

Queenslanders with Disability Network response:

ARA Version of Disability Standards for Accessible Public Transport

Summary

Section	Description	Comment
1.1 to 1.8	Preliminary clauses	No changes
1.9	Access path	Exemption
1.11AX	Assistance Dog	Exemption (New Clause)
1.11BX	Boarding Point	Exemption (New Clause)
1.11CX	Booked Services on Trains	Exemption (New clause)
1.11DX	Unbooked Services on Trains	Exemption (New clause)
1.15X	Disability Aid	Exemption (New Clause)
1.18	Infrastructure	Exemption
1.18X	Level Crossing	Exemption (New Clause)
1.19AX	Mobility Aid	Exemption (New Clause)
1.19BX	Nominated Accessible Boarding Point	Exemption (New clause)
1.21	Premises	Exemption
1.23X	Sleeping berth	Exemption
Part 1X	Mobility Aids	Exemption (New part)
2.1	Access paths - Unhindered passage	Exemption
2.2	Access paths - Continuous accessibility	Exemption
2.3	Access paths - Path branching into 2 or more parallel tracks	No Change
2.4	Access paths - Minimum unobstructed width	Exemption
2.4X	Access paths - Minimum unobstructed width for railway platforms	Exemption (New Clause) (HREOC Outcome)

2.5	Poles and obstacles, etc	Exemption
2.5AX	Level crossings	Exemption (New clause)
2.6	Access paths - Access paths — conveyances	Exemption
2.7	Minimum width between front wheel arches of bus	No Change
2.8	Access paths - Extent of path	Exemption
2.9	Access paths - When is an access path not required	No Change
3.1	Manoeuvring areas - Circulation space for wheelchairs to turn in	Exemption
3.2	Manoeuvring areas - Access for passengers in wheelchairs, etc	No Change
3.3	Manoeuvring areas - Limited on-board manoeuvring	No Change
4.1	Passing areas - Minimum width	Exemption (Deleted Clause)
4.2	Passing areas - Two-way access paths and aerobridges	Exemption
4.3	Passing areas - Passing areas — conveyances	Exemption
5.1	Resting points - When resting points must be provided	Exemption
6.1	Ramps - Ramps on access paths	Exemption
6.2	Boarding ramps	Exemption
6.3	Ramps - Minimum allowable width	Exemption
6.4	Ramps - Slope of external boarding ramps	No Change
6.5	Ramps - Slope of ramps connected to pontoon wharves	No Change
7.1	Waiting areas - Minimum number of seats to be provided	No Change
7.2	Waiting areas - Minimum number of allocated spaces to be provided	No Change
8.1	Boarding - Boarding points and kerbs	Exemption
8.2	Boarding - When boarding devices must be provided	Exemption
8.3	Boarding - Use of boarding devices	No Change
8.4	Boarding - Hail-and-ride services	No Change
8.5	Boarding - Width and surface of boarding devices	Exemption (Delete Clause)
8.6	Maximum load to be supported by boarding device	Exemption
8.7	Boarding - Signals requesting use of boarding device	Exemption (Delete Clause)
8.8	Boarding - Notification by passenger of need for boarding	Exemption

	device	
9.1	Allocated space - Minimum size for allocated space	Exemption
9.2	Allocated space - Minimum number of allocated spaces to be provided	No Change
9.3	Minimum head room	No Change
9.4	Number of allocated spaces to be provided — buses	No Change
9.5	Number of allocated spaces to be provided — ferries	No Change
9.6	Number of allocated spaces to be provided — train cars, etc	Exemption
9.7	Allocated space - Consolidation of allocated spaces	Exemption
9.8	Allocated spaces in aircraft and coaches	No change
9.9	Use of allocated space for other purposes	No change
9.10	Allocated space - International symbol of accessibility to be displayed	Exemption
9.11	Allocated space - Movement of mobility aid in allocated space	No change
10.1	Surfaces - Compliance with Australian Standard	Exemption – Conveyances, Exemption Infrastructure/Premises see 10.X
10.1X	Surfaces - Compliance with Australian Standard	Exemption (New Clause) (Infrastructure)
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11.3	Handrails and grabrails - Handrails on steps	Exemption
11.4	Handrails and grabrails - Handrails above access paths	Exemption
11.5	Handrails and grabrails - Compliance with Australian Standard	Exemption
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12.3	Doorways and doors - Weight activated doors and sensors	Exemption
12.4	Doorways and doors - Clear opening of doorways	Exemption
12.5	Doorways and doors - Vertical height of doorways	No Change
12.6	Doorways and doors - Automatic or power-assisted doors	No Change
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14.1	Stairs - Stairs not to be sole means of access	Exemption
14.2	Stairs - Compliance with Australian Standards — premises and infrastructure	No change
14.3	Stairs - Compliance with Australian Standards — conveyances	Exemption
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15.2	Toilets - Location of accessible toilets	Exemption
15.3	Toilets - Unisex accessible toilet — ferries and accessible rail cars	Exemption
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17.3	Signs - Location — conveyances	No Change
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17.5	Signs - Electronic notices	Exemption
17.6	Signs - Raised lettering or symbols or use of Braille	Exemption
17.7	Signs - Taxi registration numbers	No Change
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18.2	Tactile ground surface indicators - Style and dimensions	Exemption
18.3	Tactile ground surface indicators - Instalment at accessible bus boarding points	No Change
18.4	Tactile ground surface indicators - Instalment at railway stations	Exemption
18.5	Tactile ground surface indicators - Instalment at wharves	No Change
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20.2	Lighting - Illumination levels — conveyances	No Change
20.3	Lighting - Dimming	No Change
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(3) Manoeuvrability: restates performance specification in existing clause 3.1. Error! Bookmark not defined.

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Part 1 Preliminary

Division 1.1 Purpose and application of Standards

1.1 Name of Standards

These Standards are the *ARA Version of Disability Standards for Accessible Public Transport*.

Note These Standards take effect as provided by subsections 31 (3) and (4) of the *Disability Discrimination Act 1992*.

1.2 Purpose of Standards

- (1) The *Disability Discrimination Act 1992* seeks to eliminate discrimination, 'as far as possible', against people with disabilities. Public transport is a service covered by the *Disability Discrimination Act 1992*.
- (2) The purpose of these Standards is to enable public transport operators and providers to remove discrimination from public transport services.

1.3 Acknowledgment of rights of passengers, operators and providers

In prescribing how public transport is to be made accessible, these Standards acknowledge certain rights of passengers, operators and providers, as well as imposing some responsibilities.

1.4 Application of Standards

- (1) These Standards apply to the widest possible range of people with disabilities as defined by the *Disability Discrimination Act 1992*.
- (2) These Standards apply to all operators and the conveyances they use to provide public transport services. They also apply to providers and supporting premises and infrastructure.

1.5 Guidelines

These Standards are accompanied by Guidelines. Passengers, operators and providers need to consult the Guidelines when interpreting these Standards.

1.6 Incorporation of Australian Standards and Australian Design Rules

These Standards:

- (a) prescribe certain sections of **Australian Standard 1428.1** (*Design for access and mobility. Part 1 General requirements for access — Buildings*, second edition, 2001) for transport premises, infrastructure and conveyances; and
- (b) prescribe some of the additional requirements of **Australian Standard 1428.2** (*Enhanced and additional requirements — Buildings and facilities*, 1992) for transport premises, infrastructure and conveyances; and
- (c) prescribe some of the additional requirements of **Australian Standard 1428.1 Supplement 1** (*Design for access and mobility: General requirements for access — Buildings — Commentary*, 2001) for transport premises, infrastructure and conveyances; and
- (d) prescribe some of the additional requirements of **Australian Standard 1428.4** (*Design for access and mobility: Tactile ground surface indicators for the orientation of people with vision impairments*, 1992) for transport premises, infrastructure and conveyances; and
- (e) prescribe some of the additional requirements of **Australian Standard 1735.12** (*Lifts, escalators and moving walks: Facilities for persons with disabilities*, 1999) for transport premises, infrastructure and conveyances; and
- (f) prescribe some of the additional requirements of **Australian Standard 2220.1** and **Australian Standard 2220.2** (*Emergency warning and intercommunication systems in buildings*, 1993) for transport premises, infrastructure and conveyances; and
- (g) prescribe some of the additional requirements of **Australian Standard 2899.1** (*Public information symbol signs: General information signs*, 1986) for transport premises, infrastructure and conveyances; and
- (h) prescribe some of the additional requirements of **Australian Standard 3856.1** (*Hoists and ramps for people with disabilities — Vehicle mounted: Product requirements*, 1998) for transport premises, infrastructure and conveyances; and

-
- (i) prescribe some of the additional requirements of **Australian Design Rule 58** (*Requirements for omnibuses designed for hire and reward*, as amended to include *Road Vehicle (National Standards) Determination No 2 of 1992*) for transport premises, infrastructure and conveyances; and
- (j) apply additional requirements specific to public transport.

1.7 Applicability of Standards

These Standards apply to conveyances, premises and infrastructure as indicated in a table below each section.

Examples

Example 1 A section that includes the information set out below applies to all conveyances, premises and infrastructure.

Conveyances	Premises	Infrastructure
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Example 2 A section that includes the information set out below applies to all premises and infrastructure but does not apply to conveyances.

Premises	Infrastructure
----------	----------------

Example 3 A section that includes the information set out below applies only to conveyances that are buses and does not apply to premises or infrastructure.

Conveyances

- Buses

Example 4 A section that includes the information set out below applies to all infrastructure, except airports that do not accept regular public transport services, and does not apply to conveyances or premises.

Infrastructure

except airports
that do not accept
regular public
transport services

Division 1.2 Meaning of important terms

1.8 Purpose of Division 1.2

- (1) This Division gives the meanings for some important terms used in these Standards.
- (2) Unless the contrary intention appears, any other term that is used in these Standards and in the *Disability Discrimination Act 1992* has the same meaning in these Standards as it has in the Act.

Note See section 4 of the *Disability Discrimination Act 1992* for definitions of other relevant terms, for example **disability** and **disability discrimination**.

Original Clause

1.9 Access path

An **access path** is a path that permits independent travel for all passengers within public transport premises, infrastructure or conveyances.

Revised Clause (Exemption)

1.9 Access path

An **access path** is a path that permits independent travel for all passengers within public transport premises, infrastructure or conveyances. An access path may include a compliant walkway, ramp or lift.

Agree.

An **access path** on a rail conveyance is a path from the external passenger doorway to the allocated space, priority seats and other essential facilities for passengers with **mobility aids**.

Disagree. Omit 'rail' as the Standards cover all transport modes. Omit 'mobility aids' and use the generic term 'disabilities' as blind passengers (particularly those with guide dogs or canes) need access paths to priority seating also.

An **access path** on a railway station is a clear and unobstructed path from a nominated boundary point to a nominated accessible **boarding point** on each platform and to all accessible facilities.

Agree for existing premises and infrastructure only. Omit 'railway station' and use 'premises and infrastructure' as this will apply to ferry wharfs, airports, bus stations, etc, equally. The nominated boundary point should be either the principal or most popular entrance. A minor access point lacking parking or

drop off facilities (if these are available at other entrances) would be unsuitable and discriminatory.

Reason 1.9

Improved definition for access paths for a rail environment. The standards require various compliant features to be available at or along access paths. It is important for the effective and efficient design of rail premises, infrastructure and conveyances that it is clear where these features are to be provided. This clarification will aid the end users to know which path is compliant e.g. stations where the topography does not allow for all paths to be compliant.

New facilities should comply fully with the existing Transport Standards. The revised clause gives a functional outcome for existing platforms. At least one access path leads to all facilities required to accessible. If implemented intelligently this would give equitable use of the transport system, rather than equitable use of the transport facilities.

All paths on new stations can usually be constructed to a compliant standard. This should be stated. It is accepted that at existing stations this will sometimes be difficult or impossible. This can also be stated. The Guidelines are probably the best location for this type of 'guidance' information.

1.10 Airport that does not accept regular public transport services

An *airport that does not accept regular public transport services* is an airport that accepts aircraft other than aircraft that operate for the purpose mentioned in paragraph 206 (1) (c) of the *Civil Aviation Regulations 1988*.

1.11 Allocated space

An *allocated space* is a three dimensional space that can accommodate a wheelchair or similar mobility aid.

New Clause (Exemption) – Replaces Clause 1.23

1.11AX Assistance Dog

- (1) An assistance dog, is a dog that is registered and trained to alleviate the effects of a person's disability on public transport.

- (2) An assistance dog must be under the direct control of the person with the disability at all times and wear a recognised form of identification as a trained assistance dog.
- (3) The handler is solely responsible for the conduct, care, feeding, hygiene and toileting of their animal.

Reason 1.11AX

The term "assistance dog" will need to be uniformly used throughout the document.

There is no definition in the Standards to differentiate a service / assistance animal from a therapy animal or pet. Relevant clauses are brought across from the Guidelines and to pick up HREOC recommendations contained in its report following consultations on Section 9 (1) (f) of the Disability Discrimination Act (18 November 2003).

Disagree though the need for uniformity in references is accepted, as is the separation of 'working' from 'companion/comfort' animals. Perhaps the term 'assistance animal' allows more scope. Dogs are certainly the most common 'assistance animals' but other animals (trained and registered) may be needed where people are not compatible with, or have religious aversion to, dogs.

New Clause (Exemption)

1.11BX Boarding Point

A **boarding point** is the place where passengers board a public transport conveyance.

Reason 1.11BX

To better define the boarding point for a conveyance.

Disagree. This definition is still fairly broad. Try "**Boarding point:** The immediate point from which passengers board a public transport conveyance." This might be as restricted as a bus stop or as broad as a cab rank that stretches along a full city block.

New Clause (Exemption)

1.11CX Booked services on trains

Booked services on trains are long distance passenger train services where prior booking is required to purchase a specific seat and/or allocated space.

Reason 1.11CX

To define the requirements and service.

Accept this definition, but could it be expanded to cover buses, ferries, aircraft etc? The ARA has a rail perspective but the Standards must accommodate all modes of public transport.

New Clause (Exemption)

1.11DX Unbooked services on trains

Unbooked services on trains are generally suburban passenger train services where no seat is booked or reserved for a specific person.

Accept this definition, but could it be expanded to cover buses, ferries, aircraft etc? The ARA has a rail perspective but the Standards must accommodate all modes of public transport.

Reason 1.11DX

To define the requirements and differentiate booked and unbooked services.

Accept the need for this differentiation but the definitions should incorporate buses, ferries, taxis etc.

1.12 Conveyance

- (1) A ***conveyance*** includes any of the following, to the extent that they are used to provide a public transport service:
 - (a) aircraft;
 - (b) buses or coaches;
 - (c) ferries;
 - (d) taxis;
 - (e) trains, trams, light rail, monorails, rack railways;
 - (f) any other rolling stock, vehicle or vessel classified as public transport within its jurisdiction by regulation or administrative action of any Government in Australia.
- (2) A ***conveyance*** does not include the following:
 - (a) charter boats (including water taxis);
 - (b) limousines (including chauffeured hire cars);
 - (c) self-drive rental cars.

1.13 Dedicated school bus and dedicated school bus service

- (1) A bus is a ***dedicated school bus*** only during the time in which it is being used to provide a dedicated school bus service.
- (2) A ***dedicated school bus service*** is a service that operates to transport primary or secondary students to or from school or for other school purposes.

1.14 Dial-a-ride service

A ***dial-a-ride service*** is a service that:

- (a) is usually operated by a small bus; and
- (b) serves a local community; and
- (c) operates on flexible routes that allow passengers to be picked up and dropped off at their front doors.

1.15 Direct assistance

Direct assistance is help given by an operator or provider:

- (a) to make public transport accessible to a person with a disability when premises, infrastructure or conveyances do not fully comply with these Standards; or
- (b) to provide non-discriminatory access on request.

New Clause (Exemption)

1.15X Disability aid

A ***disability aid*** is a device designed to be used by a person with a disability to alleviate the effects of that disability.

Disability aids include personal mobility, sensory and medical devices, but do not include devices designed for use by more than one person at the one time nor those that are primarily designed for use as transportation vehicles.

Constraints that are part of providing safe and effective public transport services and operations may limit the types of aids that can be accommodated on transport services, premises and infrastructure.

Passengers are responsible for the supply, assembly and operation of their disability aids at all times while using public transport services / facilities.



Reason 1.15X

Although there is reference in the Standards to disability aids, there is no definition of what this term means or includes. Due to safety, operational and space constraints, disability and mobility aids, as opposed to transport vehicles / devices, must be defined in relation to the alleviation of a disability on a transport service.

Devices carrying more than one person, or devices that are essentially vehicles rather than a personal aid essential to alleviate a disability, are not suitable and often not safe on trains and stations. This wording extracts relevant clauses from the Guidelines and brings them across to the Standards to provide increased certainty for passengers and operators/providers.

For the occupational health and safety of both passenger and crew, train crew are unable to assist with the assembly or disassembly of disability aids. Staff on booked services are able to assist by folding a manual wheelchair for a passenger wanting to transfer to a seat and store the chair with the passenger in the seating / sleeping compartment, however they are unable to take aids apart for storage.

Disagree. This is too ambiguous to understand and does nothing to clarify the situation. A definition is needed, with examples (as stated), but it is not provided. Rather, several paragraphs of hints are proposed. Clearly and unambiguously state what assistance can be provided, and for which items. Bear in mind this must also cover taxis, buses, ferries, aircraft etc.

1.16 Equivalent access

- (1) **Equivalent access** is a process, often involving the provision of direct assistance, under which an operator or provider is permitted to vary the equipment or facilities that give access to a public transport service, so long as an equivalent standard of amenity, availability, comfort, convenience, dignity, price and safety is maintained.
- (2) **Equivalent access** does not include a segregated or parallel service.

1.17 Hail-and-ride service

A ***hail-and-ride service*** is a service operated by a bus that follows set routes, but may stop for passengers at any safe point on the route.

Original Clause

1.18 Infrastructure

- (1) ***Infrastructure*** is any structure or facility that is used by passengers in conjunction with travelling on a public transport service.
- (2) ***Infrastructure*** does not include any area beyond immediate boarding points (for example, bus stops, wharves, ranks, rail stations, terminals).

Revised Clause (Exemption)

1.18 Infrastructure

- (1) ***Infrastructure*** is any structure or facility that is used by passengers to gain direct access to a public transport service. Infrastructure includes boarding points, footbridges, open railway platforms and open shelters.
- (2) ***Infrastructure*** does not include any area beyond immediate boarding points.

Disagree. Taxi Ranks have been omitted from the examples. They must be retained as this is the only reference to them in the Standards. "Gain direct access to a" may inadvertently omit information systems. Try "needed by passengers in order to use a".

Reason 1.18

To make the definition of infrastructure clearer so that structures within the rail corridor that are unrelated to provision of public transport services are not subject to compliance requirements.

Accept, but these definitions cover far more than rail facilities and must reflect that broad application.

New Clause (Exemption)

1.18X Level crossing

A level crossing is any vehicular and/or pedestrian crossing of a railway corridor at grade, as defined in AS1742.7.

Reason 1.18X

Level crossings were not included in the Transport Standards previously.

Agree the need to include level crossings, but should they not also be technically described in the 'Part 2 Access Paths'? Further, AS1742.7 is still in draft. It may not have a final form acceptable to the disability sector.

1.19 Manoeuvring areas

A *manoeuvring area* is a space in which a wheelchair or similar mobility aid is able to turn.

New Clause (Exemption)

1.19AX Mobility aid

- (1) A mobility aid is a disability aid that is designed to be used by one person with a disability to alleviate the effects of their limited mobility.
- (2) Mobility aids include wheelchairs and motorised scooters but do not include those devices that are primarily designed for use as transport or recreational vehicles.
- (3) A mobility aid for use on public transport services, premises and infrastructure must meet the requirements of Part 1X Mobility Aids.

Reason 1.19AX

Although there is reference in the Standards to mobility aids, there is no definition of what this term means. Mobility aids, as opposed to transport vehicles / devices, must be defined in relation to the alleviation of a disability on a transport service. Devices carrying more than one person, or devices that are essentially vehicles rather than a personal aid essential to alleviate a disability, are unsuitable and often unsafe on trains and stations. The maximum size of a mobility aid must also be included within the Standards to apply to all clauses and not just allocated space, due to the finite dimensions of track width and gauge, track corridor width and height of overhead wiring.

Most States provide an integrated ticketing system for bus, rail and ferry. For consistency clause 2.7 (width between wheel arches on buses) is the common constraint.

Disagree. The definitions need further examples. Walking frames, walking sticks, crutches and so on are mobility aids, where golf buggies are not. In Queensland a skateboard is a recreational vehicle (by Act of Parliament) but hardly likely to cause difficulty.

The definition should either clearly differentiate between mobility aids and disability aids, or combine the two. For example, a mobility aid might be an item that only directly assists with mobility (eg wheelchair, white cane, walking stick) while a disability aid might be an item that assists with the disability but is not directly involved with mobility (eg medication packs, oxygen bottles, security alarms, communication devices).

Integrated ticketing does not mandate use of buses. People may choose not to use buses for various reasons. The distance between bus wheel arches should not be used to define spaces in other transport conveyances.

New Clause (Exemption)

1.19BX Nominated accessible boarding point

A nominated accessible boarding point is a boarding point nominated by the Provider for accessible boarding by people with disabilities to provide a coordinated and central location for providing direct assistance if necessary, and the provision of core facilities/services.

Reason 1.19BX

This is in line with Guidelines clauses 8.2 (1) and 8.2 (2) covering independent access.

Agree that a definition is needed. Suggest breaking the above into two sentences. Eg: "*A nominated accessible boarding point* is a boarding point nominated by the Provider for accessible boarding by people with disabilities who require assistance in boarding. This allows a coordinated and central location for providing direct assistance if necessary, and location of core facilities/services in convenient proximity."

1.20 Operator

- (1) An **operator** is a person or organisation (including the staff of the organisation) that provides a public transport service to the public or to sections of the public.

