



Submission:

**Moving Canberra – Planning Better
for Everyone**

**Response to Moving Canberra 2019 – 2045:
Integrated Transport Strategy**

April 2019

At a glance

Moving Canberra must be about planning for everyone to move where they need to, regardless of whether they move by community transport, buses, rail, cars, wheelchair taxis, specialised transport or get around by bikes, wheels, pedals or feet.

Transport is a public good – essential in daily life. Transport in Canberra is about more than buses and the tram, and planning must include all modes, especially community-managed on-demand transport. Transport policy is about more than vehicles; it's also about the surrounding infrastructure: paving, safety, streetlighting and accessibility.

Good access to suitable, affordable transport supports successful navigation of key transitions like starting in a new school or job, or moving to a new home. Lack of access to suitable, affordable transport can create a barrier to solving problems during the most difficult moments life can throw at us.

Some of us are struck hardest when transport is not available or affordable – people with transport disadvantage have the greatest need to travel, face greatest isolation when they can't but the least flexibility about where and how they move across the city.

Travel is an essential cost of living and this cost falls disproportionately on those with the least ability to pay. In a smart and compact city, travel costs should not stop people doing the things they have to do or the things they want to do.

The ACT Government should consider making public transport free.

About ACTCOSS

ACTCOSS acknowledges Canberra has been built on the land of the Ngunnawal people. We pay respects to their Elders and recognise the strength and resilience of Aboriginal and Torres Strait Islander peoples. We celebrate Aboriginal and Torres Strait Islander cultures and ongoing contribution to the ACT community.

The ACT Council of Social Service Inc. (ACTCOSS) represents not-for-profit community organisations and advocates for social justice in the Australian Capital Territory.

ACTCOSS is a member of the nationwide COSS Network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS' vision is for Canberra to be a just, safe and sustainable community in which everyone has the opportunity for self-determination and a fair share of resources and services.

The membership of the Council includes the majority of community-based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS advises that this document may be publicly distributed, including by placing a copy on our website.

Contact Details

Phone: 02 6202 7200
Address: Weston Community Hub, 1/6 Gritten St, Weston ACT 2611
Email: actcoss@actcoss.org.au
Web: www.actcoss.org.au
Director: Susan Helyar
Policy Officer: Craig Wallace

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An ACT Government funded initiative.

Initiative of



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Acronyms

ABC	Australian Broadcasting Corporation
ACTCOSS	ACT Council of Social Service Inc.
ATODA	Alcohol, Tobacco and Other Drug Association ACT
CALD	culturally and linguistically diverse
HCCA	Health Care Consumers' Association of the ACT
NDIS	National Disability Insurance Scheme
PWD ACT	People With Disabilities ACT
WATS	Wheelchair Accessible Taxis

ACTCOSS contributions to development of the strategy

This submission builds on a body of transport themed papers published by ACTCOSS prior to the 2016 ACT Election and in our ACT Budget submissions over several years.

Our contributions are founded on the following priorities for improvements in transport from the [ACT Community Shared Statement](#) for the 2016-2020 term of the ACT Government signed by 19 community peaks in October 2016:

Develop transport services that are accessible, affordable and fit for purpose, especially for people working outside 9-5 Monday-Friday jobs, for people with disabilities and for people who do not drive or have access to a private vehicle. Ensure transport information is easily accessible, the services are accessible to people with mobility and/or cognitive barriers, and services offered enable people to complete activities of daily living and participate in their community.

Relevant reports and submissions include:

- [ACTCOSS 2018-19 ACT Budget submission](#)
- [Community Transport: Our Shared Vision, 2016](#)
- [2016 Election Statement – Transport](#)
- [Transport: a wicked problem we have the strengths and assets to solve, 2016](#)

This paper provides additional evidence, information and responses to the draft strategy that we have collated since 2016, including via generous contributions of insights and advice from ACTCOSS members and other community partners.

In March 2019, a group of community organisations, community service representatives, peaks and thought leaders came together as part of a think

tank convened by ACTCOSS to discuss priorities and work areas for the strategy – these inform significant parts of this submission.

This submission, taking its lead from advice at the consultations, assumes that the strategy document is a draft working document which is able to be reworked significantly to incorporate community feedback, priorities, gaps and ideas.

