Code (NCC). Table 3B applications and values have been determined by Technical Committee BD-094 for use in applications that are not regulated by the NCC. Technical Committee BD-094 has responsibility for the development and maintenance of *AS/NZS 4586 Slip resistance classification of new pedestrian surface materials.*

Aspects	Description
Affected conveyances	N/A
Affected premises	All
Affected infrastructure	All

Table 8: Part 10, Section 10.3, Slip resistance—Conveyances

Aspects	Description
Issue	**Part 10 Surfaces** 10.3 Slip resistance—Conveyances **Moderate change in material outcome**
Current text	**10.1 Compliance with Australian Standard** (1) Ground and floor surfaces must comply with **AS1428.2 (1992) Clause 9**, *Ground and floor surfaces*. (2) **AS1428.1 Supplement 1 (1993) Clause C12** provides criteria for the selection of floor surfaces.
Recommended text	**10.3 Slip resistance—Conveyances** (1) Conveyances must meet relevant Australian Design Rules (Australian Design Rule 58 – Conveyances) for slip and skid resistant surfaces.
Ramifications	Conveyance regulators have slip resistance requirements for floors, decks and surfaces that differ from those of the NCC and from the various authorities who have responsibility for public space. Section 10.1 (3) introduces no material change for industry manufacturing and operating conveyances but does introduce a new requirement into the DSAPT.
Affected conveyances	Buses, except dedicated school buses Coaches
Affected premises	N/A
Affected infrastructure	N/A

Table 9: Part 11, Section 11.1, Compliance with Australian Standard — premises and infrastructure

Aspects	Description
Issue	**Part 11 Handrails and grabrails** 11.1 Compliance with Australian Standard — premises and infrastructure **Minor change in material outcome**
Current text	**11.1 Compliance with Australian Standard — premises and infrastructure** A handrail must comply with **AS1428.2 (1992) Clause 10.1**, *Handrails*.

Aspects	Description
Recommended text	**11.1 Compliance with Australian Standard — premises and infrastructure** (1) A handrail must comply with **AS1428.1 (2009) Clause 12**, *Handrails* and **Clause 11.2**, *Stairway handrails*. (2) Handrails must have at least 30% luminance contrast with any background wall or surface adjacent to the handrail, within a distance of 2000 mm from the handrail. (3) If the handrail is interrupted a domed warning indicator with a height of between 4–5 mm and a diameter of between 10–12 mm must be provided on the top of the handrail 150 mm from the end of the handrail.
Ramifications	The current and recommended text have equivalent requirements except that the Note in AS1428.2 Clause 10.1 regarding second handrail has been omitted: *NOTE: Where a high proportion of users are short (i.e. not necessarily children) a second handrail should be provided in accordance with Figure 5.* AS1428.1-2009 Figure 29(A) has identical requirements to AS1428.1-2001 Figure 9. AS1428.1-2009 Figure 29(B) provides specification for elliptical profile handrails (permitted in the Premises Standards for *Accessways*). This is the only point of difference. Subsections (2) and (3) have been extracted from the requirements of AS1428.2 as they do not occur in AS1428.1-2009.
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 10: Part 11, Section 11.3, Handrails on steps

Aspects	Description
Issue	**Part 11 Handrails and grabrails** 11.3 Handrails on steps **No change in material outcome**
Current text	**11.3 Handrails on steps** (1) A handrail on steps need not extend beyond the top or bottom of the steps. (2) A domed button may be placed 150 mm from any break or end of a handrail instead of an extension at a rail end (**AS1428.2 (1992) Figure 5**).
Recommended text	**11.3 Handrails on steps** (1) A handrail on steps need not extend beyond the top or bottom of the steps. (2) A domed warning indicator complying with **Section 11.1 (3**) may be placed 150 mm from any break or end of a handrail instead of an extension at a rail end.
Ramifications	The *domed button* of AS1428.2-1992 Figure 5 has been incorporated into the DSAPT text as a *warning indicator*.
Affected conveyances	All, except dedicated school buses and small aircraft

Aspects	Description
Affected premises	N/A
Affected infrastructure	N/A

Table 11: Part 11, Section 11.4, Handrails above access paths

Aspects	Description
Issue	**Part 11 Handrails and grabrails** 11.4 Handrails above access paths **Minor change in material outcome**
Current text	**11.4 Handrails above access paths** If installed, a handrail above an access path must comply with **AS1428.1 (2001) Clause 6.1 (c),** *Handrails* and **Figure 9**.
Recommended text	**11.4 Handrails above access paths** If installed, a handrail above an access path must comply with **AS1428.1-2009, Clause 12(d),** *Handrails* and **Figure 29**
Ramifications	AS1428.1-2009 Clause 12(d) and AS1428.1-2001 Clause 6.1(c) have identical requirements. AS1428.1-2009 Figure 29(A) has identical requirements to AS1428.1-2001 Figure 9. AS1428.1-2009 Figure 29(B) provides specification for elliptical profile handrails (permitted in the Premises Standards for *Accessways*). This is the only point of difference.
Affected conveyances	All, except dedicated school buses and small aircraft
Affected premises	N/A
Affected infrastructure	N/A

Table 12: Part 11, Section 11.5, Compliance with Australian Standard

Aspects	Description
Issue	**Part 11 Handrails and grabrails** 11.5 Compliance with Australian Standard **No change in material outcome**
Current text	**11.5 Compliance with Australian Standard** A grabrail must comply with **AS1428.2 (1992) Clause 10.2**, *Grabrails*.
Recommended text	**11.5 Compliance with Australian Standard** A grabrail must comply with **AS1428.1 (2009) Clause 17**, *Grabrails*.

