



ALGA

Australian Local
Government Association

Submission on the Exposure Draft: Disability Standards for Accessible Public Transport Amendment 2025

November 2025

Introduction

The Australian Local Government Association (ALGA) welcomes the opportunity to provide feedback on the exposure draft of the Disability Standards for Accessible Public Transport Amendment 2025 (the amendments). We note these amendments give effect to the reforms to the Transport Standards that were announced by the Australian Government on 20 March 2024.

We acknowledge the Transport Standards Guidelines (Guidelines) have also been updated to reflect the proposed amendments, remove outdated content, and better support interpretation of the Transport Standards.

ALGA is the national voice of local government in Australia, representing 537 councils across the country. In structure, ALGA is a federation of state and territory local government associations. This submission should be read in conjunction with any separate submissions received from state and territory associations as well as individual councils.

As a signatory to Australia's Disability Strategy, **ALGA supports the intent of these amendments to improve public transport accessibility for people with disability**. Access to public transport is fundamental to social inclusion, economic participation, and community engagement. Local government plays a critical role in delivering accessible public transport infrastructure, including bus stops, footpaths, passenger loading zones, taxi ranks, and park-and-ride facilities.

However, we emphasise that these changes will create **significant financial and operational impacts for local government**. The funding mechanisms remain inadequate and prevent councils from keeping up with the delivery of new or upgraded infrastructure. Councils are reliant on own-sourced revenue and in some jurisdictions cannot apply developer contributions to fund public transport infrastructure on local roads. ALGA continues to call for an increase in untied Federal Government funding for local government, to provide long-term financial certainty and security for all councils.

The diversity of Australian councils, from small rural shires to major metropolitan cities, means impacts will vary considerably in scale and complexity. What remains consistent is that all councils will need to balance these new requirements against existing statutory obligations, community service delivery, and infrastructure maintenance needs, in a climate of fiscal uncertainty and budgetary constraint for many councils.

This submission highlights key areas where greater clarity, practical guidance, and implementation supports are needed to ensure these important accessibility improvements can be delivered effectively by local government. Please note this submission includes comments and suggestions for both the exposure draft and the accompanying Guidelines.

General Observations

Support for Improved Accessibility

ALGA supports modernising the Transport Standards to reflect current best practice, technology advances, and the needs of people with disability. The comprehensive consultation process undertaken to develop these reforms is acknowledged and appreciated.

Transitional Provisions

The transitional provisions outlined in Part 35 of the exposure draft demonstrate thoughtful consideration of projects underway at commencement. The distinction between projects that have and have not reached the "approach to market" or "relevant approval" stages is generally sound.

Alignment with Other Standards

The alignment with the Premises Standards and updates to Australian Standards references are appropriate and will reduce duplication in some areas.

Need for Implementation Support

The success of these amendments will depend significantly on the availability of practical implementation support, technical guidance, and opportunities for ongoing consultation during the transitional periods. This includes discussing with councils what unique needs they may have in implementing the reforms.

Key concerns and recommendations

On-Street Infrastructure Requirements (Part 8, Sections 8.11-8.13)

Issue: New sections 8.11, 8.12, and 8.13 introduce substantial requirements for passenger loading zones, taxi ranks, and public parking areas on public streets and within council-managed infrastructure.

Impact: These requirements apply to infrastructure managed by councils. The scale of impact will vary significantly, with some councils facing upgrades to hundreds of bus stops, multiple car parks, and extensive footpath networks requiring tactile ground surface indicators (TGSIs) and kerb ramps.

The 10-year transitional period for existing assets, while appreciated, presents challenges for councils to:

- Conduct comprehensive audits of all affected sites
- Prioritise works across potentially thousands of locations
- Integrate upgrades with scheduled road and footpath maintenance programs
- Secure necessary budget allocations across multiple budget cycles
- Coordinate with utilities and existing street furniture

A 10-year transition is only attainable with sustained funding support from other levels of government. In the absence of funding support, a longer transition period for local government would support accessibility improvements when infrastructure is scheduled for renewal.

This also represents an example of cost shifting onto local government. Councils are responsible for providing and maintaining bus stop infrastructure on local roads, yet they do not operate the bus services. As a result, they have no mechanism to recoup costs from bus service providers or bus users, despite being required to meet new compliance standards. This unfunded mandate places additional strain on local government budgets already under pressure from competing infrastructure and service delivery needs.