We have provided specific section by section commentary on the draft strategy and highlighted further work needed to inform the next stage of development of the strategy.

ACTCOSS thanks the following organisations who provided feedback or contributions in the development of this submission:

- Carers ACT
- Council on the Ageing (ACT)
- People With Disabilities ACT
- Public Transport Association of Canberra
- Women's Centre for Health Matters
- Woden Community Service
- Community Services #1
- Individual transport users who provided lived experience feedback.

Key objectives for the strategy

ACTCOSS welcomes development of a long-term plan with the strategies and policies that will improve provision of affordable, suitable transport to meet current and future needs. The transport strategy needs to include all the modes used and valued by the community including on-demand transport provided by community organisations. It also needs to shape and prioritise development of surrounding infrastructure: paving, safety, streetlighting, accessibility.

Planning a strategy out till 2045 is ambitious, but difficult because there is so much scope for change in technology, demographics and needs over that time. The strategy starts some welcome conversations about the relationships between place, space, movement and the emerging technologies some people may use to move and work in the years to come. The data that is informing development of the strategy is incomplete and the finer details of the strategy need to be determined with reference to the other plans and changes rapidly transforming our city (including urban renewal, municipal service investment, transition to zero emissions by 2045, human services design and locations).

The final strategy needs to clearly outline how changes to and investment in transport infrastructure will contribute to improved social and economic participation, social cohesion and equality in the ACT.

As a peak organisation working for people who are on low incomes, who experience barriers to travel and who have the least flexibility about where and how they move across the city, we approach mobility as a positive right and a public good contributing to social participation, community cohesion, personal liberation and empowerment. It is an essential public and community service and is one of the core foundations of good city infrastructure that offers both provision of and access to essential services.

Affordable, suitable transport that assures people of their right to mobility is highly valued by everyone. It enables us to access friends, employment, food, healthcare and specialist services. It connects neighbourhoods and enables people to form and participate in communities of interest.

Considered as a resource, the value of transport is most starkly understood when it is not available. Lack of transport can cause loneliness and the loss of freedom; a decline of social and economic activity; being unable to travel to appointments like health appointments or Centrelink compliance requirements; or to easily get to places in a crisis – be it a health emergency or a personal place of safety.

Having proximity to the right kinds of transport available is important during key life transitions – starting school; looking for employment; keeping in touch with the people and services that support your wellbeing and provide assistance with difficult circumstances; getting access to income support between employment; starting and keeping employment; managing casualised employment; and keeping active after you stop driving. It's important during difficult and stressful times which happen to most of us – getting medical help after hours or dealing with a family crisis. People with disabilities, older people losing a licence or people concerned about using public transport because they feel unsafe have their freedoms denied if other transport options are not available.

In a smart and compact city, the costs of travel should not stop people doing the things they have to do or the things they want to do.

Travel is a cost, and this cost falls disproportionately on those with the most need to travel and the least ability to pay. Single parents needing to access health care. People with disability needing to travel by expensive taxis. People working in low paid jobs outside 9am-5pm hours. Centrelink customers needing to travel to endless appointments and compliance requirements while some of them survive on under \$40 a day.

We believe that the ACT should consider the business case for making buses and Canberra light rail free (or otherwise strengthen concessions); should properly and sustainably fund community transport; should ensure low-income people aren't disadvantaged in a just climate change transition to electric vehicles; and should reform the Wheelchair Accessible Taxis (WATS) subsidy regime.

Key beneficiaries of the strategy

Moving Canberra must be about planning for everyone to move where they need to, regardless of whether they move by community transport, buses, rail, cars, wheelchair taxis or specialised transport or get around by bikes, wheels, pedals or feet.

This means it is vital to ensure the strategy delivers for people with transport disadvantage, including low-income people, older people, people with disabilities, Aboriginal and Torres Strait Islander people, women, children and young people.

The needs of those who cannot use buses and light rail must be part of the integrated strategy. On-demand transport isn't an 'alternative' but requires attention and investment at the core of the Canberra public transport plan.

New modes, platforms and opportunities to change travel behaviours should be explored but risks and potential for perverse outcomes should be considered honestly and mitigated.