- (2) A public transport service may have more than one operator.

Original Clause

1.21 Premises

- (1) **Premises** are structures, buildings or attached facilities that an operator provides for passenger use as part of a public transport service.
- (2) **Premises** are a form of infrastructure.

Revised Clause (Exemption)

1.21 Premises

- (1) **Premises** are structures, buildings or attached facilities that a **provider** supplies for passenger use as part of a public transport service.
- (2) **Premises** are a form of infrastructure.
- (3) **Premises** do not include footbridges, open railway platforms or open shelters, which are covered under 1.18 Infrastructure.

Reason 1.21

To better define premises with reference to clause 1.18.

The infrastructure in the rail environment is unique and often constrained in size and function by the location of rail tracks. It is sometimes not possible or relevant for the features on open rail platforms or footbridges to comply with requirements for 'premises'.

Accept need for clarity. Similar constraints apply at kerb side (eg bus shelters, indented taxi ranks, etc). Bus stations and rail stations have more facilities in common than in exception. Definitions must be applicable to all infrastructure and premises. Consider clearly differentiating between 'Infrastructure' and 'Premises' (rather than making 'premises a form of infrastructure') with a table placing the various structures in the relevant category.

1.22 Provider

- (1) A **provider** is a person or organisation that is responsible for the supply or maintenance of public transport infrastructure.
- (2) A **provider** need not be an operator.

1.23 Public transport service

- (1) A **public transport service** is an enterprise that conveys members of the public by land, water or air.
- (2) A **public transport service** includes:
 - (a) community transport conveyances that are funded or subsidised by charity or public money and that offer services to the public; and
 - (b) foreign aircraft and vessels that carry passengers to, from, or in Australia and that offer services to the public.
- (3) A **public transport service** does not include a service that provides adventure travel (for example, white water rafting, ballooning or amusement park rides), except to the extent that the service operates to move the public from one location to another distant location.

New Clause (Exemption)

1.23X Sleeping berth

A sleeping berth is a sleeping space which may be in a compartment, or a seat/bed recliner chair in an open area.

Reasons 1.23X

To provide a clear definition of sleeping berths.

Agree need to define. Is it certain that the design of seat/bed recliner chairs will be accessible to people who have mobility impairments and will be located on an access way?

1.24 Small aircraft

A **small aircraft** is an aircraft with less than 30 seats for the carriage of passengers.

New Part (Exemption)

Part 1X Mobility aids (new part)

1X.1 Design Criteria

Maximum size

- (1) The maximum size of a mobility aid for use on public transport services, premises and infrastructure is less than 750mm wide by 1300mm long with a maximum head clearance height of 1500mm.

Disagree. Defining 750 mm width for the mobility aid is not acceptable. Minimum width for the mobility aid envelope (which includes occupant) must be 800 mm (AS1428.2 Clause 6). Since the Premises Standard will be based around the 1300 x 800 mm, and will incorporate parts of the Transport Standard in its Part H, consistency regarding the envelope must be maintained between the two Standards. Further, the tightest restrictions on conveyances will be between the wheel arches of buses. It would be unreasonable to restrict access to trains, ferries, taxis etc over an accessway constriction on buses. While integrated ticketing may allow bus and train to be accessed with a single ticket, people may choose not to use the bus, knowing that they will not fit. This bus constraint should not restrict access to other modes of transport.

- (2) The front of the mobility aid shall be designed to meet the Figure 1X-X minimum knee and foot clearance beneath tables, counters and worktops.

Disagree. As scooters are mobility aids in 1.19AX above this is an impossible requirement. Scooters have a wheel or wheels and steering column forward, while walking frames have framework forward. The above could only apply to wheelchairs.

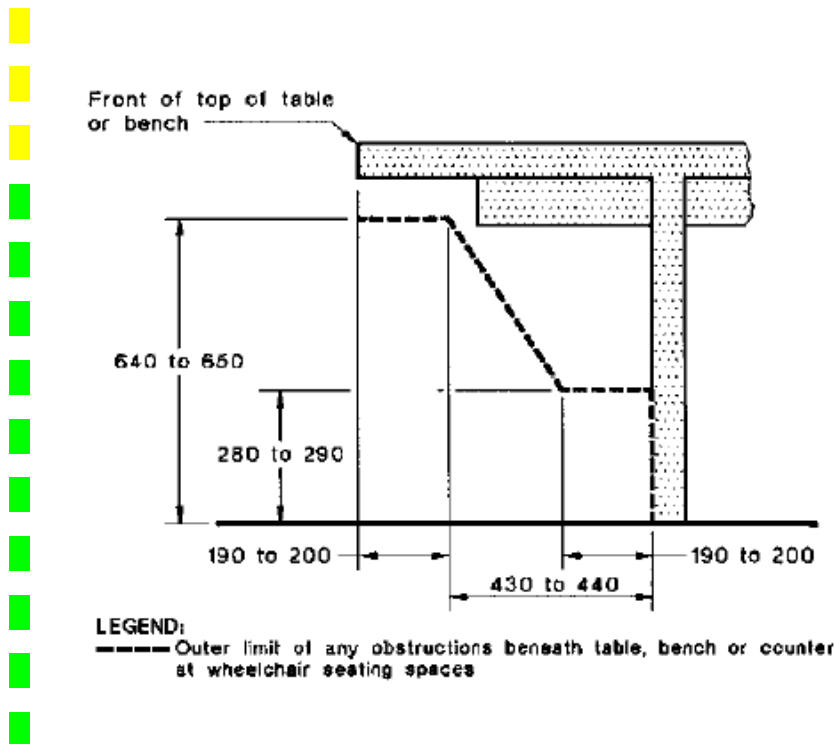


Figure 1X-X

Manoeuvrability

- (3) The device must be able to turn through 180 degrees within an area of 2070 mm by 1540 mm.

Disagree. This requirement diminishes the existing Transport Standard rights of people with disabilities. Leave the reference to AS1428.2 Clause 6.2 in Part 3.1 unchanged. It states the above are minimum dimensions but adds that 2270x 1740 mm is preferable.

Mass

- (4) The combined mass of the passenger, the mobility aid, and any required assistant must be less than 300 kg.

Agree. Weight restrictions are really only applicable to boarding ramps (Part 8.6) though. This must be specified. A passenger may board by a means that does not entail a ramp or they may only access premises or infrastructure. In any of these instances mass is usually immaterial.

Reasons 1X.1

The clauses in this new part extract relevant clauses from the Guidelines, particularly the criteria specified in Part 40. They are included in the Standards to provide increased certainty for passengers and operators / providers in relation to the size and characteristics

required for safe travel of passenger using mobility aids on public transport.

Disagree. It is unacceptable to extrapolate a restriction on buses to other conveyances. The reduction in footprint is therefore not reasonable. It would be reasonable to state a performance requirement, such as: " In certain limited locations mobility aids must be able to pass through restricted spaces down to 750mm wide (eg between bus wheel arches)."

1X.1 Size:

(1) The maximum size of a mobility aid must be defined for all transport situations, not just as it applies for the allocated space. Without clear definition it is foreseeable that passengers will want to bring larger mobility aids on to trains and stations and they will neither fit nor be able to negotiate the constrained space available on trains and stations. Not all devices are suitable or safe in the highly space constrained transport environment.

The maximum width of less than 750mm ensures consistency with the existing clause 2.7 which specifies the minimum access path width of 750mm that can be achieved between the wheel arches of a bus. This specification is applied to other relevant clauses such as the trafficable width of a ramp in clause 6.3.

Disagree. As stated above in '1X.1 Design Criteria', it is not reasonable to extrapolate from buses to other types of conveyance. The minimum envelope for a mobility device must remain at 1300 mm x 800 mm with stated performance requirements for particular areas (eg access through wheel arches).

(2) The dimensions included in 1X.1(2) for the front of the mobility aid are taken from AS1428.2 – 1992 Clause 24.1.4 and Figure 25.

Disagree. These cannot be applied to all mobility devices but are only applicable to wheelchairs.

(3) Manoeuvrability: restates the performance specification in existing clause 3.1.

Disagree. Part 3.1 refers to the minimum space for a 180 degree wheelchair turn, not a maximum. Further, it gives preferred dimensions greater than the minimum.

(4) Mass: This change reflects the amendment to DDA legislation for boarding ramp load tolerance in March 2005.

Agree but this should only be applicable to boarding ramps.

1X.2 Performance criteria —

Braking

- (1) Mobility aids must have effective braking systems and passengers must apply the brakes while conveyances are in motion, and at other times as required for safe travel.

Agree.

Anchoring

- (2) Mobility aids must comply with relevant safety requirements eg criteria for anchorage points.

Disagree. Which requirements are these? A point of reference is required. If an Australian Standard or similar can be quoted as a deemed to satisfy requirement then its relevant Clauses need to be quoted.

Stability

- (3) Mobility aids must be stable under normal conveyance forces of acceleration, deceleration, cornering and pitching.

Disagree. How will mobility aids be tested and certified compliant with this requirement?

Propulsion

- (4) Internal or external combustion driven aids are not permitted on transport premises, infrastructure or conveyances.

Agree.

Batteries

- (5) Electric mobility aids must comply with regulations governing the carriage of batteries on public transport. Batteries need to be adequately secured and contained. Gel or solid state options should be considered.

Agree.

Wheels and Gaps

- (6) A mobility aid should be able to :
 - (a) cross a horizontal gap of 75 mm for pedestrian level crossings as defined in AS1742.7; and

Disagree. This clashes with the requirements for an *Accessway* as defined in this Standard. Where compliance is not possible it must be through Unjustifiable Hardship. Further, this 75 mm provision will halt research into solving the flange gap dilemma rather than accepting it temporarily as an unjustifiable hardship.

- (b) mount a vertical rise (bump) up to 20 mm; and

Disagree. This clashes with the requirements for an *Accessway* as defined in this Standard. Where compliance is not possible it must be through Unjustifiable Hardship.

- (c) cross grating gaps up to 13 mm wide and 150 mm long, and

Agree but for clarity quote AS1428.2 Clause 9(c).

- (d) cross a horizontal gap up to 65 mm wide when combined with a vertical gap of up to 20 mm at station boarding points.

Disagree. This clashes with the requirements for an *Accessway* as defined in this Standard. Where compliance is not possible it must be through Unjustifiable Hardship. Direct Assistance through use of boarding ramps should be available on request in such circumstances.

Ramps

- (7) Mobility aids should be able to negotiate:
(a) a 1 in 12 ramp unassisted; and

Disagree. Change 1:12 to 1:14. To comply with Part 6 Ramps of this Standard, a 1:14 ramp is the steepest grade permitted.

- (b) a 1 in 8 grade unassisted where the ramp is less than 1520 mm; and
(c) a 1 in 4 ramp with assisted access.

Agree but this should indicate a maximum length for 1:4 ramps on workplace health and safety grounds. Suggest 1200 mm as this allows 300 mm vertical level change.

Operation and storage

Passengers are responsible for:

- (8) (a) any dis/assembly, operation and manoeuvrability of their disability aids into and out of public transport conveyances, premises and infrastructure
(b) storage of their disability aids prior to and after travel on public transport services.

Disagree. Taxi drivers need to park wheelchairs, place wheelchairs in car boots and restrain passengers in wheelchairs. They may also place luggage and/or aids in car boots. This will need to be redrafted to incorporate transport modes other than rail.

Working Environment

(9) The mobility aid must be able to operate safely in internal and external environments under varying ambient conditions.

Agree.

Reasons 1X.2

1X.2 Performance criteria

(1) - (3): incorporates existing clauses 1.22 (2) and 1.19 (2) from the Guidelines.

(4) and (5): reflect safety requirements under OH&S legislation for safe carriage of hazardous materials.

(6) Wheels and gaps:

(6) (a): Many stations have level crossings forming part of the access path. The 75mm horizontal gap (when no vertical gap present) reflects the minimum maintenance width of the flange gap that can be achieved on a pedestrian level crossing which is referenced in As1742.7. At present there are no technical solutions to reduce this gap in all situations.

(6)(b) and (6)(d): The PTC in WA can meet the standards of 20 mm vertical gap combined with a 65 mm horizontal gap on new straight platforms, and have advised that many people with disabilities can safely cross these gaps.

This is a train - station interface issue, and infrastructure forms part of the solution. In other states, the 12 mm and 40 mm gaps are not practical to achieve or maintain, particularly on rail lines that carry both passenger and freight services and where stations have curved platforms and superelevation of the track may be required. For a diagonal gap (ie both vertical and horizontal gaps present) exceeding 20mm vertical with 65mm horizontal, the Operator provides direct boarding assistance.

(6)(c) This clause references AS1428.1 (2001) for surfaces in an external environment.

(7) Ramps: This clause restates the performance specification in existing clause 6.4.

(8) Operation and storage: This clause incorporates the intent of existing clause 1.21 from the Guidelines and reflects OH&S obligations to staff and passengers.

1X.2(9) Environment: facilities are provided in an external environment, so passengers and their mobility aids must be able to be safely operated in this external environment.

1X.3 Orientation

Transport operators may determine the location and orientation of passengers on premises, infrastructure and conveyances.

Conveyances	Premises	Infrastructure
except dedicated school buses, and small aircraft		except airports that do not accept regular public transport services

Reasons 1X.3

1X.3 Orientation: This clause incorporates existing clause 1.19(1) from the Guidelines.

Agree where it is a safety issue.

Part 2 Access paths

Original Clause

2.1 Unhindered passage

- (1) An access path that allows unhindered passage must be provided along a walkway, ramp or landing.
- (2) An access path must comply with **AS1428.2 (1992) Clause 8.1**.

Premises	Infrastructure
----------	----------------

except airports that do not accept regular public transport services

Revised Clause (Exemption)

2.1 Unhindered passage

- (1) An access path that allows unhindered passage to a boarding point must be provided. The **Provider** may nominate the access path.
- (2) An access path must comply with **AS1428.1 (2001)**, subject to Part 2.X and with the following exceptions and additions:

(a) Walkways, ramps and landings shall have an unobstructed width of not less than 1200 mm.

- (3) An access path must have a maximum crossfall of 1 in 40 except for 1:33 if the surface is a bituminous seal.

Premises	Infrastructure
----------	----------------

except airports that do not accept regular public transport services

Reason 2.1

This allows the Providers to identify the safest and most practicable access path at stations. This will enable Providers to find a solution on existing infrastructure, having regards to:

- External geography
- Track configuration

Not all walkways, ramps and landings form part of the Provider's nominated access path.

Allow landings at 9m on ramps to be consistent with the draft premises standard (Building Code of Australia (BCA)). AS1428.1-2001 Clause 5.3(b) states that landings are to be provided at 9m intervals for 1:14 ramps and 15m for 1:20 ramps.

AS1428.1-2001 Clause 5.2(a) states that landings are to be provided at 15m intervals for 1:20 walkways and 25m for 1:33 walkways.

To include reference to the HREOC Outcome (Part 2.X)

Clause 2.1(3) for cross fall references the draft AS1428.1 clause 11.1(c)

The reasoning behind the 1 in 33 and 1 in 40 cross fall is taken from AS2890.1-1993 Parking Facilities, Clause 2.4.5 Parking Spaces for People with disabilities state "A parking space shall consist of an unobstructed area having a firm, plane surface with a fall not exceeding 1:40 either parallel to, or at 90 degrees to the angle of parking (1:33 if the surface is a bituminous seal and the parking space is out-of-doors)." This standard has been superseded by AS/NZS 2890.1-2004, which refers to 2890.6 Off-street Parking for People with Disabilities. 2890.6 is currently in draft form and repeats this clause, as does the current draft version of AS1428.1.

Disagree. On a new station this Part could result in unlawful outcomes. In that a minimum of one accessway to a boarding point is required, this Clause falls short of the current 'premises' requirements of the Building Code. This requires access 'to and within' access floors and floors connected by lift or ramp. It is best not to take a minimalist approach. If a path of travel can be made accessible without unjustifiable hardship, then this should occur. Consider: "Access paths that allow unhindered passage to boarding points and other facilities must be provided, unless to do so would impose an unjustifiable hardship (Refer to Part 33.7)."

Original Clause

2.2 Continuous accessibility

An access path must comply with **AS1428.2 (1992) Clause 7**, *Continuous accessible path of travel*.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Revised Clause (Exemption)

2.2 Continuous accessibility

An access path shall be provided as follows:

- (1) Accessible paths of travel within the boundary of the site shall be provided from transportation stops, accessible parking and accessible passenger loading zones, and accessible public streets or walkways to the accessible building entrance they serve.
- (2) Accessible paths of travel shall connect accessible buildings, facilities, and spaces that are on the same site.
- (3) Accessible paths of travel shall connect accessible building entrances with all accessible spaces and facilities within a building.
- (4) Accessible paths of travel shall connect accessible entrances of each accessible building with those exterior and interior spaces and facilities that serve it.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 2.2

This clause change reduces referencing, provides performance based criteria, and strengthens the need to connect accessible facilities.

Agree, but would like all of AS1428.2 Clause 7 included. Clause 7(e) and the Note contain important material on the siting of facilities and fatigue experienced while travelling. As a thought only, will moving this and the other Standards Australia technical material to the Transport Standard constitute a breach of copyright?

Original Clause (No Change)

2.3 Path branching into 2 or more parallel tracks

If an access path branches into 2 or more parallel tracks:

- (a) the ends of each track must be on the main pedestrian traffic routes; and
- (b) the parallel tracks must have equal convenience and be located as close as practicable to the main pedestrian branch.

Premises	Infrastructure
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	except airports that do not accept regular public transport services
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Original Clause

2.4 Minimum unobstructed width

- (1) The minimum unobstructed width of an access path must be 1200 mm (**AS1428.2 (1992) Clause 6.4**, *Width of path of travel*).
- (2) However, the minimum unobstructed width of a moving footway may be 850 mm.

Premises	Infrastructure
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	except airports that do not accept regular public transport services
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Revised Clause (Exemption - see added clause 2.4X)

2.4 Minimum unobstructed width

- (1) The minimum unobstructed width of an access path must be 1200 mm. For doorways and gateways see relevant clauses.
- (2) However, the minimum unobstructed width of a moving footway may be 850 mm.

Premises

Infrastructure

except airports that do not accept regular public transport services

except railway platforms

Reason 2.4

To clarify the requirements for doorway and gateway widths and reduce referencing.

New clause 2.4X has been added to cover railway station platforms to incorporate the HREOC outcome.

Agree

New Clause (HREOC Outcome)

2.4X Minimum unobstructed width for railway platforms

Width of an access path at railway stations must comply with the following:

(1) New platforms

New platforms must comply with Part 2.4.

(2) Existing stations and platforms

Existing stations and platforms must be brought into compliance with these Standards to the maximum extent possible.

Fittings and fixtures (bins, seats, vending machines) must be relocated to the extent possible to achieve maximum compliance.

Requirements for warning TGSIs to be installed on platform edges may compromise clear access paths in some circumstances as indicated below.

(3) Site constraints preventing fully compliant paths of travel
Clear access path width may be reduced from 1200mm to 1000mm where site constraints or fixed structures preclude full compliance. This includes new structures constructed within existing site constraints.

(4) Existing platforms - exceptionally severe site constraints
Where an access path width of 1000mm cannot be achieved adjacent to the 600mm warning TGSIs then compliance must be maximized by a range of options, which may include:

(a) Equivalent access by maintaining an access path of 1000mm (minimum) to at least one side of an obstacle.

(b) Providing an access path of 1000mm (min) to a nominated accessible boarding point and equivalent access to essential facilities on the platform.

(5) Using platform edge warning TGSIs as part of the access path

Where 1000mm clear access path cannot be achieved by the options outlined above, warning TGSIs may form part of the access path (for example where power stanchions or other fixed structures on platforms need to be passed). The overlap of warning TGSIs and access paths must be minimized.

(6) Information to passengers

Where stations do not have a clear access path width of 1000mm, operators should provide passengers with information (including at stations and through internet sites and other appropriate information methods) detailing access features provided.

(7) Moving footways

The minimum unobstructed width of a moving footway may be 850 mm.

Infrastructure
Railway
platforms

Reason 2.4X

The new clause is added to cover railway station platforms and to incorporate the HREOC outcome in relation to access paths and TGSIs.

Clause 2.4 (2) is repeated here for railway platforms.

Agree. The TGSi material is relevant at some wharfs, bus stations, airports etc.

Original Clause

2.5 Poles and obstacles, etc

- (1) Poles, columns, stanchions, bollards and fixtures must not project into an access path.
- (2) Obstacles that abut an access path must have a luminance contrast with a background of not less than 30%.

Premises	Infrastructure
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except airports that do not accept regular public transport services

Revised Clause (Exemption)

2.5 Poles and obstacles, etc

- (1) Poles, columns, stanchions, bollards and fixtures must not project into an access path, except as provided for in Part 2.4X.
- (2) Obstacles that abut an access path must have a colour contrast with the background.

Premises	Infrastructure
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except airports that do not accept regular public transport services

Reason 2.5

A standard testing procedure is required to measure luminance contrast in all the required in situ situations (eg. day, night, wet & dry). These Standards should exclude the reference to the 30% to be consistent with the draft Building Code of Australia (BCA) wording. The current proposed testing procedures from the Australian Standards are unclear and do not produce results consistent with physical trials of people with vision impairment. This was confirmed by Queensland University of Technology Photometric Laboratory testing.

Agree, but emphasise a distinct or strong colour contrast with the background. Luminance contrast fails to consistently produce a visual contrast between surfaces (from field experience). The draft Access to Premises Standard (Building Code) does not drop the 30% luminance contrast requirement for certain objects as, apart from signs, these are covered in Australian Standards.

New Clause (Exemption)

2.5AX Level Crossings

If a public pedestrian level crossing is used as a direct access path to a boarding point it shall comply with AS1742.7 Pedestrian Level Crossings.

Infrastructure

Reason 2.5AX

Level crossings have never been considered previously under the Transport Standards. Draft Australian Standard AS1742.7 Pedestrian Level Crossings is out now for public comment by 23 August 2005.

