



DDA Transport Standard Review

Response by Association in Consultants for Access Australia (ACAA) Aug 07

Introduction

This submission is made on behalf of ACAA www.access.asn.au which is a national organisation of consultant professionals, interested individuals and organisations interested in the subject of access to the built environment for people with disabilities, which includes access to public transport.

The format of this submission consists of two parts A and B with Part A providing the following scope;

- National overview of each transport mode
- Responses to the generic questions presented in the Briefing Paper
- State by state examples
- Summary of recommendations

Part B of the submission covers responses to the proforma questions issued by Allens Consulting.

Executive Summary

While the DDATS has provided a fundamental set of access principles and technical parameters to facilitate the implementation of accessible public transport it is the opinion of ACAA that there are some areas of the DDATS that require refinement and amendment to eliminate gaps or inappropriate measures, which were first drafted in 1994.

In our opinion the knowledge and experiences of people with disabilities, operators and new technology should be harnessed to better inform the DDATS.

To facilitate the collection of knowledge and experiences over the past 5-10 years ACAA recommends that a Accessible Transport Technical Group be formed to further the development and implementation of the DDATS, which includes the need to undertake specific research in various areas as nominated below.

It is also our view that a technical group should include equal participation of people with disabilities and operators.

Recommendations

1. The DDATS requires specific requirements for vehicles used for transporting passengers with disabilities in terms of passenger comfort and safety systems.
2. The DDATS should be modified to require flip up armrests on accessible allocated spaces while operators should be required to locate people with disabilities in appropriate seats to suit their physical size. In particular leg room and seat width for people who are paralysed or unable to walk.
3. The DDTAS should facilitate research into the area of an accessible onboard toilet.
4. ACCA recommends wheelchair restraints in buses to ensure a person in a wheelchair is safely and securely restrained which also avoids collisions with other passengers when buses are manoeuvring swiftly through bends/corner turns.
5. ACAA recommends that the aisle area between the wheel arches and tight turn to enter the buses causes be modified to overcome restriction of entry for



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- people who use some wheelchair and scooter users, typically the 4 wheeled variety.
6. ACAA recommends that standards for ticketing machines and resellers of tickets are to be wheelchair accessible while ticketing machines must provide tactile, Braille or audio output to enable independent use by people with vision impairment.
 7. ACAA recommends that the Australian Standards and DDA Transport Guideline need further development in the area of bus stop design to facilitate better and safer access for people with vision impairment and wheelchair access.
 8. ACAA recommends **that the total exemption for a infinite period** should be amended to include dedicated school buses, possibly with a longer timeframe for implementation – say 25 years commencing from 2007 with a requirement for 20% accessibility every 5 years.
 9. ACAA recommends that HREOC should initiate a public inquiry into the long distance coach industry and commence an education and awareness program of the various providers about their obligations under the DDA.
 10. ACAA recommends a partnership program between the tourism industry, government, transport operators and HREOC should be formed to facilitate a broad scale implementation program of accessible tourist transport to make Australia the destination of choice for tourists with a disability.
 11. It is recommended that the DDATS be amended to include requirements for Emergency Evacuation procedures for people with disabilities need to be added to the Guidelines as an obligation for all conveyance operators and infrastructure providers including places of refuge for wheelchair users in underground stations and the like or fire-isolated lifts.
 12. It is our opinion that communication systems within allocated spaces must be improved to ensure safe and accessible journeys in a timely manner.
 13. ACCA recommends that research be undertaken to review the various designs of onboard accessible toilets and the needs of the user group of people with physical disabilities to determine a standard for train carriages, and potentially other conveyances.
 14. ACCA recommends that research be undertaken to review stairway requirements in double deck train and wheelchair accessible sleeper cars in train carriages to determine appropriate access standards for train carriages, and potentially other conveyances.
 15. Boarding Ramps – Manually deployed ramps that rely on assisted access should have a maximum gradient of 1:8 for ramps up to 1520mm in length (1:14 preferred) and not 1:4 as currently listed in clause 6.4(c) of the DDA Transport standard. In our opinion a 1:4 slope is unsafe for the operator assistant and the passenger.
 16. Where platform hoists are used for boarding conveyances the minimum platform area should be no less than 1300 X 800 in area in accordance with AS3856.1.
 17. Accessible Compartment area in Taxis should provide a **level floor area**, combined height, length and width envelope of 1300mm L X 800 W X 1410mm headroom (1500mm after 2013 currently) plus 100mm on each side for shoulder movement and around the current headroom requirement of 1405mm to allow for the inevitable movement during vehicle manoeuvring to



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reflect the anthropometrics of the passenger in the wheelchair when the vehicle is in motion. It is also recommended that the current 1405 and 1410 headroom requirements be amended to require the 1500mm headroom requirement to take effect immediately rather than further delay to 2013.

18. Wheelchair restraints & Passenger Restraints – ACAA recommends that AS2942 should be referenced within the DDATS for passenger restraints for occupants in wheelchairs in taxis with a direct requirement for lap sash restraint systems with adjustable height mechanism for the over shoulder anchor point as available in modern vehicles.
19. Taxi Vehicle Inspection and Authorisation – While inspection regimes vary from state to state around Australia with varying degrees of effectiveness it is our opinion that the DDATS should be broadened to include a list of minimum standards that must be met prior to an Accessible Taxi being allowed to carry passengers who use a wheelchair as described above. This list of minimum standards should be adopted by all state and territory authorities responsible for regulating taxi transport services.
20. To ensure appropriate benchmarks are included in the DDATS to assess the equitable access to accessible taxi transport ACAA recommends that the DDATS should be amended to include minimum percentages of a taxi co-op's fleet to be accessible at each 5 year milestone, commencing with a 20% minimum by 2012, which could be the subject of review at that time to determine the next milestone.
21. ACAA recommends that a technical working party should be formed to develop several design options for accessible gangways for use on ferry vessels, accessible on-board toilets, stairway designs.
22. ACAA recommends that the **definition** of the vessels, ferries, charter boats and water taxis should be clarified to ensure that operators are aware of their obligations under the DDA and equally that people with disabilities are aware of the right of access.



