

# Northern Territory Submission

## Review of the Disability Standards for Accessible Public Transport 2002

## **A. Introduction**

As the Minister for Transport and Infrastructure, I am pleased to make a submission to this Review and provide some insight into its observations and experience in working with the Standards since their inception in 2002. I believe that a major outcome of the Review process will need to be a more practical application of the Standards, if the twin goals of efficiency in the provision of the infrastructure and effectiveness of the Standards in improving the accessibility to public transport for disabled people, are to be achieved.

## **B. Background**

Urban public transport in the Northern Territory is dominated by the provision of public bus services. The Northern Territory Government contracts the provision of these services in Darwin and Alice Springs. Other public transport services include taxis, private hire vehicles and the ferry service between Darwin and Mandorah, a small community on the far side of Darwin Harbour. There are no urban rail services.

### ***Buses***

Public bus services in the Darwin area are provided by two operators:

- Darwin Bus Service (DBS) is a Government-owned bus fleet which operates as a Government Business Division.
- Buslink Pty Ltd is a private bus operator that also operates the fledgling Alice Springs public bus service.

The comments on practical application of the Standards provided as part of this submission relate principally to the provision of services by the DBS.

Information is provided on the taxi assistance schemes that the Northern Territory has in place for disabled users.

DBS is currently contracted to provide 25 buses to operate on the urban network, 23 of which are low-floor easy-access type vehicles – more than 90% of the contracted fleet. The total DBS fleet is 30 buses. The additional buses are used as spares. DBS operates six days a week, with 25 buses provided Monday to Friday and 17 buses on Saturday. DBS believes that all the 23 low-floor easy-access vehicles, the first manufactured in October 1995 and the last acquired in May 2006, comply with the applicable Standards as provided by the Australian manufacturers and as requested in more recent times as contractual obligations included in all supply contracts.

Buslink is contracted to supply 21 buses for the urban passenger services and has 24 that are classed as low-floor buses with ramps.

### ***Infrastructure***

Bus service infrastructure in the Darwin area consists of three main interchanges (Darwin city, Casuarina and Palmerston shopping centres), with around 500 bus stops, 200 of which are shelters. The infrastructure is owned and maintained by the Northern Territory Government.

The passenger terminals servicing the Ghan passenger rail service at Darwin, Katherine and Tennant Creek are also the responsibility of this Government as is the ferry terminal located at Cullen Bay.

Any improvements at these facilities for compliance with the Standards are currently a Northern Territory Government funding responsibility.

An assessment of the bus shelters and stops is being undertaken with reference to the Transport Standards. None of the existing bus shelters and stops will be fully compliant. However, the assessment will provide template design plans that, in accordance with the interpretation of the Disability Standards for Accessible Public Transport 2002 and Disability Standards for Accessible Public Transport Guidelines 2004 (No 3), should comply when constructed. These templates will be used for the ongoing construction program of upgrades to, and provision of new, shelters and stops.

### ***Taxis***

There are approximately 150 taxis in the Northern Territory servicing Darwin, Alice Springs, Katherine, Nhulunbuy and Tennant Creek. Multipurpose Taxis (MPTs), which are wheelchair accessible, represent 18% of the total fleet and are distributed as follows:

Darwin – 19  
Alice Springs – 6  
Katherine – 1  
Nhulunbuy – 1

The Northern Territory Government regulates the taxi industry through licensing and registration approvals, vehicle standards and the release of new licences as required by population increases. A ballot system is used to determine successful applicants for the licences in Darwin and Alice Springs. Standard taxi and MPT licences are offered through the ballot and while data on waiting times is anecdotal and based on complaints received, the decision to release more

MPTs in the mix (all licences offered recently in the ballot have been MPTs) is strongly influenced by the Standards' requirement that waiting times for MPTs should be the same as those for standard taxis.

To encourage the uptake of MPTs, the licence fee is set at 50% of the standard taxi licence fee applicable in the particular centre, i.e. \$8000 per annum for Darwin, \$6500 for Alice Springs, \$4500 for Katherine, \$2500 for Gove and \$2250 for Tennant Creek. The Northern Territory Government has recently introduced a \$10 lift fee to drivers of MPTs as a means of ensuring disabled passengers do not face long waiting times for these vehicles.