Making the right investments

ACTCOSS has identified investment priorities to guide transport development in the ACT and included these in our 2018-19 ACT Budget submission. These priorities should be considered in the next stage of development of the strategy.

Investment is needed in:

- Funding community transport at sustainable levels and in a manner that will ensure community transport continues to be available to all who need of it. That means ensuring a community transport system that is available to more than just people eligible for an individualised funding package through Commonwealth initiatives like the National Disability Insurance Scheme (NDIS) or an aged care package. For example, women with young children or family members needing mobility assistance, who are primary carers and do not own a private vehicle; or people who do not have a driver's licence and/or own a private vehicle or who are unable to use public transport because of mental health issues. Attention needs to be given to adequate and secure funding for community transport post-2019, especially from ACT Health. Community transport requires funding continuity so that providers can upgrade, renew and replace vehicle stock and plan across a multi-year timeframe
- Needs assessment, policy, design and planning work to ensure transport design, planning, integration and implementation addressing the needs of those with transport disadvantage across both on-demand and mass transit systems. This work should ensure that transport investments keep up with urban infill, growth and group centre redesign and that this is done with lived experience input from those with the greatest level of transport disadvantage. Proactive lived experience testing should be routine in transport redesign processes

- Investigating transport gaps for people experiencing social disadvantage and funding any improvements in transport coverage and frequency required to meet the needs identified
- Improving the fairness and adequacy of transport related concessions. This should include: concessions for learner, probationary and restricted driver's licences and aligning the discount on licence fees for Health Care Card holders (currently 50% of costs) with Pension Card holders (100%)
- Evaluating accessibility of existing public transport infrastructure (vehicles and fixed infrastructure) for people with disabilities and other mobility issues and fund improvements to meet accessibility standards as an urgent priority
- Undertaking a study of transport costs to examine how individuals on low and fixed incomes meet costs of vehicle operation and maintenance and if and to what extent this involves reliance on sub-prime loans. Measures should then be developed to address findings on the broader relationship between transport costs, indebtedness and infringements (e.g. driving unregistered) for people on low and moderate incomes.

Why not make it free?

Assess the business case for making public transport free to passengers

The government has announced that transport will be fare free on the weekend that light rail opens in Canberra. As part of events like Seniors Week, the ACT also makes transport free to some groups of people experiencing transport disadvantage.

Fare-free transport is being trialled in other jurisdictions such as Luxemburg and is being considered across Germany.

The ACT Government should consider developing a triple bottom line business case for making most public transport, including light rail and buses, permanently fare free.

This might include a cost benefit analysis which balances: revenue received; the costs of collecting fares; the costs of administering concessions; the potential for accelerated climate abatement from more use of public transport and mode shifting; the potential gains to revenue and savings from unlocking social and economic participation by low-income people; and the potential for gains, including reductions to congestion at peak periods, if economic considerations were removed from people's travel planning considerations.

Free transport might have a range of highly liberating personal benefits like the ability for people to meet Centrelink requirements without facing

exorbitant costs or not having to factor in transport costs when seeking minor medical attention or leaving a domestic or family violence situation at short notice.

In addition to making buses and trams free, the ACT Government could address costs experienced by people with disability who cannot use public transport by removing trip limits on vouchers as recommended by PWD ACT in their 2016 election platform.¹

Areas of the strategy that need redrafting

The next draft of the strategy should address the work areas outlined in more detail later in this submission:

- The strategy as a whole should articulate transport as a public good which is desirable and necessary, especially for those who are at risk of social and economic and social exclusion. The project of the strategy should be clearly articulated as providing people with freedom of movement
- The strategy should have a much more detailed, integrated and direct consideration of non-bus or tram transport options available to people with additional needs, such as on-demand transport provided by community transport services funded and planned as part of the public transport system for the ACT
- The opening sections of the strategy draft should be reframed to ensure that the vision, principles, movement and place framework and strategy directions are internally coherent with the customer focussed commentary and policy work from page 40 onwards
- The strategy should reference transport disadvantage evidence and data beyond the point-in-time Household Travel Survey
- The Movement and Place Framework needs to better articulate how it will manage and facilitate relationships between places and spaces to facilitate movement. The framework and the strategy as a whole should speak more to urban infrastructure which supports people to travel
- The economic analysis should be broadened to the impact of transport costs on individuals, the costs of transport disadvantage to the community and the costs to all of us from inefficient and ineffective access to travel, as well as a triple bottom line analysis of the benefits of free public transport in Canberra
- In canvassing zero emissions, the strategy should work to ensure a thorough and just transition to climate change, especially for low-income

¹ People with Disabilities ACT, *2016 Election Platform*, October 2016, p.5, (archived and provided to ACTCOSS).

households and others unable to shift from use of internal combustion vehicles.