Section A – Mode by Mode review by ACAA

Mode 1: Air Travel

In some respects the task of travelling by air has become more difficult for people who use a wheelchair since the introduction of the DDA Transport Standard.

The issues and areas of difficulty relate to;

- Larger carriers Qantas and Virgin have introduced restrictions of which people who use a wheelchair can travel by air and to which airports that did not exist prior to the introduction of the DDATS.
- Qantas has introduced restrictions on the size and type of wheelchairs that they will carry within the baggage compartments of the planes hull.
- Many people who use powered wheelchairs are now restricted to travel on main capital city routes, and even then there are times when Qantas refuses to carry a person in a wheelchair because the scheduling of planes may mean a person can not fly at their time of choosing and could be delayed at an airport for hours or days waiting for a suitable plane.
- While people in a wheelchair have been travelling by air for several decades it is inconceivable that in 2007 air carriers are purchasing planes for major capital city routes that have such poorly designed hulls that can not carry a powered wheelchair in the upright position.
- Virgin has adopted a policy of requiring a person who requires assistance to transfer into a seat to be accompanied by a companion who will undertake the transfer. To add insult to injury the companion must pay the full fare. **Clearly, the DDATS requires stronger requirements to enable appropriate equity for people who need assistance when travelling rather than the existing objective based self-regulation approach.**
- **Seat Allocation & Plane Access** - in the experience of people who use a wheelchair it is quite common to be allocated a seat that DOES NOT have Flip-Up Armrests to facilitate easier and safer transfer access even though most plans have some Flip-up Armrests. **Clearly self-regulation is NOT working and we call on the DDATS to clarify the requirements for seat allocation for safe passenger access.**
- **On-board Toilet Access and Alternative Arrangements** – Since the introduction of the DDATS there has been no improvement in accessible on-board toilets or the provision of alternative arrangements. **We call on the DDATS to enhance the plane accessibility to toilets and alternative arrangements.**
- Qantas requires considerable personal information about a person with a disability who can not WALK onto the plane and travel independently which in the view of some travellers, encroaches upon their individual privacy as some of the information is deemed unnecessary. Clearly this is not equal treatment compared to other travellers.
- On a positive note, we commend Qantas for the development of the passenger hoist which enables safer access for people who can not transfer independently into a plane seat. The hoist avoids potential injuries sometimes incurred when a manual lift is performed by two people.
- **Airport Access** – It is noted that on a recent overseas trip departing from Sydney KSA the plane was nor not parked at an aero bridge and a transporter highlift truck



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was required to take the person in a wheelchair from a ground level gate lounge into the truck and across the tarmac to the plane and elevated to the plane door. However, in the process the person in the wheelchair fell out of an aisle wheelchair onto the floor of the truck due the fact that the truck had no restraint system for a person in a wheelchair.

Summary Recommendations

- 1 The DDATS requires greater emphasis on airport boarding access and arrangements for passengers with disabilities.
- 2 The DDATS requires specific requirements for vehicles used for transporting passengers with disabilities in terms of passenger comfort and safety systems.
- 3 The DDATS should be modified to require flip up armrests on accessible allocated spaces while operators should be required to locate people with disabilities in appropriate seats to suit their physical size. In particular leg room and seat width for people who are paralysed or unable to walk.
- 4 The DDATS should facilitate research into the area of an accessible onboard toilet.



Mode 2: Bus Travel and Bus Stop Infrastructure

While accessible route buses commenced operating in various parts of Australia well before the introduction of the DDA Transport Standard in 2002 the last 5 years has seen continued expansion of the introduction of accessible route buses, especially by Government transport operators.

In some areas of Sydney the proportion of accessible route buses exceeds 50% with some routes being advertised as 100% accessible. More recently Sydney Buses and some private operators (e.g. Forest Coaches) have introduced accessible "articulated buses" on the longer distance / high patronage routes.

It is noted that some of the smaller bus companies have been slower to introduce accessible buses and have achieved the 5 Milestone requirements.

As people who use wheelchairs and scooters have commenced using accessible buses the issues that have arisen include:

- The need for wheelchair restraints in buses to ensure a person in a wheelchair is safely and securely restrained which also avoids collisions with other passengers when buses are manoeuvring swiftly through bends/corner turns.
- The aisle area between the wheel arches and tight turn to enter the buses causes some restriction of entry for people who use some scooters, typically the 4 wheeled variety.
- Various ticketing machines and resellers of tickets are not wheelchair accessible while ticketing machines do not provide tactile, Braille or audio output to enable independent use by people with vision impairment.

It is apparent that more research is needed in the areas of restraints and scooter access and that ticketing machines require remodelling to suit people with disabilities.

INFRASTRUCTURE

In terms of Bus Stops and footpath linkages there is vast variation in the level of accessibility provided by local governments.

In general terms, it is our opinion that the introduction of the DDA Standard has aided in the increase of access to bus stops, albeit the design and installation of some bus stops and associated bus shelters do not comply with Australian Standards 1428 parts 1, 2, 4.

There are many examples where bus shelters are installed in a manner that blocks the footpath and causes a hazard for people with vision impairment.

In other cases the footpath gradients and clearances around the shelters prevent access for people who use a wheelchair.