Aspects	Description
Ramifications	AS1428.2-1992 Clause 10.2 cites AS1428.1-2001, which covers grabrails in Clause 6.2. AS1428.1-2001 Clause 6.2 and AS1428.1-2009 Clause 17 read alike.
Affected conveyances	All, except dedicated school buses and small aircraft
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	Infrastructure except airports that do not accept regular public transport services

Table 13: Part 11, Section 11.7, Compliance with Australian Standard

Aspects	Description
Issue	**Part 11 Handrails and grabrails** 11.7 Grabrails to be provided in allocated spaces **No change in material outcome**
Current text	**11.7 Grabrails to be provided in allocated spaces** Grabrails that comply with **AS1428.2 (1992) Clause 10.2**, *Grabrails*, must be provided in all allocated spaces.
Recommended text	**11.7 Grabrails to be provided in allocated spaces** Grabrails that comply with **AS1428.1 (2009) Clause 17**, *Grabrails*, must be provided in all allocated spaces.
Ramifications	AS1428.2-1992 Clause 10.2 cites AS1428.1-2001, which covers grabrails in Clause 6.2. AS1428.1-2001 Clause 6.2 and AS1428.1-2009 Clause 17 read alike.
Affected conveyances	Buses, except dedicated school buses Coaches Ferries Trains Trams Light rail
Affected premises	N/A
Affected infrastructure	N/A

Table 14: Part 12, Section 12.2, Compliance with Australian Standard — premises and infrastructure

Aspects	Description
Issue	**Part 12 Doorways and doors** 12.2 Compliance with Australian Standard — premises and infrastructure **Moderate change in material outcome**

Aspects	Description
Current text	**12.2 Compliance with Australian Standard — premises and infrastructure** Doorways and doors must comply with **AS1428.2 (1992) Clause 11** (except **Clause 11.5.2**).
Recommended text	**12.2 Compliance with Australian Standard — premises and infrastructure** Doorways and doors must comply with **AS1428.1 (2009) Clause 13** *Doorways, Doors and Circulation Space at Doorways.*
Ramifications	AS1428.1-2009 Clause 13 increases some door circulation dimensions, particularly access path width (L dimension) which usually increases by 100 mm for swing or sliding doors. Most other requirements of AS1428.2-1992 Clause 11 and AS1428.1-2009 Clause 13 are equal or equivalent. AS1428.1-2009 Clause 13 is required by the Premises Standards A3.1 referencing D3.1.
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 15: Part 12, Section 12.4, Clear opening of doorways

Aspects	Description
Issue	**Part 12 Doorways and doors** 12.4 Clear opening of doorways **No change in material outcome**
Current text	**12.4 Clear opening of doorways** Doorways must comply with **AS1428.2 (1992) Clause 11.5.1**, *Clear opening of doorways*.
Recommended text	**12.4 Clear opening of doorways** Doorways must comply with **AS1428.1 (2009) Clause 13.2**, *Clear opening of doorways*.
Ramifications	AS1428.2-2009 Clause 11.5.1 and AS1428.1-2009 Clause 13.2 have identical 850 mm minimum clear open widths.
Affected conveyances	Buses, except dedicated school buses Coaches Ferries Trains Trams Light rail

Aspects	Description
Affected premises	N/A
Affected infrastructure	N/A

Table 16: Part 14, Section 14.2, Compliance with Australian Standards — premises and infrastructure

Aspects	Description
Issue	**Part 14 Stairs** 14.2 Compliance with Australian Standards — premises and infrastructure **Minor change in material outcome in 14.2(a), 14.2(b) and 14.2(c) in part** **Moderate change in material outcome (14.2(c) in part**
Current text	**14.2 Compliance with Australian Standards — premises and infrastructure** Stairs must comply with: (a) **AS1428.1 (2001) Clause 9.1** (including the notes), *Stair construction*; and (b) **AS1428.1 (2001) Clause 9.2**, *Stairway handrails*; and (c) **AS1428.2 (1992) Clause 13.2**, *Configuration of steps*, **Clause 13.3**, *Warning strip at nosing of steps* and **Figures 8 and 9**.
Recommended text	**14.2 Compliance with Australian Standards — premises and infrastructure** Stairs must comply with: (a) **AS1428.1-2009, Clause 11.1** *Stair construction*; and (b) **AS1428.1 (2009) Clause 11.2,** *Stairway handrails*, if the handrail is interrupted, a dome warning indicator with a height of between 4-5mm and a diameter of between 10-12mm must be provided on the top of the handrail 150mm from the end of the handrail; and (c) Risers will be 150-165mm and Treads will be 275-300mm.

Aspects	Description
Ramifications	*14.2 (a) Minor change* AS1428.1-2009 Clause 11.1 clarifies the AS1428.1-2001 Clause 9.1 requirement for stair setback from an access path and is referenced in the Premises Standards. The setback specifications of Clause 11.1 enhance the safety of people exiting the stair that meets another access path at a blind corner. AS1428.1-2009 Clause 11.1 will harmonise the DSAPT specifications for the contrasting strip on the tread nose with the Premises Standards requirements (AS1428.1-2009 Clause 11.1). AS1428.1-2009 Clause 11.1 references AS1428.4.1-2009 for TGSIs. *14.2 (b) Minor change* Apart from domed button specification the requirements of AS1428.1-2009 Clause 11.2 and AS1428.1-2001, Clause 9.2 read alike. *14.2 (c) Moderate change* AS1428.2 (1992) Clause 13.2 tread and riser geometry are dated. The Premises Standard relies on National Construction Code, Table D2.13 *Riser and going dimensions* for stair geometry. *14.2 (c) Minor change* With regard to contrasting strips AS1428.2-1992 Clause 13.3 and figures 8 and 9 are obsolete and have been identified as posing safety issues for people who have poor vision. The contrasting strip requirements of AS1428.1-2009, Clause 11.1(f) and (g) are required by the Premises Standards in D3.1.
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 17: Part 15, Section 15.1, Unisex accessible toilet — premises and infrastructure

Aspects	Description
Issue	**Part 15 Toilets** 15.1 Unisex accessible toilet — premises and infrastructure **Moderate change in material outcome**
Current text	**15.1 Unisex accessible toilet — premises and infrastructure** If toilets are provided, there must be at least one unisex accessible toilet without airlock that complies with **AS1428.1 (2001) Clause 10, Sanitary facilities**.

