

Yarra Trams

RESPONSE TO DRAFT REPORT

Review of the Disability Standards for Accessible Public Transport 2002

31 March 2008

Summary of Yarra Trams issues

(from our Submission to the review group)

In summary, Yarra Trams seeks the following amendments to the DSAPT, particularly due to the uniqueness of trams, as well as having infrastructure, that requires shared road use:

1. There is no applicable lighting standard for tram stops. The Australasian Railway Association developed a lighting standard for railway stations. A similar standard for tram stops is required.
2. Bus stops have a reduced compliance regime for waiting areas, symbols, signs, alarms, lighting, furniture and fitments, hearing augmentation and information. This does not apply to tram stops, but as they have similar usage in the same environment as bus stops and are often shared, the same compliance regime should apply.
3. Trams are in the unique position as a rail operator, where they must share the road with cars, trucks, bicycles, and buses. The DSAPT and associated legislation should espouse the Disability Discrimination Act to assist tram operators to provide an accessible public transport system.

Discussion on the Draft Report

The above summary points have not been addressed in the report.

a) Lighting Standard

The draft report actually believes that a lighting standard for tram stops was developed by ARA at the same time as the railway station standard was done. This is not the case, and unless the DSAPT is accepted as incorrect, there is a 100% non conformance.

b) Tram versus Bus Stop Compliance

This issue, which logically will apply to coach stops, as well as tram stops was discussed with the Attorney General's Department, who suggested it be dealt with in the 5 Year Review. Yarra Trams suggests this be done.

Refer to the email attached as Appendix A.

Response to the Draft Report

Yarra Trams requests

- a) that our initial submission to the Review Group be reviewed and adopted.
- b) that the proposal from Australasian Railway Association for development and acceptance of the Accessible Rail Services Code of Practice for adoption by the rail industry be adopted.

APPENDIX A

-----Original Message-----

From: Akers, Bridget [mailto:Bridget.Akers@ag.gov.au]

Sent: Friday, 25 June 2004 4:12 PM

To: Charles Ruth

Subject: FW: Tram Stop DDA Compliance

Ruth,

As discussed, information for Lindsay Donahoo.

Regards,

Bridget

Dear Lindsay,

Thank you for your email of 16 June 2004 asking for information about the compliance timeframes that apply to tram stops.

As your email notes, schedule 1 of the Transport Standards provides that different compliance timeframes apply to bus stops as apply to other types of infrastructure. Whilst it may be that tram stops and bus stops have similar characteristics, because the Transport Standards do not expressly provide that tram stops are subject to different compliance timeframes to other types of infrastructure (as they do with respect to bus stops), the compliance times that apply to tram stops are those that apply to infrastructure generally.

As you discussed with Bridget Akers of AGD on Tuesday, it may be that the compliance timeframes that apply to tram stops should be examined during the five year review of the Transport Standards. However, until further amendment is made to the Transport Standards, Tram stops should be made compliant with the Transport Standards within the timeframes that apply to infrastructure.

Regards,

Bridget Akers

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