Recommendation 1: The Guidelines should include practical prioritisation frameworks that allow councils to sequence works based on usage levels, proximity to key destinations, and integration with planned maintenance activities. The Guidelines should also provide clear, relevant examples of how the requirements apply to common scenarios, including:

- Small rural bus stops with minimal usage
- Shared zones and traffic-calmed areas
- Locations with significant space constraints
- Integration with existing street furniture and utilities

Tactile Ground Surface Indicators (Part 18)

Issue: The amendments significantly expand TGSi requirements, including new luminance contrast standards (Section 18.2) and requirements for TGSIs at bus boarding points (Section 18.3), railway stations (Section 18.4), and wharves (Section 18.5).

Impact: Councils manage thousands of bus stops and footpath networks. While new TGSi specifications for directional indicators will improve wayfinding for people with vision impairment, retrofitting existing infrastructure will be complex and costly. The requirement for existing TGSIs to meet new luminance contrast standards within 10 years raises practical questions about:

- Testing methodologies for existing TGSIs
- Whether non-compliant TGSIs must be replaced immediately or can remain until scheduled replacement
- Prioritisation of high-use versus low-use locations
- Integration with footpath renewal programs
- Costs associated with updating TGSIs

Recommendation 2: The Guidelines should include:

- Practical, field-tested methods for assessing luminance contrast of existing TGSIs
- Clear guidance on when existing TGSIs must be replaced versus when they can remain until scheduled renewal
- A risk-based prioritisation framework
- Specifications for durable materials suitable for high-traffic outdoor environments

Recommendation 3: Clarify what constitutes "substantial refurbishment" that triggers immediate compliance for existing infrastructure (for example, does resealing a footpath trigger TGSi replacement?). Where TGSIs have already been installed at bus stops, updates to meet new standards should occur only at the point of asset renewal. This avoids unnecessary cost shifting to local government for services they do not operate.

Lighting Requirements (Part 20, Section 20.1)

Issue: The shift to a performance-based standard for lighting in premises and infrastructure creates uncertainty. The requirement to "deliver appropriate lighting solutions for the diverse and nuanced requirements of people with disability while also meeting the unique safety, contextual and operational requirements" lacks objective criteria.

Impact: Without clear metrics or technical specifications, councils and auditors may interpret "appropriate" differently, leading to:

- Inconsistent implementation across jurisdictions
- Compliance assessment difficulties
- Potential disputes
- Uncertainty for budgeting and design processes

Performance-based standards work well when supported by robust guidance and clear assessment criteria. In the absence of these, prescriptive technical standards provide greater certainty.

Recommendation 4: Clarify how compliance with the performance-based lighting standard will be assessed and by whom and either:

- Retain technical specifications for lighting levels (e.g., lux requirements for different contexts); or
- Provide detailed guidance material with objective performance metrics, measurement methods, and practical examples of compliant lighting solutions for common public transport infrastructure types

Definitions and Transitional Provisions (Part 35, Section 35.1)

Issue 1 - "Relevant Approval": The definition states "an approval or a development application (however described) for the premises or infrastructure" but does not specify the precise timing. It is unclear whether this means when a development application is:

- Lodged
- Approved
- When a construction certificate is issued
- When another approval milestone is reached

This creates uncertainty for multi-stage projects, staged construction, and progressive upgrades, which impacts councils as primary land-use managers.

Issue 2 - "Approach to Market":

It is also unclear whether the definition includes:

- Expression of Interest (EOI) processes
- Requests for Quote (RFQ) versus Requests for Tender (RFT)
- Panel arrangements
- Direct procurement under financial thresholds

Recommendation 5: Revise the "relevant approval" definition to specify the precise approval milestone that triggers application of the existing standards to projects underway. Provide examples of how this applies to staged developments and progressive upgrades.

Recommendation 6: Clarify which procurement methods are captured by this definition.

Handrails on Infrastructure (Part 11, Sections 11.1-11.2)

Issue: Section 11.2 requires continuous handrails on access paths, specifically identifying overbridges and subways, with requirements for luminance contrast, height specifications, and interruption indicators.