It is apparent that the Australian Standards or DDA Transport Guideline need further development in the area of bus stop design to facilitate better and safer access.

SCHOOL BUSES

It is noted that "dedicated school buses" are exempt from the requirements of the DDA Transport Standard.

However, the rights of children with disabilities are no less important than those of adults with disabilities.



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While the bus transport industry has historically put a case for exemption **it is our opinion that a total exemption for a infinite period is not consistent with the DDA** and that this part of the DDA Standard should be amended to include dedicated school buses, possibly with a longer timeframe for implementation – say 25 years commencing from 2007 with a requirement for 20% accessibility every 5 years.

Long Distance Coach Travel (including small to medium Tourist Vans)

LONG DISTANCE COACHES

With respect to the availability of long distance coaches it is apparent from a recent survey that there are virtually no long distance coaches in Australia. For example there are NO coaches on any major routes such as Sydney - Melbourne or Sydney – Brisbane. When asked “could a person travel in their wheelchair the company advised – catch a train”. While this maybe reasonable advice if a person is near an appropriate train service but it is not acceptable within the context of the DDA.

Clearly the DDA Transport Standard has failed dismally to realise the objective of enabling 25% of the fleet to be accessible by 2007.

Notwithstanding the almost total abstinence by private coach operators in providing accessible coach travel it is noted that rail operators such as NSW Countrylink do provide accessible long distance bus travel in country regions of NSW. Typically, the buses are fitted with a hydraulic platform hoist to facilitate wheelchair access into the vehicle which has removable seats to allow the person to remain in their wheelchair.

While there are no apparent technical barriers preventing coach operators to implement accessible coaches it must be assumed that significant attitudinal barriers exist within the industry.

We suggest that HREOC should initiate a public inquiry into the long distance coach industry and commence an education and awareness program of the various providers about their obligations under the DDA.

TOURIST VANS

With respect to the availability of accessible tourist vans and midi buses (say 1030 seats) there is evidence that various niche operators have commenced the introduction of accessible vehicle within their operations.

However, this exemplary practice is not widespread nor widely advertised, which limits the take up of tourism opportunities by people who use a wheelchair.

A partnership program between the tourism industry, government, transport operators and HREOC should be formed to facilitate a broad scale implementation program of accessible tourist transport to make Australia the destination of choice for tourists with a disability.

Summary Recommendations

5. ACCA recommends wheelchair restraints in buses to ensure a person in a wheelchair is safely and securely restrained which also avoids collisions with other passengers when buses are manoeuvring swiftly through bends/corner turns.



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6. ACAA recommends that the aisle area between the wheel arches and tight turn to enter the buses causes be modified to overcome restriction of entry for people who use some wheelchair and scooter users, typically the 4 wheeled variety.
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Mode 3: Train Travel

This section examines progress in the areas of:

- Accessibility of railway stations – including emergency egress
- Accessibility of suburban and inter-city commuter trains
- Accessibility of long distance-interstate trains with buffet and sleeper cars

RAILWAY STATION ACCESSIBILITY

While the accessible upgrading of railway stations commenced well before the introduction of the DDA Transport Standard in 2002 (1993 in NSW) the last 5 years has seen continued expansion of accessible railway station networks.

For example in NSW approximately 95 of the 307 NSW City Rail Stations are wheelchair accessible with 6-8 being upgraded each year. The City Rail network extends from the Sydney metropolitan area to Newcastle / Hunter region, Lithgow in Blue Mountains, Goulburn to the south-west and to Nowra on the south coast. The overwhelming majority of these 95 stations are higher patronage stations. In NSW it is envisaged that the stations that provide appropriate access will facilitate access for at least 80% of passengers who use rail by 2012, albeit the proportion of stations that will be accessible may equal only 40%-45%.

With respect to the effectiveness of the DDA Transport Standard it is noted that the quality of access has improved slightly between the mid 1990's and today, with a greater level of compliance.

However, the introduction of hazard warning tactile ground surface indicators and hearing augmentation on railway platforms / concourse areas lag behind in terms of "total accessibility" of the rail infrastructure environment.

TRACKWORK, TEMPORARY STATION CLOSURES AND EMERGENCY EVACUATION

There have also been numerous problems with train travel when trackwork has caused rail providers to use buses, which have been inaccessible, thereby not being able to provide the advertised service.

The DDA Transport Guidelines need to be strengthened in this area to ensure people with disabilities are not further disadvantaged, left stranded on a railway platform that does not have a lift or sitting at a bus stop waiting for a bus that maybe inaccessible.

Emergency Egress - There are no provisions in the standards regarding emergency egress, especially from buildings and railway stations for people disabilities, in particular for people who use a wheelchair. E.g. A recent train breakdown on Sydney Harbour Bridge saw a person in a wheelchair left on the train and the response from the rail operator was "*we'll get back to you in 2-3 days*".

Underground railway stations do not provide fire-isolated lifts.

The requirements for Emergency Evacuation procedures for people with disabilities need to be added to the Guidelines as an obligation for all providers.



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TRAIN ACCESSIBILITY

With respect to the accessibility of **trains in urban and inter-city commuter areas** it is evident that some progress has been made in terms of wheelchair accessibility and general access for people with vision impairment, albeit the progress has been slower than that compared to the access upgrades of stations.

This is partly due to the age and lifecycle of rolling stock which may not be due for replacement at the identical rate and milestones of the DDA Transport Standard.

It is noted that various rail providers have adopted varying methods of enabling access onto and off trains with NSW providing a staff deployed manual ramp, while in WA (Perth) the step and gap from platform to carriage is generally small enough that people in a wheelchair can independently manage the process of boarding and alighting.