Aspects	Description
Recommended text	**15.1 Unisex accessible toilet — premises and infrastructure** If toilets are provided, there must be at least one unisex accessible toilet without airlock that complies with **AS1428.1-2009, Clause 15, Sanitary facilities**.
Ramifications	AS1428.1-2009, Clause 15 has superior requirements to AS1428.1-2001 Clause 10. Circulation space around the pan increases by 300 mm in length and width. Clearance around the wash basin increases slightly from 800 mm width to 850 mm. Washbasins are only permitted internally by AS1428.1-2009. AS1428.1-2001 permits washbasins to be either inside or outside the toilet compartment. Safety features such as backrests have been introduced. AS1428.1-2009, Clause 15 is required by the Premises Standards in F2.4.
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 18: Part 15, Section 15.4, Requirements for accessible toilets — ferries and accessible rail cars

Aspects	Description
Issue	**Part 15 Toilets** 15.4 Requirements for accessible toilets — ferries and accessible rail cars **No change in material outcome 15.4 (2)** **No change in material outcome 15.4 (3)** **No change in material outcome 15.4 (4)** **No change in material outcome 15.4 (5)** **Minor change in material outcome 15.4 (6)**
Current text	**15.4 Requirements for accessible toilets — ferries and accessible rail cars** (1) An accessible toilet must: (a) comply with the requirements set out in this section; and (b) allow passengers in wheelchairs or mobility aids to enter, position their aids and exit. (2) The minimum dimension from the centre line of the pan to the near-side wall must be 450 mm (**AS1428.1 (2001) Figure 22**). (3) The minimum dimension from the centre line of the pan to the far-side wall must be 1150 mm (**AS1428.1 (2001) Figure 22**). (4) The minimum dimension from the back wall to the front edge of the pan must be 800 mm (**AS1428.1 (2001) Figure 22**). (5) The toilet seat must be between 460 mm and 480 mm above the floor (**AS1428.1 (2001) Figure 18**). (6) Hand washing facilities must be provided either inside or outside the toilet (**AS1428.1 (2001) Clause 10.2.1 (b)**, *Water closets*).

Aspects	Description
Recommended text	(1) An accessible toilet must: (a) comply with the requirements set out in this section; and (b) allow passengers in wheelchairs or mobility aids to enter, position their aids and exit. (2) The minimum dimension from the centre line of the pan to the near-side wall must be 450 mm **(AS1428.1 (2009) Figure 38)**. (3) The minimum dimension from the centre line of the pan to the far-side wall must fall within the range of 1150—1450 mm. (4) The minimum dimension from the back wall to the front edge of the pan must be 800 mm **(AS1428.1 (2009) Figure 38)**. (5) The toilet seat must be between 460 mm and 480 mm above the floor **(AS1428.1 (2009) Figure 38)**. (6) Hand washing facilities must be provided inside the toilet (**AS1428.1 (2009) Clause 15.2.10**, *Washbasins for unisex accessible sanitary facilities*).
Ramifications	*15.4 (2) No change* AS1428.1-2009, Figure 38 and AS1428.1 (2001) Figure 22 have identical near-side wall to pan centre line requirements. *15.4 (3) No change* The minimum permitted dimension of 1150 mm is unchanged. The 1450 mm dimension has been achieved in the latest generation of Brisbane CityCats and should be encouraged where possible. It may also be achievable in some broad- or standard-gauge rail cars. *15.4 (4) No change* AS1428.1-2009, Figure 38 and AS1428.1 (2001) Figure 22 have identical wall to pan front edge requirements. *15.4 (5) No change* AS1428.1-2009, Figure 38 and AS1428.1 (2001) Figure 18 have identical seat height requirements. *15.4 (6) Minor change* AS1428.1-2009 Clause 15.2.10 is superior to AS1428.1 (2001) Clause 10.2.1 (b) in that the washbasin is internally located only. This is highly likely to be the practice in all new onboard toilets. It does limit the previous allowance for external hand washing facilities to equivalent access or unjustifiable hardship situations.
Affected conveyances	Ferries Accessible rail cars
Affected premises	N/A
Affected infrastructure	N/A

Table 19: Part 16, Section 16.2, Compliance with AS2899.1 (1986)

Aspects	Description
Issue	**Part 16 Symbols** 16.2 Compliance with AS2899.1 (1986) **No change in material outcome**
Current text	**16.2 Compliance with AS2899.1 (1986)** The illustrations and symbols prescribed in **AS2899.1 (1986)** must be used if applicable.
Recommended text	**16.2 Compliance with ISO 7001 (2007)** The illustrations and symbols prescribed in **ISO 7001 (2007)** *Graphical symbols — Public information symbols* must be used if applicable.
Ramifications	AS2899.1 (1986) illustrated various international symbols but has been withdrawn by Standards Australia. International symbols are currently illustrated in ISO 7001 (2007) *Graphical symbols — Public information symbols*.
Affected conveyances	All
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All

Table 20: Part 18, Section 18.1, Location

Aspects	Description
Issue	**Part 18 Tactile ground surface indicators** 18.1 Location **Minor change in material outcome**
Current text	**18.1 Location** Tactile ground surface indicators must be installed on an access path to indicate stairways, ramps, changes of direction, overhead obstructions below a height of 2000 mm, and hazards within a circulation space or adjacent to a path of travel (**AS1428.2 (1992) Clause 18.1**, *Tactile ground surface indicators*).
Recommended text	**18.1 Location** Warning tactile ground surface indicators must be installed on an access path to indicate stairways, ramps, escalators, passenger conveyors or moving walks, overhead obstructions below a height of 2000 mm, and hazards within a circulation space or adjacent to a path of travel (**ASNZ1428.4.1 (2009) Clause 2.3.3, Clause 2.4, Clause 2.5 and Clause 2.6**).
Ramifications	*Changes of direction* has been removed and *escalators, passenger conveyors or moving walks* inserted to accord with Premises Standards. Reference has been updated to AS1428.4.1-2009 as per Premises Standards. Directional TGSIs and other wayfinding cues will cover the *changes in direction* deletion.

Aspects	Description
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All

Table 21: Part 18, Section 18.2, Tactile ground surface indicators

Aspects	Description
Issue	**Part 18 Tactile ground surface indicators** 18.2 Style and dimensions **Minor change in material outcome**
Current text	**18.2 Style and dimensions** (1) The style and dimensions of tactile ground surface indicators must comply with **AS1428.4 (1992)**. (2) The stated dimensions may be reduced where a conveyance design does not provide the necessary area.
Recommended text	**18.2 Style and dimensions** (1) The style and dimensions of warning tactile ground surface indicators must comply with **ASNZ1428.4.1 (2009) Clause 2.2, Clause 2.3.1 and Clause 2.3.2**. (2) The style and dimensions of directional tactile ground surface indicators must comply with **ASNZ1428.4.1 (2009) Clause 2.2, Clause 3.2.1 and Clause 3.2.2**.
Ramifications	AS1428.4-1992 allows Type A, Type B and Type C profiles. Type A TGSIs are probably no longer commercially available. AS1428.4-1992 Type B and AS1428.4.1-2009 warning TGSIs have similar style and dimensional requirements for integrated TGSIs. AS1428.4-1992 Type C and AS1428.4.1-2009 directional TGSIs have similar style and dimensional requirements for integrated TGSIs. AS1428.4.1-2009 is required by the Premises Standard. Discrete TGSIs are an addition in AS1428.4.1-2009. They are widely used in the public transport environment. Reference to Conveyances in 18.2 (2) has been removed as section 18.2 of DSAPT applies only to *Infrastructure* and *Premises not covered by the Premises Standards*. The luminance contrast test for TGSIs accords with that required in the Premises Standards. AS1428.4-1992 has no luminance contrast test.
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All

