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Disabilities Transport Access Secretariat
Road Safety and Transport Access Branch
Department of Infrastructure and Regional
Development
GPO Box 594,
Canberra, ACT 2601

14th July 2014

Dear Secretariat,

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

Thank for the opportunity to provide comment on the Draft Report
and the corresponding Recommendations.

Following our review we support all *Recommendations 1-7*
documented, but wish to make particular comment on
Recommendations 2-6 as follows:

Recommendation 2 – Modernise the Transport Standards

We agree with this recommendation regarding the modernisation of
the Transport Standards to ensure that any discrepancies relating
to older versions of Australian Standards are eliminated. For
example under the Transport Standards older standards are
currently applicable to Transport Infrastructure such as
AS1428.1:2001 and 1428.4:1992 as opposed to AS 1428.1:2009
and AS 1428.4.1:2009. Australian Standards AS 1428.1:2009 and
AS 1428.4.1:2009 are current standards applicable to Transport
Buildings covered by the Access Code/BCA.

The Australian standards referenced in the future version of
Transport Standards regarding transport infrastructure must be
consistent with Transport buildings as referenced in the Access
Code/BCA. Specific dated versions of these standards should also
not be listed in Transport Standards so that Australian Standards
always remain current.

Recommendation 3 – The complaints process

Suggest that the complaints mechanism of the state anti-
discrimination commissions aligns with the Australian Human Rights
Commission until such time that there is consolidation of

Commonwealth Anti-discrimination legislation. Both commissions should have an aligned complaints mechanism, which acknowledges existing transport exemptions of transport operators and providers made under the Transport Standards. The Transport Standards should inform the complaints process to aim to distinguish between access requirements covered under public transport under the Transport Standards and access to goods, facilities and services under state anti-discrimination legislation.

Recommendation 4 –Whole of journey approach

Guidelines for the whole of journey approach may include associated pathways, streetscape within a defined proximity of transport infrastructure, similar to a defined pedestrian catchment area. The pedestrian catchment areas would encompass areas similar to that of a 'Ped Shed' analysis which covers pedestrian catchment areas of a 5 minute travel distance or 400m of the transport infrastructure. This distance may be 100m initially and then incremental milestones for upgrade for the remaining distances.

A continuous accessible path of travel for all pedestrians should be provided to, from and between all transport infrastructures within this catchment area. In addition state, territories and local governments should have guidance on associated streetscape specific to defined distances as part of transport planning. Accordingly Transport infrastructure and streetscape covering all directions of the specific route to and from the destination should be covered as part of the Standards for Accessible Public Transport.

Recommendation 5 - National motorised mobility and labelling scheme

Agree with these recommendations as mobility scooters models need to be identified with weight and dimensions. Once mobility scooters have been labelled, specific guidelines should be developed for public transport operators and providers. This would cover dimensions for allocated spaces, boarding devices and manoeuvring spaces on conveyances.

Recommendation 6 – National Wheelchair accessible taxi compliance milestones

Agree with this recommendation in regard to the staged implementation for Wheel Chair Accessible Taxi compliance. The milestone relating to taxi infrastructure such as boarding points should also be clearly noted with reference to the accessibility requirements of taxi rank boarding points, for example, gradients at boarding points, kerb ramps and associated pathways to ensure access to the taxi rank and conveyance.

Yours Sincerely,

A handwritten signature in black ink that reads "D. D. Bedwell". The signature is written in a cursive style and is underlined with a single horizontal line.

Daniel Bedwell NRAC ACAA
Director

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