The Northern Territory Government also provides a subsidy scheme for taxi costs for certain categories of disabilities. The Northern Territory Taxi Subsidy Scheme (NTTSS) is administered by the Department of Health and Community Services (DHCS) and is designed to provide assistance to people assessed as having a chronic disability that prevents them being able to use public transport to access the community. The disability may be physical, sensory, psychiatric or intellectual. The NTTSS is intended to *assist* with transport needs, *not* to meet all transport costs.

The NTTSS provides eligible members with a subsidy of approximately half of a taxi fare in the form of vouchers (the other half is to be paid by the member). Vouchers are issued in denominations of \$2.50 and \$5.00.

Membership of the NTTSS cannot be transferred to or from other states and territories. If Northern Territory members travel interstate they can exchange some of their NT vouchers for interstate vouchers.

Eligibility criteria for the NTTSS are:

- The applicant must live in the Northern Territory. Verification of residence is required by an address on a Centrelink card or documentation, utility bills or a current NT driver's licence.
- The applicant must be unable to utilise public transport safely due to one or more of the following:
  - Dependence on a wheelchair or scooter for all mobility outside the home.
  - Significant mobility restrictions as the result of a permanent disability.
  - Significant visual impairment in both eyes.
  - Severe and uncontrollable epilepsy with seizures involving loss of consciousness.
  - Significant intellectual disability, memory or communication impairment.

- Significant psychiatric disability.

Remote area applicants may be eligible to access the NTTSS to support their transport when visiting urban centres.

There are five categories of benefit (A, B, BMPV, C and D). Eligibility for each category is based on the assessed need of the applicant.

Applications may be approved on a permanent or temporary basis depending on disability and inability to use public transport. The Categories are ranked in descending order for the amount of the subsidy paid.

### ***Category A***

Provides benefits of more than \$1785 per annum.

To be eligible, persons must be able to demonstrate that remaining in Category B would result in severe financial hardship because of their transport needs.

Funding levels and inclusion to Category A is at the discretion of the Minister for Family and Community Services.

### ***Category B***

Entitles a member to maximum benefits of \$1785 per annum.

Applicants must demonstrate financial hardship (according to Centrelink tables) because of their transport needs, **and** have a need to use a taxi at least 5 days a week on a regular basis.

### ***Category B MPV***

Entitles a member to benefits of up to \$1785 per annum.

Applicants must be assessed as having to use taxis that are multi-purpose vehicles equipped with appropriate wheelchair restraint equipment.

### ***Category C***

Entitles a member to benefits of up to \$525 per annum.

This category is designed for moderate use.

### ***Category D***

Entitles a member to benefits of up to \$210 per annum.

This category is designed to support people with a disability who require low or intermittent usage.

## C. General

As a general comment, I would like the Review to address alternative compliance measures to the strong adherence to the Standards and infrastructure as the principal test of effectiveness. There is a high degree of reliance on infrastructure to provide non-discriminatory access for disabled people to public transport services without due recognition of a balance between costs and benefits.

For example, not all bus stops serviced by the public bus network in the Northern Territory have adjoining curbed footpaths. Bus stops could be made compliant but the access to them cannot (without a great deal of expenditure and for potentially limited or no use). A more practical solution would be to allow individual jurisdictions more flexibility in meeting the identified travel needs of disabled people. Rather than attempting to upgrade all bus shelters and stops, effectiveness of the standards in regard to enhancing accessibility to public transport may be better served by prioritising expenditure at selected shelters and stops identified as the major problem areas for people with disabilities wanting to access public transport. In the feedback from public forums held in the Northern Territory, public bus transport is often found to be not the first choice of transport, with a preference instead for wheelchair accessible taxis.

For a small jurisdiction such as the Northern Territory, the ability to prioritise expenditure on public transport infrastructure is critical in terms of maximising the gains from limited financial resources.

I suggest that meeting of milestones is not the only means by which accessibility to public transport for people with disabilities can be substantially improved. Given the high cost of compliance as opposed to benefit gained, an alternative that the Review could consider is the acceptance of individual jurisdictional action plans that are more focused on targeting issues in their respective public transport systems relating to disabled groups and accessibility. I consider that this could allow a more practical approach to the efficiency question that is part of the Review process.