It is our opinion that independent access is always preferred.

Notwithstanding the above comments the availability and accessibility of call buttons and communication between passengers and train staff is truncated and in some cases non-existent causing problems for some travellers missing their destination station.

It is our opinion that communication systems within allocated spaces must be improved to ensure safe and accessible journeys in a timely manner.

In terms of the provision of wheelchair accessible toilets on inter-city trains there are several examples around Australia that illustrate a variety of approaches depending on whether the train is single deck, double deck and capability of providing accessible intercar gangways, which also relates to the topography of the track and the amount of vertical change in levels, or slope of the tracks.

From an examination of various designs of accessible toilets it is apparent that no one design fully complies with the requirements of AS1428.1 as referenced by the DDA Transport Standard. This is due partly to that AS1428.1 is primarily a "building standard" and has had no regard for the inherent limitations of a railway carriage.

Notwithstanding this scenario some trains provide better access and useability than others and it is recommended that research work be undertaken to review the various designs and the needs of the user group of people with physical disabilities to determine a standard for train carriages, and potentially other conveyances.

The requirements for hearing augmentation on trains is slowly being acknowledged with a few isolated examples around Australia, mainly on inter-city and intrastate trains.

LONG DISTANCE TRAINS

With regard to the accessibility of long distance trains there are two general categories of intrastate and interstate, both providing common toilets, buffet car and sleeper cars.

Intrastate Trains

There are various examples of partially accessible intrastate trains around Australia.

In NSW the Explorer train (approximately 20 years old) provides a service from



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Sydney to Broken Hill includes wheelchair access onto the train (albeit with a ramp deployed by staff), an accessible toilet and accessible seating spaces for 2 people, with staff assistance to obtain food from the buffet car. However, there is NO wheelchair access to the sleeper car.

While some refurbishment (currently underway) of the train will improve the quality of access to the toilet, seating area, call button for staff assistance and incorporate hearing augmentation the sleeper car and buffet car will remain inaccessible.

It is hoped that when a new replacement train is designed that all features will be accessible to people with disabilities, including the ability to access the buffet and sleeper cars. Theoretically could be achieved by planning a Toilet Car (with seating) followed by a buffet car, which includes an accessible aisle and intercar gangway to the sleeper car.

Interstate Trains

Upon examination of several interstate trains such as the Southern Pacific, Ghan and Overlander it is evident that there is either NO wheelchair access or limited access which is completely dependent of staff or companions to perform multiple transfers to narrow 480mm width aisle chairs to negotiate parts of the train.

It is noted that the Southern Pacific and Ghan provide a special needs Pullmans carriage which incorporates a shower recess with no hob. However the shower recess is significantly smaller than the dimensions in AS1428.1 and almost every other aspect of entry and internal circulation on the trains are grossly deficient in terms of meeting the requirements of the DDA Transport Standard.

Long Distance Train travel is a problem due to the lack of, or grossly inadequacy of the "so called accessible" amenities on these trains. Southern Pacific, Ghan, Overlander and interstate trains do not provide accessible sleeper cars – a 570mm width aisle is NOT accessible and the alternative of transferring into a carer assist aisle chair to move between cabins is not equitable access.

Summary recommendations

12. It is recommended that the DDATS be amended to include requirements for Emergency Evacuation procedures for people with disabilities need to be added to the Guidelines as an obligation for all conveyance operators and infrastructure providers including places of refuge for wheelchair users in underground stations and the like or fire-isolated lifts.
13. It is our opinion that communication systems within allocated spaces must be improved to ensure safe and accessible journeys in a timely manner.
14. ACAA recommends that research be undertaken to review the various designs of onboard accessible toilets and the needs of the user group of people with physical disabilities to determine a standard for train carriages, and potentially other conveyances.
15. ACAA recommends that research be undertaken to review stairway requirements in double deck train and wheelchair accessible sleeper cars in train carriages to determine appropriate access standards for train carriages, and potentially other conveyances.



Mode 4: Trams, Light Rail & Monorail

While there are limited trams / lite rail services in Sydney and Adelaide the overwhelming majority of tram services are located in Melbourne.

Sydney

Generally, the Sydney Lite Rail reports 100% accessibility with raised platform stops that average 50-70mm steps and 100mm gaps between platforms and conveyance. To assist passengers with a wheelchair the staff deploy a ramp for boarding. There are wheelchair spaces on board with appropriate call buttons.

The only major failing are the touchscreen ticketing machines which are in accessible to people with vision impairment and wheelchair users.

The Sydney Monorail also reports 100% accessibility, albeit there are no truly defied wheelchair seating spaces within the cars.

Melbourne

Melbourne has about 1800 tram stops. About 180 of these are what are called 'Super Stops', raised platforms designed to provide stepless access to low-floor trams (the fleet has about 90 of these).

It has been reported that many Super Stops have been poorly constructed, with the acceptable tolerances exceeded, resulting in an unintended step at the doors of the low-floor trams.

Observation also reveals that in some cases access to and from super stops is problematic, and sometimes dangerous due to traffic conditions.

While the accessibility of trams has improved in recent years it is apparent that the level of accessibility is behind the 5 year milestone and that much more work is needed to meet the objectives of the DDA.

Adelaide

It is acknowledged that the heritage Glenelg tram presents difficulties in achieving access.



Mode 5: Taxi Travel

It is noted that accessible taxi services commenced operating in various parts of Australia in the early 1980's, well before the introduction of the DDA Transport Standard in 2002 and historically been regulated by State government transport departments with varying degrees of success.

With respect to the effect of the DDA Transport Standard in improving accessible taxi travel over the last five years, it is our opinion that the DDA Transport Standard has had little or no effect on improving accessible taxi transport.

