

# Temporary Exemptions Report

Department for Infrastructure and Transport – South Australia



**Reporting Period: 1 October 2019 to 30 September 2020**

The South Australian Department for Infrastructure and Transport on behalf of the Rail Commissioner maintains all rail infrastructure and provides tram and train services within Metropolitan Adelaide.

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## Introduction

### Rail Network

The South Australian Department for Planning Transport and Infrastructure (the Department) on behalf of the Rail Commissioner maintains all rail infrastructure and provides tram and train services within Metropolitan Adelaide.

The Adelaide Metropolitan Passenger Rail Network (AMPRN) comprises 132 kilometres of railway track on the Seaford, Gawler, Outer Harbor, Belair, Grange and Tonsley Lines, including 40 kilometres of electrified railway, 88 railway stations, 297 pedestrian crossings, 70 diesel railcars, and 22 electric railcar sets with 12 additional electric sets on order.

The Rail Network also includes 16 kilometres of 600 volt tramline, 33 tram stops, 15 Flexity and 9 Citadis trams.

The Department is a member of the Australasian Railway Association (**ARA**).

On 1 October 2015, the Australian Human Rights Commission (**AHRC**) granted temporary exemptions to members of the ARA in relation to various provisions of the *Disability Standards for Accessible Public Transport 2002 (Cth)* (**Transport Standards**) and the *Disability (Access to Premises – Buildings) Standards 2010 (Cth)* (**Premises Standards**).

The Department provides this report in relation to the Network and some of the temporary exemptions that contain reporting requirements.

This report is for the period 1 October 2019 to 30 September 2020 (**Reporting Period**) and is based on the best information available to the Department.

Should you have any feedback in relation to this report, please contact:

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## **Adelaide Metropolitan Rail Network (Trains) Audit**

In the 2018-2019 report, the Department indicated a commitment to undertake a full compliance audit of the Adelaide Metropolitan Passenger Rail Network (AMPRN), through an external contractor. This audit commenced in April 2020. The associated reporting will be used to develop a prioritised Disability Action Plan for future compliance upgrades across the AMPRN.

The intention of the audit was to gather a clear and current understanding of the network, to determine levels of compliance impacted by major or minor works, maintenance or degrading infrastructure over time and landscaping, arts or other projects that may have potential to impact compliance.

### **Future planning and compliance**

Works across the network are led by prioritised funding, election commitments, focus on improving pedestrian safety where critical safety risk is present, and grade separation projects. Major Infrastructure works continue to occur, including Flinders Link, Gawler Electrification Project and the North-South Corridor which will all improve pedestrian access and facilities.

During the reporting period the Department withdrew from a further exemptions application via the Australasian Railway Association. The Department has instead committed to focus on compliance through improved risk identification and development of a prioritised program specific to accessibility improvements and compliance and reflective of funding capacity, new infrastructure and modernisation of the DSAPT.

## Part A: Exemptions from the Transport Standards

### 2.1 Access paths – Unhindered Passage

#### Temporary exemption: Rail premises and rail infrastructure

*For a period of five years, flange gaps of up to 75 mm are permitted where a level crossing forms part of an access path on rail premises or rail infrastructure.*

#### Reporting requirements:

- a. Action taken to improve safe use of level crossings where they form part of an access path.

The Department continues to employ a number of measures to improve level crossing safety, such as:

- maintaining existing pedestrian crossings to a high degree;
- installing electromagnetic latches and gates that automatically close as the train approaches, and;
- grade separating access paths to rebuilt stations.

The Department continues to conduct civil inspections of rail crossings every 13 weeks, as per the Department's *Track and Civil Code of Practise CPTS953 – Management Principals*, which seeks to identify any safety issues as early as possible. Inspections check for uneven surfaces and/or required repairs and where a defect is detected, this work will be actioned based on priority and need.

Engineering and infrastructure improvements, installation of warning signals and automatic pedestrian gates, education and enforcement continue to be necessary to improve safety at existing crossings.

The Gawler Electrification project remains ongoing with upgrades of several crossings to occur over the life of the project. The project is currently actively assessing, with results of the AMPRN audit central to the assessment, priority upgrades to intersections and stations that can be further incorporated into the project.

- b. The Department's Railway Crossing Safety Strategy, as reported in previous years, continues to provide rail safety awareness and identification of safety risks for the public. Information is available on the Department's website and provides access to a range of information. Progress made in the removal of level crossings.

The Department seeks to include safety in design processes and meet its strategic directive of "zero harm". This is done by reducing the number of railway crossings via closure or grade separation, as well as excluding additional crossings from new works. Reducing the probability of traffic and pedestrians meeting rail conveyances will reduce the potential of accidental harm on the Rail Network.