As with all jurisdictions, the Northern Territory is concerned that the Standards and Guidelines have been established in the belief that they are prescriptive enough to allow certainty in interpretation and application. This is not the case, and it would be expected that submissions from infrastructure providers will detail ambiguities and confusion as to what constitutes 'compliance'. An example is that there is no clear direction as to what constitutes a simple stand-alone bus stop, bus stop with seating and bus stop with shelter. It is also difficult to interpret where a bus stop 'finishes' in terms of compliance, particularly in regard to accessibility to the bus stop. Section 2.1 of the Standards specifies that an access path be provided along a walkway, ramp or landing, while Section 2.1 of the Guidelines sets out the concept of an access path as the requirement for

independent movement of passengers through premises and infrastructure. The Standards and Guidelines become ambiguous where there is no path of any description to a bus stop but the intention is to increase accessibility for disabled people. It is difficult to see how having a fully compliant bus stop that no disabled person relying on mobility aids can access is effective in meeting the intention of the Standards.

The ultimate test of compliance is a decision handed down by in the Federal Courts system in relation to a complaint and with the degree of ambiguity in the Standards, no infrastructure provider can be completely sure that the infrastructure it provides is going to pass the ultimate test.

The Northern Territory also has concerns that the Disability Standards and the Australian Standards are sometimes contradictory when trying to determine the requirements for a bus stop. Of particular concern is where the Standards refer to Australian Standards that have been superseded.

For example, in interpreting the standards for a bus stop, the Northern Territory assumes that the area immediately adjacent to the road kerb is classified as a maneuvering area. That being the case, the direction of travel is not clear. If the direction of travel is considered as the path towards the bus, the preferred width is 1740 mm. The tactile requirement for this asset is then required to be 1800 mm wide.

I suggest that the Review should address the need for an independent audit of the Standards in terms of ease of interpretation and application to improve accessibility to public transport for people with disabilities.

#### **D. NT Response to Questions in the Issues Paper**

##### **1. Has the accessibility of public transport improved since the introduction of the Transport Standards?**

Feedback from the public sessions suggests that the high proportion of the public bus fleet in Darwin and Alice Springs that are now low floor easy access has improved accessibility for passengers reliant on mobility aids such as wheelchairs.

##### **a) How has accessibility to conveyances changed? Can you provide examples?**

##### **Buses**

The Northern Territory Government policy for contracting public transport services is to stipulate that all new buses must be low floor easy access to

allow for wheelchairs. The first low floor bus came into service in 1995. Since 2002, bus manufacturers sign off that the new buses being supplied are compliant with the *Disability Discrimination Act*. However there is no auditing by the Northern Territory Government of these claims in relation to the Standards.

At present it is unlikely that buses would comply with the needs for visually and hearing impaired passengers. However, the buses are equipped to carry electronic systems such as closed circuit television cameras and could support sound systems for visually impaired passengers through retrofitting. Details of the bus fleet composition for the urban bus services in the Darwin area are set out in the background section at the beginning of this submission.

In July 2007, the Northern Territory Government changed its policy on stopping at bus stops. The new policy is that buses will stop at all designated bus stops at which a person is waiting. The policy now places the following obligations on both drivers and passengers:

#### Obligations of Drivers and Conductors

Drivers of motor omnibuses must stop at all bus stops where they observe potential passengers positioned at or adjacent to the bus stop, or where they observe a person closely approaching a bus stop who has signalled or is in the process of signalling their intention to board the bus.

Passengers who are in motion and approaching a bus stop may hail or signal to the driver their intention to board, and the driver must stop, providing that the bus is able to stop safely and the person is sufficiently close to the bus stop that their boarding of the bus will not cause the driver and other passengers unnecessary delay.

#### Obligations of Intending Passengers

It is the responsibility of intending passengers who wish to board a motor omnibus at a designated bus stop to ensure that they:

- place themselves as close to the bus stop as is practical so as to be visibly apparent to the approaching driver that they are an intending passenger; and
- are in a position that makes them clearly visible to the driver of an approaching bus from a distance that will allow the driver to safely bring the omnibus to a halt at the bus stop.

## Taxis

MPTs have been included in the Taxis Regulations for some time (prior to 1999). In 1999, amendments to the *Commercial Passenger (Road) Transport Act* cancelled all taxi licences and reissued them for an annual fee. The MPT fee was set at 50% (\$8000 in Darwin) of the standard taxi fee and has remained at this level. Prior to deregulation, the cost to transfer an MPT licence was determined in the open market and at a higher cost than the current annual licence fee.

