


14 July 2014

DISABILITIES TRANSPORT ACCESS SECRETARIAT
Road Safety and Transport Access Branch
Department of Infrastructure and Regional Development
GPO Box 594, CANBERRA ACT 2601

Architects
Strategic and Facility Planners
Disability Access Consultants

Dear Secretariat,

Re: Review of Disability Standards for Accessible Public Transport Draft
Report released on 9 May 2014

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E: 

We offer the following observations:

1. We support the recommendations in the Draft Review Report to achieve effective and consistent regulation of the built environment.
2. The Transport Standards need to be consistent with the Premises Standards. However, it is important not to diminish current accessibility provisions under both Standards. For example, the Premises Standards provide better amenity and the Transport Standards provide better path of travel to accommodate the regular use of large mobility devices, such as mobility scooters, within public transport infrastructure and buildings.
3. Both the Transport and Premises Standards should be amended concurrently as soon as possible and then every 5 years. In our opinion, the recommended commencement to update and modernise the Transport Standards by 30 June 2016 is much too late and must now be expedited.
4. We agree that the criteria for access to buildings may be different from those applicable to conveyances and infrastructure. The development of technical standards specifically suited to public transport conveyances and infrastructure, as recommended in the 2007 report, is long overdue.

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Thank you for the opportunity to make this submission. We hope it will be reflected in the final Report.

Yours sincerely,



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