Table 22, Part 18, Section 18.3, Instalment at accessible bus boarding points

Aspects	Description
Issue	**Part 18 Tactile ground surface indicators** 18.3 Instalment at accessible bus boarding points **Minor change in material outcome**
Current text	**18.3 Instalment at accessible bus boarding points** Colour-contrasted tactile indicators must be installed at accessible boarding points at bus stops or in bus zones.
Recommended text	**18.3 Instalment at accessible bus boarding points** Tactile ground surface indicators must be installed at accessible boarding points at bus stops or in bus zones. Tactile ground surface indicators must meet Luminance requirements of Section 18.2.
Ramifications	The text change introduces the requirement for luminance contrasting TGSIs.
Affected conveyances	N/A
Affected premises	N/A
Affected infrastructure	Bus boarding points

Table 23, Part 18, Section 18.4, Instalment at railway stations

Aspects	Description
Issue	**Part 18 Tactile ground surface indicators** 18.4 Instalment at railway stations **Minor change in material outcome**
Current text	**18.4 Instalment at railway stations** Colour contrasted tactile indicators must be installed at the edges of railway platforms as prescribed by **AS1428.4 (1992) Clause 6.7**.
Recommended text	**18.4 Instalment at railway stations** Warning tactile ground surface indicators must be installed at the edges of railway platforms as prescribed by **ASNZ1428.4.1 (2009) Clause 3.4**, except that the access path between the platform edge TGSIs and any platform infrastructure or building shall be a minimum of 1200 mm width. Tactile ground surface indicators must meet Luminance requirements of Section 18.2.
Ramifications	The text change introduces the requirement for luminance contrasting TGSIs. The recommended text reflects the outcome of a 2002 equivalent access process where it was recognised that platform edge TGSIs did not form part of a 1200 mm width access path unless significant constraints prevented compliance.
Affected conveyances	N/A
Affected premises	N/A

Aspects	Description
Affected infrastructure	Railway platforms

Table 24, Part 18, Section 18.5, Instalment at wharves

Aspects	Description
Issue	**Part 18 Tactile ground surface indicators** 18.5 Instalment at wharves **Minor change in material outcome**
Current text	**18.5 Instalment at wharves** Colour contrasted tactile indicators must be installed at wharf edges as prescribed by **AS1428.4 (1992) Clause 6.8**.
Recommended text	**18.5 Instalment at wharves** Warning tactile ground surface indicators must be installed at wharf edges as prescribed by **ASNZ1428.4.1 (2009) Clause 3.5**. Tactile ground surface indicators must meet Luminance requirements of section 18.2.
Ramifications	The text change introduces the requirement for luminance contrasting TGSIs.
Affected conveyances	N/A
Affected premises	N/A
Affected infrastructure	Passenger wharves

Table 25, Part 21, Section 21.1, Compliance with Australian Standard — premises and infrastructure (Controls)

Aspects	Description
Issue	**Part 21 Controls** 21.1 Compliance with Australian Standard — premises and infrastructure (Controls) **Minor change in material outcome**
Current text	**21.1 Compliance with Australian Standard — premises and infrastructure** Controls must comply with **AS1428.1 (2001) Clause 11**.
Recommended text	**21.1 Compliance with Australian Standard — premises and infrastructure** (1) Controls must comply with **AS1428.1 (2009) Clause 13.5** *Door controls* and **Clause 14**. (2) Door handles must luminance contrast with their background by at least 30%.

Aspects	Description
Ramifications	AS1428.1-2009, Clause 13.5 Door controls is superior to AS1428.1 (2001) Clause 11 in that it better defines the location and function of controls. Clause 13.5 also relaxes door opening forces to levels that were achievable by industry but which were still accessible. The Premises Standard requires compliance with AS1428.1-2009, Clause 13.5. Luminance contrast of door handles has been added to conform to section 21.2.
Affected conveyances	N/A
Affected premises	All, except premises to which the Premises Standards apply
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 26, Part 21, Section 21.2, Passenger-operated devices for opening and closing doors

Aspects	Description
Issue	**Part 21 Controls** 21.2 Passenger-operated devices for opening and closing doors **Minor change in material outcome**
Current text	**21.2 Passenger-operated devices for opening and closing doors** Passenger-operated devices for opening and closing manual and power assisted doors on conveyances must comply with **AS1428.2 (1992) Clause 23.2**, *Operation*, and **Clause 23.3**, *Door handles and hardware*.
Recommended text	**21.2 Passenger-operated devices for opening and closing doors and other controls** (1) Passenger-operated devices for opening and closing manual and power assisted doors on conveyances must comply with **AS1428.1 (2009) Clause 13.5**, *Door controls* and **Clause 14**. (2) Door handles must have luminance contrast with their background by at least 30%.
Ramifications	AS1428.2-1992 Clauses 23.2 and 23.3 (and by citation AS1428.1-2001 Clause 11.1) have similar requirements to AS1428.1 (2009) Clause 13.5. AS1428.1 (2009) Clause 13.5 is required by the Premises Standards A3.1 referencing D3.1. Controls for power operated doors are better defined by AS1428.1 (2009) Clause 13.5. Manual door opening forces are rationalised in AS1428.1 (2009) Clause 13.5 to conform to those that can be met by commercially available products. Luminance contrast of door handles has been retained from AS1428.2-1992 Clause 23.3.