Impact: Many existing pedestrian bridges and subways managed by councils lack continuous handrails. Retrofitting may be structurally complex and expensive, potentially requiring:

- Structural engineering assessments
- Modifications to existing structures
- Consideration of heritage values for older infrastructure
- Substantial capital expenditure

The application table indicates these requirements apply to "new and substantially refurbished/upgraded assets" but does not specify a transitional period for existing infrastructure that is not being substantially refurbished.

Recommendation 7: Provide a transitional period for existing overbridges and subways that will require substantial refurbishment or upgrading, and include practical guidance, to allow councils to:

- Conduct structural assessments
- Plan and budget for retrofits
- Integrate works with scheduled bridge and subway maintenance programs.

Recommendation 8: Clarify what triggers compliance for existing structures. For example, does routine maintenance (such as repainting) trigger the requirement for continuous handrails?

Braille and Tactile Signage (Part 17, Sections 17.6-17.6D)

Issue: Extensive new requirements for braille and tactile signage align with the Premises Standards but create practical challenges for outdoor public transport infrastructure including bus shelters, passenger loading zones, and taxi ranks.

Impact: While improving accessibility for people with vision impairment, outdoor braille and tactile signage faces:

- Vandalism risks in public spaces
- Weather exposure and durability challenges
- Higher replacement costs
- Maintenance requirements

The requirement applies immediately to new and replacement signage, which means councils must ensure all new signage meets these requirements as soon as the amendments commence.

Recommendation 9: The Guidelines should include:

- Durability standards specific to outdoor public transport infrastructure
- Maintenance protocols and expected lifespan guidance
- Practical examples of vandal-resistant materials and designs
- Guidance on prioritising braille signage at high-value information points

Accessible Parking (Part 8, Section 8.13)

Issue: The requirement for "one accessible parking space for every 50 parking spaces where there are more than five parking spaces" applies to council-operated parking facilities.

Impact: This may require:

- Reallocation of existing spaces in paid parking areas (potential revenue impact)
- Physical modifications (line marking, signage, access paths)
- Changes to parking management systems

Some areas may already exceed this ratio under state or local planning requirements, creating the potential for confusion.

Recommendation 10: Clarify how these requirements interact with existing state and local planning requirements for accessible parking.

Recommendation 11: Provide guidance on managing the transition for paid parking areas where reallocation of spaces may impact parking revenue.

Coordination with other standards

The amendments frequently references alignment with the Premises Standards, which is generally positive. However, greater clarity is needed on:

- Scope boundaries between the Transport Standards and Premises Standards
- Which standard takes precedence when requirements differ
- Simplified compliance pathways when both standards apply to the same infrastructure

Recommendation 12: The Guidelines should clearly explain the interaction between the Transport Standards and Premises Standards, with practical examples of common scenarios where both may apply (e.g., accessible toilets in transport precincts, station buildings).

Implementation support requirements

The success of these amendments depends on comprehensive implementation support that recognises:

Varying council contexts:

- Different scales of affected infrastructure
- Urban, regional, and rural settings
- Different existing accessibility levels
- Varying technical and financial capacity

Resource constraints:

- Limited specialist accessibility staff in many councils
- Competing budget priorities
- Need to sequence works efficiently

ALGA requests the following council-specific implementation support:

Recommendation 13: The Commonwealth should facilitate discussion with state and territory governments regarding potential funding support mechanisms or partnership arrangements to assist councils with implementation.

Recommendation 14: Provide tailored and place-specific webinars and training for councils prior to commencement and during the transitional periods, with recordings available for ongoing reference.

Recommendation 15: Establish an ongoing technical support mechanism such as a helpdesk or community of practice or a platform for councils to share practical solutions and lessons learned during implementation.

CONCLUSION

ALGA supports the policy intent of improving public transport accessibility. These amendments represent a significant modernisation of the Transport Standards that will deliver important benefits for people with disability.

Successful implementation by local government requires:

- **Comprehensive implementation support** including funding, training and technical assistance
- **Greater clarity** in key definitions and transitional provisions
- **Practical guidance** that recognises the diversity of council contexts
- **Ongoing consultation** during the transitional periods
- **Recognition** of the significant financial and operational impacts on councils
- **Discussion** of potential support mechanisms to assist with implementation.

ALGA seeks ongoing engagement with the Commonwealth as the amendments are finalised and as the updated Guidelines and implementation support materials are developed.

We welcome the opportunity to discuss this submission further.

Sincerely



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