The number of MPTs as a percentage of the total number of taxis in the NT has been steadily increasing:

June 2005	8.8%
July 2006	10.3%
September 2007	15.6%

New taxi licences are issued via a ballot system. The number of MPTs is monitored and if there are indications of shortages (usually from complaints on waiting times), forthcoming ballots for new licences are adjusted to release more MPTs as opposed to standard taxi licences.

### **b) How has accessibility of information changed? Can you provide examples?**

Destination boards used are now all larger sized LED type with the additional side mounted board which enables a passenger at a bus stop to identify the bus route. The LED units provide significantly improved display to intending passengers from a greater distance in both daylight and darkness.

Large font timetables are available for people with vision impairment and the Internet site for public transport is disability interactive. A customer service information line has been established to assist passengers.

### **c) How has accessibility of infrastructure changed? Can you provide examples?**

The improvements have been minor, with some bus stops upgraded with seats and a concrete pad.

## **2. Have these changes matched your expectations on the implementation and uptake of the Transport Standards?**

From the perspective of both a conveyance and infrastructure provider, my general comment is that there needs to be recognition by disabled passengers on the limitations of public transport facilities to meet all their needs, even with Standards being in place. Mobility aids are of great concern for the bus operators. The inability of many passengers with mobility aids (scooters or gopher's vehicle) to be able to drive onto the bus and manoeuvre into the appropriate wheelchair carriage area without assistance is an issue. This has been due to inability of the passenger to manoeuvre the aid without hitting either the interior of the bus or running into standing passenger's legs, etc. Assistance generally comes from the driver or other passengers or a combination of both.

Many of the aids are considerably larger / longer and heavier, and with a greater turning circle, than a conventional wheelchair. These units do not conform to the same applicable standard as regular wheelchairs. The interior of buses receive considerable damage from these large mobility devices, mainly from front and rear steel bumper bars. Additional steel plating along both sides of the bus entry and front wheel arches is now included in contract specifications to reduce damage. Many passengers cannot turn the unit around inside the bus which has created safety issues when they attempt to reverse down the ramp.

I understand that in some instances, the weight of some mobility units, with the passenger on board, can exceed the manufacturer's safe working load of 300 kg on the electric ramps fitted to the 23 vehicles operated by DBS. From the public forums held in Darwin the private bus operator Buslink advised that they have incidences where the ramps, complying with the 300 kg requirements for load limits, have been bent.

Drivers are the most appropriate asset to address the effective and efficient delivery of a public transport service without discriminating against a person on the grounds of disability. While buses can be built to any number of standards and incorporate a range of innovative components, it is through due diligence, competence, compassion and professionalism of drivers, that the majority of the difficulties currently experienced by disabled passengers on the public transport network are overcome. With the view by some users that the Standards are the ultimate benchmark for conveyances and infrastructure, there is a real danger that the human factor of assistance will not be given its due weight in any complaint action.

My view is that there needs to be some responsibility on manufacturers of mobility aids to advise people purchasing their equipment whether or not the

particular aid can be carried on public transport that does comply with the criteria established in the Standards for the carriage of mobility aids.

I am also of the view that training on the correct entry and egress on buses, bus stop specific requirements, restraints, timetabling and special needs is required as part of regular discussions with disability groups regarding access to public transport services.

The Review should address the need for a realistic balance between the expectations of passengers and the expectations of the public transport provider.

**3. Do you consider that the level of compliance required at the end of the first five year period is sufficient to have had an impact on accessibility?**

Not applicable as this requires passenger response.

**4. To what extent do you consider current data on accessibility is reliable? Can you provide examples of problems with data that you are aware of?**

There is no data collected on accessibility issues in regard to public transport in the Northern Territory. Problems experienced by disabled people are generally made known via letters of complaint. The NT will need to collect data on MPT wait times, and where and how people with disabilities are accessing the public service, to identify deficiencies and publish information on compliant infrastructure and conveyances.

**5. How could reporting of accessibility data be improved for future stages of the implementation of the Transport Standards?**

As covered in 4 above, usage data would be extremely beneficial in prioritising expenditure.

**6. Are you aware of examples where improved accessibility of public transport has led to increased patronage?**

This data is not currently collected in the NT.