Aspects	Description
Affected conveyances	Buses Coaches Ferries Trains Trams Light rail
Affected premises	N/A
Affected infrastructure	N/A

Table 27, Part 21, Section 21.3, Location of passenger-operated controls for opening and locking doors

Aspects	Description
Issue	**Part 21 Controls** 21.3 Location of passenger-operated controls for opening and locking doors **Minor change in material outcome**
Current text	**21.3 Location of passenger-operated controls for opening and locking doors** Passenger-operated opening and locking controls for doors on conveyances must be located according to **AS1428.1 (2001) Clause 11.1.2**, *Location*.
Recommended text	**21.3 Location of passenger-operated controls for opening and locking doors** Passenger-operated opening and locking controls for doors on conveyances must be located according to **AS1428.1 (2009) Clause 13.5.3**, *Location*.
Ramifications	AS1428.1-2009, Clause 13.5.3 is identical to AS1428.1 (2001) Clause 11.1.2 except that it better specifies the location for manual controls to power-operated doors. The Premises Standards requires compliance with AS1428.1-2009, Clause 13.5.3.
Affected conveyances	Buses Coaches Ferries Trains Trams Light rail
Affected premises	N/A
Affected infrastructure	N/A

Table 28, Part 21, Section 21.4, Signal devices for conveyances that stop on request

Aspects	Description
Issue	**Part 21 Controls** 21.4 Signal devices for conveyances that stop on request **Minor change in material outcome**
Current text	**21.4 Signal devices for conveyances that stop on request** (1) Conveyances that stop on request must be equipped with signal devices that comply with **AS1428.2 (1992) Clauses 23.2 and 23.3**. (2) If a signal is operated by a button or pad, one surface dimension must be at least 25 mm.
Recommended text	**21.4 Signal devices for conveyances that stop on request** (1) Conveyances that stop on request must be equipped with signal devices that comply with **AS1428.1 (2009) Clause 13.5** and **Clause 14**. (2) If a signal is operated by a button or pad, one surface dimension must be at least 25 mm.
Ramifications	AS1428.2-1992 Clauses 23.2 and 23.3 (and by citation AS1428.1-2001 Clause 11.1) have similar requirements to AS1428.1 (2009) Clause 13.5.
Affected conveyances	**s** Buses Trams Trains Light rail
Affected premises	N/A
Affected infrastructure	N/A

Table 29, Part 25, Section 25.4, Circulation space in front of vending machine

Aspects	Description
Issue	**Part 25 Payment of fares** 25.4 Circulation space in front of vending machine **No change in material outcome**
Current text	**25.4 Circulation space in front of vending machine** The circulation space in front of any vending machine must allow for a 180 degree turn as in **AS1428.2 (1992) Clause 6.2**, *Circulation space for 180 degree wheelchair turn*.
Recommended text	**25.4 Circulation space in front of vending machine** The circulation space in front of any vending machine must allow for a 180 degree turn as in **AS1428.1 (2009) Clause 6.5,** *Circulation space for wheelchair turn.*
Ramifications	Space for 180-degree turns remains unchanged between AS1428.2 Clause 6.2 and AS1428.1-2009 Clause 6.5 (2070 mm x 1540 mm). The AS1428.1-2009 specifications are required in D3.1 of the Premises Standards.

Aspects	Description
Affected conveyances	N/A
Affected premises	All
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 30, Part 12, Section 12.3, Weight activated doors and sensors

Aspects	Description
Issue	**Part 25 Doorways and doors** 12.3 Weight activated doors and sensors **No change in material outcome**
Current text	**12.3 Weight activated doors and sensors** (1) A pressure pad of a weight activated door must be sensitive enough to detect a 15 kg service animal. (2) Any other type of sensor on an access path must be able to detect movement between ground level and 500 mm above the access path.
Recommended text	**12.3 Weight activated doors and sensors** (1) A pressure pad of a weight activated door must be sensitive enough to detect a 15 kg assistance animal. (2) Any other type of sensor on an access path must be able to detect movement between ground level and 500 mm above the access path.
Ramifications	The change from *service animal* to *assistance animal* aligns the Transport Standards text with the Disability Discrimination Act 1992 (DDA). Sections 8 and 9 of the DDA uses the term *assistance animal*.
Affected conveyances	N/A
Affected premises	All
Affected infrastructure	All, except airports that do not accept regular public transport services

Table 31, Part 28, Section 28.3, Location of carers, assistants and service animals

Aspects	Description
Issue	**Part 28 Booked services** 28.3 Location of carers, assistants and service animals **No change in material outcome**

Aspects	Description
Current text	**28.3 Location of carers, assistants and service animals** (1) On booked services, operators must locate carers, assistants or service animals with the passenger with whom they are travelling. (2) In the case of carers or assistants, this would normally be in an adjoining seat. (3) If a passenger is travelling with a service animal, the animal must be able to accompany the passenger at all times and to travel without encroaching onto an access path.
Recommended text	**28.3 Location of carers, assistants and assistance animals** (1) On booked services, operators must locate carers, assistants or assistance animals with the passenger with whom they are travelling. (2) In the case of carers or assistants, this would normally be in an adjoining seat. (3) If a passenger is travelling with an assistance animal, the animal must be able to accompany the passenger at all times and to travel without encroaching onto an access path.
Ramifications	The change from *service animal* to *assistance animal* aligns the Transport Standards text with the Disability Discrimination Act 1992 (DDA). Sections 8 and 9 of the DDA uses the term *assistance animal*.
Affected conveyances	Aircraft Coaches Ferries Dial-a-ride services
Affected premises	N/A
Affected infrastructure	N/A

Table 32, Part 31, Section 31.2, Information to be provided about vacating priority seating

Aspects	Description
Issue	**Part 31 Priority** 31.2 Information to be provided about vacating priority seating **No change in material outcome**
Current text	**31.2 Information to be provided about vacating priority seating** Operators must inform all relevant passengers (by signage or similar systems) that they should vacate an identified priority seat or allocated space if a passenger with a disability requires it.
Recommended text	**31.2 Information to be provided about vacating priority seating *and allocated spaces*** Operators must inform all relevant passengers (by signage or similar systems) that they should vacate an identified priority seat or allocated space if a passenger with a disability requires it.

Aspects	Description
Ramifications	The existing heading mentions only priority seating but the text also covers allocated spaces. Amending the heading imposes no material change and clarifies the intent of the text.
Affected conveyances	Buses Coaches Ferries Trains Trams Light rail
Affected premises	N/A
Affected infrastructure	N/A

20.3 Consultation questions

- Do you support the changes to the references to Australian Standards?
    - If not, which changes do you not support and why?
- Do you find domed buttons at the end of a staircase to be helpful as a warning indicator?
- Would it be helpful if section 21.2 (Controls – passenger-operated devices for opening and closing doors) and section 21.3 (Controls – location of passenger operated controls for opening and locking doors) in the Transport Standards are consolidated as a single provision?

