

Comments on the Draft Review Report of the Disability Standards for Accessible Public Transport 2002

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on behalf of
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The following comments are mainly limited to bus stop/taxi rank infrastructure as this is the principal issue of concern for Newcastle City Council (apart from the matter of funding).

While the Draft Review Report has made mention of the concerns raised by NCC (and many other councils and state transport organisations) regarding bus stop/taxi rank infrastructure, it has not stated how these issues are to be addressed. They have not been included in the list of issues to be considered by the proposed *technical expert group*. As previously indicated, the failure to address practical implementation issues is a serious failure of the current arrangements. It is essential that these issues be addressed by the above group to allow councils to properly plan the upgrade of bus stop/taxi rank infrastructure and to avoid undesirable consequences such as removal of stops (and potentially bus services) where stops cannot practically be made compliant.

These issues include:

- applicability of the DSAPT for bus stops in areas with steep topography
- extent of upgrade at bus stops that currently have only a flag post and no adjoining infrastructure such as footpath paving. Does the boarding point need to be in concrete in such a location. If so what would be the minimum dimensions
- maximum allowable crossfall and longitudinal grade at boarding points in areas of steep terrain
- maximum allowable crossfall at bus stops in shopping precincts where the existing crossfall (fixed by existing building line and kerb levels) is in excess of 1:40. This is particularly relevant where a Council may have plans to undertake minor improvements such as installation of a seat, as the DSAPT would require the Council to fully upgrade the stop at the same time, even if there are relatively small non-compliances. Works could involve removal and replacement of a large section of existing footway and/or kerbing, construction of ramps and landings to achieve compliant path and waiting area grades and crossfalls (costs could easily exceed \$20,000 per site). Such costs would encourage Councils to avoid doing even minor improvements and would be counterproductive in terms of public convenience. Such works would also seriously constrict the width of the remaining footway.
- the requirement to have room for two wheelchairs and have two seating spaces, identified for use by people with disabilities, within a regular bus shelter is considered excessive and should be re-assessed. As stated in last year's submission such requirements may be fine for major interchanges but they are considered too onerous for regular bus stops as this would take up most of the room in a regular sized shelter.

Local councils cannot proceed with planning upgrades without a resolution of such basic questions. The Standards need to address practicality issues and need to provide a level of certainty that expensive re-fits will not be contested in the courts.

The following excerpts from the Queensland Transport submission reinforce many of the concerns raised by NCC:

“17. Are there requirements that have proven to be impractical or difficult to implement? If so please specify.

Many of the requirements in the Transport Standards have proven to be impractical and/or difficult to implement. The fear is that when an issue becomes too difficult, too costly or too impractical to deal with, it will be removed altogether. Some public transport operators and providers of premises and infrastructure have indicated that this may be their preferred approach. They advise that it is much simpler and less costly to remove a service rather than trying to make it comply with the Transport Standards. They also advise that even if they do spend the money required for compliance, no-one can tell them if it does indeed comply. For many, this is an unacceptable business risk.

Bus stop topography

The Transport Standards require that bus stop areas (ie. walkways, ramps, landings) are required to have certain falls / grades (i.e.: 1:14, 1:20, 1:40, etc.). If this isn't able to be achieved due to site constraints (i.e. bus stops located on hills, inclines or slopes greater than the requirements), it is unclear whether this means that certain bus stops should not be installed or should be removed because they don't meet these requirements. In most cases, to meet the standards, major footpath work (major costs and inconvenience) is required, including service relocations. In some cases even this will not enable the bus stop area to comply. It may be perceived that relocation actually disadvantages other passengers (large majority) and possibly even some people with a disability who feel that they are capable of access, albeit with some difficulty.

It could be argued that all passengers would rather a bus stop be installed at these locations, with the acceptance of the slope, as opposed to no stop at all. There would be significant issues to address if bus stops were removed / not developed because of the requirements of the current Transport Standards.

Bus stop boarding points (access and tactile ground surface indicators)

If a bus stop that consists of simply a pole installed in grass or another flat and stable substrate at the boarding point (not concrete), it is not certain as to the requirement to install TGSIs. However, TGSIs can't be installed unless a concrete pad or path has been installed.

A further question arises as to whether bus stops that are located in outer areas require a concrete pad, generally at lower use suburban and rural stops, where footpaths may only consist of grassed areas (i.e. no concrete access paths to bus stop area).

If the requirement to install TGSIs (which also means the inclusion of a concrete boarding point/path) at these particular stops (i.e. posts installed in grass footpaths), then from a financial and operational perspective it would possibly mean that the only practical solution in many cases would be the removal of a large number of stops from service and the rejection of new, requested stops. Currently, these numerous stops are generally of low usage and therefore would not warrant the enormous cost of installing concrete and TGSIs.

However, if the Transport Standards give no option but to remove bus stops from service because of this issue, then it could possibly be perceived as disadvantaging the majority of passengers.”

With regard to TGSIs the current Australian Standard should be adopted (1428.4 2002) rather than the 1992 version quoted in the Transport Standards. As stated in the Draft Review Report vision impairment disability groups consider the current TGSIs standard provides a higher level of accessibility.

To summarise, the technical information in the Standards is not specific enough for people to be confident that what they build will be fully compliant and they will not be liable to possible litigation. Bus stop upgrades can be very expensive and providers can't afford to get it wrong. The Standards need to be made clearer by having more detail included to remove the need for interpretation.

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