Further development of the strategy

The next stage of development of the strategy needs to ensure it:

- Delivers better planning, consultation and implementation of transport for Canberra in ways that line up our goals for people with transport disadvantage in the context of urban growth and city renewal as well as the attendant strategies such as the Territory Plan Review, the Affordable Housing Strategy, the City and Urban Gateway Strategy and the Better Suburbs Strategy.
- Focusses on transport disadvantage and directly consults with people with transport disadvantage in those transport design conversations and decision-making processes.
- Responds to transport gaps identified in a comprehensive study of transport disadvantage and funds any improvements in public transport coverage and frequency required to meet the needs identified
- Funds community transport at sustainable levels and in a manner that will ensure that community transport continues to be available to all in our community who are in need of it. That means ensuring a community transport system that is available to more than just people eligible for an individualised funding package through Commonwealth initiatives like the NDIS or an aged care package. There is a need to consider and appropriately resource community transport as part of investments in the mass transit system.
- Supports a whole-of-journey approach to accessible transport and ensuring that we evaluate accessibility of existing public transport infrastructure (vehicles and fixed infrastructure) for people with disabilities and other mobility issues and fund improvements to meet accessibility standards as an urgent priority. As the city changes, we must understand and mitigate the risks posed to some vulnerable users from the increase in shared zones (both in terms of design and information) and the need for planning to retain a viable network and options for people for whom 'active travel' is neither realistic, viable or safe
- Understands and responds to the scope of unmet transport need in the ACT for Aboriginal and Torres Strait Islander people, people with disability and carers, marginalised families, young people (as per above – consistency) and the links between transport disadvantage food insecurity, access to health and access to specialised services
- Better considers transport needs in the context of housing renewal (especially for public housing tenants moved from the inner city, south and north) and in greenfields and brownfields sites across the city

- Develops a triple bottom line business case for making public transport, including light rail and buses, permanently fare free. This might include a cost benefit analysis across: revenue received; the costs of collecting fares; the costs of administering concessions; accelerated climate abatement from more use of public transport and mode shifting; potential gains to revenue and savings from unlocking social and economic participation by low-income people; and the potential for gains, including reductions to congestion at peak periods, if economic considerations were removed from peoples travel planning considerations.
- Where transport fares apply (e.g. for taxis, rideshare), improves the fairness and adequacy of transport related concessions. This should include: concessions for learner, probationary and restricted driver's licences and aligning the discount on licence fees for Health Care Card holders (currently 50% of costs) with Pension Card holders (100%). Reforms should be considered to uncap the Taxi Subsidy Scheme for people with disabilities
- Incorporates findings from a study of transport costs to examine how individuals on low and fixed incomes meet costs of vehicle operation and maintenance and if so to what extent this involves reliance on sub-prime loans. Measures should then be developed to address findings on the broader relationship between transport costs, indebtedness and infringements (e.g. driving unregistered) for people on low and moderate incomes. This should be integrated with other cost of living work to give a complete picture of the costs facing people who experience transport disadvantage.
- Considers whether the new bus network routes and schedules deliver improved proximity to transport services for people who are transport disadvantaged
- Incorporates processes that future-proof transport access and affordability in residential developments through time by monitoring continued delivery of efficient and effective bus routes in the places people live and where it is planned that people will live as suburbs grow
- Incorporates deep, ongoing user and citizen engagement in all suburbs about the planning and investment of transport modalities and routes in the future. This should happen at the neighbourhood level. This should intentionally and proactively include people experiencing transport disadvantage.

Evidence and analysis that has informed ACTCOSS commentary on the draft strategy

Existing literature provides some insight into which population groups in our community are not well served by our existing transport systems. Below we have compiled illustrative data drawn from a broad range of studies in the ACT that highlight the impact of transport disadvantage in people's lives.

