

26 April 2013

Disability Transport Access Secretariat
Transport Access Section
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
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Dear Secretariat,

Re: 2012 Review of Disability Standards for Accessible Public Transport

I wish to highlight issues that most concern architects and building designers and passengers with sensory impairments.

1. Australian Standards referenced by the Transport Standards.

Accessibility requirements for public transport buildings currently differ from those for other buildings because, as a result of chronology, the Transport Standards 2002 (revised in 2010) and the Premises Standards 2010 refer to different Australian Standards.

There are many premises and infrastructure providing public transport services that are subject to both the Transport Standards and the Building Code of Australia, which incorporates the Access Code of the Premises Standards.

The Transport Standards reference three major Australian Standards - i.e. AS 1428.1-2001, AS 1428.4-2002 and AS 1428.2-1992 - two of which have now been superseded and one is being updated:

- AS 1428.1-2001 has been superseded by AS 1428.1-2009;
- AS 1428.4-2002 has been superseded by AS 1428.4.1-2009;
- Some provisions in AS 1428.2-1992 have been incorporated into AS 1428.1-2009 and the remaining provisions are under review as part of the future AS 1428.2 Fixtures and Fittings.

The revised Australian Standards provide better amenity and are more comprehensive. However, certain provisions in AS 1428.2-1992 are better than those in AS 1428.1-2009, especially in regard to width of minimum path of travel, or cover areas not subject to the Premises Standards.

Recommendation 1:

The references in the current Transport Standards need to be revised so they align more closely with those of all other public buildings subject to building regulation but on the condition that any revision does not diminish the accessibility provisions for public transport buildings.

In principle, references in a revised Transport Standards should be aligned with those applicable for other public buildings under the Premises Standards with the exception of AS 1428.2-1992, part of which need to be retained in order to not diminish current accessibility provisions.

Detailed analysis of current provisions for transport buildings and other buildings and recommendations for change have been provided by Mr John Deshon AM LFRAIA RIBA MIAMA ACAA in his submission dated 16 April 2013.

I fully concur with his recommendations.

Access Consultant

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2. Part 26 Hearing augmentation – listening systems.

Hearing augmentation is not an effective way of providing equivalent message where used in conjunction with public address systems. This is because people who are deaf cannot benefit from it and people who have hearing impairment would not have their hearing aid switched to the “T” position (which cuts off audio input from the hearing aid microphone) in anticipation of a possible announcement over the public address system.

Recommendation 2:

- a. Strategically located electronic screens capable of visually displaying the message from the public address system need to be provided on conveyances and at transport premises for the benefit of people who are deaf and those who have hearing impairment.
- b. AS 1428.5-2010 *Communication for people who are deaf or hearing impaired* should be referenced by the Transport Standard.

3. Access to information for passengers who are blind or have low vision.

Passengers who are blind or have low vision rely on good audio input for information but the quality (in terms of clarity and volume) of sound from the public address system on conveyances and at transport premises are often poor.

Recommendation 3:

- a. Part 27.4 needs to be more specific and include requirements for a sound system that delivers clear audio information with an adequate number of speakers strategically positioned in waiting areas and concourses and throughout seating areas on conveyances.
- b. The system needs to include a means of alerting the conveyance driver of whether or not the sound system is operational.

I submit the above recommendations for your consideration.

Yours sincerely,

A handwritten signature in black ink that reads "Francesca Davenport". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Francesca Davenport FRAIA ACAA
Registered Architect & Accredited Access Consultant
Principal, HSPC Disability Access Consultancy