**Questions 7, 8 and 9 are not applicable as they require passenger response.**

- 10. Has the introduction of the Transport Standards clarified your obligations as a public transport operator or provider? If yes, in what ways has it done this?**

The Northern Territory is very aware of its responsibilities in regard to the Standards but as mentioned believes there are significant deficiencies in the ability to interpret and apply the Standards that need to be addressed as part of the Review process.

- 11. Are the Transport Standards sufficient, or have you needed to consult other sources? What other sources have you consulted? How did you find out about these sources?**

From an infrastructure view, the Standards are ambiguous and there is limited opportunity in the Northern Territory to access professional advice on compliance prior to construction. My view is that the Department of Transport and Regional Services and the Australian Attorney General's Office need to be able to offer 'definitive interpretation of the Transport Standards and their application'.

There is an expectation from the private sector that the Northern Territory Government can provide the expert advice on compliance. Given the issue of interpretation, it cannot, and any advice given has the potential to leave the Government exposed to damages in any complaint involving public transport, even where provided by the private sector.

- 12. Are you aware of other operators or providers of public transport, who appear to be unaware of their obligations? Can you provide examples? How could this lack of awareness be addressed?**

The Northern Territory Government has conducted industry and Government awareness briefings regarding respective obligations under the DDA and the Standards. The NT Government will need to continue to take the central coordination role in establishing a compliance mentality across all modes of public transport as it is responsible for much of the public transport infrastructure.

- 13. Are there areas of the Transport Standards that you consider unclear in terms of the adjustments operators and providers need to make? Please specify.**

The interpretation problems have been pointed out. As familiarity with the Standards increases there will undoubtedly be more queries if they remain in their current format.

- 14. Have the exemptions allowed under the Transport Standards (as specified in the previous chapter), reduced the clarity of obligations under the Transport Standards?**

The lack of clarity of obligations is due to the ambiguity in the Standards and the difficulty in interpretation.

The Standards need to reflect more the actual operations of transport services and infrastructure. By doing so, there may need to be less reliance on 'unjustifiable hardship' as a defence against inappropriate standards which over time is likely to be seen by disability groups as a standard excuse for infrastructure and conveyance providers not to meet their responsibilities.

- 15. To what extent do the Transport Standards allow operators and providers a choice of ways in which they can demonstrate compliance?**

The allowance for equivalent access is spelt out in the Standards. However, the issue will be what constitutes 'without discrimination as far as possible' in section 33.5 of the Standards.

- 16. Where Australian Standards or other technical requirements are specified, are these appropriate? Please provide examples where you believe the use of Australian Standards is not appropriate.**

The lighting standards are an issue. Darwin Bus Service has installed an additional two halogen downlights in the driver's compartment which operate when the front doors are opened. Even with these two additional lights, the requirement of 150 lux is not reached and this particular Standard is considered to be inappropriate. It would create a dangerous situation of the driver trying to adjust his night vision from an extremely bright area to darkness as they continue their run back onto the roadway after closing the front doors and extinguishing the interior lights.

The Australian Standard for grab rails is also an issue in the buses. The distance required for a shorter or frail standing passenger to walk without access to hand holds or stanchions past the two front wheelchair positions is considerable. A taller passenger is able to reach the roof-mounted grab rails, however a shorter frail passenger is required to move without support. The introduction of a lower grab rail would result in an overhead injury potential for other passengers as many able-bodied passengers choose to stand in the two wheelchair areas.

**17. Are there requirements that have proven to be impractical or difficult to implement? If so, please specify.**

This has been answered through the body of this submission. As a general comment there are areas of the Standards where the requirements are impractical. A prime example is bus stops located where there is no supporting infrastructure such as footpaths making it impossible for people in wheelchairs to access a compliant bus stop. Narrow road verges also present practical difficulties in having enough room to meet the space requirements for mobility aids.

**18. As a public transport user, are there areas of the Transport Standards where you consider that a more specific requirement for compliance would improve accessibility?**

Not applicable as this requires passenger response.

**19. Do you consider that the requirements in the Transport Standards have been applied consistently across different modes of public transport?**

No. Much of the compliance has centred on the bus service and the provision of easy access buses. A compliance audit on taxi ranks has not been undertaken and the wait times for MPT's remain an issue. The recently announced lift fee of MPT drivers is aimed at reducing the waiting times for people with disabilities requiring this form of transport. In terms of regional aviation, aircraft servicing the remote communities in the Northern Territory generally meet the definition of a small aircraft under the definition in the Standards. The majority of the communities are also serviced by charter operations and not what could be classed as regular public transport services.