- c. Any developments in research into possible technical solutions for bridging flange gaps.

As reported previously, the Australasian Centre for Rail Innovation continues to undertake a 'Rail Flange Gap Risk Reduction' project which will investigate available treatments for rail flange gaps and trial a variety of solutions to provide advice on the safest and most suitable solution. A public date for the intended completion of the research and associated findings is not yet available. Once completed, the Department will consider the suitability of the findings for the network.

**Temporary exemption: Existing rail premises and existing rail infrastructure.**

*For a period of five years, an access path is required to provide entrance and exit only at a single boundary point for existing rail stations where providing access at each entrance would require significant structural building work or not be feasible due to space, topographical or heritage reasons.*

**Reporting requirement:**

- a. Rail stations which have inaccessible entrances.

For the purpose of this report, a station with an 'inaccessible entrance' is a station which is 'accessible only by steps'.

The Department does not have any locations where there is 'stair only' access to train stations or tram stops.

Adelaide Railway Station is a heritage listed building with all entrances accessible with one leading from North Terrace via a steeper ramp. This ramp does not meet the required gradient, however, it has hazard tactile ground surface indicators, rest areas and handrails installed.

All other entrances on North Terrace are accessible via lift, stairs and escalators and are signposted.

Each of the entrance options leads to all the accessible facilities within the precinct such as accessible toilets and accessible gates leading to the platforms.

**2.4 Access paths - Minimum unobstructed width**

**Temporary exemption: Existing rail premises and existing rail infrastructure.**

*For a period of five years, for existing rail premises and existing rail infrastructure:*

- *where the 1200 mm minimum unobstructed width for access paths cannot be met due to structural and technical constraints, an access path with a minimum unobstructed width of 1000 mm may be provided;*
- *the 850 mm minimum unobstructed width (applicable to doorways and gateways) is also permitted on access paths for the purposes of passing an obstruction limited to less than 800 mm in length; and*
- *platform edge warning TGSIs are permitted to intrude into access paths.*

**Reporting requirement:**

- a. Stations with restricted paths of travel.

The AMPRN audit has provided a better understanding of the compliance issues across the network relevant to this clause. It has identified a restricted path of travel in a number of stations not previously identified<sup>1</sup>.

The following stations have been identified as having restricted paths of travel, with further assessment of the Outer-harbour and Seaford lines required for a full understanding:

Blackwood	Warradale	Greenfields	Marino
Pinera	Torrens Park	Unley Park	Christie Downs
Goodwood	Smithfield	Port Adelaide	Belair
Millswood	Coromandel	Lynton	Mitcham
Tambelin	Womma	Nurlutta	Parafield Gardens
Dry Creek	Kilburn	Dudley Park	Ovingham
North Adelaide	Grange	East Grange	Seaton Park

The Department has robust requirements in the current Station Standards that are considerate of accessibility within the rail environment, and includes that, where possible, all access paths should be a minimum of 1800 mm in width. These standards are used in the design and development of all new and upgraded stations where the width of the rail corridor allows for the full 1800mm across all access paths.

## **2.6 Access paths – Conveyances**

### **Temporary exemption: Existing rail conveyances.**

*For a period of five years, an access path is only required at a single door rather than all doors of existing rail conveyances.*

### **Reporting requirement:**

- a. Measures taken to ensure that staff and passengers are adequately informed of both the access paths available at the doors of existing rail conveyances and the equivalent access measures available.

All train and tram stations continue to encourage one entry point on conveyances with a one (1) metre square blue and white international symbol for access painted on the platform that aligns with the front door of the leading railcar. This allows for assisted access where required through ramp deployment, and ensures on time running of the networks. If the allocated spaces available in the front carriages are full, train drivers are trained to deploy the ramp at the second or subsequent carriage to allow access to alternative allocated spaces.

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<sup>1</sup> Restricted paths of travel may not have previously been identified as a result of a previous lack of understanding of the measurement requirements or in some instances due to the installation of shelters, lighting, security equipment, etc.

The trams across the city and many of the suburban platforms are now level access and allow for multiple entry points.

The Adelaide Rail Station (ARS) has been the focus of a trial of gap filler to enable level and unassisted entry onto conveyances, and funding is currently being sought to undertake a full rollout of the gap filler across all platforms at ARS and potentially to all doors if practicable, to allow entry to all doors of the conveyances.

Of note, the department has not recorded any complaints or feedback since the commencement of the temporary exemptions from commuters regarding concerns with accessing only one door to a conveyance.