This section examines aspects of the taxi transport that impact of the physical accessibility and ability to obtain access to taxi services.

- Vehicle Accessibility - physical dimensions and accessible entry/exit from taxis
- Service frequencies / response times

This review does not consider matters relating to cost, subsidy schemes and other driver/co-op incentive programs which are state government responsibilities that are not within the direct scope of the DDA Transport Standard.

VEHICLE ACCESSIBILITY

While the DDA Transport Standard incorporates minimum requirements for the basic wheelchair foot print (clause 9.1), height / headroom clearances (clause 9.3) and maximum ramp gradients (clause 6.4) there are other matters that influence the overall accessibility of the vehicle for passengers who use a wheelchair.

In our opinion the requirements for accessible taxis should be broadened to include the following features:

- **Ramps** – Manually deployed ramps that rely on assisted access should have a maximum gradient of 1:8 for ramps up to 1520mm in length (1:14 preferred) and not 1:4 as currently listed in clause 6.4(c) of the DDA Transport standard. In our opinion a 1:4 slope is unsafe for the operator assistant and the passenger.
- **Platform hoists** – Where platform hoists are used the minimum platform area should be no less than 1300 X 800 in area in accordance with AS3856.1.
- **Compartment area;** including level floor area, combined height, length and width envelope. – While the 1300mm L X 800 W X 1410mm headroom (1500mm after 2013) are appropriate dimensions for the minimum floor area and height these simple dimension do not reflect the needs of the passenger in terms of shoulder and arm movement and the capacity to close the rear door where the passenger is located at the rear of the vehicle.
- While clause 10.1 of the DDATS requires a generally level surface in accordance with AS1428.1 for the wheelchair seating areas in all conveyances, **except taxis**, there have been several reports of sloping floors within inappropriate taxi vehicle modifications currently in service around Australia, which is hazardous and uncomfortable for passengers in a wheelchair. In our opinion there are no valid reasons why taxis should not be included within the coverage of clause 10.1.
- It is strongly recommended that the DDATS be amended to illustrate a three dimensional volume area of these dimensions (including a flat level floor) with an extra 200mm in width in the shoulder region and 100mm extra to the rear for headroom movement during vehicle manoeuvring to reflect the anthropometrics of the passenger in the wheelchair when the vehicle is in motion.
- **Wheelchair restraints & Passenger Restraints** – While Australian Standard



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AS2942 provides requirements of passenger restraints for occupants in wheelchairs it is apparent that the DDATS does not reference his standard, even for taxis, which seems incongruous. Experience of passengers in a wheelchair over the years indicates that the overwhelming majority of accessible taxis do not provide truly effective and adjustable lap sash restraint system. Therefore in our opinion this aspect of the DDATS requirements an amendment to clarify the requirements for passenger restraint systems, which may include further research in this area in partnership with Standards Australia.

- **Passenger ride and comfort including heating and cooling** – In addition to the basic rights issues of access to public transport it is our opinion that passengers with disabilities should be afforded the same level of amenity as other passengers using these conveyances.
- However, the experiences of people with disabilities indicates that due to the type of vehicles often used by taxi operators, which in many cases are converted cargo style vans, that there is limited passenger comfort for passengers who use a wheelchair due to the location of the wheelchair space over the rear axle which also has inadequate heating and cooling. Frankly, the rear area of a vehicle provides the worst ride and comfort which is the area designated for people with the least capability to tolerate vibration and excessive movement from vehicle motions.
- In our opinion the standards applied to taxis used by the general public should extend to the areas used by people in a wheelchair. This should translate into a wheelchair seating space in the mid-vehicle area with equal view as is the case with some modified Chrysler Voyager vehicles with side access entry.
- **Passenger view and interaction between passenger and companions / driver** – In addition to the abovementioned issue of comfort is the issue of view and interaction with a travelling companion and/or the driver. As many accessible taxis provide the accessible seating area at the rear of the vehicle, and in some cases with a raised roof and no windows, then the amenity afforded the person in a wheelchair is appalling and would not be tolerated by the average taxi passenger.
- **Vehicle Inspection and Authorisation** – While inspection regimes vary from state to state around Australia with varying degrees of effectiveness it is our opinion that the DDATS should be broadened to include a list of minimum standards that must be met prior to an Accessible Taxi being allowed to carry passengers who use a wheelchair as described above. This list of minimum standards should be adopted by all state and territory authorities responsible for regulating taxi transport services.

SERVICE FREQUENCY & RESPONSE TIMES

- **Monitoring mechanisms to benchmark response times** – While the DDATS has adopted response times as a mechanism for measuring the success or otherwise of the provision of accessible taxis it is our opinion that this is not easily measured nor should it be the only criteria.

In NSW it has been reported at various times that approximately only 25% of taxi services are “booked services” and that the remaining 75% of services are arranged privately between passenger and driver due to the historically poor recorded of the central booking systems. This practice leads to passengers travelling when the “driver is available” and in areas where there a very limited number of taxis that can mean a person can not travel on the day and time of their choosing.



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Given the gross failure of taxi booking systems in various parts of Australia and the adhoc methods people with disabilities use to access taxi travel it is evident that the "response time" benchmarking is not an appropriate means for the **sole method** of determining equal and equitable access to taxi transport.

Therefore in our opinion an additional measure should be adopted into the DDATS which requires a proportion of a taxi co-ops fleet to be accessible.

- **Proportion of fleet that are accessible** – Further to the comments above various studies undertaken by state government agencies indicates that there is significant variation in the per capita provision of accessible taxis compared to inaccessible taxis.