Chapter 21: Consultation

This chapter:

- details the previous consultation that has occurred
- outlines the next steps, and
- presents a consolidated list of the consultation questions for the 16 areas of reform.

21.1 Previous consultation

As outlined under Part 34 in the Transport Standards, the Minister for Infrastructure and Transport, in consultation with the Attorney-General, is required to undertake a review of the efficiency and effectiveness of the Transport Standards every five years. The first of these reviews was held in 2007.

Under the 2012 review, the Department of Infrastructure identified the need to modernise the Transport Standards based on extensive consultations with key stakeholder groups, including disability rights groups, and transport operators and providers.

With the release of the review report and Australian Government response, the Department of Infrastructure, in close consultation with the National Accessible Public Transport Advisory Committee (NAPTAC), commenced a project to modernise the Transport Standards.

NAPTAC identified issues with the current standards after splitting into modal working groups. The modernisation work occurred in two phases based on the complexity of the issues identified.

This approach resulted in a process that focused on amendments to the existing prescriptive framework, rather than identifying and addressing problems with the overarching framework and finding the best ways to address the issues identified.

With a process focused on technical aspects of the Transport Standards, participation required in depth knowledge of both public transport systems and Australian Standards. As a result, draft consultation material produced in 2018 proposed amendments to existing prescriptive standards and predominantly focused on costs to industry rather than the removal of discrimination against people with disability.

On 2 August 2019, the former Transport and Infrastructure Council (now Infrastructure and Transport Ministers' Meeting), consisting of all state and territory government transport ministers and chaired by the Deputy Prime Minister, endorsed a proposal that the Queensland Government and the Australian Government commence a new, refreshed process to reform the Transport Standards.

21.2 Next steps

Once the public consultation period for this Consultation RIS has completed, a Decision RIS will be prepared. The Decision RIS will incorporate the updated and relevant information collected from stakeholders during the consultation period. The Decision RIS will also make recommendations for each option (non-regulatory and regulatory) to adopt in relation to modernising the Transport Standards and be provided to the Australian, state and territory transport ministers for decision.

21.3 Consultation questions

Each of the 16 areas for reform, as well as updates to the Australian Standards references comprise a series of questions to support gathering of views from interested community members and stakeholders

responding to this Consultation RIS. The following section provides a consolidated picture of all questions presented throughout each of the chapters.

Staff Training and Communication

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What experiences do people with disability have when interacting with frontline staff and employees of public transport networks, including when seeking assistance?
- How do public transport staff interact with people with disability?
    - How have these interactions affected the ability of people with disability to access public transport?
    - How have these interactions affected the sense of safety and confidence of people with disability to use public transport?
- How does disability awareness impact interactions with public transport staff?
    - How would mandatory disability awareness training impact interactions with public transport staff and overall experience with using public transport?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What disability awareness training do you provide to frontline and back of house staff?
- What processes are in place to ensure staff interacting with the public are aware of the needs of people with disability and transport accessibility?
- What processes are in place to make sure staff involved in design, policy and procurement undergo disability awareness or 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?
- If staff disability awareness training was mandatory:
    - Would you be required to implement new training programs?
    - What costs would you incur?
- Are there examples of improved accessibility or improved customer service interactions as a result of recently implemented training programs or well-trained staff?
- Are there any cases of complaints or other impacts on people with disability that you are aware of relating to staff training?

Mobility Aid Safety

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?

- What experiences do people with disability have in travelling in a mobility device or travelling with someone using a device on buses, trams and light rail?
- What current mobility device safety systems are in place for public transport conveyances?
- Would mobility device users be receptive to the installation of active restraints in public transport conveyances?
    - What would be the benefits to mobility device users?
    - What are any disadvantages to mobility device users?
    - How will the installation of active restraints impact the likelihood or ability of people with disability to use public transport?
- Should the installation of active restraints in public transport conveyances be mandatory or discretionary?
    - Can you provide reasons for why it should be mandatory or discretionary?
- If an active restraint was available without assistance from staff, how likely are people with disability to use the system while in transit?
    - How would using an active restraint without assistance from staff impact an individual's experience?
- If device users have a negative experience in using mobility devices, what mechanisms are in place to report the incident to industry or jurisdictions?

Questions for operators and providers of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What has been your experience in facilitating travel of mobility devices and carers for people using a device on the network?
- What mobility device restraining systems are used on your public transport conveyances?
    - 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?
- What technical barriers or difficulties do you experience in implementing solutions which prevent tipping of mobility devices in both existing and new fleet?
- 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?
- What alternative mitigations have you implemented to address the risks associated with mobility aids tipping or sliding out of allocated spaces while in transit?

- Have mobility device users on your public transport conveyances had accidents where the device has slipped or toppled over?
    - What methodologies have been implemented to minimise or reduce the likelihood of further incidents occurring?

Priority Seating

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the number of priority seats in the regulatory option, do you prefer: option 1, option 2, option 3 or option 4?
- What experiences do people with disability have in identifying, reaching and accessing priority seats on conveyances (buses, trains, trams)?
- Section 31.1 of the Transport Standards currently requires two priority seats for each public transport conveyance. Is this number appropriate? If not, what would be a reasonable number of priority seats to be provided?
    - How will an increase in the number of priority seats change an individual's experience of public transport?
- What are the benefits and challenges of people with disability wearing identification so that public transport staff and other passengers could recognise and allow them access to priority seats?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the number of priority seats in the regulatory option, do you prefer: option 1, option 2, option 3 or option 4?
- How many priority seats are provided on your conveyances?
    - 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)?
- If you have or were to install additional priority seats, what upfront and ongoing costs associated would you incur?
    - How will this impact associated operational issues?
- 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?
    - What upfront or ongoing costs would you incur?
    - What benefits would be achieved?

- How do you address circumstances where an individual refuses to vacate a priority seat for a person with a disability?

Allocated Spaces in Transit

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?
- What experiences do people with disability have in accessing allocated spaces on conveyances from the entry door?
    - What are the challenges people with disability face when accessing the allocated space (for example do objects project or protrude into the access path or is there enough space to permit turning into an allocated space)?
    - How will changes to requirements around access paths, manoeuvring areas and allocated spaces in conveyances affect an individual's public transport experience?
- What are the experiences of people with disability where allocated spaces are occupied by people who do not vacate?
    - How have public transport operators responded to such circumstances?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?
- Given the current requirements for allocated spaces what is your experience in the customer use of these facilities?
- 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?
- What upfront and ongoing costs would you incur if these changes became mandatory?
- How do you address circumstances where an individual refuses to vacate an allocated seat for a person with a disability?

