



A service of Independent Living Centre NSW

Review of the Disability Standards for Accessible Public Transport

The Independent Living Centre NSW

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Disability Discrimination Act, 1992 – Review of the Disability Standards for Accessible Public Transport:

This submission, dated 31.3.08, has been prepared by the Independent Living Centre NSW to comment specifically on the accessibility of Bus Stops. A crucial element of independent living is to have a continuous accessible path of travel from home- to home. For many people this includes travel by public transport.

Accessible Public Transport should not only be designed to encourage people to use the services, but to encourage people to carry on their usual lifestyles when they no longer have access to the family car. (A typical example is shown in the first photograph).

The DDA Standards for Accessible Public Transport require compliance with up to (16) criteria for a Bus Stop to be completely accessible, depending on the specific circumstances of the individual Stop. *The criteria include Access paths; handrails and grabrails; manoeuvring areas; stairs; passing areas; symbols; ramps; signs; waiting areas; tactile ground surface indicators; boarding; lighting; allocated space; street furniture; surfaces and information.* In addressing these issues, this report considers not only people with permanent disabilities, but seniors, people with temporary disabilities, people with luggage or parcels, and parents with strollers.

On the basis that there is little point in providing an accessible facility if it cannot be accessed, there are two critical elements that need to be addressed in the design/re-design of Bus Stops that can provide compliance with the maximum number of access criteria - their location; and the construction of a hard-stand area which is at least 150mm above the roadway.

Accessible Locations:

Road Authorities should be encouraged to survey all Bus Stops in their areas and prepare checklists of existing and required accessible features. The checklists should then be used to determine the re-design needs of each on a priority basis - immediate, short term (e.g. 5 years) and long term (by 2030). Those sites on existing Accessible Bus Routes should receive priority action. Re-design may require only minimal alterations to an existing Stop, such as the replacement of a section of grass with a concrete slab (See photographs 4 and 5). Relocation of the Bus Stop to a more Accessible site should always remain a possibility.



It is acknowledged, however, that the most appropriate location for a Bus Stop, based on the proximity of passengers, may not be suitable as an Accessible Bus Stop because of the local topography or road design; and it is acknowledged that the provision of fully Accessible Bus Stops may place a cost burden on providers.

Hard-stand Areas:

In the Section on 'Boarding' in the Accessible Transport Standards, it is stated in Clause 8 that, "If a kerb is installed, it must be at least 150mm higher than the road surface". This statement is incongruous. If no kerb is present, the step from the road surface to the bus is too great for seniors, people with mobility disabilities, parents with children or passengers with luggage. Ramps from the bus would be too steep and dangerous, or too long, requiring a much larger hard-stand area.

During the development of the Standards in 1995, the NSW Department of Transport's DDA Transport Standards Design Specification Working Group discussed at length the appropriate height of kerbs at Bus Stops. The Bus and Coach Association argued for the minimum height to be fixed at 200mm, as it was claimed that this better suited the design of bus floors and loading ramps.

As a NSW Local Government representative on that Group, I argued the case for a kerb height of 150mm, as this was a common height throughout the Sydney Metropolitan Area, and the costs to reconstruct existing sites with 200mm high kerbs would have been excessive. A minimum kerb height of 150mm was subsequently adopted.

Therefore, unless the hard-stand area is at least 150mm above the roadway, the Bus Stop is inaccessible.

Bus Waiting Shelters do not actually enhance access but they do provide convenience and protection. Their provision should be encouraged, but there are two important aspects to be considered – the impact they have on the construction of the Bus Stop, and the control that Road Authorities must retain over their location, size and design.

There are many examples around Sydney where shelters have been provided on footways, to the impediment of through pedestrians. Hard-stand areas should be designed to accommodate Waiting Shelters of appropriate design.

Photographs:

Through its Access Consulting Unit, Education Unit and Access Awareness Programs, ILC NSW has formed the opinion that there is a lack of understanding within local Authorities of the elements required in the construction of a Bus Stop, for full compliance with the Accessible Transport Standards. The attached series of photographs is included to support this opinion.

Although some sites are identified, it is not the intention of ILC NSW to criticize any Authority. The photographs show only examples of situations that are repeated many times throughout Metropolitan Sydney.

1. Recently, I overheard a lady tell her friends, “I don’t go to the Cemetery any more. I can’t get on and off the buses”. If the lady, an ambulant senior citizen, was talking about Botany Cemetery, then her difficulty is apparent in the first photograph. The Bus Stop outside Botany Cemetery in Bunnerong Road at Little Bay Road, Chifley, has a waiting shelter on a concrete slab. The Stop, which is on a designated Accessible Bus Route has no pathways and the slab is at the level of the road.
2. The second photograph shows the Bus Stop in Silverwater Road near South Street, Rydalmere, in the vicinity of a Housing Commission Estate. The Bus Stop is located on several Accessible Bus Routes. The photograph tells its own story.
3. The third photograph shows a typical suburban Bus Stop, which could easily be made Accessible by the replacement of a small area of grass by a concrete slab, as shown in the next photograph.
5. and 6. show typical examples of local Bus Stops with hard-stand areas, which cannot be accessed by people in wheelchairs.



7. The fifth photograph also shows a typical suburban Bus Stop, where the shelter is placed on the footway and a concrete slab is constructed so that through pedestrians can pass around the obstruction. Both the longitudinal grade of the street and the crossfall in the new slab far exceed the standard gradient of 1:40, creating a difficulty for bus passengers and a difficult passage for through pedestrians, particularly those with mobility disabilities. A better solution for this situation would have been to either select a more accessible site, or re-design this site to comply with Australian Standards.

8. Traffic leaving this residential street must turn left onto busy Canterbury Road. The location of the waiting shelter in the middle of the footway not only creates a difficulty for through pedestrians, but its advertising panel creates a hazard for drivers making the left-hand turn as it reduces the safe sight distance along Canterbury Road. The shelter should have been located within the park.

9. The longitudinal fall of the footway is approximately 1:12, far too great a gradient to be negotiated by a person with a mobility disability. The seat is 400mm high at one end, in compliance with AS1428.1, but it is 620mm high at the other end, making it unusable for many people.

10. This shelter is located off the main pathway, but the slab has a crossfall of 1:14, and the path beside the shelter is only 800mm wide. There is space within the shelter for the standing of a wheelchair, but it cannot be accessed.

11. This location is possibly the perfect site for a Bus Stop. The crossfall in the slab and footway is 1:40, and the longitudinal fall is also approximately 1:40. The shelter is set back from the 2 metre wide footway to allow for through pedestrians, the kerb is 150mm high, and there is wheelchair standing room within the attractive, see-through shelter. The advertising panel and a nearby street lamp provide limited lighting. A Timetable is provided, although the information would be more useful if it was provided in larger print. Not all Bus Stops can be provided in such ideal locations, but this is a good example of appropriate road and footway design providing an Accessible and safe Bus Stop.

Recommendations:

It is agreed that the Standards need to be more descriptive but, rather than complicate them by the inclusion of technical data relating to the provision of fully Accessible Bus Stops, it is **recommended** that a Check List be prepared for distribution to Local Authorities, which sets out all features to be considered in design/re-design.

Chapter 12 of the Allen Consulting Group report advise that the APTJC has the capacity to establish a Technical Experts Group to report on technical amendments to the Accessible Transport Standards. It is **recommended** that this Group be requested to develop a Check List of features that are required for the full accessibility of a Bus Stop.



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