#### **4.2 Passing areas – Two-way access paths and aerobridges**

##### **Temporary exemption: Existing rail platforms.**

*For a period of five years, for existing rail platforms, a passing area every 9 metres along any two-way access path that is less than 1800 mm wide is permitted where it is not possible to provide one every 6 metres due to structural or heritage constraints.*

##### **Reporting requirement:**

- a. Rail station platforms which do not provide passing spaces every 6 metres where any two-way access path is less than 1800 mm wide.

During the reporting period, the City South Tram Stop was rebuilt to provide improved accessibility and amenity for all users, and to cater to existing and predicted residential and commercial growth in the area.

The AMPRN audit identified several non-compliances regarding passing areas on two-way access paths. For example, Salisbury Interchange previously allowed for two-way access around a building situated on one platform to enable exiting from the platform at the southern end. Due to a reconfiguration of gates to close off a non-compliant access path and introduce ticket validation gates, the southern end of the platform is now only accessible via a two-way access path that for a period of 12 metres is 1250mm wide. Completion of the AMPRN audit will identify any other stations that have been impacted by works over time.

#### **5.1 Resting points – When resting points must be provided**

##### **Temporary exemption: Existing rail premises and existing rail infrastructure.**

*For a period of five years, compliance with clause 5.1 is not required for existing rail premises and existing rail infrastructure to the extent that site constraints prevent compliance (rather than only add expense or difficulty).*

##### **Reporting requirements:**

- a. Outcome of consultation.

The Department continues to monitor feedback from customers and seeks guidance and advice from the department's Disability Access and Inclusion Committee. All upgraded stations have seating and allocated space at rest points along continuous accessible paths of travel. The Department has to date not received any requests for additional resting points or complaints regarding a lack thereof.

b. Locations of any non-compliance.

For the purpose of this report, a 'non-compliance' refers to a station which 'does not contain a resting point along an access path if the walking distance between facilities or services exceeds 60 metres'.

The AMPRN audit has improved the understanding of non-compliances relating to resting points. As a result, an increased number of stations failing to provide adequate resting spaces are included in this report. Previous reporting may have been influenced by a lack of understanding of the measurement requirements by previous auditors, and changes and retrofitting over time including removal of seating and additions of walkways, maze-ways, shared paths and car parking adjacent to stations.

The audit has identified that the following lines have stations with non-compliances (results of Outer Harbour and Seaford still to be reported):

- 23 Stations on the Gawler line;
- 4 Stations on the Grange Line;
- 5 Stations on the Belair Line; and
- 0 Stations on the Tonsley Line.

As a matter of priority the Department is identifying and improving stations where issues such as removal of seating or minor changes to paths have occurred, which may require low cost and simple modifications to station to achieve compliance.

#### **6.4 Slope of external boarding ramps**

##### **Temporary exemption: Rail conveyances.**

*For a period of five years, where the relationship between the platform and rail carriage means that an external board ramp can only be provided at a gradient greater than 1 in 8 and less than 1 in 4, ARA members are not required to provide staff assistance in ascending or descending the ramp.*

##### **Reporting requirements:**

- a. Number of locations where boarding ramp slopes of 1 in 8 or better cannot currently be achieved.

29 existing stations do not provide 1 in 8 boarding ramp slopes. These stations are low patronage 'neighbourhood' stations and usually do have access at the next station, as recommended in the guidelines. These stations are:

Belair	Pinera	Glenalta	Mitcham
Unley Park	Marino Rocks	Marino	Warradale
Woodlands Park	Edwardstown	Emerson	Goodwood
Woodville Park	Clovelly Park	Mitchell Park	Kudla
Womma	Dry Creek	Islington	Ovingham
North Adelaide	Seaton Park	Outer Harbor	Midlunga

Taperoo	Draper	Peterhead	Alberton
Cheltenham			

- b. Measures to be taken to increase the number of locations where external boarding ramp slopes of 1 in 8 or better will be achieved.

All new and rebuilt stops and stations provide level access. Existing Key Node and Interchange stations provide 1 in 8 gradient or better (mostly level) access to conveyances.

During 2019/20 platform raising investigations were undertaken at Woodville Park and Gawler Central stations, with works to be completed in 2020/21. Woodville Park raised platform is scheduled to commence in October 2020, with Gawler Central placed on hold due to engineering and design constraints.

- c. Results of examination of alternative methods of achieving accessible boarding.

The investigation listed at point b has identified an appropriate platform outcome to be trialled at Woodville Park station. Following this trial consideration will be had to cost, benefit and effectiveness of the product for any future installation where funding is available.