For example, in NSW regions such as Newcastle, Wollongong/Illawarra and outer suburban areas they is a small fraction of per capita availability of accessible taxis compared to the per capita availability of inaccessible taxis for the general public. This creates a serious adverse impact on the capacity of people who need accessible taxis to access workforce, education, recreational opportunities and general community life.

Therefore, in our opinion the DDATS should be amended to include minimum percentages of a taxi co-ops fleet to be accessible at each 5 year milestone, commencing with a 20% minimum by 2012, which could be the subject of review at that time to determine the next milestone.

Recommendations

16. Boarding Ramps – Manually deployed ramps that rely on assisted access should have a maximum gradient of 1:8 for ramps up to 1520mm in length (1:14 preferred) and not 1:4 as currently listed in clause 6.4(c) of the DDA Transport standard. In our opinion a 1:4 slope is unsafe for the operator assistant and the passenger.

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standards should be adopted by all state and territory authorities responsible for regulating taxi transport services.

21.To ensure appropriate benchmarks are included in the DDATS to assess the equitable access to accessible taxi transport ACAA recommends that the DDATS should be amended to include minimum percentages of a taxi co-op's fleet to be accessible at each 5 year milestone, commencing with a 20% minimum by 2012, which could be the subject of review at that time to determine the next milestone.



Mode 6: Ferry Transport (including ferries for leisure cruises)

While the accessible upgrading of ferry wharves commenced well before the introduction of the DDA Transport Standard in 2002 it is evident from several capital city and other regional locations around Australia that the accessibility of ferry services has increased since the introduction of the DDATS.

Wharves

However, in some localities the progress has stalled due to some ambiguity of who owns some ferry wharves and subsequently who would upgrade them. For example in Sydney approximately 50% of the ferry wharves are technically owned by local government agencies while the ferry operators are generally owned by state government agencies such as Sydney Ferries. The same 50% of ferry wharves are inaccessible and Council's have been unwilling or unable to upgrade them due to lack of financial resources.

It is hoped that the impasse will be resolved and the upgrading program will recommence to enable achievement of the 10 year milestone in 2012.

Boarding

With respect to boarding ferries there are excellent examples of floating pontoons and hydraulic adjustable gangways to accommodate different vessels with various freeboard provisions.

However, the gradient of some gangways exceed the 1:12 gradient for independent access in the DDATS and staff assistance is not always provided.

Portable gangways are often poorly designed for wheelchair access and the surfaces do not provide appropriate slip resistance and handrails.

Therefore we recommend that a technical working party should be formed to develop several design options for accessible gangways for use on ferry vessels.

On-board Amenities

With respect to wheelchair seating spaces, accessible toilets and stairways it is apparent that the overwhelming majority of vessels fail to comply with the DDATS by providing no designated wheelchair seating spaces, inaccessible toilets and stairways that don't provide appropriate access.

Ferries for Leisure Cruises (excluding charter boats & water taxis)

It is evident that the definitions of a ferry, charter boat and water taxi are somewhat unclear within the DDATS which causes some ambiguity and uncertainty among people with disabilities about their right of access to some vessels.

When is a water taxi large enough to be a ferry ?

When is a vessel a charter boat and not a ferry ?

Is a leisure cruising vessel a ferry or a charter boat ?

In our opinion a leisure cruising vessel operating a tourist service that requires the purchase of tickets is a ferry and therefore is covered by the DDATS.



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In our opinion the terminology is too interchangeable for some vessels and operators which leads avoidance with the requirements of the DDATS.

We recommend that the definition of the vessels should be clarified to ensure that operators are aware of their obligations under the DDA and equally that people with disabilities are aware of the right of access.

Recommendations

- 23.ACAA recommends that a technical working party should be formed to develop several design options for accessible gangways for use on ferry vessels, accessible on-board toilets, stairway designs.
- 24.ACAA recommends that the **definition** of the vessels, ferries, charter boats and water taxis should be clarified to ensure that operators are aware of their obligations under the DDA and equally that people with disabilities are aware of the right of access.



Section B - Questions for all Stakeholders

1) Has the accessibility of public transport improved since the introduction of the Transport Standards?

How has accessibility to conveyances changed? Can you provide examples?

- There are far more accessible buses, trains, light rail, taxis, ferries providing wheelchair access than were previously available.
- However, the availability of accessible long distance coaches and trains remains unchanged with NO accessible long distance coach services in most of Australia.

How has accessibility of information changed? Can you provide examples?

- Little change seems to have occurred in hardcopy publications. Some websites are more accessible.

How has accessibility of infrastructure changed? Can you provide examples?

- Bus stops, railway stations, ferry wharves etc are being steadily upgraded to provide improved access for people with disabilities.
- Approximately 90 of the 307 NSW City Rail Stations are wheelchair accessible with 6-8 being upgraded each year.
- The majority of the larger ferry wharves are accessible in Sydney but more needs to be done in terms of accessible long stay parking, accessible footpath approaches and accessible bus services that interface with the ferries.
- However, local governments are relatively poor performers in terms of upgrading bus stop and footpath infrastructure and they seem to be more interested in forming commercial agreements with advertising companies to install bus shelters than providing improved footpath infrastructure to bus stops.

2) Have these changes matched your expectations of the implementation and uptake of the Transport Standards?

Do you consider that the changes have matched (1) the compliance requirements and (2) your expectations?

- Compliance requirements are being exceeded in some situations such as accessible railway stations, government bus services and ferry wharves. However, many private bus operators have failed to provide reasonable level of accessible services and long distance coaches remain INACCESSIBLE.
- While there are more accessible taxis available the poor distribution within some regions and co-ops combined with inadequate monitoring by industry and relevant government agencies has resulted in variable outcomes. Some improvement while other service areas languish, especially regional & rural.
- While several inquiries have been undertaken into wheelchair accessible taxis and problems identified there has been little or no will by government to rectify the situation.
- **Taxi Co-ops and Service Performance** - It is our position that each taxi co-op needs to have a minimum ratio of its fleet as being wheelchair accessible and should provide booking statistics to the relevant government agency each



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year to verify performance.

