



28 June 2023

Department of State Development, Infrastructure, Local Government and Planning
PO Box 15009
CITY EAST QLD 4002

Via email: 

Dear Sir/Madam

2022 Review of the Transport Standards – Sunshine Coast Council response

Sunshine Coast Council (Council) thanks the State for inviting input into the review of the Transport Standards, with the intention to reduce discrimination of people with a disability on public transport services. Council values and supports inclusivity, accessibility, and equitable transport choices for all users regardless of age or ability.

Council is not a public transport operator or provider. However, Council is responsible for the delivery and maintenance of many of the bus stops and their approaches within the local government area. Council also financially supports “Council Link” and funds two-year trials on new bus routes in the region.

Council is responsible for some 740+ bus stops and over the last 10 years Council has invested substantial budget and resources toward their upgrade and disability compliance. Since June 2022, Council has had almost 100% of its bus stops compliant. Currently 11 bus stops are classified as non-compliant and unable to be upgraded and achieve compliance without significant financial investment.

The bus stop upgrade program has given Council first-hand experience of the complexities in achieving compliance across a range of topographies and urban areas. Road cross-falls, particularly where overlays have built up the level of roads, create some of the most significant challenges for Council in achieving compliance at these locations. This experience has highlighted to Council that a “Performance based approach” may be more appropriate to achieve a DDA compliant bus stop. Council advocates that there are other “acceptable solutions” which can be tested with the affected user groups to demonstrate achieved compliance. The inclusion of an “acceptable solutions” options is proposed by Council after

site investigations and feasibility analysis have demonstrated the Transport Standards are unable to be met without significant financial investment and a more sustainable cost option is available. This flexibility in design solutions is of particular relevance at steep or hilly locations across the Sunshine Coast region where the current standards limit their adaptation to meet the range of abilities within our community.

Council further recommends that consideration of shade, obstacles on footpaths and the transitions which result from new driveway installations across existing footpaths should also be acknowledged within this review.

Council recognises that Translink have been active in exploring new applications for technology (such as hearing-impaired apps) for use on buses. Council welcomes the opportunity to reiterate its support for an app that highlights to the user which bus stops are suited to differing impairments. Council strongly advocates for the inclusion of technology which supports greater accessibility and inclusivity of Public Transport to be considered during this review. Council further welcomes the inclusion of a real time application software review with benefits expected to extend beyond disabled users to increased overall patronage with improved service and infrastructure provisions.

To that end, Council would like to highlight that the Disability Standards for Accessible Public Transport (AS1428 suite) compliance does not guarantee functional or dignified accessibility for the user.

Council has been proactive in ensuring that our supplementary guidance to the Disability Standards for Accessible Public Transport (AS1428 suite) Transport Standards is properly and pragmatically defined and has been undertaken in consultation with affected user groups. To better appreciate the strengths and limitations of the standards and supplementary guidance when applied on the ground, Council has undertaken two bus field trips with Kinetic Buses and a cross-section of disabled users. These Bus Stop Infrastructure Disability Audits included People with Disability (PWD) users reliant on wheelchairs, hearing impaired users, vision impaired users and walking frame users. It was observed that while some buses support wheelchair access, they are not inclusive of vision impaired users and do not meet the criteria of all abilities.

Key observations made by Council, during the Bus Stop Infrastructure Disability Audits included:

- PWD guests had difficulties exiting and entering the bus when the grades were higher (kerb ramp $\geq 12.5\%$); it made them feel unsteady and at risk of falling. The road crossfall at the bus stop is the main reason for the steep grades within the bus boarding area and ramp. The roadway crossfall at bus stops should be a maximum gradient of 5% to help the operations within the bus (vehicle).
- Bus stop seats should be a maximum height of 520mm as it was noted that higher seats were a problem for some commuters with varying abilities.
- For the bus stops that cannot be designed to be in line with the Practice Note due to terrain or other circumstances, it is recommended that further information is provided on both TransLink's and Council's websites explaining the potential difficulty of the specific site.
- The deployment of the bus boarding ramp caused difficulties for both wheelchair and walking frame users when mounting the edges of the ramp (footpath lip and ramp recess in the bus) and traversing the ramp hinge, when the internal bus crossfall was greater than 1.9%.

- This latest model of the Kinetic bus (the one used) has a ramp up between the driver and the PWD chair area level section. The ramp caused further difficulties for users as it increased the longitudinal grade of the bus, in this isolated section of the bus.
- This model bus has a retractable seatbelt for securing wheelchairs. The intent should also be to prevent the wheelchairs toppling over in bus operation, it is suggested that tethering needs more detailed consideration for operating issues.
- Finally, it was observed that there was no on-bus communication for the visually impaired to know what bus stop the bus was at.

Again, Council appreciates the opportunity to share key learnings from our recent Bus Stop Infrastructure Disability Audits including the challenges Council has faced trying to reach 100% Bus Stop Disability compliance.

On behalf of the Sunshine Coast Council and community we encourage continued collaboration to support inclusivity, accessibility, and equitable transport choices for all users regardless of age or ability.

Should you require any further information or wish to discuss the contents of this letter, please contact Yolanda Burt, Coordinator Transport Strategy and Policy via email at

Yours sincerely

Emma Thomas
CHIEF EXECUTIVE OFFICER

cc. Scott Taylor, Group Executive, Built Infrastructure
Julie Edwards, A/Manager, Strategic infrastructure Planning & Policy