Disagree. It is not reasonable to require compliance with a document that is in draft only. Arguably, those level crossing that are on a direct accessway to a station are already covered in the Transport Standards.

Original Clause

2.6 Access paths — conveyances

- (1) Subject to subsection (3) and section 2.7, an access path that allows continuous and unhindered passage must be provided with a minimum width of at least 850 mm.

-
- (2) Subsection (1) applies to doorways and stairs, and between entrances, exits, allocated spaces and other essential facilities for passengers using wheelchairs and other mobility aids.
- (3) If the conveyance exists or is ordered before the commencement of this section, the minimum width may be reduced to 800 mm at any doorway restriction.

Conveyances

- Buses
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

2.6 Access paths — conveyances

- (1) Subject to subsection (2) and sections 2.7 and 2.8. a clear access path with a width of 850 mm, except where design constraints require local restriction to a minimum of 750 mm,, is required extending from the entrance doorway to the allocated spaces, priority seats and other essential facilities for passengers with mobility aids.
- (2) If the conveyance exists or is ordered before 2 April 2004, the minimum width may be reduced to 750 mm at any doorway restriction.
- (3) Some sections of a conveyance may not be available to all passengers.

Conveyances

- Buses
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Reason 2.6

1. Consistent with the definition in clause 1.9 of the Access Path.

Disagree. New definition is not fully acceptable.

2. Stairs are removed from original 2.6(2) as stairs cannot by definition form part of an access path.

Stairs may be used by blind or low vision passengers and are thus part of an accessway.

3. Priority seats have been included.

Agree.

4. Door widths on existing conveyances should be in line with access requirements based on Guidelines Part 40 and using allocated space dimensions and conveyance design constraints.

Disagree. A moving mobility device has a larger footprint than one that is stationary. 850 mm is reasonable and if it can be achieved it should be.

5. The date 2 April 2004 refers to Amendment 2004 which added the new clause for conveyances under Part 2 Access Paths.

Disagree. The Transport Standards have been current since 2002, enough time for contract or tender conditions to be sorted out where possible. Genuine constraints are covered by unjustifiable hardship.

6. Most States provide an integrated ticketing system for bus, rail and ferry. For consistency clause 2.7 (width between wheel arches on buses) is the common constraint.

Disagree. A person who never uses a bus should not be constrained on other modes by the distance between some wheel arches. The bus forms the exception to the rule rather than setting the standard.

7. Clause 2.6(3) incorporates clause 14.1(2) of the guidelines to recognise the constraints of train design and access through double deck rolling stock.

Agree that people with mobility aids will not climb stairs.

Original Clause (No Change)

2.7 Minimum width between front wheel arches of bus

Between the front wheel arches of a bus, the minimum width of an access path may be reduced to 750 mm between floor level and a height of 300 mm.

Conveyances

- Buses
-

Original Clause

2.8 Extent of path

- (1) An access path must extend from the entrance of a conveyance to the facilities or designated spaces provided for passengers with disabilities.
- (2) Up to 50 mm of an adjacent allocated space may be used as part of the access path.
- (3) If an access path cannot be provided, the operator must provide equivalent access by direct assistance.

Conveyances

- Buses
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

2.8 Extent of path

- (1) An access path must extend from the entrance of a conveyance to the allocated spaces, priority seats and other essential facilities for passengers with mobility aids and people with vision impairment using canes and assistance dogs.
- (2) Up to 50 mm of an adjacent allocated space may be used as part of the access path.
- (3) If an access path cannot be provided, the operator must provide equivalent access by direct assistance.

-
- (4) When allocated spaces adjacent to an access path are occupied, some manoeuvring by people in the allocated spaces may be required to achieve a clear access path.
- (5) An access path need not extend through an area with hearing augmentation.

Conveyances

- Buses
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Reason 2.8

Clause (1) amended to be consistent with the definition of an access path on a conveyance. The access path is not needed for adequate access to all facilities for all disabilities as it is only people using mobility aids and people using white cane and assistance dogs who will require extra space. The current wording of Clause 2.8 captures all sections of a train with hearing augmentation for people with hearing impairment.

Disagree. A definition of 'essential' is needed or various interpretations will be employed. Better to leave the original Clause unchanged.

Clause 2.8(4) is applicable for multiple allocated spaces in one car, and cases such as two longitudinal allocated spaces and a narrow access path. Clause 2.8(4) acknowledges that some manoeuvring is required by all passengers in certain circumstances, particularly during peak operational periods, due to the limited width of conveyances and the structure gauge.

Agree.

Clause 2.8.5 is inserted to be consistent with Clause 2.6(3) to avoid situations in double deck trains where the only acceptable reception area for hearing augmentation is upstairs and this area is not accessible to people with mobility aids.

Disagree. Hearing impairment affects some people who use mobility aids. There must be a specified equivalent means for these people to access information if they cannot reach a designated area for hearing augmentation.

Clause 2.8(1) is redundant due to 2.6 changes and could be deleted but has been left unchanged.

Original Clause (No change)

2.9 When is an access path not required

- (1) An access path need not extend inside the entrance of a conveyance.
- (2) If there is no access path inside the entrance of a conveyance, the operator must provide on-board wheelchairs or direct assistance to passengers to use on-board facilities or services.

Conveyances

- Accessible taxis
 - Coaches
 - Aircraft
-

Part 3 Manoeuvring areas

Original Clause

3.1 Circulation space for wheelchairs to turn in

A manoeuvring area must comply with **AS1428.2 (1992) Clause 6.2**, *Circulation space for a 180 degree wheelchair turn*.

Premises	Infrastructure
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	except airports that do not accept regular public transport services
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Revised Clause (Exemption)

3.1 Circulation space for mobility aids to turn in

A manoeuvring area must allow for a mobility aid to make an 180° turn. Where possible, the space required for a mobility aid to make an 180° turn shall be no less than 2070mm in the direction of travel and not less than 1540mm wide.

Premises	Infrastructure
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	except airports that do not accept regular public transport services
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Reason 3.1

Information extracted to reduce referencing to Australian Standards.

This reinforces the criteria in the Guidelines Part 40 and Part 1X Mobility Aids of the Standards.

Agree but fully quote AS1428.2: "Where possible, the space required for a mobility aid to make an 180° turn shall be no less than 2070mm in the direction of travel and not less than 1540mm wide. Note: a space of 2270 mm in the direction of travel and 1740 mm wide is preferred." (copyright permitting)

Original Clause (No Change)

3.2 Access for passengers in wheelchairs, etc

- (1) Passengers in wheelchairs or mobility aids must be able to enter and exit a conveyance and position their aids in the allocated space.
- (2) If this is not practicable, operators must provide equivalent access by direct assistance.

Note See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

Conveyances

- Buses
except dedicated
school buses
 - Ferries
 - Accessible rail cars
 - Accessible tram
cars
 - Accessible light rail
cars
-

Original Clause (No Change)

3.3 Limited on-board manoeuvring

If the design restrictions of a conveyance limit on-board manoeuvring areas for wheelchairs and similar mobility aids, the operator of the conveyance must ensure equivalent access by direct assistance to passengers.

Note See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

Conveyances

- Accessible taxis
 - Coaches
 - Aircraft
except small
aircraft
-

Part 4 Passing areas

Original Clause

4.1 Minimum width

A passing area must have a minimum width of 1800 mm (**AS1428.2 (1992) Clause 6.5 (a)**, *Passing space for wheelchairs*).

Premises	Infrastructure
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	except airports that do not accept regular public transport services
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Delete Clause 4.1 Minimum width (Exemption)

Reason 4.1

Clause 4.1 is redundant; information is covered in Clause 4.2.

Agree

Original Clause

4.2 Two-way access paths and aerobridges

- (1) A passing area must be provided at least every 6 metres along any two-way access path that is less than 1800 mm wide (**AS1428.2 (1992) Clause 6.5 (b)**, *Passing space for wheelchairs* and **Figure 3**).
- (2) A passing area is not required on an aerobridge.

Premises	Infrastructure
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	except airports that do not accept regular public transport services
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Revised Clause (Exemption)

4.2 Two-way access paths and aerobridges

1. Where a path of travel is less than 1800mm wide, passing areas at intervals of not more than 9 metres shall be provided as follows:
 - (a) On one side of the path of travel – the passing area shall not be less than 1600mm long and 1800mm wide.
 - (b) With space distributed equally on both sides of the path of travel – the passing area shall be not less than 2000mm long and 1800 mm wide.
2. A passing area is not required on an aerobridge.
3. For sections of railway stations covered by Part 2.4X, no passing areas are required.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 4.2

This takes into account the HREOC outcome regarding the minimum width of an access path on railway platforms.

Disagree. The HREOC outcome did not dispense with passing spaces. Rather, it acknowledged strictures along accessways on existing platforms.

Consistency with the various associated standards is critical for the effective and efficient design and application of these standards. It is important to remove inconsistencies and reduce the amount of cross referencing needed to obtain performance requirements. Therefore the distance between passing areas should be increased to 9m, to give consistency with the 9m for landing used by AS1428.1 and the current and proposed Building Code of Australia (BCA).

Agree.

Original Clause

4.3 Passing areas – conveyances

- (1) A ferry designed to carry more than 1 wheelchair must include at least 1 passing area for each accessible deck.
- (2) A train designed to carry more than 1 wheelchair must include at least 1 passing area for each accessible rail car.

-
- (3) The passing area must enable passengers travelling in mobility aids (conforming with the assumptions indicated in Part 40.1 of the Guidelines) to pass each other.
 - (4) The passing area may comprise part of the allocated space or circulation space or both.

Conveyances

- Ferries
 - Trains
-

Revised Clause (Exemption)

4.3 Passing areas — conveyances

- (1) A ferry designed to carry more than 1 wheel chair must include at least 1 passing area for each accessible deck.
- (2) Each accessible rail car designed to carry more than 1 mobility aid must include at least 1 passing area.
- (3) The passing area must enable passengers travelling in mobility aids (conforming with Part 1X Mobility Aids and the assumptions indicated in Part 40.1 of the Guidelines) to pass each other.
- (4) The passing area may comprise part of the allocated space or circulation space or both.
- (5) Turn taking is an acceptable practice to allow mobility aids to pass.

Conveyances

- Ferries
 - Accessible rail car
-

Reason 4.3

The existing clause implies that each accessible rail car with even one mobility aid requires a passing area. Hence the change from train to accessible rail car.

Agree

Turn taking should be an acceptable alternative to allow mobility aids to pass, especially in peak hours.

Agree.

Part 5 Resting points

Original Clause

5.1 When resting points must be provided

- (1) There must be resting points for passengers along an access path if the walking distance between facilities or services exceeds 60 metres (**AS1428.2 (1992) Note to Clause 7**, *Continuous accessible path of travel*).
- (2) A resting point must provide seats (**AS1428.2 (1992) Clause 27.1(a)**, *Street Furniture*).

Premises

Infrastructure

except airports that do not accept regular public transport services

Revised Clause (Exemption)

5.1 When resting points must be provided

- (1) There must be resting points for passengers along an access path if the walking distance between facilities or services exceeds 60 metres.
- (2) Where major site restraints do not allow for resting points as required, these shall be provided in locations where the infrastructure permits.
- (3) A resting point must provide seating for a minimum of two people and at least one space for a mobility aid. Seats shall be a minimum of 500 mm away from the path of travel.

Premises

Infrastructure

except airports that do not accept regular public transport services

Reason 5.1

It is common for access paths to be more than 60 metres in length and it is also common for the dimensions of these paths to be constrained by other infrastructure (eg subways, underground stations, arcades, vertical transport requirements). These access paths may just comply with the minimum access path width and it may not be possible to widen them. A minimum width of 2.4 m is required to provide a seating zone and an access path which is not always available (see Figure 31 AS1428.2 and AS1428.2 Clause 27.1(a)). The installation of a rest point with seating may result in a dangerous and unseen constriction point for large numbers of customers using the walkway during peak periods.

Disagree for new platforms. This would seem a reasonable unjustifiable hardship provision. As such it should be incorporated into the Guidelines. New platforms can be designed to comply with the existing Part 5.1.

The Operator must have the flexibility to assess the higher risks in restricting large numbers of customers and modify existing facilities that protrude into the access path.

Agree for existing platforms.

Consistency with the various associated standards is critical for the effective and efficient design and application of these standards. It is important to remove inconsistencies and reduce the amount of cross referencing needed to obtain performance requirements.

Agree, but check that plagiarism has not become a breach of copyright.

Part 6 Ramps

Original Clause

6.1 Ramps on access paths

A ramp on an access path must comply with **AS1428.2 (1992) Clause 8**.

Premises	Infrastructure
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	except airports that do not accept regular public transport services
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Revised Clause (Exemption)

6.1 Ramps on access paths

A ramp on an access path must comply with **AS1428.1 (2001)** and;

1) In outdoor conditions, ramps on access paths shall be designed so that water does not accumulate on surfaces. (For requirements for ground surfaces, see **AS1428.2(1992) Clause 9**.)

2) Kerb ramps shall comply with the requirements set out in the **AS1428.1 (2001)**.

Premises	Infrastructure
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	except airports that do not accept regular public transport services
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Reason 6.1

Consistency with the various associated standards is critical for the effective and efficient design and application of these standards. It is important to remove inconsistencies and reduce the amount of cross referencing needed to obtain performance requirements. The infrastructure installed or modified to accommodate access for customers, particularly those using mobility aids, usually has a service life of up to 40 years. Therefore it cannot be easily modified to accommodate selective application of various standards or changes in dimensions which have a low impact on accessibility. The latest Australian Standard AS1428.1 (2001) has been adopted by the BCA.

Agree on consistency but AS1428.1-2001 will shortly be redundant.

Original Clause

6.2 Boarding ramps

A boarding ramp must comply with **AS3856.1 (1998) Clause 2.1.8 (b), (c), (f) and (g)**.

Conveyances

except dedicated
school buses and
small aircraft

Revised Clause (Exemption)

6.2 Boarding ramps

- (1) When two or more ramps are deployed, they shall be attached securely to one another.
- (2) The surface of the ramp shall have a slip-resistant finish. The surface shall be an acceptable surface when tested in accordance with AS3698.13. Cleats may be provided to assist an attendant using the ramp.
- (3) A ramp shall have no protrusions extending for more than 6 mm above the surface except cleats or side edge barriers.
- (4) When the ramp is deployed, there shall be no opening or gap in the ramp more than 40 mm.

Conveyances

except dedicated
school buses and
small aircraft

Reason 6.2

Reduced referencing and clarification of clause.

Agree. Copyright breach?

Original Clause

6.3 Minimum allowable width

The minimum allowable width of a ramp is 800 mm.

Conveyances

except dedicated
school buses and
small aircraft

Revised Clause (Exemption)

6.3 Minimum allowable width

Ramps shall have a minimum trafficable width of 750 mm.

Conveyances

except dedicated
school buses and
small aircraft

Reason 6.3

This aligns with clause 2.7 related to the clear area between bus wheel arches, and Part 40 Guidelines.

Trafficable width is a more appropriate method for measuring ramps as it defines the requirements for the wheels of the mobility aid.

Disagree. Boarding ramps need to service passengers who may choose not use buses, but who would need access to an 800 mm wide ramp to board a train or ferry.

Original Clause (No Change)

6.4 Slope of external boarding ramps

The slope of an external boarding ramp must not exceed:

- (a) 1 in 12 for unassisted access (**AS3856.1 (1998) Clause 2.1.8(e)**); and

-
- (b) 1 in 8 for unassisted access where the ramp length is less than 1520 mm (**AS1428.2 (1992) Clause 8.4.2 (a)** and **AS1428.1 (2001) Figure 8**); and
 - (c) 1 in 4 for assisted access (**AS3856.1 (1998) Clause 2.1.8 (e)**).

Conveyances

except dedicated
school buses and
small aircraft

Original Clause (No Change)

6.5 Slope of ramps connected to pontoon wharves

The slope of a ramp connected to a pontoon wharf must comply with section 6.1 for at least 80% of the high and low tide levels listed in standard tide charts.

Infrastructure

- Pontoon wharves
-

Part 7 Waiting areas

Original Clause (No Change)

7.1 Minimum number of seats to be provided

If a waiting area is provided, a minimum of 2 seats or 5% of the seats must be identified as available for passengers with disabilities if required.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Original Clause (No Change)

7.2 Minimum number of allocated spaces to be provided

If a waiting area is provided, a minimum of 2 allocated spaces or 5% of the area must be available for passengers with disabilities if required.

Premises	Infrastructure
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except airports that do not accept regular public transport services

Part 8 Boarding

Original Clause

8.1 Boarding points and kerbs

- (1) Operators and providers may assume that passengers will board at a point that has a firm and level surface to which a boarding device can be deployed.
- (2) If a kerb is installed, it must be at least 150 mm higher than the road surface.

Premises	Infrastructure
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except airports that do not accept regular public transport services

Revised Clause (Exemption)

8.1 Boarding points and kerbs

- (1) Operators and providers may assume that passengers will board at a point that has a firm and level surface to which a boarding device can be deployed.
- (2) If a kerb is installed, it must be at least 150 mm higher than the road surface.

-
- (3) The **Provider** may nominate a single accessible location for boarding of a conveyance.

Premises

Infrastructure

except airports that do not accept regular public transport services

Reason 8.1

This allows operators and providers to concentrate their supply of information and services to one area of the platform. This benefits both passengers and operators by improving safety and consistency and allowing for a more efficient service. A single location may be chosen to maximise the efficient use of the platform and associated infrastructure, and services.

Agree for people who require assistance to board a conveyance. People who board independently may wish to board at a point convenient to themselves.

Original Clause

8.2 When boarding devices must be provided

- (1) A manual or power assisted boarding device must be available at any accessible entrance to a conveyance that has:
- (a) a vertical rise or gap exceeding 12 mm (**AS3856.1 (1998) Clause 2.1.7 (f)**); or
 - (b) a horizontal gap exceeding 40 mm (**AS3856.1 (1998) Clause 2.1.8 (g)**).

Conveyances

except dedicated school buses and small aircraft

Revised Clause (Exemption)

8.2 When boarding devices must be provided

- (1) A manual or power assisted boarding device must be available at any accessible entrance to a conveyance that has:

-
- (a) a vertical rise or gap exceeding 20 mm; or
 - (b) a horizontal gap exceeding 65 mm

Conveyances

except dedicated
school buses and
small aircraft

Premises

Infrastructure

except airports that
do not accept
regular public
transport
services

Reason 8.2

The PTC WA can meet the standards of 20 mm vertical gap and 65 mm horizontal gap on new straight platforms, and have advised that many people with disabilities can safely cross these gaps.

Disagree. 'Many' must accommodate 90th percentile. Have PTC WA thoroughly tested their theory with a broad range of or are they merely relating observations? This seems to be a strategy to avoid giving direct assistance.

This is a train-station interface issue, and infrastructure forms part of the solution.
The 12 mm and 40 mm gaps are not practical to achieve or maintain.

Agree regarding difficulty in maintaining 12 mm and 40 mm maximum gaps. However the Transport Standard does not require these are maintained. It rather states at which point a boarding device needs to be deployed. This is a non-issue. Pick realistic gaps dimensions and deploy a boarding ramp.

In other states, platform gaps of more than 20 mm and 65mm will always apply owing to curved platforms, super elevation of the track or freight traffic. The Operator would provide direct assistance in these cases.

Agree.

Original Clause (No Change)

8.3 Use of boarding devices

- (1) If a conveyance has a manual or automatic boarding device, it must be available for use at all designated stops.
- (2) An available boarding device must be deployed if a passenger requests its use.

Conveyances

except dedicated
school buses and
small aircraft

Original Clause (No Change)

8.4 Hail-and-ride services

- (1) If a hail-and-ride service is offered, passengers must be able to hail the service at nominated accessible boarding points where boarding devices can be deployed.
- (2) The boarding points must offer equal access to public transport services.

Conveyances

- Hail-and-ride
services
except dedicated
school buses
-

Original Clause

8.5 Width and surface of boarding devices

A boarding device must:

- (a) be a minimum of 800 mm wide; and
- (b) have a slip-resistant surface.

Conveyances

except dedicated
school buses and
small aircraft

Delete Clause 8.5 (Exemption)

Reason 8.5

This aligns with clause 2.7 related to the clear area between bus wheel arches, and the Part 40 Guidelines.

Trafficable width is more appropriate method for measuring ramps.

Delete clause 8.5 which repeats information in Ramps Clauses 6.2 and 6.3.

Agree, but maintain 800 mm minimum width in Part 6.

Original Clause

8.6 Maximum load to be supported by boarding device

- (1) A boarding device must be able to support a total passenger and mobility aid weight of up to 300 kg.
- (2) The device must be clearly labelled with the maximum load that it can carry, both on the boarding device and next to the accessible entrance on the outside of the conveyance.

Conveyances

except dedicated
school buses and
small aircraft

Revised Clause (Exemption)

8.6 Maximum load to be supported by boarding device

- (1) A boarding device must be able to support the combined mass of the passenger, mobility aid and any assistant up to a total of 300 kg.

Agree. Perhaps clarify beyond reasonable doubt that the assistant is only included in the mass restriction if they are on the boarding ramp simultaneously with the passenger and their mobility aid.

- (2) The device must be clearly labelled with the maximum load that it can carry.

Agree that the device rather than the conveyance door needs to be labelled.

Conveyances

except dedicated
school buses and
small aircraft

Reason 8.6

1. Reduce excess signage.

2. The boarding device load description is DDA legislation amended on 17 March 2005.

Agree.

Original Clause

8.7 Signals requesting use of boarding device

- (1) Any signal for requesting the deployment of a boarding device must be located in an allocated space.
- (2) If possible, a signal is to be placed according to the dimensions given in **AS1428.2 (1992) Clause 11.4, Call buttons.**

Conveyances

- Buses
except dedicated
school buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Delete Clause 8.7 (Exemption)

Reason 8.7

This clause is deleted and covered in clause 8.8.