- **Taxi Vehicle Registration** - Relevant licensing and registration agencies should undertake tighter control of vehicle design to ensure appropriate modifications to a vehicle will enable wheelchair access, including a 3 dimensional wheelchair envelope of height as well as footprint and seat belts.

If the changes have fallen short of your expectations, can you provide examples?

- See above re Taxis.
- Airline travel seems to be getting harder for people who use a wheelchair with some airlines requiring a carer to travel as a companion to lift the person in and out of their seat and some planes refusing to carry some powered wheelchairs.
- Long Distance Coach travel is virtually non-existent, except for an isolated vehicle or two in Queensland.
- Long Distance Train travel is also a problem due to the lack of, or grossly inadequacy of the "so called accessible" amenities on these trains. Southern Pacific, Ghan, Overlander and interstate trains do not provide accessible sleeper cars – a 570mm width aisle is NOT accessible and the alternative of transferring into a carer assist aisle chair to move between cabins is not equitable access.

3) Do you consider that the level of compliance require at the end of the first five year period is sufficient to have an impact on accessibility?

- No. – While 25% accessibility may sound significant in actual fact if only the boarding point is accessible and the destination is not accessible then the journey is INACCESSIBLE and unlikely to be used by people who use a wheelchair.
- Accessibility can only be measured when the journey is accessible from start to finish.

4) To what extent do you consider current data on accessibility are reliable? Can you provide problems with data that you are aware of?

- We are not aware of any robust monitoring and data systems except for websites and booking services advertising accessible infrastructure and conveyances. E.g. 131500, private bus operators.
- Although in the past I am aware that the NSW taxi transport subsidy scheme has produced the number of passenger trips made by people with disabilities, which is collated on a postcode basis, or similar. Albeit the data was collected by the taxi operator and was not generally made public. The data also failed to report "response times" which is the performance criteria in the DDA Transport Standard.

5) How could reporting of accessibility data be improved for future stages of the implementation of the Transport Standards?

- It would be better to require access data calibrated clearly against the Transport Standards and be provided as part of customer service by transport operators.

6) Are you aware of examples where improved accessibility to transport has lead to increased patronage?

- For reasons stated above we are not aware of increased patronages by people with disabilities that can be reported in statistical terms, except



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possibly for the NSW Taxi Transport Subsidy Scheme.

Questions for Public Transport Users

7) Has the introduction of the Transport Standards helped you better understand your rights as a public transport user? If yes, in what ways has it done this?

- To some extent people with disabilities are more aware of their rights due to the emergence of accessible conveyances and infrastructure and their inherent curiosity to enquire further about other services.

8) Are the Transport Standards and the accompanying guidelines a sufficient source of information on your rights as a user of public transport, or have you needed to consult other sources? What other sources have you consulted? How did you find out about these sources?

- The Standards and Guidelines provide a reasonable foundation, but like many "standards oriented" publications they do not provide a plain English interpretation.
- While the HREOC website provides a great deal of useful information each transport provider should incorporate brief statements and reference contacts within general timetables / websites about their rights under the DDA Transport Standard and where to go for further information.

9) Are you aware of other users of public transport who appear to be unaware of their rights or obligations? How could this lack of awareness be addressed?

- Most people with disabilities are vaguely aware that they have a right to public transport, although older people who are frail and inherently have mobility and other impairments are less likely to be aware.
- This could in part be due to the lesser use of computer technology by older Australians and the fact that the transport standard has been in force only since 2002 and many services are still inaccessible.

Questions for Public Transport Operators and Providers

10) Has the introduction of the Transport Standards clarified your obligations as a public transport operator or provider? If yes, how have they done this?

N/A

11) Are the Transport Standards sufficient or have you needed to consult with other sources? What other sources have you consulted with? How did you find out about these sources?

N/A

12) Are you aware of other operators and providers of public transport that appear to be unaware of their obligations? Can you provide examples? How could this lack of awareness be addressed?

N/A



Questions for all Stakeholders

13) Are there areas of the Transport Standards that you consider unclear in terms of the adjustments operators and providers need to make? Please specify.

- • **Emergency Egress** - There are no provisions in the standards regarding emergency egress, especially from buildings and railway stations for people disabilities, in particular for people who use a wheelchair. E.g. recent train breakdown on Sydney Harbour Bridge saw a person in a wheelchair left on the train and the response from the rail operator was "we'll get back to you in 2-3 days".
- Underground railway stations do not provide fire-isolated lifts.
- The requirements for Emergency Evacuation procedures for people with disabilities need to be added to the Guidelines as an obligation for all providers.
- **Backup Service Arrangements** - There have also been numerous problems with train travel when trackwork has caused rail providers to use buses, which have been inaccessible, thereby not being able to provide the advertised service. The Guidelines need to be strengthened in this area to ensure people with disabilities are not further disadvantaged.
- **Standards Consistency** - Consistency between the Transport infrastructure requirements and the proposed DDA Premises Standard need to be aligned. Currently the draft documents are NOT aligned.
- **Tactile and Braille Signage** - The transport standards needs more guidance on the where and how the information should be provided within conveyances and infrastructure to enable equitable access for people who are blind or have a vision impairment.
- **Wheelchair Restraints in Route Buses** - The Standard should be amended to include restraint systems in buses.
- **Passenger Restraints in Wheelchair Accessible Taxis** - The DDA Transport Standard and associated Australian Standard are grossly inadequate in terms of design requirements for the safe installation of passenger restraints.
- **Ticketing Machines** - these are generally inaccessible to many wheelchair users, people with limited hand / finger function and people with vision impairment. Types of card authority or concession systems need to be developed for people with disabilities who can not use in accessible ticketing machines.