## **8.2 Boarding – When boarding devices must be provided**

### **Temporary exemption: Rail conveyances.**

*For a period of five years, a manual or power assisted boarding device is only required at a single door rather than all doors of a rail conveyance.*

### **Reporting requirement:**

- a. Measures taken to ensure that staff and passengers are adequately informed of both the doors of rail conveyances at which boarding devices are available and the equivalent access measures available.

As above, all train and tram stations have a one (1) metre square blue and white international symbol for access painted on the platform that aligns with the front door of the leading railcar. Boarding Help signs are also located in close proximity to the access point to advise passengers of locations where boarding devices will be available to access the conveyance. i.e. “Boarding Help – when the tram is due wait at this symbol for boarding ramp.”

As above, the allocated spaces available in the front train carriages are full, train drivers are trained to deploy the ramp at the second or subsequent carriage to allow access to alternative allocated spaces. This approach helps with on time running, which is identified as a beneficial outcome for all commuters. Of note, failing to maintain on-time running is a regular concern for commuters, and no complaints have been recorded during the exemptions period regarding a lack of access to an alternative door from people in wheeled devices.



#### **Boarding Help Sign and Access Patch – City South Tram Stop**

In addition; accessibility Fact Sheets to make travelling on public transport easier and more accessible for people with disabilities are available to download or view at:

<https://www.adelaidemetro.com.au/Using-Adelaide-Metro/Accessibility-Disability>

Topics of particular interest for people with a disability include:

[Using Your Motorised Mobility Device on Public Transport](#) PDF

[Safer Travel for Passengers using wheelchairs on Public Transport](#) PDF

[Safer Travel for Passengers using wheelchairs on Public Transport](#) RTF

[Priority Seating and Allocated Space on Public Transport](#) Word

[Priority Seating and Allocated Space on Public Transport](#) PDF

#### **11.2 Handrails and grabrails - Handrails to be provided on access paths**

##### **Temporary exemption: Rail platforms.**

*For a period of five years, rail platforms are exempt from clause 11.2*

##### **Reporting requirement:**

- a. Where a request is made but the installation of a handrail does not proceed, report on the request and the reasons for not taking action.

The Department continues to monitor feedback from our customers. No requests for handrails or grabrails on an access path, outside of those provided, have been received during the reporting period. The Department install handrails and grabrails to achieve safety in the design of all new stations and any upgrades to stations.

From the Departments perspective, risk and safety, impact on accessible path of travel, and issues presented for people with vision impairment are a consideration required in the assessment of the outcomes associated with this clause, and as such handrails and grabrails are not currently provided on rail platforms.

Of note, no complaints have been recorded over the period of the exemption relating to no handrails or grabrails being available on platforms and no requests for the installation of handrails or grabrails have been received.

## **Part B: Exemptions from the Premises Standards**

### **H2.2 - Accessways**

#### ***Temporary exemption: Rail premises and rail infrastructure***

*For a period of five years, flange gaps of up to 75 mm are permitted where a level crossing forms part of an access path on rail premises or rail infrastructure.*

#### **Reporting requirements:**

- a. Action taken to improve safe use of level crossings where they form part of an access path.

Please see the Department's response at *Part A – 2.1 – Access Paths Unhindered passage*.

- b. Progress made in the removal of level crossings.

Please see the Department's response at *Part A – 2.1 – Access Paths Unhindered passage*.

- c. Any developments in research into possible technical solutions for bridging flange gaps.

Please see the Department's response at *Part A – 2.1 – Access Paths Unhindered passage*.

#### ***Temporary exemption: Existing rail premises and existing rail infrastructure***

*For a period of five years, an access path is required to provide entrance and exit only at a single boundary point for existing rail stations where providing access at each entrance would require significant structural building work or not be feasible due to space. Topographical or heritage reasons.*

#### **Reporting requirements:**

- a. Rail stations which have inaccessible entrances.

The Department does not have any stations with inaccessible entranceways.

#### ***Temporary exemption: Existing ail premises and existing rail infrastructure***

*For a period of five years, for existing rail premises and existing rail infrastructure:*

- *Where the 1200 mm minimum unobstructed width for access paths cannot be met due to structural and technical constraints, an access path with a minimum unobstructed width of 1000 mm may be provided;*
- *The 850 mm minimum unobstructed width (applicable to gateways and doorways) is also permitted on access paths for the purposes of passing an obstruction limited to less than 800 mm in length; and*
- *Platform edge warning TGSIs are permitted to intrude into access paths.*

**Reporting requirements:**

- a. Rail stations which have restricted paths of travel.

Please see the Department's response at *Part A – 2.4 – Restricted path of travel.*



Tony Braxton-Smith  
**CHIEF EXECUTIVE**

02.09.2020