Disagree. Clause 8.8 does not adequately cover alighting.

Original Clause

8.8 Notification by passenger of need for boarding device

- (1) It must be possible for a passenger to notify the operator of a conveyance that he or she needs a boarding device to board or alight from a conveyance

-
- (2) If a request signal device is used, it may be located on the conveyance or at the boarding point according to the dimensions given in **AS1428.2 (1992) Clause 11.4, Call buttons.**

Conveyances	Premises	Infrastructure
<ul style="list-style-type: none">• Buses except dedicated school buses• Coaches• Ferries• Trains• Trams• Light rail		except airports that do not accept regular public transport services

Revised Clause (Exemption)

8.8 Notification by passenger of need for boarding device

- (1) It must be possible for a passenger to notify the operator of a conveyance that he or she needs a boarding device to board or alight from a conveyance.
- (2) If a request signal device is used, it may be located on the conveyance or at the nominated accessible boarding point.

If a signal device is located at the boarding point but not the allocated space, how will a passenger get from the allocated space to the boarding point to activate it? 8.8(2) should stress that it is an option for locating boarding signals only. These might be located at the boarding point or externally on the conveyance.

- (3) Any signal for requesting the deployment of a boarding device on a conveyance must be located in or near an allocated space or at an entrance.

This entrance location introduces difficulties in crowded conveyances. It is best to keep the request signal device accessibly located in or near an allocated space.

- (4) Where possible, call buttons at entrances shall be located not less than 550 mm and not more than 1200 mm above the finished floor and not less than 500mm from an internal corner.

What is the point of reference for this technical specification? How was it developed? AS1428.2 (1992) Clause 11.4, *Call buttons* is currently required.

Point 4 above seems to diminish existing rights of passengers who have disabilities.

(5) Operators may provide equivalent access by direct assistance.

Conveyances

- Buses
except dedicated school buses
- Coaches
- Ferries
- Trains
- Trams
- Light rail

Premises

Infrastructure

except airports that do not accept regular public transport services

Reason 8.8

To recognise the constraints of the vehicle structure and layout such as the placement of windows and the surrounding structures affecting the button position. The passenger is most likely to use the call button when in a position to alight the train i.e. near the entrance.

Passengers may not have time to reach the entrance before the train pulled out. Alerting staff from the allocated space buys time and certainty in the process of alighting. It is anticipated that movement towards the entrance would not begin until the train was stationary. Progress may be slowed through crowding by other passengers, inappropriately stored baggage or the person's disability. Location of the call button in the allocated space ensures consistently being able to alert staff of the need for an access ramp or similar.

AS1428.2 Figure 23 details the common reach zone of ambulant and wheelchair users for critical controls as between 700mm and 1200mm above floor level. Design and wall space constraints on trains and platforms mean that a call button for passengers with mobility aids may need to be placed lower than the 700mm (minimum 550mm) above floor level, eg where flip up seats are installed in the allocated space under windows. This provides greater design flexibility in constrained spaces.

It is accepted that design and space constraints exist in conveyances. However, Clause 22.4 and Figure 23 of AS1428.2 are not the appropriate references for location of call buttons to be used by a person sitting in an allocated space in their own mobility aid or on a folding seat. This Clause and Figure define a common zone of reach for people seated or standing. Rather, Clause 11.4 of AS1428.2 is appropriate for seated people who need to operate call buttons. Should compliance not be possible due to genuine constraints, equivalent access provisions apply.

The “where possible” refers to the presence of weather shields on existing rollingstock adjacent to the side door opening.

It would not be practicable for this to be implemented at all boarding points in the rail environment. The advantage of having the request signal device at the nominated accessible boarding point is that the majority of conveyances are double ended with the operator nominating the accessible boarding point which may vary depending on the length of train and platforms and the direction of travel.

Agree with location of call buttons at nominated boarding points only.

Details from Australian Standards have been extracted to reduce referencing.

Agree that reduction of referencing is useful (is it lawful?), but disagree on the specifications used in this instance.

The “where possible” in 8.8 (4) reflects the practical difficulties where mixing of high level and low level platforms on a line or network occurs on the exterior of the train.

The specifications for 8.8 (4) place the call button 'not less than 500 mm from an internal corner'. Is this appropriate for external buttons? Perhaps the clause could be reworded to account for both internal buttons not affected by platform height but constrained by space, and external buttons affected by variable platform height but with fewer space constraints.

Part 9 Allocated space

Original Clause

9.1 Minimum size for allocated space

The minimum allocated space for a single wheelchair or similar mobility aid is 800 mm by 1300 mm (**AS1428.2 (1992) Clause 6.1**, *Clear floor or ground space for a stationary wheelchair*).

Conveyances	Premises	Infrastructure
except dedicated school buses and small aircraft		except airports that do not accept regular public transport services

Revised Clause (Exemption)

9.1 Minimum size for allocated space

(1) The minimum allocated space (minimum clear floor or ground space, including knee space under objects as in Figure 1X-X) for a single mobility aid and occupant is 800 mm wide by 1300 mm long and 1500 mm high.

Disagree. It is unreasonable to include the knee space requirement. This is only applicable to wheelchairs and not to mobility aids of various other dimensions such as scooters. The allocated space is a clear, three dimensional area without any intrusions (as defined in Part 1.11) and thus no requirement or need for knee space.

(2) Transport operators may determine the location and orientation of allocated spaces in conveyances.

Agree.

(3) Mobility aid users may not be able to enter or exit an allocated space in a single manoeuvre, given the internal configurations of a conveyance.

Agree.

Conveyances

except dedicated
school buses and
small aircraft

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 9.1

To reduce referencing to Australian Standards

Clause 9.1(2) and 9.1 (3) are copied from the Guidelines clauses 1.19 (1) and 9.1 (3) respectively.

Clause 9.1 (2) is inserted to allow design flexibility and to achieve an efficient usage of the space available to meet peak loading

Agree with minimising referencing if feasible but cannot accept knee clearance as part of the requirements for allocated spaces in conveyances. This may be appropriate at counters, tables, vending machines etc but certainly not the space in which a person sits to travel.

Original Clause (No change)

9.2 Minimum number of allocated spaces to be provided

At least one allocated space must be provided in each conveyance (**AS1428.2 (1992) Clause 6.1**).

Conveyances

- Accessible taxis
-
-

Original Clause (No Change)

9.3 Minimum head room

- (1) The minimum head room in an allocated space is 1410 mm.

Note See section 12.5 in relation to minimum doorway opening.

- (2) For a conveyance entering service on or after 1 January 2013, the minimum headroom is 1500 mm.

Conveyances

- Accessible taxis
-

Original Clause (No Change)

9.4 Number of allocated spaces to be provided — buses

- (1) At least 2 allocated spaces must be provided in each bus with more than 32 fixed seats.
- (2) At least one allocated space must be provided in each bus with less than 33 fixed seats.
- (3) An allocated space is additional to the fixed seating capacity.

Conveyances

- Buses
except dedicated
school buses
-

Original Clause (No Change)

9.5 Number of allocated spaces to be provided — ferries

- (1) A minimum of 2 allocated spaces must be provided for the first 32 passenger capacity on a ferry.
- (2) An additional 2 allocated spaces must be provided for each additional 100 passenger capacity.

Conveyances

- Ferries
-

Original Clause

9.6 Number of allocated spaces to be provided — train cars, etc

- (1) At least 2 allocated spaces must be provided for each rail, tram or light rail car.

-
- (2) Up to 8 allocated spaces may be consolidated in one car of a set.
 - (3) If different classes of travel are offered, allocated spaces must be provided in each class.

Conveyances

- Rail cars
 - Tram cars
 - Light rail cars
-

Revised Clause (Exemption)

9.6 Number of allocated spaces to be provided — rail, tram, light rail cars

Number for unbooked services

- (1) (a) The minimum number of allocated spaces required on an unbooked service is equal to the number of rail cars.

(b) An articulated light rail vehicle or tram with a capacity of 100 or more (including standing passengers) must contain a minimum of 2 allocated spaces.

Disagree. Cutting the number of allocated spaces by 50% is unacceptable. Maintain two per rail carriage. For trams and light rail it accepted that seating capacity per car may be low compared to heavy rail. In such cases the provisions of 'Part 9.4: Number of allocated spaces to be provided — buses' could be considered.

Number for booked services

- (2) The minimum number of allocated spaces required on booked services is 2 spaces for 1 to 7 passenger seating cars, 3 spaces for 8 to 11 passenger seating cars, and 4 spaces for 12 or more passenger seating cars in a consist.

Disagree. Cutting numbers of allocated spaces is not acceptable. Consider removable seating or a flexible seating policy to utilise unbooked allocated spaces.

- (3) Up to 8 allocated spaces may be consolidated in one car of a set.

Agree.

-
- (4) If seating and sleeping accommodation is provided, allocated spaces and accessible sleeping berths must be provided.

Agree.

Conveyances

- Rail cars
 - Tram cars
 - Light rail cars
-



Reason 9.6

Changes to clause 9.6 (1) original clause– There needs to be a separation of suburban and long distance trains where the number of allocated spaces is based on the number of passengers carried so there are equal percentages for allocated space to seating ratios. Under the existing clause, a carriage with nine passengers has to provide the same number of allocated spaces as a carriage with 150 passengers. The short car articulated train/tram/light rail allocated space requirement is excessive.

Agree on the separation of suburban and long haul transport. However, removable seating and a flexible seating policy could resolve the issue of under utilisation on long haul transport. Agree that requirements for small tram and light rail cars may be excessive and suggest they be aligned with seat numbers as per bus allocated space provisions in Part 9.4.

The number of allocated spaces for Australia is much higher than overseas. The allocated space requirement in the UK is 2 spaces for 2 to 7 vehicles, 3 spaces for 8 to 11 vehicles, and 4 spaces for 12 or more vehicles.

This may only indicate inadequate provision in other jurisdictions.

A comparison of the ratio of allocated spaces to seated passengers for booked services, special services, and unbooked services is given below with indicative numbers.

AS1428.1 2001 gives 156,100 as the number of people using manual and electric wheel chairs and motorised scooters which calculates to 0.8%. of the population (ABS Survey data 1998)

Data seven years old should not dictate policy and practice that must remain current well beyond 2020. The aging population will greatly increase the number of scooters in particular.

Reference Clause 9.6	Comparison of allocated spaces to total numbers of passengers carried (typical number)
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Reference Clause 9.6	Comparison of allocated spaces to total numbers of passengers carried (typical number)					
Type of Service	Unbooked Suburban single deck	Unbooked Suburban Double deck	Special Services (e.g. tourist luxury train)	Booked Long Distance Services Small Consist	Booked Long Distance Services Medium Consist	Booked Long Distance Services Large Consist
No of Cars	6	8	17	1	4	8
Total of passengers	500	800	100	52	192	384
1 % of seats =	5	8	1	1	2	4
2 % of seats =	10	16	2	1	4	8
Allocated spaces required for Transport Standards	12	16	34	2	8	16
Ratio of Allocated spaces to passenger seating (%) under Transport Standards.	2%	2%	34%	4%	4%	4%
ARA proposal for allocated spaces	6	8	4	2	2	3

Reference Clause 9.6	Comparison of allocated spaces to total numbers of passengers carried (typical number)					
ARA proposal percentage (%) Ratio of allocated spaces to total passengers	1%	1%	4%	4%	1%	1%

The number of passengers booking allocated spaces on booked services is typically around 0.05% of all passengers i.e. the demand for mobility aid positions was 1 passenger in every 2,000. This is less than 1 space needed for every 5 trains, not 2 spaces per car (typically 14 spaces per train) as required under the current standard. 2 spaces, as proposed by the ARA, will significantly exceed the demand while still allowing 2 wheelchair passengers to travel together if required.

As per statements above, for services requiring a booking, unbooked allocated spaces can be occupied by standard but removable seating. Diminution of existing seating rights is not required, but rather a flexible seating policy.

Changes to clause 9.6 (3) original clause – Providing allocated spaces in each class is inefficient on a long distance conveyance which has limited space with several classes of travel, and reduces opportunities for consolidation of allocated spaces.

DDA requires equity of opportunity and does not easily accommodate 'inefficiencies' if they conflict with human rights. Suggest the seating policy is the answer.

Original Clause

9.7 Consolidation of allocated spaces

If possible, allocated spaces are to be consolidated to accommodate larger mobility aids.

Conveyances

- Buses
except dedicated school buses
- Ferries
- Trains
- Trams
- Light rail

Revised Clause (Exemption)

9.7 Consolidation of allocated spaces

If possible, allocated spaces are to be provided in close proximity to each other.

Conveyances

- Buses
except dedicated
school buses
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Retain 'consolidated' in preference to 'close proximity'.

Reason 9.7

It is more important for mobility aid users, their friends and/or carers to travel together than to consolidate space for larger mobility aids.

Mobility aids that comply with Part 1X should be used on Public Transport.

Disagree. The size of a mobility device has never been defined in the Transport Standard, but rather the minimum size of an allocated space is defined. This should not change. Agree that large mobility aids should not be used. However, until Transport Authorities begin the risky practice of measuring aids and excluding large units this will continue. If allocated spaces are consolidated a vacant space can be used as part of the manoeuvring space (as per Part 9.1 (3) above) required to allow access to another allocated space.

The issue of large mobility aids might be better addressed through a public education campaign and through regulations defining maximum dimensions and performance of scooters prior to their being approved for sale.

Original Clause- (No change)

9.8 Allocated spaces in aircraft and coaches

An operator does not have to provide allocated space in an aircraft or coach if each passenger uses a fixed seat in the aircraft or coach.

Conveyances

- Aircraft
 - Coaches
-

Original Clause – (No change)

9.9 Use of allocated space for other purposes

Allocated space may be used for other purposes if it is not required for use by a passenger in a wheelchair or similar mobility aid.

Conveyances

- Buses
except dedicated
school buses
 - Ferries
 - Accessible taxis
 - Trains
 - Trams
 - Light rail
-

Original Clause

9.10 International symbol of accessibility to be displayed

- (1) The floor area of an allocated space must:
 - (a) display the international symbol of accessibility; and
 - (b) be outlined in a flush contrasting strip 25 mm wide.
- (2) The colours prescribed in **AS1428.1 (2001) Clause 14.2 (c)** are not mandatory.

Conveyances

- Buses
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

9.10 International symbol of accessibility to be displayed

- (1) An allocated space must:
 - (a) display the international symbol of accessibility (AS1428.2: 2001 Fig 32); and
 - (b) if displayed on the floor, be outlined in a flush contrasting strip 25 mm wide.
- (2) The preferred colours of white figure on ultramarine blue (AS2700 B21) are not mandatory.

Conveyances

- Buses
 - Trains except booked services
 - Trams
 - Light rail
-

Reason 9.10

Recommend that alternatives to floor marking be used for new vehicles to allow for flexibility and ease of changing interior layout, and to avoid permanent highlighting of areas as "special" areas.

Disagree. Space's use needs to be unambiguous.

Consultation has shown that floor markings are not always preferred by mobility aid users who feel segregated.

Whose consultations and how many were consulted?

In (2) the details of the Australian Standard have been extracted. On booked trains, allocated spaces are reserved and therefore not required to be identified.

Agree.

Original Clause (No Change)

9.11 Movement of mobility aid in allocated space

An allocated space must contain movement of a mobility aid towards the front or sides of a conveyance.

Conveyances

- Buses
except dedicated
school buses
 - Trams
 - Light rail
-

Part 10 Surfaces

Original Clause

10.1 Compliance with Australian Standard

- (1) Ground and floor surfaces must comply with **AS1428.2 (1992) Clause 9**, *Ground and floor surfaces*.
- (2) **AS1428.1 Supplement 1 (1993) Clause C12** provides criteria for the selection of floor surfaces.

Conveyances	Premises	Infrastructure
<ul style="list-style-type: none">• Buses except dedicated school buses• Coaches• Ferries• Trains• Trams• Light rail		except airports that do not accept regular public transport services

Revised Clause for Conveyances (Exemption)

10.1 Compliance with Australian Standard

- (1) Ground and floor surfaces must comply with **AS1428.2 (1992) Clause 9**, *Ground and floor surfaces*.
- (2) **AS1428.1 Supplement 1 (1990) Clause C13** provides criteria for the selection of floor surfaces.

Conveyances

- Buses
except dedicated
school buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Reason 10.1

Remove Infrastructure and premises from this clause and make a new clause due to the different environments.

Superseded Australian Standards such as AS1428.1-1993 are not available on current electronic standards lists.

The Supplement stated is incorrect. The correct supplement needed is AS1428.1 Supplement 1 (1990) Clause C13.

Agree to separation of conveyances from infrastructure and premises. While superseded versions such as AS1428.1-1993 may be quoted, compliance with

a later version (eg 2001) is entirely in order provided no diminution of access occurs (a most unlikely outcome). As it happens AS1428.1-2001 will soon be redundant. There is no answer to the dilemma of Australian Standards updating frequently.

AS1428.1 Supplement 1 (1993) Clause C12 is the correct reference for floor surfaces (there is no Clause 13).

New Clause (Infrastructure) (Exemption)

10.1X Compliance with Australian Standard

- (1) All continuous accessible paths of travel shall have a slip-resistant surface.
- (2) A continuous accessible path of travel shall have a texture that is traversable by a mobility aid.
- (3) Grates on an accessible path of travel shall have spaces not more than 13 mm wide and not more than 150 mm long. If gratings have elongated openings, they shall be placed so that the long dimension is transverse to the dominant direction of travel.

Agree, but 'slip resistant' and 'traversable by mobility aid' need definition (use Clause 9 from AS1428.2).

Premises	Infrastructure
	except airports that do not accept regular public transport services

Reason 10.1X

The new clause is introduced to reference AS1428.1 (2001) Clause 12 for external environments.

Referencing AS1428.2 Clause 9 automatically picks up Clause 12 of AS1428.1-2001, as there is no date to the reference to AS1428.1 in this Clause of AS1428.2.

Part 11

Handrails and grabrails

Original Clause

11.1 Compliance with Australian Standard — premises and infrastructure

- (1) A handrail must comply with **AS1428.2 (1992) Clause 10.1**, *Handrails*.

Premises	Infrastructure
----------	----------------

except airports that do not accept regular public transport services

Revised Clause (Exemption)

11.1 Compliance with Australian Standard — premises and infrastructure

- (1) A handrail must comply with **AS1428.2 (1992) Clause 10.1**, *Handrails*, except Clause 10.1.2(c).
- (2) Where there is a background wall, handrails shall have a colour contrast with the background wall.

Agree. Colour contrast is easier to determine than luminance contrast, but suggest the use of 'marked colour contrast' to ensure functional outcome.

Premises	Infrastructure
----------	----------------

except airports that do not accept regular public transport services

Reason 11.1

Clause 11.1(2) extracts the Guidelines clause 11.2.

The amendments reflect the removal of the 30% Luminance contrast.

Extensive research is needed to define luminance and colour contrast requirements under different light conditions.

Agree on the difficulties posed by luminance contrast. Colour contrast is acceptable but contrast between surfaces must be marked to ensure a functional outcome.

Original Clause

11.2 Handrails to be provided on access paths

- (1) Handrails must be placed along an access path wherever passengers are likely to require additional support or passive guidance.
- (2) A handrail must not infringe an area on a roadside boarding point that may be needed to deploy a boarding device.

Premises	Infrastructure
----------	----------------

except airports that do not accept regular public transport services

Revised Clause (Exemption)

11.2 Handrails to be provided on access paths

- (1) Handrails must be placed along an access path wherever passengers are likely to require additional support or passive guidance.
- (2) A handrail must not infringe an area on a roadside boarding point that may be needed to deploy a boarding device.

Premises	Infrastructure
----------	----------------

Except buildings at railway premises

except airports that do not accept regular public transport services

Except railway infrastructure

Reason 11.2

Railway premises and infrastructure are excluded from this Standard to clarify the intent to provide assistance to those that need extra support along the accessible path. It is not possible for an Operator/Provider to anticipate the level of additional support for every single customer that uses the facility or may use it sometime in the future. The clause as it stands may require the Operator/Provider to provide handrails along the entire length of the access path from property boundary to boarding point. This could possibly be dangerous and a barrier to mobility aid access on railway infrastructure. Handrails are also provided as way-finding devices and it is noted that mobility support and way-finding features are already prescribed in other parts of these Standards. For example:

- Alternative way finding and cues are available through TGSIs.
- Ramps to 1 in 19 and stairs are currently required to have handrail.
- Seating is provided at rest areas every 60m.
- Seats are provided on platforms
- All pedestrian mazes have fences

Disagree. Accept that hand rails are inappropriate in most locations. However, where people are required to queue or wait standing, seating is not appropriate. Further, if barriers are used to constrict and direct the flow of pedestrian traffic, handrails offer frail people support. It is not possible to state that these instances will never occur on railway premises or infrastructure.

Original Clause

11.3 Handrails on steps

- (1) A handrail on steps need not extend beyond the top or bottom of the steps.
- (2) A domed button may be placed 150 mm from any break or end of a handrail instead of an extension at a rail end (**AS1428.2 (1992) Figure 5**).

Conveyances

except dedicated
school buses and
small aircraft

Revised Clause (Exemption)

11.3 Handrails on steps

- (1) A handrail on steps need not extend beyond the top or bottom of the steps.

-
- (2) A domed button may be placed 150 mm +/- 10 mm from any break or end of a handrail instead of an extension at a rail end.

Conveyances

except dedicated
school buses and
small aircraft

Reason 11.3

Reduced referencing to standards and uses the tolerance from Figure 5 AS1428.2.

Support only where space in the conveyance is restricted and where stair access is not required for equitable use of the conveyance. It is accepted that space on some conveyances is restricted, and that not allowing handrails to protrude 300 mm into the circulation space or walkway at the top or bottom of the stairs will save considerable space.

Original Clause

11.4 Handrails above access paths

If installed, a handrail above an access path must comply with **AS1428.1 (2001) Clause 6.1 (c)**, *Handrails* and **Figure 9**.