14) Have the exemptions allowed under the Transport Standards reduced the clarity of obligations under the Transport Standards?

- NO, it is assumed that during any Exemption application process with HEROC that a provider's obligations have been clarified.

15) To what extent do the Transport Standards allow operators and providers a choice of ways in which they can demonstrate compliance?

- The potential for flexible equivalent access arrangements existing within the standard.



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16) Where Australian Standards or other Technical requirements are specified, are these appropriate?

- In most cases Australian Standards referenced in the DDA transport Standard can be readily achieved for new infrastructure and premises and most existing premises and infrastructure.
- However, there are a few problems applying AS1428 to conveyances especially, existing conveyances. The areas of greatest challenge are stairways in double deck conveyances, accessible toilets and some access paths, which prevails on existing and new stock due to the constraints imposed by vehicles sizes which is further exacerbated by the lack of good design requirements and ignorance by designers.
- **New research funding** needs to be made available for designing accessible public transport conveyances.

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

- In addition to the above comments there is a significant shortfall in the provision of assistive listening systems for people with hearing impairment in the areas of conveyances, railway station PA systems, etc.
- The various timetable display systems also fail to provide appropriate access for people with vision impairment and there is generally no alternative audio system.

18) As a public Transport user, are there areas of public transports were you consider a more specific requirement for compliance would improve accessibility?

- See above regarding; wheelchairs restraints in buses, wheelchair accessible coaches, wheelchair accessible long distance trains (sleeper cars), hearing augmentation, alternative formats for information delivery,

19) Do you consider that the requirements of the Transport Standards have been applied consistently across different modes of public transport?

- No. Some smaller operators in rural and regional bus and taxi service areas, appear to be generally unaware of ill informed about their obligations under the Standard.
- Furthermore the non-urban local government authorities controlling the infrastructure these services use are equally ignorant or unwilling to implement changes even when advised of their obligations.
- Coach operators have largely ignored the transport standard.
- Long Distance trains provide extremely poor or no wheelchair access.

20) Will any current areas of inconsistency be addressed through the future stages of implementation of the Transport Standards?

- NO, not unless the current DDA Transport Standard is amended and will correlate with the proposed DDA Premises Standard

21) Do you consider that the current exemptions granted are appropriate? Should these exemptions be reduced over time?

- Exemptions are granted after consultation with the disability sector and industry. This approach is sound. Hopefully as the Standards mature the need



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for exemption will decrease.

- The new updated 2006 version of the level railway crossings standard AS1742-7 is better but entrapment for wheelchair users is still an issue and needs more research.

22) In implementation of the Transport Standards, have the requirements lead to a relatively consistent standard of compliance across all modes of public transport? If not, where are the major differences of approach?

NO is the simple answer. While the majority of the prescriptive requirements concerning infrastructure are relatively clear there are many aspects about accessibility requirements in conveyances that are unclear, inherently difficult to implement and give rise to varied approaches or a "do nothing approach".

In particular:

- Stairways I double deck trains, high floor coaches and ferries.
- Accessible toilets within trains, ferries, long distance coaches and aircraft.
- Taxi design
- Restraint systems in buses and taxis

23) To what extent do the requirements in the Transport Standards address all of the accessibility requirements for people with disability? Are there gaps in the coverage of requirements?

See above comments. Safety requirements in conveyances are not covered. Passengers in buses are subjected to the same forces as those in taxis but have no means of being secured. Passengers using wheelchairs frequently report feeling endangered when their wheelchairs move while buses are cornering.

Emergency evacuation plans and provisions are not a requirement of the DDATS.

24) Does the compliance timetable provide for a gradual improvement of accessibility over the 30 year implementation period? Are there aspects of this timetable that present compatibility problems? How could these requirements be improved?

Yes. However, safety components such as TGSIs are not at 100% by 2007 and restraints in buses are not required. Gradual improvement will probably mean transport networks remain ineffective in many areas until at least 2017.

25) Are providers meeting their obligations across all aspects of accessibility, which ensures compatibility?

Generally government operated transport systems are progressing towards the goal of providing accessible public transport. However, some private operators have failed to meet their 5 year milestone while others have ignored their obligations such as long distance coaches and trains.

26) Do the requirements of the Transport Standards need to more explicitly recognise the potential other regulatory constraints that impede the capacity of transport providers to deliver the objects of the Transport Standards?

Workplace Health and Safety legislation potentially restricts the level of direct assistance given. This needs to be clarified or the technical requirements for



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boarding mechanisms and transfer equipment strengthened to facilitate more independent and safer access for passengers and staff alike.

27) How well are the current arrangements for making complaints about accessibility understood by the public?

Mixed. Some members of the public are very articulate and effective self advocates, while the majority of people with disabilities are totally unaware of complaint mechanisms or their rights or have the capacity to lodge a complaint, especially in tourism based transport such a ferries, coaches, tourist vans.

28) Are the current processes sufficiently responsive to complaints, or requests for information or advice on the transport standards?

If people are aware that they can be informed or complain, they usually can access services reasonably quickly.

With respect to the technical provisions within the DDATS which reference various Australian Standards, it is evident that the general public can not readily access this information which is only available by purchase and are quite expensive costing well over \$500 for the relevant suite of standards referenced by the DDATS.

We recommend that the technical information should be freely available to the general public free of charge.