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my ref: DSAPT

Disabilities Transport Access Secretariat
Transport Access Section
Road Safety and Transport Access Branch
DEPARTMENT OF INFRASTRUCTURE AND TRANSPORT
GPO Box 594
CANBERRA ACT 2601

Dear Secretariat

Re: 2012 Review of the Disability Standards
for Accessible Public Transport 2002 ("Transport Standards")

Architects and others who design buildings use the Transport Standards as a reference for application in premises and infrastructure which provides public transport services.

Many of these structures are also subject to State and Territory building legislation, which relies, in turn, upon the Building Code of Australia ("BCA") for technical specifications.

The Disability (Access to Premises – Buildings) Standards 2010 removed some of the specifications of those structures subject to both the BCA and the Transport Standards from the Transport Standards, and placed them in their own discrete Part of the Access Code (Schedule 1 of the Premises Standards). The Transport Standards were amended, the generic note being applied to the specification reading *"except premises to which the Premises Standards apply"*. The Access Code is replicated in the BCA.

It is acknowledged that the present review is of the Transport Standards, and that amendment of the Premises Standards which will be necessary to give effect to the following recommendations may have to observe the review timetable for the latter. It is pointed out, however, that the Transport Standards were amended in 2010 although their review was not scheduled until now, to give effect to the Premises Standards. If the administrative principle is enforced rigidly, the two Standards, which overlay each other in this respect, will never be aligned. Any amendment to the Transport Standards will require an amendment to the BCA; an amendment to the Premises Standards could be accommodated without further difficulty.

It makes good sense that the requirements for public transport buildings and those for others are as nearly as possible identical in their requirements. Both disability standards are created under The Disability Discrimination Act, and both deal with access by the public to premises. Members of the public who require the particular design features which render them accessible benefit from consistency in the provision of those features.

At this time they are not identical, mainly because their referenced Australian Standards are different. This is a simple result of chronology. The last substantive review of the Transport Standards occurred before AS1429.1-2009 and AS1428.4.1-2009 were published, so they were unavailable for reference. The Premises Standards became effective after publication of the Transport Standards, and referenced them.

The absurdity of this situation may be demonstrated by a comparison of accessible public toilet requirements. If two were to be built side-by-side, one attached to a bus stop and the other to a picnic ground, their amenity would be quite different, the latter being larger and better-equipped. There seems no rationale for the difference.

This review of the Transport Standards presents an opportunity to revise the references so that they align more closely with those of all other buildings subject to building regulation, the single proviso being that the accessibility provisions for public transport buildings should not be diminished in any revision.

In some cases the amendment of the reference makes little or no difference to the building outcome, because the latter Standard replicates the earlier one. In others, however, the difference would be significant and the date of introduction of any amendment, when set against the Target Dates, becomes of considerable import for those programming implementation in existing building stock. Some revision of the Target Dates may be necessary.

There is no need to review the specifications for conveyances because they stand alone.

A broad comparison between the present requirements for public transport facilities and other buildings is shown at **Table 1** which follows.

Not all structures previously subject to the Transport Standards are subject to the Premises Standards, so their specifications remain within the Transport Standards.

Because specifications for those transport buildings subject to the BCA now lie within the Premises Standards, it would be necessary, for consistency, to amend both disability standards to give effect to this recommendation for transport buildings subject to the Premises Standards

The previous table would be amended as shown in **Table 2**, where highlighted, should the recommendation be accepted. When amended, the requirements for the nominated component of buildings, whether Transport Buildings or not, would be identical.

The effect of the amendments in **Table 2** is to reduce the scope of the Access Code Part H2, because the differences between transport buildings and others are considerably reduced.

The equivalent amendments to the references in the Transport Standards specifications for structures which are not subject to the Premises Standards are shown in **Table 3**.

Specifications for conveyances are not listed – no amendment is proposed or necessary.

Specifications in **Table 3** which reference Australian Standards should nominate the relevant clause.

Specifications in **Table 3** which utilise the Access Code or BCA should reproduce the relevant text.

I submit the proposal for consideration.

Yours sincerely

A handwritten signature in blue ink that reads "John Deshon". The signature is written in a cursive, flowing style.