**20. Will any current areas of inconsistency be addressed through the future stages of implementation of the Transport Standards? (see Appendix B)**

This will depend on what changes, if any, are made to the Standards themselves and/or the way in which they are applied.

**21. Do you consider that the current exemptions granted are appropriate? Should these exemptions be reduced over time?**

Exemptions granted to aircraft are appropriate. There will continue to be a need for exemptions as conveyance providers should always have the right to choose type of conveyance on the basis of providing a sustainable and profitable service. An example is Alice Springs and the issue of carriage of high-backed mobility aids in the baggage areas of narrow-bodied aircraft such as the Boeing 737. Unless there is a significant increase in patronage it is unlikely that wide-bodied aircraft other than on overseas charter flights will ever be economical to service such regional centres. However the danger is that the interpretation of the particular Standard is taken to be the 'letter of the law' and there is not a flexible approach taken by airport staff to accommodating such wheelchairs where possible.

**22. In implementation of the Transport Standards, have the requirements led to a relatively consistent standard of compliance across all modes of public transport? If not, where are the major differences in approach?**

No. For the Northern Territory, the high-use modes of public transport such as the public bus system (both public sector and private sector providers) have a higher level of compliance because the wider population access these services and the Northern Territory Government has a role in providing for this service via contractual arrangements. Apart from the public bus service providers, the evidence presented at NT public forums suggests that there is not the same level of commitment to the Standards by other private sector providers of public transport.

**23. To what extent do the requirements in the Transport Standards address all of the accessibility requirements for people with disability? Are there gaps in the coverage of requirements?**

The Northern Territory does not currently collect data on accessibility requirements. Problems come to the fore when complaints have been

lodged. However it would be fair to say that the Standards are not going to meet all requirements, no matter how prescriptive they become.

**24. Does the compliance timetable provide for a gradual improvement of accessibility over the 30 year implementation period? Are there aspects of this timetable that present compatibility problems? How could these requirements be improved?**

My view that a more practical approach to the Standards is required has already been expressed in this submission. A cost versus benefit approach rather than simply meeting milestones would be the basis for the twin goals of the Review (the effectiveness and efficiency of the Standards). The cost, in this instance, is the lost opportunities for this expenditure to be used in achieving a greater degree of compliance and in a shorter time period on those parts of the public transport network where the greatest need has been identified.

**25. Are providers meeting their obligations across all aspects of accessibility, which ensures compatibility?**

The lack of comprehensive data precludes making any definitive statement on how well other providers of public transport services are meeting obligations. The comments for question 22 apply.

**26. Do the requirements of the Transport Standards need to more explicitly recognise the potential other regulatory constraints that impede the capacity of transport providers to deliver the objects of the Transport Standards?**

Yes. It would be beneficial to have a schedule of at least the Commonwealth Acts that take precedent over the Standards.

**27. How well are the current arrangements for making complaints about accessibility understood by the public?**

The Northern Territory has had three complaints, two of which involved issues surrounding the carriage of high-backed motorised wheelchairs in narrow-bodied aircraft such as the B737 serving Alice Springs. The third complaint prompted the change in policy for stopping at bus stops and that complaint has now been withdrawn.

**28. Are the current processes sufficiently responsive to complaints, or requests for information or advice on the Transport Standards?**

Not applicable as this requires passenger response.

**Summary**

The Review needs to address the ambiguities in the Standards as they are currently written and the difficulties this currently imposes in the interpretation and the practical application of the Standards. I suggest that an independent audit be carried out on the Standards in terms of ease of interpretation and application. The audit should also include a determination on those Standards that have the ability to compromise safe operation of the conveyances, e.g. the intensity of lighting in buses

In determining the effectiveness and efficiency of the Standards, I suggest that the Review should address the need for more practical approaches to the application of the Standards by taking into account cost versus benefit considerations, rather than simply relying on the meeting of the milestones to achieve the effectiveness goal. Some consideration should also be given to the role of jurisdictional action plans, formulated in consultation with groups representing disabled public transport users, as a means of satisfying progression against the intention of the Standards.

The Standards and adherence to the milestones has the potential to raise the expectations of public transport users with disabilities that the public transport system should be able to meet all their requirements. The Review needs to address the issue of awareness by disability groups of the limitations of public transport conveyances and infrastructure in meeting all needs.