Digital Information Screens

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How do people with disability use digital information displays at public transport sites and on public transport conveyances as part of their public transport journey?

  - How does this impact the public transport journey?
  - What experiences do people with disability have with digital information displays?
  - What display features worked well and what don't?
  - How could it be improved?
- How will digital displays with functional requirements which are user friendly for people with disability impact your likelihood or ability to use public transport?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What are the benefits for operators and providers associated with installing digital displays with functional requirements which are user friendly for people with disability?
- What are the barriers associated with installing digital displays to meet the needs of people with disability?
  - 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?
- 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?

Lifts

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What experiences do people with disability have when using lifts at public transport sites?
  - What are the barriers to using lifts?
  - What are the impacts of using lifts?
  - What are some of the critical features of lifts?
- How could lifts around public transport sites be improved?
- How will these proposed changes to lift requirements affect your public transport experience?
  - How would they change your current interaction with lifts?
- What experiences do people with disability have when a lift is out of service for maintenance or repair?
  - What equivalent means of access were provided to you to continue on your journey?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- When lifts are installed what are some of the key considerations to determine the most appropriate product?
    - Do you have current lift specifications or standard designs?
    - Which standard do you currently comply with?
- What are the impacts of harmonising the Transport Standards lift requirements with those of the NCC/Premises Standards?
- If the Transport Standards lift requirements are updated to align with NCC/Premises Standards requirements, what upfront and ongoing extra costs are likely to be incurred to meet these new requirements?
- If lifts are required to be updated to align with NCC/Premises Standards, how long will a lift be out of service?
- Do contractual lift maintenance and repair timeframes stress the fastest possible return to service?
- How can down times for lift maintenance and repairs be made equivalent in metropolitan and regional areas?
    - Where equivalence cannot be obtained, what would be a reasonable compromise timeframe for regional areas?
- What is the average response time for breakdown or entrapment in regional areas?

Website Accessibility

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?
- How do people with disability use websites to access information on public transport services?
- What are the benefits and challenges of using websites to access information?
    - How could websites be improved to meet the needs of people with disability?
- How will improved website accessibility impact an individual's public transport experience?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, do you prefer: sub-option 1, sub-option 2, sub-option 3 or sub-option 4?
- 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?

    - What are the barriers and challenges with meeting website accessibility requirements?
- How do the current website accessibility requirements meet the needs of people with disability?
    - 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?
- If the current website does not meet the AA requirements, what upfront and ongoing costs would you incur to meet the requirements?
- If your websites were required to meet WCAG 2.1 AA requirements, what upfront and ongoing costs would you incur to meet the requirements?
    - What barriers or operational impracticalities will you face in meeting the requirements?
- If your websites were required to meet WCAG 2.0 AAA requirements, what upfront and ongoing costs would you incur to meet the requirements?
    - What barriers or operational impracticalities will you face in meeting the requirements?

Communication during Service Disruption

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory option 1, non-regulatory option 2 or status quo?
- What experiences do people with disability have with planned and unplanned disruptions relating to public transport?
    - How do planned and unplanned disruptions impact the public transport experience of people with disability?
- What communication methods relating to planned and unplanned disruptions on public transport currently work for people with disability and why?
- What communication methods during planned and unplanned disruptions do not work and why?
    - What could be improved?
- How will improved communication methods for planned and unplanned disruptions affect your sense of safety and security in using public transport?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory option 1, non-regulatory option 2 or status quo?
- What feedback have you received from people with disability regarding communication methods in planned and unplanned disruptions?
    - What key issues or themes can be identified?

- What types of communication do you use to communicate with people with disability regarding planned and unplanned transport disruptions?
- What additional costs have you incurred when applying and trialling additional communication methods as part of planned and unplanned disruptions?
- How do your communication methods that you use or have trialled impact people with disability?
- How can communication be improved during planned and unplanned disruptions?
- What barriers do you face to improving communication during planned and unplanned disruptions?

Gangways

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What are the experiences of people with disability in utilising gangways to access ferries?
- How can gangways to access ferries be improved?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How successful is the Transport Standards in providing clarity on technical and functional requirements for accessibility of gangways connecting to ferry pontoons?
    - How could the Transport Standards be improved to reflect best practice?
- What are the potential upfront or ongoing costs associated with providing clarity on technical requirements to reflect best practice?
- What are the core differences between a fixed ramp and a gangway from a design and use perspective?

Assistance Animal Toileting Facilities

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What experiences do people with disability have in traveling on public transport with an assistance animal with regards to toileting?
- How does assistance animal toileting areas not being available impact an individual's public transport journey?
- What are the risks when attempting to locate a suitable place to toilet your assistance animal?
- What features or design elements of assistance animal toileting areas are good and not so good?
- If an assistance animal toileting area was available on the public transport network, would people with disability use it, or seek an alternative location to toilet an assistance animal? If so why?

    - How will this affect an individual's access to public transport and confidence to use public transport?

- What transport precincts or locations would most benefit having an assistance animal toileting area available?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What considerations do you currently make for people traveling with an assistance animal on public transport?
- What (if any) assistance animal toileting areas have you constructed on your public transport network or facilities?
- What designs did you consider and what were the deciding factors that led you to your final design?
- What features are available to users within or immediately outside the area?
- 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?
- What was the cost (or foreseeable cost) to construct the area/s?
- What is the cost (or foreseeable cost) to maintain and clean the area/s?

Emergency Egress

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- If there is an emergency at a public transport site, what is required to ensure that people with disability can safely evacuate?
- What is the experience of people with disability who have been in an emergency situation at a public transport site?
- What is the experience of people with disability who have experienced an emergency situation in other premises?
    - What lessons can be learnt from that experience?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How can emergency egress be accommodated through the use of the existing provisions of access paths?
- 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?
- What are your policies and procedures in place for emergency situations?
- How do you manage emergency evacuation incidents at your public transport infrastructure sites?

    - What lessons can be learnt from these experiences?
- 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?