Conveyances

except dedicated
school buses and
small aircraft

Revised Clause (Exemption)

11.4 Handrails above access paths

- (1) If installed, a handrail above an access path must comply with **AS1428.1 (2001) Clause 6.1 (c)**, *Handrails* and **Figure 9**, other than where local controls or equipment are in place.
- (2) Grabrails may be used where handrails cannot be installed.

Conveyances

except dedicated school
buses, and
small aircraft

Reason 11.4

The design constraints of limited internal width and the wall space available on rollingstock do not allow equipment to be recessed above the handrail. The above amendment reduces unnecessary breaks in the handrail and brings across relevant Guidelines clause 11.1(2) to provide design flexibility in confined spaces.

Agree.

Original Clause

11.5 Compliance with Australian Standard

A grabrail must comply with **AS1428.2 (1992) Clause 10.2, Grabrails.**

Conveyances	Premises	Infrastructure
except dedicated school buses and small aircraft		except airports that do not accept regular public transport services

Revised Clause (Exemption)

11.5 Grabrail compliance requirements

- (1) Grab rails shall be of rigid construction with circular or oval cross section of diameter 30 to 40 mm, designed for a 1100 N load in all directions, slip resistant design where required in wet areas, having hand clearances of 50 to 60 mm, and having an unobstructed hand movement on the top 270 degrees, and minimum corner and edge radii of 5 mm.
- (2) Horizontal grab rails require a clear area 600mm above the rail. Where significant design constraints limit this clearance it should be maximized as much as is technically possible.

Conveyances	Premises	Infrastructure
except dedicated school buses, and small aircraft		except airports that do not accept regular public transport services

Reason 11.5

Reduced Australian Standard referencing.

Title changed from "Compliance with Australian Standard" to "Compliance Requirements".

The area above the grabrail may have local controls, such as a door open button or an intercom, or the grabrail may be recessed into the wall on conveyances to reduce the risk of hip fracture (if the train was jolted or stopped suddenly).

The limited width of rollingstock does not allow equipment to be recessed above the handrail. The above amendment reduces unnecessary breaks in the grab rails.

Agree

Original Clause

11.6 Grabrail to be provided where fares are to be paid

A grabrail or handrail must be provided at fixed locations where passengers are required to pay fares.

Conveyances	Premises	Infrastructure
except dedicated school buses and small aircraft		except airports that do not accept regular public transport services

Revised Clause (Exemption)

11.6 Grabrail to be provided where fares are to be paid

A grabrail or handrail may be provided at fixed locations where passengers are required to pay fares by manual exchange of money.

Conveyances

except dedicated
school buses and
small aircraft

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 11.6

Amended to clarify the requirements.

Operators and Providers need to provide a safe location and facilities to purchase tickets. This allows a designer to provide a benchtop or equivalent support method. Modern ticketing machines do not require the use of money.

Agree on the use of 'may'.

Original Clause

11.7 Grabrails to be provided in allocated spaces

Grabrails that comply with **AS1428.2 (1992) Clause 10.2, *Grabrails***, must be provided in all allocated spaces.

Conveyances

- Buses
except dedicated
school buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

11.7 Grabrails to be provided in allocated spaces

Grabrails must be provided in all allocated spaces.

Conveyances

- Buses
except dedicated
school buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Reason 11.7

Grabrails requirements are given in clause 11.5.

Removed unnecessary repeating of Australian Standard reference.

Reiteration of reference clause is not onerous.

Part 12 Doorways and doors

Original Clause

12.1 Doors on access paths

- (1) Any doors along an access path must not present a barrier to independent passenger travel.
- (2) Direct assistance may be provided through security check points.

Conveyances

except dedicated
school buses and
small aircraft

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Revised Clause (Exemption)

12.1 Doors on access paths

- (1) Any doors along an access path must not present a barrier to independent passenger travel, or equivalent access must be provided by the Operator.
- (2) Direct assistance may be provided through security check points.

(3) Doors on conveyances may be controlled or opened by the operator.

Conveyances	Premises	Infrastructure
except dedicated school buses and small aircraft		except airports that do not accept regular public transport services

Reason 12.1

Clause 12.1(3) repeats the Guidelines clause 12.2(2) which covers safe operation of doors by guard / driver. Passengers are not allowed to open / close external doors independently for safety reasons.

Agree.

Original Clause

12.2 Compliance with Australian Standard — premises and infrastructure

Doorways and doors must comply with **AS1428.2 (1992) Clause 11** (except **Clause 11.5.2**).

Premises	Infrastructure
	except airports that do not accept regular public transport services

Revised Clause (Exemption)

12.2 Compliance with Australian Standard — premises and infrastructure

Doorways and doors (except at toilets) must comply with AS1428.2 (1992) Clause 11 (except Clause 11.5.2).

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 12.2

Specification for toilet doors are covered in Part 15.

Disagree with exempting toilet doors on infrastructure and premises. AS1428.1-2001 Clause 10 quoted in Part 15 of this Standard does not cover toilet door widths. Leave the current provision unchanged.

Original Clause

12.3 Weight activated doors and sensors

- (1) A pressure pad of a weight activated door must be sensitive enough to detect a 15 kg service animal.
- (2) Any other type of sensor on an access path must be able to detect movement between ground level and 500 mm above the access path.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Revised Clause (Exemption)

12.3 Weight activated doors and sensors

- (1) A pressure pad of a weight activated door must be sensitive enough to detect a 15 kg assistance dog.
- (2) Any other type of sensor on an access path must be able to detect movement between ground level and 500 mm above the access path.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 12.3

The term "service animal" is changed to "assistance dog" which has been defined.

Agree as a dog is the only service animal likely to weight 15 kg.

Original Clause

12.4 Clear opening of doorways

Doorways must comply with **AS1428.2 (1992) Clause 11.5.1**, *Clear opening of doorways*.

Conveyances

- Buses
except dedicated
school buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

12.4 Clear opening of doorways

The minimum clear opening of a doorway shall be 850 mm except at a toilet door which may be 750 mm.

Conveyances

- Buses
 except dedicated
 school buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Reason 12.4

Reduce Australian Standard referencing. The dimension 750 mm is consistent with the trafficable width of the ramp.

Disagree. The current Part 6.3 requires 800 mm as minimum ramp width on conveyances. Coincidentally this is also the minimum permitted door width in AS1428.1. Accept however that 750 mm is allowed between bus wheel arches. People may chose not to use buses as their mobility device will not fit between the wheel arches, but would still use other forms of public transport. A constraint on one mode should not be extrapolated to all modes as this is most unfair.

The contrasting trim note in the Australian Standard is not compulsory and is not included.

Agree, though not to use contrasting trim when it could be done seems miserly.

The width of some existing rollingstock is too narrow with door mechanisms currently available for toilet doors. The design feasibility and reliability of curved doors are currently being researched.

The internal width of rollingstock does not allow the current standards to be met for both the toilet door width and the access path past the toilet.

This has been confirmed by three rollingstock manufacturers who have difficulties meeting the original dimensions.

Disagree. Accept that in some cases toilet door width of 750 mm will be the only option achievable. In other circumstance, especially on ferries, it will easily be exceeded. The unjustifiable hardship provision already covers legitimate non-compliance so this amended Clause is unnecessary.

Original Clause (No Change)

12.5 Vertical height of doorways

- (1) Doorways must have an unobstructed vertical height of at least 1400 mm.

Note See section 9.3 in relation to internal headroom.

- (2) For a conveyance entering service on or after 1 January 2013, the minimum unobstructed doorway height must be 1500 mm.

Conveyances

- Accessible taxis
-

Original Clause (No Change)

12.6 Automatic or power-assisted doors

- (1) Doors may be fully automatic.
- (2) Power-assisted doors must not require passengers to grip or twist controls in order to operate opening devices.
- (3) Operators may provide equivalent access to conveyances by opening manual doors for people with disabilities.

Note See sections 33.3 to 33.5 in relation to equivalent access.

Conveyances

except dedicated
school buses and
small aircraft

Part 13 Lifts

Original Clause

13.1 Compliance with Australian Standard — premises and infrastructure

Lift facilities must comply with **AS1735.12 (1999)**.

Premises	Infrastructure
----------	----------------

	except airports that do not accept regular public transport services
--	--

Revised Clause (Exemption)

13.1 Compliance with Australian Standard — premises and infrastructure

Subject to the following clause (1), the lift facilities must comply with **AS1735.12 (1999)**:

- (1) The minimum lift car internal dimensions shall be 1100 mm wide by 1400 mm deep between the inside of the closed car doors to the inside back wall of the car.

Premises	Infrastructure
----------	----------------

	except airports that do not accept regular public transport services
--	--

Reason 13.1

The minimum internal lift dimension should be maintained due to existing infrastructure constraints. Clause 13.1 of the lift code AS1735.12 (1999) is inserted to clarify the internal dimensions.

Agree. At the 1100 mm x 1400 mm dimension a two door 'travel straight through' design is safer as there is no need to reverse out of a lift in a wheelchair. This should be added as guidance.

Part 14 Stairs

Original Clause

14.1 Stairs not to be sole means of access

Stairs must not be the sole means of access.

Conveyances	Premises	Infrastructure
except dedicated school buses and small aircraft		except airports that do not accept regular public transport services

Revised Clause (Exemption)

14.1 Stairs not to be sole means of access

Stairs must not be the sole means of access to facilities designated for passengers with mobility impairment.

Conveyances	Premises	Infrastructure
except dedicated school buses small aircraft, internal stairs on double deck trains		except airports that do not accept regular public transport services

Reason 14.1

Double deck trains are a necessity on the NSW unbooked network due to patronage demand and limited line space for trains. Stairs are therefore also a necessity. Stairs will unavoidably be the sole means of access to the upper and lower decks, as it is not feasible to have a lift or compliant ramp on a double deck train.

Guidelines 14.1 (2) The intent of the Disability Standards is that stairs should not be the only means of access to a conveyance nor should they prevent passengers accessing essential on-board services such as food service or toilets. However, clause 14.1(2) of the Guidelines also recognises that unavoidable differences in levels may mean that some sections of a conveyance might not be available to all passengers. On a double deck train, an access path is provided on the single deck level to allocated spaces, priority seats and other facilities for passengers with mobility impairment.

Agree. Stairs should be safe for people with disabilities who are ambulant though.

Original Clause (No change)

14.2 Compliance with Australian Standards — premises and infrastructure

Stairs must comply with:

- (a) **AS1428.1 (2001) Clause 9.1** (including the notes), *Stair Construction*; and
- (b) **AS1428.1 (2001) Clause 9.2**, *Stairway Handrails*; and
- (c) **AS1428.2 (1992) Clause 13.2**, *Configuration of steps*, **Clause 13.3**, *Warning strip at nosing of steps* and **Figures 8 and 9**.

Premises

Infrastructure

except airports that do not accept regular public transport services

Original Clause

14.3 Compliance with Australian Standards — conveyances

- (1) If stairs are provided on a conveyance mentioned below, they must comply with:
 - (a) The notes to **AS1428.1 (2001) Clause 9.1**, *Stair geometry*; and
 - (b) **AS1428.2 (1992) Clause 13.2**, *Configuration of steps*, **Clause 13.3**, *Warning strip at nosing of steps* and **Figures 8 and 9**.
- (2) However, the minimum access path width on stairs in the conveyance must be 850 mm.

Conveyances

- Ferries
 - Trains
 - Trams
 - Light rail
-

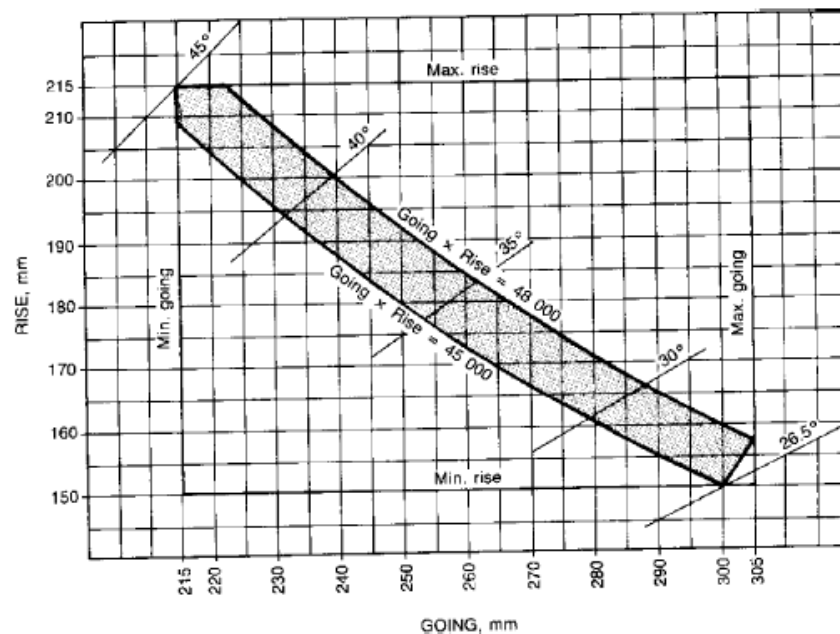
Revised Clause (Exemption)

14.3 Stairs on conveyances

- (1) Stairs must not encroach into circulation spaces and must have opaque enclosed risers.
- (2) Colour contrasted warning nosing strips 50 to 75 mm width on top and 25 to 50 mm width on the vertical edge must be provided on the edge of stair treads.

Stairs at the entrance

- (3) Stairs at the entrance to a conveyance must comply with AS 1657 (1992) Figure 4.3 measured at the centre line of the stairs.



NOTE: The combination of dimensions of going and rise must lie within the shaded area, i.e. the product of going \times rise must be not less than 45 000 nor more than 48 000. For example, for a 250 mm going a suitable rise would lie between 180 mm and 192 mm, and for a 170 mm rise a suitable going would be between 265 mm and 282 mm. Maximum slope for a stairway is 45 degrees and minimum slope 26.5 degrees. The diagram also shows slope lines and indicates the range of dimensions applicable to a given slope.

FIGURE 4.3 STAIRWAY RISES AND GOINGS

Conveyances

- Ferries
- Trains
- Trams
- Light rail

Reason 14.3

Reduce referencing to Australian Standards, change heading to match.

Due to the restricted space on trains and the need to maximise capacity both seated and standing, compliance with the dimensions specified in the current Clause 14.3 is not reasonable or required for functional accessibility. This is a premises standard for stair geometry and configuration that has been applied to a conveyance without any analysis of the functional / technical feasibility and impact of this specification on rail operations / train design.

Internal stairs on trains do not form part of an access path for a conveyance. On double deck trains, an access path is provided on the single deck level to allocated spaces, priority seats and other facilities for passengers with mobility impairment. Both UK and US access standards specifically exclude internal stairs on trains from compliance due to the design and space constraints and the passenger demand in peak operational periods in a mass transport system. Compliance requirements only apply to stairs at the entrance to a conveyance.

AS1657 is better suited to the provision of functionally accessible stairs on conveyances. The provision of handrails on either side of a single short flight of steps provides additional assistance to passengers.

Disagree. Internal stairs may form part of an access path for people who are vision impaired but not mobility impaired. Minimum width of 850 mm has been lost, as has the dimensions of the treads and risers of internal stairs. AS1657 Figure 4.3 permits risers of up to 215 mm on entrance steps while AS1428.2 limits risers to 165 mm. This significantly increases difficulty of access for people who would otherwise use stairs and necessitates direct assistance or equivalent access.

Original Clause (No Change)

14.4 Compliance with Australian Design Rule 58 — conveyances

- (1) Stairs must comply with **Australian Design Rule 58** to the extent that that rule sets requirements that conflict with these Standards.
- (2) In any other case, section 14.3 applies.

Conveyances

- Buses
except dedicated
school buses
-

Part 15 Toilets

Original Clause

15.1 Unisex accessible toilet — premises and infrastructure

If toilets are provided, there must be at least one unisex accessible toilet without airlock that complies with **AS1428.1 (2001) Clause 10**, *Sanitary facilities*.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Revised Clause (Exemption)

15.1 Unisex accessible toilet — premises and infrastructure

If toilets are provided, there must be at least one unisex accessible toilet or gender specific accessible toilets without airlock that complies with **AS1428.1 (2001) Clause 10**, *Sanitary facilities* (except clause 10.2.10(e))

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 15.1

The Clause should allow for non-unisex accessible toilets, i.e. an accessible toilet in each of the male and female toilet. The reason:

- Security reason, public perception of safety concerns with unisex toilets (as well as non-safety public concerns with shared toilets e.g. cultural sensitivity)
- At some site locations it is more suitable to have a separate accessible toilet.

The reference to the force required to open a door should be deleted (Clause 10.2.10 (e)), because door closers cannot meet this requirement.

Changes are in line with AS1428.1 (2001) Clause 10.1 Note 3.

Disagree. Quote 20N as the door opening force as per draft AS1428.1 200X. Most commercial units meet this force requirement.

The Building Code of Australia requires that the accessible toilet installed in commercial premises requiring 1 - 100 closet pans or urinals must be unisex. If separate sex accessible toilets are provided they must be in addition to the mandatory unisex toilet.

Original Clause

15.2 Location of accessible toilets

Accessible toilets must be in the same location as other toilets.

Premises	Infrastructure
----------	----------------

except airports that do not accept regular public transport services

Revised Clause (Exemption)

15.2 Location of accessible toilets

If possible, accessible toilets must be in the same location as other toilets or be in a location of equivalent convenience to the access path.

Premises	Infrastructure
----------	----------------

except airports that do not accept regular public transport services

Reason 15.2

On existing platforms and stations it is not always possible for accessible toilets to be in the same location as other toilets due to site constraints. The current location of toilets may not be a suitable or safe place to locate an accessible toilet providing equivalent convenience.

This revised clause picks up the intent of Clause 2.1.3 of the Guidelines on access paths - access paths may have to be duplicated in some locations.

Agree, but would prefer to strengthen the statement: "Unless technically impossible, accessible toilets must be in the same location as other toilets. If located away from other toilets a location of equivalent convenience to the access path must be selected."

Original Clause

15.3 Unisex accessible toilet — ferries and accessible rail cars

If toilets are provided, there must be at least one unisex accessible toilet without airlock available to passengers using wheelchairs or mobility aids.

Conveyances

- Ferries
 - Accessible rail cars
-

Revised Clause (Exemption)

15.3 Unisex accessible toilet — ferries and trains

If toilets are provided, there must be at least one unisex accessible toilet without airlock available to passengers using compliant mobility aids.

Conveyances

- Ferries
- Trains

Reason 15.3

Changed from accessible rail cars to trains to exclude accessible service cars e.g. dining cars from being required to have an accessible toilet fitted.

Disagree. It is the allocated space rather than the mobility aid that has specified minimum dimensions and therefore 'compliant mobility aids' are not defined in this Standard. If dining cars have toilets, it is reasonable to expect that they are 'accessible'.

Original Clause

15.4 Requirements for accessible toilets — ferries and accessible rail cars

- (1) An accessible toilet must:
 - (a) comply with the requirements set out in this section; and
 - (b) allow passengers in wheelchairs or mobility aids to enter, position their aids and exit.
- (2) The minimum dimension from the centre line of the pan to the near-side wall must be 450 mm (**AS1428.1 (2001) Figure 22**).
- (3) The minimum dimension from the centre line of the pan to the far-side wall must be 1150 mm (**AS1428.1 (2001) Figure 22**).
- (4) The minimum dimension from the back wall to the front edge of the pan must be 800 mm (**AS1428.1 (2001) Figure 22**).
- (5) The toilet seat must be between 460 mm and 480 mm above the floor (**AS1428.1 (2001) Figure 18**).
- (6) Hand washing facilities must be provided either inside or outside the toilet (**AS1428.1 (2001) Clause 10.2.1 (b)**, *Water closets*).

Conveyances

- Ferries
 - Accessible rail cars
-

Revised Clause (Exemption)

15.4 Requirements for accessible toilets — ferries and accessible rail cars

- (1) An accessible toilet must allow passengers in mobility aids to enter and exit.
- (2) There shall be sufficient space inside the toilet cubicle for a mobility aid to be positioned so that a disabled person can move from the mobility aid on to the toilet seat from the front or the side of the toilet.
- (3) All unisex toilet amenities must be accessible.
- (4) Hand washing facilities must be provided inside the toilet.

Conveyances

- Ferries
 - Accessible rail cars
-

Reason 15.4

This change provides a performance based solution which allows flexibility for the rollingstock manufacturers to achieve functional accessibility.

Disagree. The Transport Standards are to provide a higher benchmark for manufacturers rather than entrench current practice. Decreasing dimensions does not maintain functionality. Unjustifiable hardship can accommodate legitimate non-compliance.

Internal width of rollingstock precludes compliance with this standard for the toilet door width, internal dimensions, and provision of a compliant access path past the toilet.

Accept. However, toilets and accessways fully compliant with AS1428.1 are installed on Brisbane City Council 'Citycat' ferries. Since compliance can be achieved on one of the modes listed, it may be best to use the unjustifiable hardship clauses to cover any non-compliance on the other.

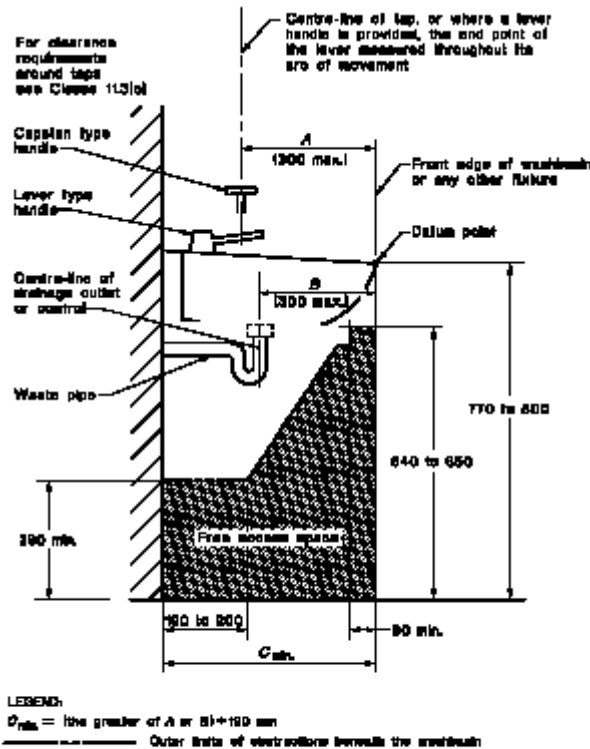
This has been confirmed by three rollingstock manufacturers who have difficulties meeting the original dimensions.

