

26 May 2014

Disabilities Transport Access Secretariat  
Road Safety and Transport Access Branch  
Department of Infrastructure and Regional Development  
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Attention: [DisabilitiesTransportAccessSecretariat@infrastructure.gov.au](mailto:DisabilitiesTransportAccessSecretariat@infrastructure.gov.au)

## Draft Report Review of Disability Standards for Accessible Public Transport

We thank you for the opportunity to comment on the report and in particular the recommendations.

We support all seven recommendations but wish to make particular comment on Recommendation 2 'Modernise the Transport Standards'. We believe that it is critical that the Transport Standards are consistent with the Disability (Access to Premises-Buildings) Standard for all aspects that related to buildings associated with transport. It is also important to acknowledge that external spaces that are not covered by the current Premises Standards need to be reviewed to ensure that they continue to provide equitable access and not be anything less than the current requirements.

In particular, the following need consideration:

- acknowledgement that mechanical means to overcome level differences, such as lifts at railway stations, should have reasonable alternative backup systems in case the mechanical method fails.
- acknowledgement that natural terrain sometimes does not permit bus stops from fully complying, even if it is just a sloping level under a seat.
- acceptable standards need to be developed for all aspects of transport systems such as ticket booths, waiting rooms/spaces, seating, reception counters and the like.
- some more formalised assessment of the various States/Territories compliance with the program and role out as it appears that some are not meeting the agreed schedules.

The process of developing details needs to include time for informed review and comment by the industry and then finalisation by June 2016.

Yours faithfully



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