Questions for access industry professionals

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How can emergency egress be accommodated through the use of the existing provisions of access paths?
- What considerations are important to achieve successful emergency egress for people with disability at public transport infrastructure such as bus stops and tram stops?
- Are there best practice examples in achieving successful emergency egress for people with disability? Can you give examples?
- What are the known gaps in achieving successful emergency egress for people with disability?
- What are foreseeable barriers or difficulties in trying to adopt egress requirements for people with disability at public transport infrastructure sites?

Fit for Purpose Accessways

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the 'access paths to be the principle pedestrian path of travel' regulatory options, do you prefer: option 1, option 2 or option 3?
    - For the 'access paths to be kept clear at all times' regulatory options do you prefer: option 1, option 2 or option 3?
- What is the experience of people with disability when entering or exiting public transport infrastructure where both stairs and ramps have been co-located?
- What causes a blocked accessway for people with a disability at public transport sites?
- What is the impact of a blocked accessway at public transport sites for people with disability?
- What makes a public transport site accessway safe and ensures direct navigation for timely egress at all times ('fit for purpose') for people with disability?
    - How does a 'fit for purpose' accessway meet the needs of people with disability?
    - How will 'fit for purpose' accessway impact the public transport experience of people with disability?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the 'access paths to be the principle pedestrian path of travel' regulatory options, do you prefer: option 1, option 2 or option 3?

    - For the 'access paths to be kept clear at all times' regulatory options do you prefer: option 1, option 2 or option 3?

- Where stairs and ramps are co-located, what have been the observed customer behaviour or feedback that has been received about their functionality?
- 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')?
    - At what point do you decide to provide both stairs and ramps when designing transport infrastructure?
- How would you improve accessways at public transport sites so that they are 'fit for purpose'?
    - What upfront costs would you incur?

Wayfinding

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What experiences have people with disability had with wayfinding? Can you provide examples?
    - How is wayfinding used?
- What are the good and bad features of wayfinding approaches taken by providers and operators at public transport sites?
- What wayfinding guidance or support do people with disability rely on most to ensure they can safely navigate public transport sites?
- What needs to be done to improve wayfinding in public transport sites?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- 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?
- 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?
- What are the impacts of working with people with disability to develop wayfinding approaches?
- What are the issues public transport operators and providers face when trying to implement good wayfinding strategies?
- 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 Code and Premises Standards
- Specified provisions of Australian Standard AS 1428.4.2 concerning building and room identification
- Wider use of minimum 30 % luminance contrast requirements as currently required under Transport Standards Section 2.5 Poles and obstacles.

Tactile Ground Surface Indicators

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How do people with disability interact with directional TGSIs?
    - What are the benefits?
    - What are the challenges?
    - How should they be applied in public transport networks?
- What are the experiences of people with disability where tactile installations have been done well or poorly at public transport sites? This may include particular product/material types.
- If the proposed regulatory approach is adopted, how will this impact your decision to travel by public transport and the overall transport experience?
- If directional TGSIs are adopted in the absence of other cues, what key facilities or destinations are required to be identified as a minimum?
- In the absence of directional TGSIs, how can guidance to facilities be provided through technology solutions such as smart phone applications?
    - Are there any barriers that need to be considered in a technology approach?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What policies or guidelines are in place for the installation of directional TGSIs in and around public transport sites?
- How do you apply the requirements for directional tactiles?
    - What are the barriers in applying the requirements?
- 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?
    - What feedback have you received from people with disability regarding the use of TGSI's 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?
- What other wayfinding tools and cues do you currently implement for people with vision impairment?

Questions for access industry professionals

- Which option do you prefer: regulatory, non-regulatory or status quo?
- How will meeting the requirements of AS1428.4.1:2009 affect the disability community?
- What are the barriers in trying to adopt requirements for tactiles, including directional tactiles in transport precincts?

Passenger Loading Areas

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2 or sub-option 3?
- What experiences do people with disability have with alighting or loading at a taxi rank or passenger loading zone?
    - What are the challenges faced and why do they occur?
    - How can this be improved?
- What are the flow-on impacts for a person as a result of not being able to alight or load at a taxi rank or passenger loading zone?
- How many accessible passenger loading spaces (including taxi-specific) should be provided at public transport premises or infrastructure?
- If all taxi ranks and passenger loading zones at public transport premises and infrastructure were accessible, how would this affect the public transport experience of people with disability?
- What features are critical to making passenger loading zones accessible?
- If passenger loading can only be provided on one side of a public transport premises or infrastructure, what is the impact on passengers?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
    - For the regulatory option, which sub-option do you prefer: sub-option 1, sub-option 2 or sub-option 3?
- What considerations do you currently make when designing passenger loading facilities?
    - What feedback have you received regarding the use of passenger loading facilities?

- If passenger loading can only be provided on one side of a public transport premises or infrastructure, what is the impact on passengers?
- In the circumstances where passenger loading can only be provided on one side, what are the reasons why?
- 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?
- How successful are AS2890.6-2009 and AS2890.5-2020 in 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?

Provision of information in multiple forms

Questions for the disability community

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What is the critical information needed in a timely manner in order to make a successful public transport journey or trip?
- What are the current ways that information is received in relation to public transport services?
- What is the preferred format for people with disability? Is information available in this format?
- How does the format requirements change depending on the type of information (e.g. accessibility information and facility maps, timetables, service information)?
- What are the barriers in trying to access information on public transport services that is only online?
    - How does this impact an individual's ability to access information and affect your overall public transport experience?
- Have you had to ask for information to be supplied to you in another format that was only available online?
    - How was your request handled and how did the outcome meet your needs?
- How can communication related to public transport services be improved?

Questions for providers and operators of public transport

- Which option do you prefer: regulatory, non-regulatory or status quo?
- What alternative formats of information, other than online formats, do you utilise?
- 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?

- 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?
    - How do you meet these requests?
    - What are the barriers you face in being able to meet these requests?
- What are the costs associated with providing information in alternative formats when only provided in online content?
- How do you receive complaints from customers with a disability relating to the provision of information?
- How can communication methods with people with disability be improved?

References to Australian Standards Amendments

- Do you support the changes to the references to Australian Standards?
    - If not, which changes do you not support and why?
- Do you find domed buttons at the end of a staircase to be helpful as a warning indicator?
- Would it be helpful if section 21.2 (Controls – passenger-operated devices for opening and closing doors) and section 21.3 (Controls – location of passenger operated controls for opening and locking doors) in the Transport Standards are consolidated as a single provision?

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