Note some toilet equipment manufacturers cannot modify their pedestal dimensions to suit Australia, e.g. Chemical toilets due to design and manufacturing constraints.

Accept. However, not all units are of this nature and so units that can comply should comply. Unjustifiable hardship can accommodate legitimate non-compliance.

Dimensions can be taken from the area under the basin from AS1428.1 Figure 23.

This figure and its dimensions will soon be redundant when the draft AS1428.1-200X is finalised.



NOTE: The dimensions of the unobstructed space beneath the washbasin are critical dimensions.

DIMENSIONS IN MILLIMETRES

FIGURE 23 POSITION OF WASHBASIN AND FIXTURES, AND OUTER LIMIT OF OBSTRUCTIONS BENEATH THE WASHBASIN

Original Clause (No Change)

15.5 Accessible toilet to be provided — aircraft

- (1) At least one toilet must be accessible to passengers using an on-board wheelchair.
- (2) Direct assistance to the toilet door must be provided.

Conveyances

- Wide-body twin-aisle aircraft
-

Original Clause (No Change)

15.6 Stops to be offered if accessible toilet not provided — coaches

If an on-board toilet is not accessible, the operator must offer stops, at reasonable frequency, at premises with accessible toilets.

Conveyances

- Coaches
-

Part 16 Symbols

Original Clause (No Change)

16.1 International symbols for accessibility and deafness

- (1) The international symbols for accessibility and deafness (**AS1428.1 (2001) Clause 14.2**, *Form of the international symbol* and **Clause 14.3**, *International symbol for deafness*) must be used to identify an access path and which facilities and boarding points are accessible.
- (2) The colours prescribed in **AS1428.1 (2001) Clause 14.2 (c)** are not mandatory.
- (3) The size of accessibility symbols must comply with **AS1428.2 (1992) Table 1**.

Conveyances

Premises

Infrastructure

Original Clause

16.2 Compliance with AS2899.1 (1986)

The illustrations and symbols prescribed in **AS2899.1 (1986)** must be used if applicable.

Conveyances

Premises

Infrastructure

Revised Clause (Exemption)

16.2 Compliance with AS2899.1 (1986)

The illustrations and symbols prescribed in **AS2899.1 (1986)**, the Manual of Uniform Traffic Control Devices Part 1 **AS1742.1-2003**, and **ISO 7001:1990** Public Information Symbols must be used if applicable.

Conveyances

Premises

Infrastructure

Reason 16.2

There are only limited signs covered by AS2899.1 (1986). Universal pictograms should be used where possible. This places a preference on pictograms over words to help children, non-English speakers, and people with reading difficulties, and reflects operators' understanding that pictograms are generally preferable and are most likely to be universally understood.

Agree.

Original Clause

16.3 Accessibility symbols to incorporate directional arrows

The symbol for accessibility must incorporate directional arrows and words or, if possible, pictograms, to show passengers the way to accessible facilities such as toilets.

Conveyances	Premises	Infrastructure
-------------	----------	----------------

Revised Clause (Exemption)

16.3 Accessibility symbols to incorporate directional arrows

Directional signage must incorporate accessibility symbols, pictograms (and if needed, words) and directional arrows to show passengers the way to accessible facilities,

Conveyances	Premises	Infrastructure
-------------	----------	----------------

Reason 16.3

This clause places a preference on pictograms over words to help people with reading difficulties, and reflects feedback to operators that pictograms are generally preferable and are most likely to be universally understood. The current wording applies to any sign with symbols or pictograms, but locational signage will not need arrows.

Agree.

Original Clause (No Change)

16.4 Accessibility symbol to be visible on accessible buses

- (1) The international symbol of accessibility must be clearly visible on the front of accessible buses.
- (2) The symbol must also appear outside accessible doors, accompanied by a numeral indicating the number of allocated spaces provided by the bus.

Conveyances

- Buses
-

Original Clause

16.5 Accessibility symbol to be visible on accessible doors

The international symbol of accessibility must be clearly visible both inside and outside accessible doors on these conveyances.

Conveyances

- Ferries
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

16.5 Accessibility symbol to be visible on accessible doors

The international symbol of accessibility must be clearly visible on the outside of accessible doors.

Conveyances

- Ferries
 - Trams
 - Light rail
-

Reason 16.5

Trains have been deleted from the Conveyances list as most train operators do not fit exterior signs on rollingstock, owing to the train configuration, as not all accessible doors will be near the nominated accessible boarding point.

Disagree. Reinstate trains. Access symbols are not expensive and easily fitted. If allocated spaces in trains have been consolidated designating the doors would not be onerous.

Duplication, covered in 16.1. Remove the need for excessive signage. Signs on internal doors are not necessary and detract from other safety information inside the car. Passengers with disabilities will have already used the designated accessible door to enter the conveyance and, in most cases, will exit the same door to alight the conveyance.

Agree.

Part 17 Signs

Original Clause (No Change)

17.1 Height and illumination

Signs must comply with **AS1428.2 (1992) Clause 17.1, Signs, Clause 17.2, Height of letters in signs and Clause 17.3, Illumination of signs and Figure 30.**

<u>Conveyances</u>	<u>Premises</u>	<u>Infrastructure</u>
--------------------	-----------------	-----------------------

Original Clause (No Change)

17.2 Location — premises and infrastructure

Signs must be placed according to **AS1428.2 (1992) Clause 17.4, Location of signs.**

<u>Premises</u>	<u>Infrastructure</u>
-----------------	-----------------------

Original Clause (No Change)

17.3 Location — conveyances

- (1) If possible, signs are to be placed in accordance with **AS1428.2 (1992) Clause 17.4, Location of signs and Figure 30.**
- (2) If the design of the conveyance prevents strict compliance, signs must be placed above the head height of passengers, whether they are sitting or standing.
- (3) If used, destination signs must be placed above the windscreen.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Original Clause

17.4 Destination signs to be visible from boarding point

- (1) Destination signs must be visible from, or available at, boarding points.
- (2) They may be displayed on the conveyance or within the premises or infrastructure.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Premises

Infrastructure

Revised Clause (Exemption)

17.4 Destination signs to be visible from boarding point

- (1) Destination signs must be visible from, or available at, the nominated accessible boarding point.
- (2) They may be displayed on the conveyance or within the premises or infrastructure.

Conveyances

- Buses
- Coaches
- Ferries
- Trains
- Trams
- Light rail

Premises

Infrastructure

Reason 17.4

Changes are made to improve the clarity of the requirement for the boarding point to be the nominated accessible boarding point.

The original clause 17.4 implies that boarding points are the whole length of the platform.

Agree.

Original Clause

17.5 Electronic notices

- (1) Presentations of words or numbers on electronic notices must be visible for at least 10 seconds, unless the electronic notice is for the purpose of ticket validation.
- (2) If the electronic notice is for this purpose, the words or numbers on the notice must cease to be visible before the end of 10 seconds if the ticket validation device is used by another person within that time.

Premises

Infrastructure

Revised Clause (Exemption)

17.5 Electronic notices

- (1) Presentations of words or numbers on electronic notices must be visible for the maximum time period operationally possible, unless the electronic notice is for the purpose of ticket validation.
- (2) If the electronic notice is for this purpose, the words or numbers on the notice must cease to be visible before the end of 10 seconds if the ticket validation device is used by another person within that time.

Premises

Infrastructure

Reason 17.5

The information cannot be displayed for 10 seconds due to the amount of information to be displayed and the need for frequent updating of services within the dwell time of the train at the platform. This operational constraint is most evident during peak time, at major stations and on platforms with services to several possible destinations or on lines with a large number of stations and a variety of stopping patterns.

Accept the constraint at busy rail and bus stations. However, some stations may see 30 minutes or more between trains or buses. Further, as the Part 17.5 refers to premises and infrastructure for all transport modes, it may be better to seek exemption strictly for rail or bus stations experiencing in excess of a stated frequency of traffic. Other modes may not be as affected by frequency of service (eg ferries).

Original Clause

17.6 Raised lettering or symbols or use of Braille

- (1) If a sign incorporates raised lettering or symbols, they must be at least 0.8 mm above the surface of the sign.
- (2) If an operator or provider supplements a notice with Braille characters, they must be placed to the left of the raised characters.

Conveyances

Premises

Infrastructure

Revised Clause (Exemption)

17.6 Raised lettering or symbols or use of Braille

- (1) If a sign incorporates raised lettering or symbols, they must be at least 0.6 mm above the surface of the sign.

- (2) If an operator or provider supplements a notice with Braille characters, they must be **left justified** and placed **adjacent** to the text or raised characters.

Conveyances

Premises

Infrastructure

Reason 17.6

The minimum raised height of lettering / symbols has been provided by the Royal Blind Society to ensure that vandal proof signage is achievable in the rail environment. What is achievable in premises is not always so on rail, given the materials used and space constraints experienced in train design that limit the size, shape and locations of signs eg curved panels, door buttons.

Clashes with Building Code in Premises. As tactile signage and Braille is not mandated, its use in difficult circumstances is optional. However, tactile components of signs covered in premises subject to the Building Code of Australia are required to be raised 1.0 - 1.5 mm. This Standard should not be used to diminish the requirements of another technical document.

Original Clause (No Change)

17.7 Taxi registration numbers

Raised taxi registration numbers must be placed on the exterior of passenger doors forward of the handle.

Conveyances

- Taxis
-

Part 18 Tactile ground surface indicators

Original Clause

18.1 Location

Tactile ground surface indicators must be installed on an access path to indicate stairways, ramps, changes of direction, overhead obstructions below a height of 2000 mm, and hazards within a circulation space or adjacent to a path of travel (**AS1428.2 (1992) Clause 18.1**, *Tactile ground surface indicators*).

Premises

Infrastructure

Revised Clause (Exemption)

18.1 Location

- (1) Warning Tactile Ground Surface Indicators (TGSIs), architectural solutions or alternative way-finding aids must be used on an access path to indicate stairways, escalators, ramps and obstructions below a height of 2000 mm.
- (2) Having established the circumstances that assist safe way-finding, design layouts should not over-use or over-prescribe the installation of tactile ground surface indicators, but rather should make full use of the range of environmental guidance features available so as to minimise inconvenience to other members of the community.

Premises

Infrastructure

Reason 18.1

The original clause has the potential to lead to the over use of Tactile Ground Surface Indicators (TGSIs), which can create more of a hazard. Wording from AS/NZS 1428.4:2002 Appendix B has been included.

To reduce referencing to Australian Standards.

Agree. This will harmonise the TGSIs requirements for premises in the Transport Standard with those of the Building Code.

Original Clause

18.2 Style and dimensions

- (1) The style and dimensions of tactile ground surface indicators must comply with **AS1428.4 (1992)**.
- (2) The stated dimensions may be reduced where a conveyance design does not provide the necessary area.

Premises

Infrastructure

Revised Clause (Exemption)

18.2 Style and dimensions

- (1) The style and dimensions of warning tactile ground surface indicators must comply with the Figure 18AX.
- (2) Where the tolerance between the truncated cones cannot be met, it shall be minimised.

The +/- 1 mm tolerance between truncated cones is impossible when installed on a curved platform.

Agree. It may clarify the intent of Part 18.2(2) if the curved platform scenario is mentioned: "Where the tolerance between the truncated cones cannot be met, such as when TGSi tiles must be cut to allow their close abutment on a curved platform or kerb-side, it shall be minimised."

Original Clause (No Change)

18.3 Instalment at accessible bus boarding points

Colour-contrasted tactile indicators must be installed at accessible boarding points at bus stops or in bus zones.

Infrastructure

- Bus boarding points
-

Original Clause

18.4 Instalment at railway stations

Colour contrasted tactile indicators must be installed at the edges of railway platforms as prescribed by **AS1428.4 (1992) Clause 6.7.**

Infrastructure

- Railway platforms
-

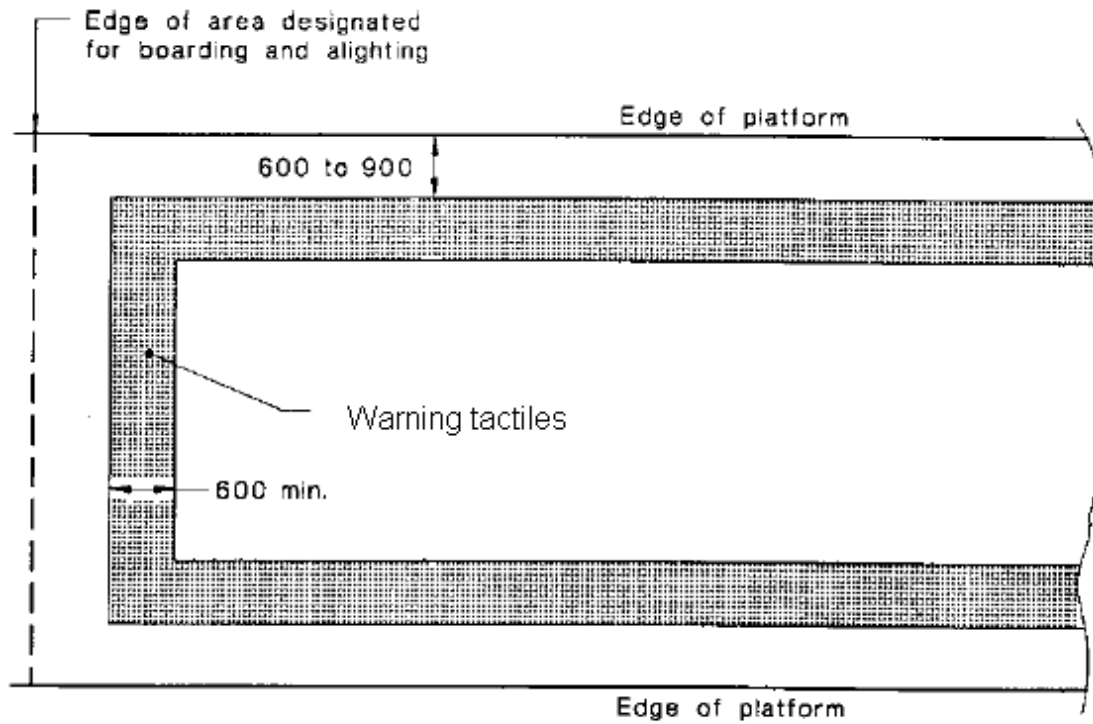
Revised Clause (Exemption)

18.4 Instalment at railway stations

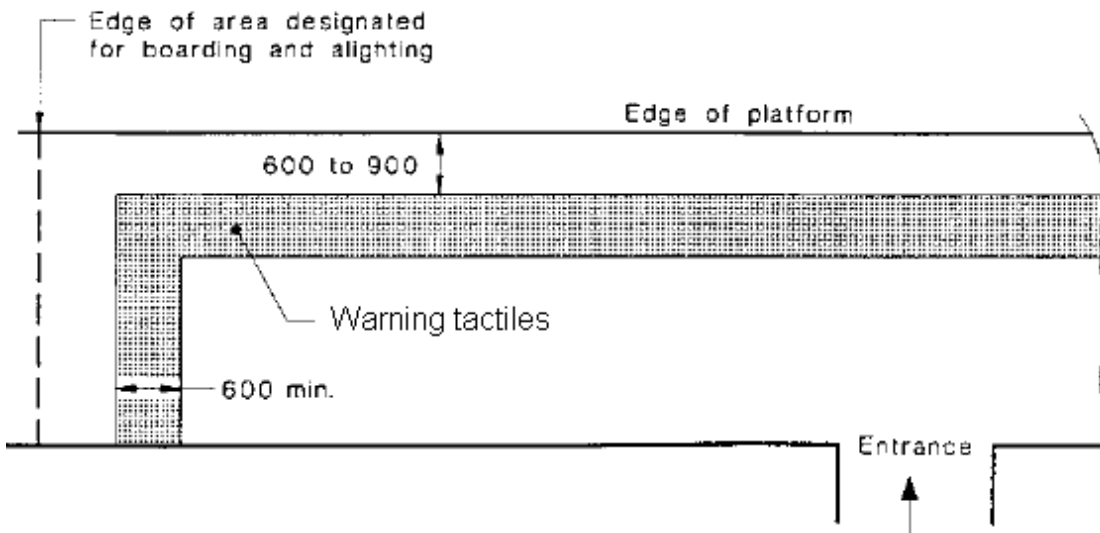
Where alternative hazard barriers, such as a fence, wall or architectural solutions are not installed, colour contrasting warning tactile indicators must be installed as shown in Figure 18BX.

Infrastructure

- Railway platforms
-



(a) Example A



(b) Example B

DIMENSIONS IN MILLIMETRES

Figure 18BX: Examples of warning tactiles at railway platforms.

Infrastructure

- Railway platforms

Reason 18.4

Reduced referencing to Australian Standards and places the emphasis on reducing hazards.

Agree. Diagram is less complex than written Clause but is it a direct copy from AS1428.4 and thus in breach of copyright? Refer to the HREOC agreement regarding TGSIs and minimum path of travel width in this Clause.

Original Clause (No Change)

18.5 Instalment at wharves

Colour contrasted tactile indicators must be installed at wharf edges as prescribed by **AS1428.4 (1992) Clause 6.8**.

Infrastructure

- Passenger wharves
-

Part 19 Alarms

Original Clause

19.1 Emergency warning systems

- (1) If installed, emergency warning systems must comply with **AS1428.2 (1992) Clause 18.2.1**, *Emergency warning systems*, **Clause 18.2.2**, *Audible alarms*, and **Clause 18.2.3**, *Visual alarms*.
- (2) Provision must be made for people with vision impairment to locate the exit path in the event of an emergency.

Conveyances

Premises

Infrastructure

Revised Clause (Exemption)

19.1 Emergency warning systems

- (1) If installed, emergency warning systems must comply with **AS1428.2 (1992) Clause 18.2.1**, *Emergency warning systems*, **Clause 18.2.2**, *Audible alarms*, and **Clause 18.2.3**, *Visual alarms*.
- (2) Provision must be made for people with a disability to locate the exit path in the event of an emergency.

Conveyances

Premises

Infrastructure

Reason 19.1

All people with a disability must be able to locate the emergency exit, not just people with vision impairment.

Agree.

Part 20 Lighting

Original Clause

20.1 Illumination levels — premises and infrastructure

Any lighting provided must comply with minimum levels of maintenance illumination for various situations shown in the notes to **AS1428.2 (1992) Clause 19.1, Illumination levels.**

Premises	Infrastructure
----------	----------------

Revised Clause (Exemption)

20.1 Illumination levels— premises and infrastructure

- (1) Any lighting provided must comply with minimum levels of maintenance illumination for various situations shown in the notes to **AS1428.2 (1992) Clause 19.1, Illumination levels, except.**
- (2) Any lighting provided on railway stations must comply with the following:

	Recommended minimum luminance			
	Code	Eav	E min	EV min
Enclosed stations				
Entrance, passageways, walkways	AS1428.2	150		
Stairs	AS1428.2	150		
Ramps	AS1428.2	150		
Toilets and locker rooms	AS1428.2	200		
Counter tops	AS1428.2	250		
Displays (timetables)	AS1428.2	200		
Telephones (ticket machines)	AS1428.2	200		
General platform	AS1680.2.1	160		
Yellow line (platform edge)			150	
Open stations				
Toilets and locker rooms	AS1428.2	200		
Counter tops	AS1428.2	250		
Displays (timetables)	AS1428.2	200		
Telephones (ticket machines)	AS1428.2	200		
Yellow line (platform edge)			30	
General platform	AS1158.3.1	42	21	14
Covered areas	AS1680.2.1	160		

Core areas (awning)	AS1680.2.1	160		
Ramps and steps (open)	AS1158.3.1	42	21	14
Open footbridge	AS1158.3.1	42	21	14
Primary access paths	AS1158.3.1	42	21	14
Enclosed footbridge	AS 1428.2	150		
Subways	AS1158.3.1	35	17.5	17.5

Interpretation

The interpretation from using both of these Australian Standards is that the 'core zone' of the station where tickets are sold, information is provided, vending machines, telephones and out of weather seating are placed will have **150 lux** minimum maintenance illumination. Within this area spot vertical lighting of between **200-300 lux** will be provided above ticket counters, timetables, information posters, vending machines and telephones.

- (3) Any lighting provided on pedestrian level crossings that provide direct access to a boarding point must comply with AS 1742.7 Pedestrian Level Crossings.

Premises

Infrastructure

Reason 20.1

The clause referenced in the original clause only deals with internal lighting and not outdoor situations or platform lighting. The Australasian Railway Association (ARA) has submitted a suggested lighting specification to Accessible Public Transport National Advisory Committee (APTNAAC) which it believes would meet the intent of the standard and be more appropriate to the external environment. The lighting levels specified in the original clause would be difficult to achieve in the external environment without impacting on the requirements of the obtrusive lighting code.

Agree. However 20.1 is equally applicable to bus stations, ferry wharfs and other infrastructure and premises. It would be best to treat all infrastructure and premises uniformly. The outdoor lighting is as yet untested. The figures above should be reassessed in 2007.

Original Clause (No Change)

20.2 Illumination levels — conveyances

- (1) Any lighting provided must comply with minimum levels of maintenance illumination for various situations shown in the notes to **AS1428.2 (1992) Clause 19.1, Illumination levels.**

-
- (2) Lighting should be at least 150 lux at the entrance and at the point where a passenger pays his or her fare.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Original Clause (No Change)

20.3 Dimming

Internal lighting may be dimmed as required to avoid reflection interfering with an operator's vision.