John Deshon AM
Director

TABLE 1 BUILDINGS SUBJECT TO THE PREMISES STANDARDS – PRESENT REQUIREMENTS

	TRANSPORT BUILDINGS	OTHER BUILDINGS
Width of minimum path of travel	AS1428.2 (1,200mm min)	AS1428.1-2009 (1,000mm min)
Relationship between parallel tracks	defined	not defined
Spacing of passing areas	AS1428.2 (6.0m)	ACCESS CODE PART D3 (20.0m)
Maximum ramp length at maximum gradient	AS1428.2 (6.0m)	AS1428.1 2009 (9.0m)
Maximum vertical level difference for ramp use	no requirement	ACCESS CODE PART D3 (3.6m)
Handrails at stairs and ramps	AS1428.2 facility for additional rail, height precision	AS1428.1-2009 no such facility
Handrails at accessways	required	not required
Grabrails	AS1428.2 (similar)	AS1428.1-2009 (similar)
Grabrails at fare paying points	required	no requirement
Doors and door circulation space	AS1428.2 (similar)	AS1428.1-2009 (similar)
Stairways	AS1428.2 tread/riser configuration more stringent	AS1428.1-2009 and BCA PART D2
Unisex accessible toilet minimum size	AS1428.1-2001 (2.0m x 1.6m)	AS1428.12009 (2.3m x 1.9m)
Symbols, sign placement and size	AS1428.1-2001 and AS1428.2 and AS2899.1-1986	AS1428.1-2009 ACCESS CODE PART D3
Tactile ground surface indicators	AS1428.4-1992	AS1428.4.1-2009 (more comprehensive)
Lighting levels	AS1428.2 (additional requirements)	BCA PART F4
Hearing augmentation	AS1428.2	ACCESS CODE PART D3
Emergency warning systems	AS1428.2 (additional requirements)	BCA PART E4
Controls	AS1428.1-2001 (similar)	AS1428.1-2009 (similar)

TABLE 2 BUILDINGS SUBJECT TO THE PREMISES STANDARDS – PROPOSED AMENDMENTS

	TRANSPORT BUILDINGS	OTHER BUILDINGS
Width of minimum path of travel	AS1428.2	AS1428.1-2009
Relationship between parallel tracks	defined	not defined
Spacing of passing areas	ACCESS CODE PART D3	ACCESS CODE PART D3
Maximum ramp length at maximum gradient	AS1428.1-2009	AS1428.1 2009
Maximum vertical level difference for ramp use	ACCESS CODE PART D3	ACCESS CODE PART D3
Handrails at stairs and ramps	AS1428.2	AS1428.1-2009
Handrails at accessways	required	not required
Grabrails	AS1428.1-2009	AS1428.1-2009
Grabrails at fare paying points	required	not required
Doors and door circulation space	AS1428.1-2009	AS1428.1-2009
Stairways	AS1428.1-2009 and BCA PART D2	AS1428.1-2009 and BCA PART D2
Unisex accessible toilet minimum size	AS1428.1-2009	AS1428.1-2009
Symbols	AS1428.1-2009 and AS1428.2 and AS2899.1-1986	AS1428.1-2009
Signs	AS1428.1-2009 and AS1428.2 and ACCESS CODE PART D3	AS1428.1-2009 and ACCESS CODE PART D3
Tactile ground surface indicators	AS1428.4.1-2009	AS1428.4.1-2009
Lighting levels	AS1428.2	BCA PART F4
Hearing augmentation	ACCESS CODE PART D3	ACCESS CODE PART D3
Emergency warning systems	BCA PART E4	BCA PART E4
Controls	AS1428.1-2009	AS1428.1-2009

**TABLE 3 TRANSPORT PREMISES AND INFRASTRUCTURE NOT
SUBJECT TO THE PREMISES STANDARDS –
PROPOSED AMENDMENTS**

	PRESENT	CHANGE TO
sections 2.1, 2.2, 2.3, 2.4 and 2.5	AS1428.2	retain
section 3.1	AS1428.2	AS1428.1-2009
sections 4.1	AS1428.2	AS1428.1-2009
section 4.2	AS1428.2	ACCESS CODE PART D3
section 5.1	AS1428.2	retain
section 6.1	AS1428.2	AS1428.1-2009
section 10.1(1)	AS1428.2	AS1428.1-2009
section 10.1(2)	AS1428.1 Supp	retain
sections 11.1, 11.4 and 11.5	AS1428.2	retain
section 11.5 and 11.7	AS1428.2	AS1428.1-2009
section 12.2 AND 11.4	AS1428.2	AS1428.1-2009
section 13.1	AS1735.12	retain
section 14.2	AS1428.2	AS1428.1-2009 and BCA PART D2
section 15.1	AS1428.1-2001	AS1428.1-2009
sections 16.1(1) and (2)	AS1428.1-2001	AS1428.1-2009
section 16.1(3)	AS1428.2	retain
section 17.1	AS1428.2	AS1428.1-2009 and ACCESS CODE PART D3
section 17.2	AS1428.2	retain
section 17.6	0.8mm high	1 to 1.5mm high
sections 18.1	AS1428.2	AS1428.4.1-2009
section 18.2	AS1428.4-1992	AS1428.4.1-2009
sections 18.4 and 18.5	AS1428.4-1992	AS1428.4.1-2009
section 19.1	AS1428.2	retain
section 20.1	AS1428.2	retain
sections 21.1	AS1428.1-2001	AS1428.1-2009
section 24.1	AS1428.2	retain
section 26.1	AS1428.2	ACCESS CODE PART D3