This material is not comprehensive, as the reports from which it is drawn are not all explicitly on the issue of transport disadvantage. However, the data is illustrative of how not having adequate access to transport disadvantages people in a range of ways. ACTCOSS recommends that a more systematic analysis of unmet transport need and its consequences should be undertaken by the ACT Government to inform further development of the strategy and that this analysis focus on broader and more inclusive transport needs than those experienced by 9-5 commuters.

Aboriginal and/or Torres Strait Islander peoples

Passing the Message Stick is a 2014 publication by the ACT Human Rights Commission that explores the experiences of Aboriginal and/or Torres Strait Islander people engaging with services in the ACT. The report highlights that access to transport is a concern in the community:

A lack of transport options was consistently reported by participants, with participants reporting that public transport does not provide timely, affordable options for Aboriginal and Torres Strait Islander people within the ACT, particularly those who have a number of small children and young people, or who have complex needs such as mental health issues, general health issues, or a disability.²

The report also noted the high cost of driving lessons as a cost barrier to driving by families participating in the research.³ The Aboriginal Legal Service (NSW/ACT) has since commenced a no-fee Driver Licence Program designed to help Aboriginal and/or Torres Strait Islander people in the ACT to get their license.

The Human Rights Commission report further notes that:

Services reported that when they offer transport for participants they generally have a significantly larger number of attendees than when they are unable to offer transport. One service advised that they run a small group program and that when they are unable to offer transport they see a decrease in attendees by up to 50%. Another service reported that they could not offer transport on one occasion for their weekly group as the bus they use was not available. This led to the group being cancelled that week as there was no other transport available for participants.⁴

Winnunga Nimmityjah Aboriginal Health and Community Services, as the report also notes, offers transport services including a free community bus service. However, the bus service is only available to transport people to and from medical appointments. The ACT Government operates a wheelchair accessible minibus through the Aboriginal and Torres Strait Islander transport program.

2 ACT Human Rights Commission, *Passing the Message Stick: Talking with Aboriginal and Torres Strait Islander people about services for children and young people in the ACT*, First edition, ACT Human Rights Commission, Canberra, 2014, p.27.

3 *ibid*, pp.27-28.

4 *ibid*, p.27.

The bus is available for a range of uses by local Aboriginal and/or Torres Strait Islander people including for transport to activities that promote cultural and community connections, sporting and recreational activities for both youth and seniors.⁵

Accessible transport for people with a disability

Transport is a barrier to community life for people living with disability.⁶ A 2009 national data report by the Australian Bureau of Statistics (ABS) found that a large majority of people with disability (82%) live in proximity to public transport.⁷ The ABS report also found that people with disability do not have high rates of public transport use: 'Out of the 2.0 million people with a specific limitation or restriction who do not use public transport, over 1.5 million did have it available in their local area'.⁸

The report also finds that:

Of the estimated 3.8 million people aged 5 years or more with reported disabilities, 1.2 million had difficulty using public transport, 2.6 million had no difficulty using public transport and 37,000 did not leave home... Those with greater restrictions or limitations were more likely to report having difficulty using public transport, except those with schooling or employment restrictions. People with schooling or employment restrictions only are those who need extra support in their schooling or occupation because of their disability but who do not fall into any of the other categories of disability status.⁹

It should not be interpreted from this that it is necessarily functional impairment that restricts people with disability from using public transport. Rather, accessibility for people with disability is largely an issue of design of public transport infrastructure:

People with profound core activity limitations reported the most common difficulties they had using public transport were getting to stops or stations (38%) and getting in or out of vehicles or carriages due to steps (48%). In contrast, the main difficulties people with mild core activity limitations

5 ACT Government, *Aboriginal and Torres Strait Islander community bus booking*, viewed 28 March 2019, <https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/1906/~/aboriginal-and-torres-strait-islander-community-bus-booking#!tabs-1>.