Conveyances

Part 21 Controls

Original Clause

21.1 Compliance with Australian Standard — premises and infrastructure

Controls must comply with **AS1428.1 (2001) Clause 11**.

Premises	Infrastructure
----------	----------------

	except airports that do not accept regular public transport services
--	--

Revised Clause (Exemption)

21.1 Compliance with Australian Standard — premises and infrastructure

Controls must comply with **AS1428.1 (2001) Clause 11**, except Clause 11.1.1 (c).

Premises	Infrastructure
----------	----------------

	except airports that do not accept regular public transport services
--	--

Reason 21.1

No door closers can satisfy this force criteria in clause 11.1.1(c).

Agree. Quote 20 N force as per Draft AS1428.1-200X.

Original Clause

21.2 Passenger-operated devices for opening and closing doors

Passenger-operated devices for opening and closing manual and power-assisted doors on conveyances must comply with **AS1428.2 (1992) Clause 23.2**, *Operation*, and **Clause 23.3**, *Door handles and hardware*.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

21.2 Passenger-operated devices for opening and closing doors

Passenger-operated devices for opening and closing manual and power-assisted doors on conveyances, other than emergency door controls, must comply with **AS1428.2 (1992) Clause 23.2**, *Operation*, and **Clause 23.3**, *Door handles and hardware*.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Reason 21.2

The emergency door controls are designed to be of higher force to avoid inadvertent use and vandalism.

Agree, but only if emergency door controls can be operated by staff as a form of equivalent access. If intended for use by the public rather than staff, a person with a disability may be trapped if alone in a conveyance or if not assisted by other passengers. The clause should reflect this. Add: "Staff may need to operate the controls in emergency for people who have disabilities."

Original Clause

21.3 Location of passenger-operated controls for opening and locking doors

Passenger-operated opening and locking controls for doors on conveyances must be located according to **AS1428.1 (2001) Clause 11.1.2, *Location***.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

21.3 Location of passenger-operated controls for opening and locking doors

Passenger-operated opening and locking controls for doors on conveyances must be located according to **AS1428.1 (2001) Clause 11.1.2, *Location*** except that door controls may be placed closer than 500 mm from an internal corner so long as they are accessible to a person using a compliant mobility aid.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Reason 21.3

Measurement of door control to floor height varies with different platform heights. The original clause tends to limit door controls to being fitted on the doors only, when weather shields are fitted internally adjacent to the doors. Weather shields provide protection from rain and other weather conditions.

Consider splitting into 'Internal controls' which do not suffer from floor level variation constraints listed above and 'External controls' which suffer variation due to platform, kerb and wharf heights not being uniform.

Original Clause (No Change)

21.4 Signal devices for conveyances that stop on request

- (1) Conveyances that stop on request must be equipped with signal devices that comply with **AS1428.2 (1992) Clauses 23.2 and 23.3.**
- (2) If a signal is operated by a button or pad, one surface dimension must be at least 25 mm.

Conveyances

- Buses
 - Trams
 - Light rail
-

Part 22 Furniture and fitments

Original Clause

22.1 Tables, benches, counters, etc

Tables, benches, counters and similar fixtures must comply with **AS1428.2 (1992) Clauses 24.1, 24.1.1, 24.1.2, 24.1.3, 24.1.4 and 24.1.5.**

Premises	Infrastructure
----------	----------------

except airport
terminals

Revised Clause (Exemption)

22.1 Tables, benches, counters, etc

- (1) At least one ticket counter must be suitable for passengers using mobility aids.
- (2) Any tables provided for designated wheelchair locations must be suitable for passengers using mobility aids as per Figure 1X-X.

Conveyances	Premises	Infrastructure
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- Booked services

except airport
terminals

Reason 22.1

The referenced clauses in AS1428.2 (1992) do not cover the ticket counter. These are the only counters or tables used by passengers on premises / infrastructure. Tables on booked services must be functional for passengers using mobility aids within the space constraints of a train. Design flexibility must be maintained by a performance specification not a prescribed specification developed for premises.

Agree regarding ticket counters. However, a ticket counter at a height suitable for a person using a mobility aid needs a point of reference. Suggest maintaining reference to AS1428.2 Clause 24.1.1.

Since 'Part 29 Food and Drink Services' is a part of the Transport Standard it is assumed that eating areas within public transport premises are covered by the Standards. Therefore tables, counters etc will need to be covered as per original Part 22.1.

Original Clause (No Change)

22.2 Information desks, check-in counters, etc — airports

At least 5% of information desks, check-in counters and similar airport fixtures used by passengers must be suitable for use by passengers in wheelchairs or similar mobility aids.

Premises

- Airport terminals
-

Original Clause (No Change)

22.3 Accessible sleeping berths — ferries and trains

- (1) Accessible sleeping berths must comply with **AS1428.2 (1992) Clause 24.3 (a), (c) and (d)**, *Beds*.
- (2) Passengers in wheelchairs or mobility aids must be able to enter and exit the berth, and position their aids, so that they can get into the bed or bunk.
- (3) If this is not possible, or where recliner chairs are used, operators must provide equivalent access by direct assistance.

Note See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

Conveyances

- Ferries
 - Trains
-

Original Clause (No Change)

22.4 Accessible sleeping berths — ferries

If a ferry has sleeping berths, at least one accessible sleeping berth must be provided for every 32 beds or bunks on the ferry.

Conveyances

- Ferries
-

Original Clause

22.5 Accessible sleeping berths — trains

- (1) If a train has sleeping berths, a minimum of 2 accessible berths must be provided in each set of up to 4 sleeping cars, or one accessible sleeping berth must be provided for every 32 bunks.
- (2) If different classes of travel are offered, accessible sleeping berths must be provided in each class.

Conveyances

- Trains
-

Revised Clause (Exemption)

22.5 Accessible sleeping berths — trains

- (1) If a train has sleeping berths, a minimum of 1 accessible sleeping berth must be provided.
- (2) If a train has more than 2 rail cars with sleeping berths, a minimum total of 2 accessible sleeping berths must be provided.

Conveyances

- Trains
-

Reason 22.5

A seat/bed recliner chair type accommodation is common in Europe equivalent to the airline "Sky bed" and is replacing traditional compartments in modern trains.

The construction of PWD berths is unique and independent of class.

Current usage by passengers with mobility aids is less than one percent, and should not exceed the percentage allowances for allocated spaces.

As a comparison, parking spaces provide 1% of parking spaces for people with disabilities in off street parking (AS2890.1)

Waiting areas allocate 5% of seats for all types of disabilities. Using ABS data below, 34% of 5% (156,100/455,100 * 5%) of all disabilities is 1.7% as the mobility aids below.

AS1428.1 2001 gives 156,100 as the number of people using manual and electric wheel chairs, and motorised scooters which calculates to 0.8%. of the population (ABS Survey data 1998)

Reference Clause 9.6	Comparison of accessible sleeping berths to total numbers of sleeping berths			
Type of Service	Sleeper Booked Long Distance Services-Typical Small consist	Sleeper Booked Long Distance Services-Typical Medium consist	Sleeper Booked Long Distance Services-Typical Large Consist	Special Services e.g tourist luxury train
No of Sleeping Cars	2	4	6	11
Sleeping passengers	30	56	94	100
Transport Standards 22.5 (1) 1 accessible berth per 32 =	1	2	3	4
Transport Standards 22.5 (1) 2 accessible berths per 4 sleeping cars =	1	2	3	6
ARA proposal	1	2	2	2

Reference Clause 9.6	Comparison of accessible sleeping berths to total numbers of sleeping berths			
Transport Standards percentage - Accessible sleeping berths to passenger berths ratio (%) .	3%	4%	3%	4% to 6%
ARA Percentage – Accessible sleeping berths to passenger berths ratio (%)	3%	4%	2%	2%

Disagree. Accessible berths need to take 'people with mobility impairments' rather than just wheelchair users.

Original Clause (No Change)

22.6 Accessible berths to be connected to access path — ferries and trains

- (1) Accessible berths must be connected by an access path to essential facilities such as toilets, bathrooms and food service areas that are not part of the accessible cabin.
- (2) If this is not practicable, operators must provide equivalent access by direct assistance.

Note See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

Conveyances

- Ferries
 - Trains
-

Part 23 Street furniture

Original Clause

23.1 Seats

Seats must comply with **AS1428.2 (1992) Clause 27.2**, *Seating in pedestrian areas*.

Premises	Infrastructure
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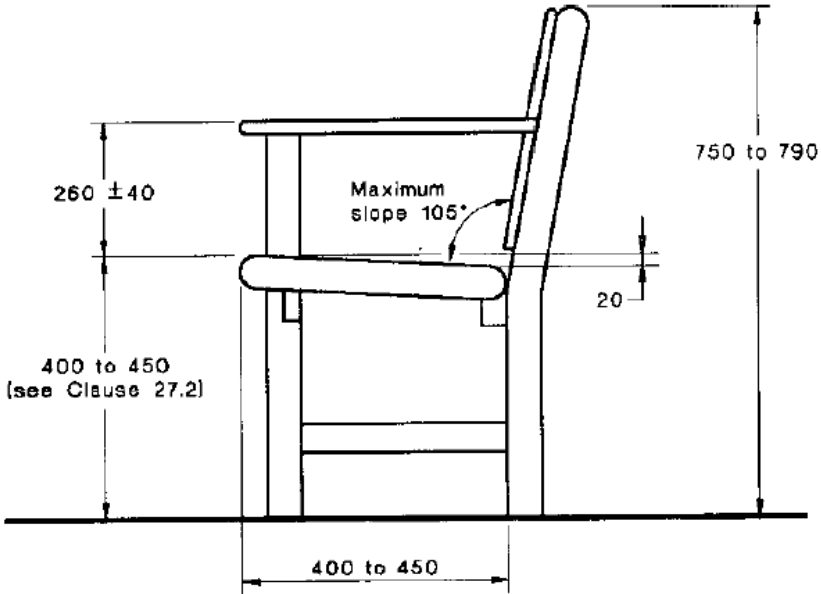
	except airports that do not accept regular public transport services
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Revised Clause (Exemption)

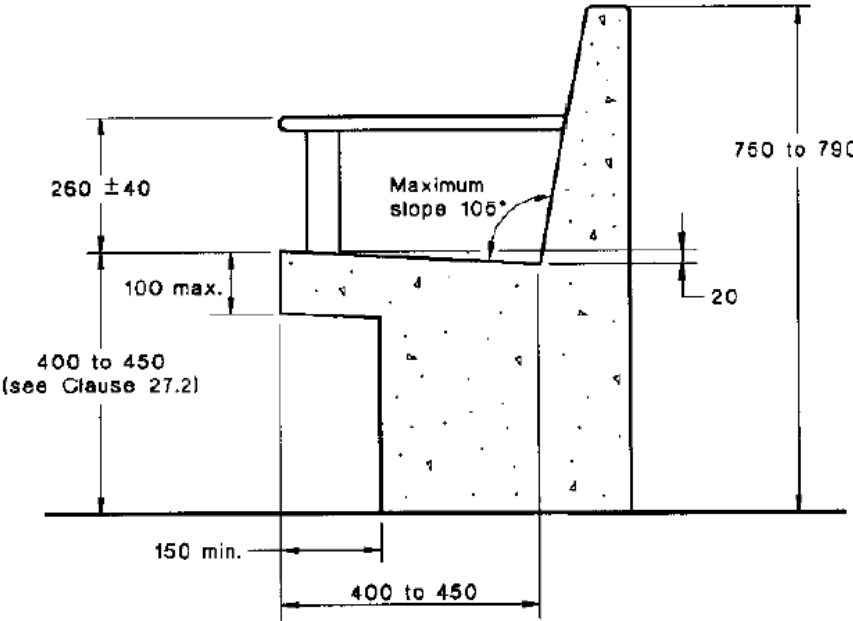
23.1 Seats

The design and installation of seating shall be as Figure 23X and recommended dimensions as follows:

- (1) The front of the seat shall have a clear space between any legs at ground level to within 150 mm of the front edge of the seat, and to within 100 mm of the seat height to allow for rearward adjustment of feet when rising.
- (2) Where armrests are provided, the top surface of the armrests shall be at a height of 260 ± 40 mm above the seat.
- (3) The front edge of the seat shall have a minimum radius of 30 mm.
- (4) No edge or projection shall have a radius of less than 5 mm unless protected from contact with the user.
- (5) The seat shall drain free of water.



(a) Side view — Type A



(b) Sectional view — Type B

DIMENSIONS IN MILLIMETRES

FIGURE 23X TYPICAL PARK BENCH SEATING – Recommended dimensions

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 23.1

Reduce referencing and provide design flexibility to achieve functional accessibility in the public domain.

Agree. Copyright?

Part 24 Gateways

Original Clause

24.1 Gateways and checkouts

- (1) Gateways and checkouts, such as ticket barriers, must comply with **AS1428.2 (1992) Clause 28**, *Gateways and checkouts*.
- (2) However, the width of an accessible gateway or checkout mentioned in **AS1428.2 (1992) Clause 28.2** must be at least 850 mm.

Premises	Infrastructure
----------	----------------

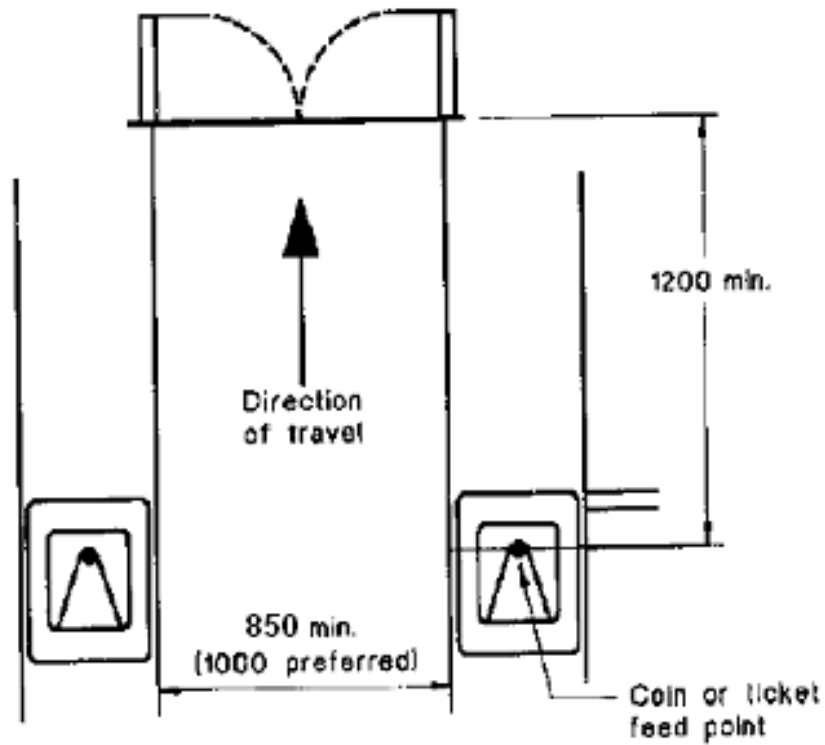
	except airports that do not accept regular public transport services
--	--

Revised Clause (Exemption)

24.1 Gateways and checkouts

Gateways and checkouts, such as ticket barriers, must comply with the following:

- (1) The international symbol for access (see Clause 16.1) shall be used to designate where access is available.
- (2) Where gateways and checkouts are installed, at least one barrier opening shall be not less than 850 mm wide.
- (3) The ticket, coin feed points shall be at a height of 800 mm to 1200 mm from the finished floor. Any controls needed to operate these machines shall have tactile applications for vision-impaired users.
- (4) A non-contact card reader shall be at a height range of 700 mm to 1200 mm from the finished floor.
- (5) Any barrier shall be not less than 1200 mm past the ticket or coin feed point in the direction of travel (see Figure 24X).



DIMENSIONS IN MILLIMETRES

FIGURE 24X BARRIERS WITH TICKET OR COIN FEED POINTS

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reason 24.1

Changes are made to reduce referencing.

Agree.

Card readers can be higher than 900mm above finished floor level as they only need to be swiped.

Agree. Suggest 900 mm to 1100 mm as range.

AS1428.2 Figure 23 details the common reach zone of ambulant and wheelchair users for critical controls as between 700mm and 1200mm above floor level.

Disagree. This risks over simplification. The zone of common reach defines an area in which 'objects' are in reach ranges common to people sitting or standing. The objects are various. Specific requirements for controls and coin feeds are listed in other clauses of AS1428.2.

The height of coin operation is brought into line with the requirements for vending machines and phone which allow coin operation at up to 1100-1200mm above floor level. This provides greater design flexibility to meet the needs of both ambulant and wheelchair passengers.

Disagree. Telephones in AS1428.2 Figure 35 have 1100 mm as maximum height and 850 mm \pm 20 mm as the minimum height for operable parts, not the 1200 mm - 500 mm required for vending machines in AS1428.2 Clause 29.1. Part 24.1 of the Transport Standard refers directly to Gateways and Checkouts. It is best to use the directly relevant Clause from AS1428.2 (Clause 28) rather than extrapolating from vending machine or telephone requirements.

Part 25 Payment of fares

Original Clause (No change)

25.1 Passengers to pay fares

All passengers must be prepared to pay fares.

Conveyances	Premises	Infrastructure
-------------	----------	----------------

Original Clause (No change)

25.2 Fare payment and ticket validation systems

- (1) Fare payment and ticket validation systems must not require actions from passengers with disabilities that exceed the requirements for other passengers.
- (2) For passengers who have difficulties with standard fare payment systems, operators and providers must offer a form of payment that meets equivalent access principles.

Note See sections 33.3 to 33.5 in relation to equivalent access.

Conveyances	Premises	Infrastructure
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Original Clause

25.3 Vending machines

Vending machines must comply with **AS1428.2 (1992) Clause 29.1, Height, Clause 29.2, Controls, and Clause 29.3, Illumination.**

Conveyances	Premises	Infrastructure
-------------	----------	----------------

Revised Clause (Exemption)

25.3 Ticket vending machines

Ticket vending machines must comply with the following:

-
- (1) The height of the operative components shall be between 500 mm and 1200 mm above the trafficable surface.
 - (2) The required operating force for any control shall not exceed 19.5 N.
 - (3) Illumination shall be provided in accordance with Part 20 Lighting.

Conveyances

Premises

Infrastructure

Reason 25.3

To include "Ticket" in the heading to this Clause for clarification. Transport operators / providers have no control over the design of other types of vending machines captured in the current wording.

Agree with clarification as this Part 25 is only concerned with payment of fares.

AS1428.2 (1992) Clause 29.2 (b) and (c) cannot be achieved on existing ticket machines due to the large number of destinations in a mass transit system that all need to be on the machine - eg 306 destinations in NSW unbooked system. They would not all fit if they had to include tactile and Braille lettering.

Disagree. Braille is not required by Clause 29.2, but rather a tactile and visually contrasting surface for controls is required. This means buttons etc can be easily felt. Touch screens or flush buttons are not useable by blind passengers.

Reduce referencing.

Agree.

Original Clause

25.4 Circulation space in front of vending machine

The circulation space in front of any vending machine must allow for a 180 degree turn as in **AS1428.2 (1992) Clause 6.2**, *Circulation space for 180 degree wheelchair turn*.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Revised Clause (Exemption)

25.4 Circulation space in front of a ticket vending machine

The circulation space in front of any ticket vending machine must allow for a 180 degree turn as in Clause 3.1.

Premises

Infrastructure

except airports
that do not
accept regular
public transport
services

Reasons 25.4

Reduce referencing and clarify wording.

Agree, provided Clause 3.1 quotes full AS1428.2 requirements.

Part 26 Hearing augmentation— listening systems

Original Clause (No change)

26.1 Public address systems— premises and infrastructure

If a public address system is installed, it must comply with **AS1428.2 (1992) Clause 21.1**, *Hearing augmentation*.

Premises

Infrastructure

Original Clause

26.2 Public address systems — conveyances

If a public address system is installed:

- (a) people who are deaf or have a hearing impairment must be able to receive a message equivalent to the message received by people without a hearing impairment; and
- (b) it must comply with **AS1428.2 (1992) Clause 21.1**, *Hearing augmentation*.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Revised Clause (Exemption)

26.2 Public address systems — conveyances

If a public address system is installed, people who are deaf or have a hearing impairment must be able to

receive a message equivalent to the message received by people without a hearing impairment.

Conveyances

- Buses
 - Coaches
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Reason 26.2

Tests on WA and QR conveyances (reports submitted to APTNAC) show current hearing augmentation installations cannot meet Australian Standard requirements. Visual information can provide a reasonably equivalent summary of audio information but is unable to exactly replicate every audio message. Other forms of direct assistance may be used to supplement visual messaging.

Agree with constraints. How will the rail authorities determine what constitutes a 'message equivalent to the message received by people without a hearing impairment'?

Part 27 Information

Original Clause

27.1 Access to information about transport services

General information about transport services must be accessible to all passengers.

Conveyances	Premises	Infrastructure
-------------	----------	----------------

Revised Clause (Exemption)

27.1 Access to information about transport services

- (1) Information necessary to use the transport service must be accessible to all passengers.
- (2) Provision of accessible information assumes that all passengers have a minimum level of literacy, English language skills and an ability to communicate their destination if required.

Conveyances	Premises	Infrastructure
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Reasons 27.1

To clarify the requirements, clause 27.1 (2) is added. Relevant clauses extracted from clauses 27.1 (2) and 1.18(3) of the Guidelines.

Agree.

Original Clause

27.2 Direct assistance to be provided

If information cannot be supplied in a passenger's preferred format, equivalent access must be given by direct assistance.

Note See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

Conveyances	Premises	Infrastructure
--------------------	-----------------	-----------------------

Revised Clause (Exemption)

27.2 Equivalent access

- (1) If essential information cannot be supplied in a passenger's preferred format, equivalent access must be given.
- (2) Certain formats may only be available from certain outlets/locations.

