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**File Ref:**  
ADOT2016/1026-001-0022

Marcus James  
General Manager  
Road Safety and Productivity Branch  
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*Marcus*  
Dear Mr James

**Re: Whole Journey Guide: A Guide for thinking beyond compliance to create accessible Public Transport Journeys.**

Thank you for your letter of 27 March 2017, seeking comments on the consultation draft of the *Whole Journey Guide: A Guide for thinking beyond compliance to create accessible Public Transport Journeys*.

The *Whole Journey* document is a helpful guide for all those involved in planning and implementing change to public transport infrastructure. The concept of going beyond compliance to create accessible public journeys is an important way of thinking to ensure that all parts of a journey are accessible.

The Northern Territory Government planning process for public transport infrastructure already takes into account whole journey compliance and is fully supported. Strategies are in place to continuously increase and improve overall accessibility of the network, and its associated infrastructure. The NT is a small (population-wise) but geographically vast jurisdiction so solutions are worked through practically. There are relatively no impediments to finding all key stakeholders (private and Government) and working through an integrated and practical whole-of-journey solution. This document would support this process.

My Department has reviewed the Guide and is supportive of the broad direction, however the Department has found that there are some challenges to providing whole journey accessibility as outlined in *The Whole Journey* such as:

The Department has found that certifiers and designers do not always interpret the Australian Standards in a consistent fashion. Section 4 provide good guidelines but there needs to be clear and sensible regulatory requirements that follow on from this. Training should be provided to certifiers and designers so that design of accessible transport is the same across Australia and people with a disability can journey with ease no matter where they are. In particular the Department has found the requirement of 150 lux lighting levels as clearly stated in *Disability Standards for Accessible Public Transport 2002* in bus stops to be unsafe and unachievable (glare levels to passing cars unacceptably high, and uncomfortable to passengers within the shelter at night). In addition, the requirement for a minimum of 2 wheelchair spaces in a bus shelter is difficult to achieve as this would take more than 50% of the available seating space. Finally, there seems to be significant inconsistency amongst certifiers and designers on tactile installation/way finding methodology in public bus interchanges.

There seems to be inconsistency in the standards applicable to public transport infrastructure and public infrastructure in general. For example, it may be quite difficult for a person with a disability to navigate from the public transport network into a shopping centre or other privately owned but publicly used spaces. Strategies to retrofit and improve the accessibility in these public spaces should be implemented so that it is indeed the whole journey including the destination that becomes accessible to someone with a disability.

General public education and how to improve public awareness of infrastructure in place to assist people with a disability should be discussed. Often tactile installation and way finding is inhibited by shop/stall holders and other entities obstructing a pathway either temporarily or permanently with advertising signage or other equipment, due to overall lack of knowledge of the meaning and use of way finding.

An additional influencing factor to assisting a person's journey should take into account general public/community assistance. Raising community awareness and instilling in people to watch out for and assist people with a disability along their journey should be actively encouraged. The Department's signage on buses to encourage people to give up their seat for someone elderly, pregnant or disabled is one such awareness raising method, but other improvements and strategies are possible.

If you require any further information please contact Mr Alex Rae, Director Passenger Transport, 08 8924 7110 or [alex.rae@nt.gov.au](mailto:alex.rae@nt.gov.au).

Yours sincerely,



Andrew Kirkman  
Chief Executive

27 May 17