Note See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

Conveyances	Premises	Infrastructure
--------------------	-----------------	-----------------------

Reason 27.2

By definition, direct assistance is a form of equivalent access. By having direct assistance written in, it limits the options of providing equivalent access. Rewording and new clause (2) - clauses 27.2 (2) and (4) of the Guidelines brought across to Standards to reflect intention of Standards and constraints of mass transport system.

Agree. Part 27.2(2) should also state that the material will be obtained from the outlets/location in a timely manner.

Original Clause

27.3 Size and format of printing

- (1) Large print format type size must be at least 18 point sans serif characters.
- (2) Copy must be black on a light background.

Conveyances	Premises	Infrastructure
--------------------	-----------------	-----------------------

Revised Clause (Exemption)

27.3 Size and format of printing

- (1) If provided, large print format type size must be at least 18 point sans serif characters.
- (2) Copy must optimise colour contrast between text and background.

Conveyances

Premises

Infrastructure

Reason 27.3

The original clause limits marketing and printing options. Printed material needs to have good contrast when photocopied. Route maps are usually shown as coloured lines for easier reading of station sequence. Additionally the colour is integrated with the colour of electronic displays and paper timetables.

Agree. Supporting material will need to be developed to define optimal colour contrast.

Original Clause

27.4 Access to information about location

All passengers must be given the same level of access to information on their whereabouts during a public transport journey.

Conveyances

Revised Clause (Exemption)

27.4 Access to information about location

- (1) All passengers must be given the same level of access to essential information on their whereabouts during a public transport journey.
- (2) If this is not practicable, operators must provide equivalent access.

Note See sections 33.3 to 33.6 in relation to equivalent access and direct assistance.

Conveyances

Reason 27.4

Equivalent access may be provided in ways other than by direct assistance eg visual displays.

Agree.

Part 28 Booked services

Original Clause

28.1 Notice of requirement for accessible travel

Operators of booked services may request advance notice of a requirement for accessible travel.

Conveyances

- Aircraft
 - Coaches
 - Ferries
 - Dial-a-ride services
 - Trains
-

Revised Clause (Exemption)

28.1 Notice of requirement for accessible travel

- (1) Operators of booked services may request reasonable advance notice of a requirement for accessible travel.
- (2) Passengers with disabilities requiring assistance, or having special requirements, must notify the operator of their requirements when they book their travel.
- (3) Passengers requiring assistance to transfer from a mobility aid to a seat, or with feeding, personal hygiene / toileting, medication or the dis/assembly and operation of disability aids must book and travel with a carer.

Conveyances

- Aircraft
 - Coaches
 - Ferries
 - Dial-a-ride services
 - Trains
-

Reason 28.1

To cover the requirement of Part 28.2. Notification of special needs is required by the operator to ensure that where independent access is not possible / available, direct assistance will be feasible and available.

The 28.1(2) clause is extracted from the Guidelines and brought across to the Standards to provide certainty that where independent access cannot be provided, the requirement for direct assistance is known and may be met by the operator and on-board attendants.

Train crew on booked services can assist passengers with disabilities by folding down a manual wheelchair and stowing it with the passenger in the seating / sleeping compartment; providing buffet food to the seat if required; walking someone to the toilet door or retrieving an aid and passing it to the passenger for their use. However, to ensure the occupational health and safety of both passenger and crew, crew are unable to dis/assemble or operate disability aids or provide feeding, medication or toileting assistance.

Agree.

Original Clause

28.2 Period of notice of requirement for accessible travel

Any advance notice required of a requirement for accessible travel must not exceed the period of notice specified for other passengers.

Conveyances

- Coaches
 - Ferries
 - Dial-a-ride services
 - Trains
-

Delete Clause 28.2 (Exemption)

Reason 28.2

Contradictory with the guidelines 28.1 (2) and previous clauses, and is covered in the amendments to 28.1

The operator on booked services may need additional notice to allow time to remove seating.

Booked services use an on-board manifest to ensure that on-board staff are informed of and prepared for passengers' requirements.

Disagree. Rather than delete the clause, use it to specify what the 'reasonable advance notice of a requirement for accessible travel' will be. It would be reasonable to assume that general booking timeframes were sufficient.

Original Clause

28.3 Location of carers, assistants and service animals

- (1) On booked services, operators must locate carers, assistants or service animals with the passenger with whom they are travelling.
- (2) In the case of carers or assistants, this would normally be in an adjoining seat.
- (3) If a passenger is travelling with a service animal, the animal must be able to accompany the passenger at all times and to travel without encroaching onto an access path.

Conveyances

- Aircraft
 - Coaches
 - Ferries
 - Dial-a-ride services
 - Trains
-

Revised Clause (Exemption)

28.3 Location of carers, assistants and assistance dogs

- (1) On booked services, operators must locate carers, assistants or assistance dogs with the passenger with whom they are travelling.
- (2) In the case of carers or assistants, this would normally be in an adjoining seat.
- (3) If a passenger is travelling with an assistance dog, the animal must be able to accompany the passenger at all times and to travel without encroaching onto an access path.

Conveyances

- Aircraft
 - Coaches
 - Ferries
 - Dial-a-ride services
 - Trains
-

Reason 28.3

Terminology used reflects revised definition of service animal to assistance dog.

Disagree. Agree that 'comfort animals' are not assistance animals, but legitimate use may be made of animals other than dogs in directly using a public transport service.

Original Clause (No change)

28.4 Accessible seats to be available for passengers with disabilities

- (1) Accessible seats must be kept for passengers with disabilities.
- (2) Operators must allocate unbooked accessible seats to other passengers only after all other standard seats are filled.

Conveyances

- Aircraft
 - Coaches
 - Ferries
 - Dial-a-ride services
 - Trains
-

Part 29 Food and drink services

Original Clause

29.1 Equal access to food and drink services

Operators and providers must ensure that any food or drink service that is provided as part of a public transport service is equally available to all passengers.

Conveyances	Premises	Infrastructure
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Revised Clause (Exemption)

29.1 Equal access to food and drink services

Operators and providers must ensure that any food or drink service that is provided as part of a public transport service is equally available to all passengers.

Conveyances	Premises	Infrastructure
Except unbooked train services	Except rail premises	Except rail infrastructure

Reason 29.1

Transport operators / providers are not and should not be responsible for the accessibility of all retail outlets selling food and drink within the transport precinct. It could be argued that they serve transport customers, but the services are not provided by the transport operators / providers, nor are they integral to the provision of essential transport services / facilities. With the current wording operators / providers are responsible for the provision of direct assistance to any food / drink outlet or vending machine that may be on or near the station.

Food / drink services are often provided as an integral part of booked train services.

Disagree with details, but agree in principle. Unbooked trains, buses, ferries, taxis etc will not normally provide food or beverages. Premises and infrastructure may have outlets or vending machines that are not run or owned by the transport provider. Consider rewording the Part: "Operators and providers must ensure that any food or drink that that they or their

contractors provide, wether for payment or not, as a service to all passengers as part of a public transport service is equally available to all passengers."

Original Clause (No change)

29.2 Distance around accessible tables

The distance around accessible tables in food and drink service areas must comply with **AS1428.2 (1992) Clause 24.1.7.**

Premises	Infrastructure
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except airports that do not accept regular public transport services

Original Clause (No change)

29.3 Space for passengers using mobility aids

Operators may provide space for passengers using mobility aids in food and drink service areas or give the same convenience by equivalent access.

Note See sections 33.3 to 33.5 in relation to equivalent access.

Conveyances

- Ferries
 - Trains
-

Part 30 **Belongings**

Original Clause

30.1 Disability aids to be in addition to baggage allowance

- (1) Disability aids (for example, equipment and apparatus including mobility, technical and medical aids) are to be in addition to normal baggage allowances.
- (2) If possible, disability aids are to be treated in the same way as cabin or accompanied baggage.

Conveyances

- Aircraft
 - Coaches
 - Ferries
 - Trains
-

Revised Clause (Exemption)

30.1 Disability aids to be in addition to baggage allowance

- (1) Disability aids are to be in addition to normal baggage allowances.
- (2) If possible, disability aids are to be treated in the same way as cabin or accompanied baggage.
- (3) Disability aids which will be transported in the luggage compartment must comply with the operator's size limitations for passenger luggage.
- (4) Only mobility aids that comply with Part 1X may be carried on public transport conveyances.
- (5) Operators are not required to carry mobility aids as priority / additional baggage in the luggage compartment of booked services:
 - (a) where allocated space for mobility aids is provided in the seating / sleeping compartment
when all allocated spaces in the seating / sleeping compartment are already booked on the required service.

-
- (6) Operators are not responsible for the assembly / disassembly or operation of disability aids on public transport services, premises or infrastructure.

Conveyances

- Aircraft
 - Coaches
 - Ferries
 - Booked Trains
-

Reason 30.1

To acknowledge operators' space limitations in transporting luggage, disability aids and mobility aids. Non-compliant mobility aids such as over sized scooters, should not have to be carried as 'priority baggage' when compliant allocated spaces are provided in the seating compartment. The same principle applies to a person travelling with a mobility aid but wanting to sit in a seat when the allocated space/s needed to store the mobility aid are already booked by other passengers. Accommodation of mobility aids is only practical when they are compliant and can be accommodated in the allocated space provided.

Extracts from Clause 1.21 and Part 30 of the Guidelines are brought across to Standards to clarify the maximum size of luggage requirements and provide certainty for operators.

Agree with all but 30.1(4). As stated earlier, it is not the mobility aid that is defined in the Transport Standard but rather its minimum allocated space.

Part 31 Priority

Original Clause

31.1 Priority seating

Operators must designate at least 2 of the seats provided on their unbooked conveyances as priority seating for passengers with disabilities and other groups in need of special assistance (for example, the aging).

Conveyances

- Buses
 - Ferries
 - Rail cars
 - Trams
 - Light rail
-

Revised Clause (Exemption)

31.1 Priority seating

- (1) Operators must designate at least 2 of the seats provided on their unbooked conveyances as priority seating for passengers with disabilities and other groups in need of special assistance (for example, the aging).
- (2) Operators may determine the location and orientation of priority seats.

Conveyances

- Buses
 - Ferries
 - Rail cars
 - Trams
 - Light rail
-

Reasons 31.1

Clause (2) added so that train designers and operators can maintain the design flexibility needed to achieve

appropriate positioning of all passengers within the space constraints of the train.

Agree. Assume that seats will be located fairly and equitably.

Original Clause (No change)

31.2 Information to be provided about vacating priority seating

Operators must inform all relevant passengers (by signage or similar systems) that they should vacate an identified priority seat or allocated space if a passenger with a disability requires it.

Conveyances

- Buses
 - Ferries
 - Trains
 - Trams
 - Light rail
-

Part 32 Adoption

32.1 Effect and application of these Standards

These Standards apply, on and from the date they come into effect under section 31 of the *Disability Discrimination Act 1992*, to:

- (a) public transport services provided with:
 - (i) newly constructed premises or infrastructure; or
 - (ii) conveyances entering service after these Standards come into effect; or
 - (iii) premises, infrastructure or conveyances that have undergone substantial refurbishment or alteration; or
 - (iv) additional or replacement equipment in premises and infrastructure or on conveyances; and
- (b) new or revised ancillary services that are provided as an adjunct to the public transport operation; and
- (c) new or updated information provided to the public.

Conveyances	Premises	Infrastructure
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32.2 Manufacture to be completed before target dates

In all cases, manufacture or other work that is required to ensure compliance with these Standards is to be completed before the target dates set out in Schedule 1.

Conveyances	Premises	Infrastructure
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Part 33 Compliance

33.1 Date for compliance with these Standards — new conveyances, premises and infrastructure

Operators and providers must comply with the specified sections of these Standards for all new premises, infrastructure and conveyances brought into use for public transport service on and from the date these Standards come into effect under section 31 of the *Disability Discrimination Act 1992*.

Conveyances	Premises	Infrastructure
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33.2 Date for compliance with these Standards — conveyances, premises and infrastructure in use at target dates

Operators and providers must comply with the specified sections of these Standards for premises, infrastructure and conveyances that are still in use for public transport at the target dates specified in Schedule 1.

Conveyances	Premises	Infrastructure
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33.3 Equivalent access

- (1) Compliance with these Standards may be achieved by:
 - (a) applying relevant specifications in these Standards before the target dates; or
 - (b) using methods, equipment and facilities that provide alternative means of access to the public transport service concerned (but not using separate or parallel services) with equivalence of amenity, availability, comfort, convenience, dignity, price and safety.
- (2) This may include direct assistance over and above that required simply to overcome discrimination.

33.4 Consultation about proposals for equivalent access

The operator or provider of a public transport service must consult with passengers with disabilities who use the service, or with organisations representing people with disabilities, about any proposal for equivalent access.

33.5 Equivalent access without discrimination

Operators and providers must be able to demonstrate that equivalent access provides public transport without discrimination 'as far as possible'.

33.6 Direct assistance

- (1) Nothing in these Standards prevents operators or providers from offering assistance directly to passengers.
- (2) If these Standards have not been fully met, direct assistance may be a means of providing equivalent access.
- (3) In addition to compliance with other provisions of these Standards, direct assistance to passengers is required if:
 - (a) it is necessary to provide equivalent access to a service; and
 - (b) direct access can reasonably be provided without unjustifiable hardship.

33.7 Exceptional cases — unjustifiable hardship

- (1) It is not unlawful to fail to comply with a requirement of these Standards if, and to the extent that, compliance would impose unjustifiable hardship on any person or organisation.
- (2) However, compliance is required to the maximum extent not involving unjustifiable hardship.
- (3) In determining whether compliance with a requirement of these Standards would involve unjustifiable hardship, all relevant circumstances of the particular case are to be taken into account including the following:
 - (a) any additional capital, operating or other costs, or loss of revenue, that would be directly incurred by, or reasonably likely to result from, compliance with the relevant requirement of these Standards;
 - (b) any reductions in capital, operating or other costs, or increases in revenue, that would be directly achieved

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- by, or reasonably likely to result from, compliance with a relevant requirement of these Standards;
- (c) the extent to which the service concerned operates, or is required to operate, on a commercial or cost-recovery basis;
 - (d) the extent to which the service concerned is provided by or on behalf of a public authority for public purposes;
 - (e) the financial position of a person or organisation required to comply with these Standards;
 - (f) any effect that compliance with the relevant requirement of these Standards is reasonably likely to have on the financial viability of a person or organisation required to comply, or on the provision of the service, or feature of service, concerned;
 - (g) any exceptional operational, technical or geographic factors, including at a local or regional level, affecting a person or organisation's ability to comply with a relevant requirement of these Standards;
 - (h) financial, staffing, technical, information and other resources reasonably available to a person or organisation required to comply with these Standards, including any grants, tax concessions, subsidies or other external assistance provided or available;
 - (i) benefits reasonably likely to accrue from compliance with relevant requirements of these Standards, including benefits to people with disabilities, to other passengers or to other persons concerned, or detriment likely to result from non-compliance;
 - (j) detriment reasonably likely to be suffered by an operator, provider, passenger or other person or organisation concerned, including in relation to equality of amenity, availability, comfort, convenience, dignity, price and safety of services or effectiveness and efficiency of operation if compliance with relevant provisions of these Standards is required;
 - (k) if detriment under paragraph (j) involves loss of heritage values — the extent to which relevant heritage value or features of the conveyance, building or other item concerned are essential, and to what extent incidental, to the transport service provided;
 - (l) whether compliance with a requirement of these Standards may reasonably be achieved (including by means of equivalent access as provided for in sections 33.3 to 33.5) by less onerous means than

-
- those objected to by a person or organisation as imposing unjustifiable hardship;
- (m) any evidence regarding efforts made in good faith by a person or organisation concerned to comply with the relevant requirements of these Standards;
 - (n) if a person or organisation concerned has given an action plan to the Commission under section 64 of the *Disability Discrimination Act 1992* — the terms of that action plan and any evidence regarding its implementation;
 - (o) the nature and results of any processes of consultation, including at local, regional, State, national, international, industry or other level, involving, or on behalf of, an operator concerned, any infrastructure providers as relevant, and people with a disability, regarding means of achieving compliance with a relevant requirement of these Standards and including in relation to the factors listed in this section;
 - (p) if a person or organisation seeks a longer period to comply with these Standards, or a requirement of these Standards, than is permitted by the preceding sections on Adoption and Compliance — whether the additional time sought is reasonable, including by reference to the factors set out in paragraphs (a) to (o) above, and what undertakings the person or organisation concerned has made or is prepared to make in this respect.
- (4) If a substantial issue of unjustifiable hardship is raised having regard to the factors listed in paragraphs (3) (a) to (p), the following additional factors are to be considered:
- (a) the extent to which substantially equal access to public transport services (including in relation to equality of independence, amenity, availability, comfort, convenience, dignity, price and safety) is or may be provided otherwise than by compliance with these Standards;
 - (b) any measures undertaken, or to be undertaken by, on behalf of, or in association with, a person or organisation concerned to ensure such access.
- (5) For these Standards:
- unjustifiable hardship*** is to be interpreted and applied having due regard to the scope and objects of the *Disability Discrimination Act 1992* (in particular the object of removing discrimination as far as possible) and the rights and interests of all relevant parties.

Part 34 Review

34.1 Timetable for review

- (1) The Minister for Transport and Regional Services, in consultation with the Attorney-General, is to:
 - (a) review the efficiency and effectiveness of these Standards within 5 years after they take effect; and
 - (b) carry out a subsequent review every 5 years after the initial review.

- (2) The review must include:
 - (a) whether discrimination has been removed, as far as possible, according to the requirements for compliance set out in Schedule 1; and,
 - (b) any necessary amendments to these Standards.

Schedule 1 Target dates for compliance

(section 33.2)

Part 1 Target date — 31 December 2007

1.1 Responsibility

- Operators
- Providers

Requirement

Full compliance with the relevant Standards in relation to:

- Waiting areas
- Symbols
- Signs
- Alarms
- Lighting
- Furniture and fittings
- Hearing augmentation
- Information
- Booked services
- Food and drink services
- Belongings
- Priority

Application

Conveyances

Premises

Infrastructure
except bus stops

1.2 Responsibility

- Radio networks
- Co-operatives

Requirement

Response times for accessible vehicles are to be the same as for other taxis.

Application

Conveyances

- Taxis
 - Dial-a-ride services
-

1.3 Responsibility

- Operators
- Providers

Requirement

Compliance with the relevant Standards by 25% of each type of service in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Resting points
- Ramps
- Boarding
- Allocated space
- Doorways and doors
- Lifts
- Stairs
- Toilets
- Tactile ground surface indicators
- Controls
- Street furniture

Application

Conveyances

Premises

Infrastructure
except bus stops

1.4 Responsibility

- Providers

Requirement

Compliance with the relevant Standards by 25% of bus stops in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Ramps
- Waiting areas
- Boarding
- Allocated space
- Surfaces
- Handrails and grabrails
- Stairs
- Symbols
- Signs
- Tactile ground surface indicators
- Lighting
- Street furniture
- Information

Application

Infrastructure
• Bus stops

Part 2 Target date — 31 December 2012

2.1 Responsibility

- Operators
- Providers

Requirement

Full compliance with the relevant Standards in relation to:

- Surfaces
- Handrails and grabrails
- Gateways
- Vending machines

Application

Conveyances

Premises

Infrastructure

except bus stops

2.2 Responsibility

- Operators

Requirement

Full compliance with the relevant Standards in relation to:

- 1500 mm minimum head room and vertical door opening

Application

Conveyances

- Accessible taxis
-

2.3 Responsibility

- Operators
- Providers

Requirement

Compliance with the relevant Standards by 55% of each type of service in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Resting points
- Ramps
- Boarding
- Allocated space
- Doorways and doors
- Lifts
- Stairs
- Toilets
- Tactile ground surface indicators
- Controls
- Street furniture

Application

Conveyances

Premises

Infrastructure
except bus stops

2.4 Responsibility

- Providers

Requirement

Compliance with the relevant Standards by 55% of bus stops in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Ramps
- Waiting areas
- Boarding
- Allocated space
- Surfaces
- Handrails and grabrails
- Stairs
- Symbols
- Signs
- Tactile ground surface indicators
- Lighting
- Street furniture
- Information

Application

Infrastructure
• Bus stops

Part 3 Target date — 31 December 2017

3.1 Responsibility

- Operators
- Providers

Requirement

Compliance with the relevant Standards by 90% of each type of service in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Resting points
- Ramps
- Boarding
- Allocated space
- Doorways and doors
- Lifts
- Stairs
- Toilets
- Tactile ground surface indicators
- Controls
- Street furniture

Application

Conveyances
except buses

Premises

Infrastructure
except bus stops

3.2 Responsibility

- Operators
- Providers

Requirement

Compliance with the relevant Standards by 80% of each type of service in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Resting points
- Ramps
- Boarding
- Allocated space
- Doorways and doors
- Lifts
- Stairs
- Toilets
- Tactile ground surface indicators
- Controls
- Street furniture

Application

Conveyances

- Buses
-

3.3 Responsibility

- Providers

Requirement

Compliance with the relevant Standards by 90% of bus stops in relation to:

- Access paths
- Manoeuvring areas
- Passing areas
- Ramps
- Waiting areas
- Boarding
- Allocated space
- Surfaces
- Handrails and grabrails
- Stairs
- Symbols
- Signs
- Tactile ground surface indicators
- Lighting
- Street furniture
- Information

Application

Infrastructure

- Bus stops
-

Part 4 Target date — 31 December 2022

4.1 Responsibility

- Operators
- Providers

Requirement

All public transport services are to fully comply with the relevant Standards.

Application

Conveyances

except trains and
trams

Premises

Infrastructure

Part 5 Target date — 31 December 2032

5.1 Responsibility

- Operators
- Providers

Requirement

All public transport services are to fully comply with the relevant Standards.

Application

Conveyances

- Trains
 - Trams
-