6 See, for example: ABS, *Disability, Australia, 2009*, cat. no. 4446.0, Australian Bureau of Statistics, Canberra, 2009, accessed 17 June 2016, <<http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/4446.0main+features122009>>; A Carnovale, *Strong Women Great City: A snapshot of findings from a survey of ACT women with disabilities*, WWDACT and WCHM, Canberra, 2012, accessed 4 May 2016, <<http://www.wchm.org.au/wp-content/uploads/2015/02/Strong-Women-Great-City-A-snapshot-of-findings-from-a-survey-of-ACTs-women-with-disabilities.pdf>>; J Gough, *Contributing our Voices: A Summary of Feedback from the Have Your Say! Forum with Women With Disabilities ACT*, Women With Disabilities ACT, Canberra, 2015.

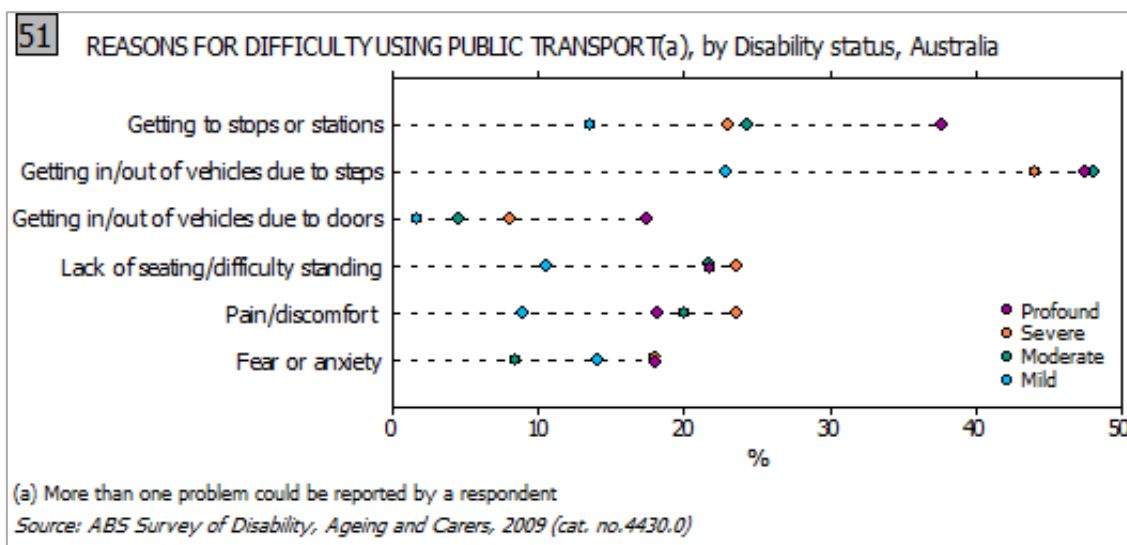
7 ABS, op. cit.

8 ibid.

9 ibid.

reported were due to difficulty getting into or out of vehicles because of steps (23%) and fear and anxiety (14%).¹⁰

Figure: Reasons for difficulty using public transport (a), by Disability status, Australia



Source: Graph reproduced exactly from Australian Bureau of Statistics 2009, 4446.0 - Disability, Australia, 2009, Australian Bureau of Statistics, Canberra, accessed 17 June 16, 2016, <<http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/4446.0main+features122009>>.

Accessibility for people with disability is a right recognised in Article 9 of the United Nations Convention on the Rights of People with Disability. Like all other jurisdictions in Australia, the ACT also has obligations under the *Disability Standards for Accessible Public Transport Act 2002* (Cwlth), and Commonwealth, as well as local, discrimination Acts to ensure that it meets accessibility standards.

The reason that these legislative instruments enshrine standards of accessibility for transport is that access to transport is fundamental to living an independent and socially integrated life. A report by Women with Disabilities ACT includes comments from participants that underscore the significance of transport to everyday life. Participants in the research project were asked what they felt would improve their social connections, and transport emerged as one of several key themes:

“Good, reliable public transport would be the most helpful thing for me.”

“Transport is the key to connectedness, but for those who are unable to use buses, things become increasingly difficult.”

“Provision of a Usable wheelchair & a practical lift to get it in the car, so I can go out without so much difficulty & also visit my family interstate sometimes.”¹¹

¹⁰ *ibid.*

¹¹ A Carnovale, *op. cit.*, p.26.

For people with disability, transport is also a barrier because of its high cost, a point that the ACTCOSS 2016 *Cost of Living Report* clearly demonstrates.¹²

Case study: Inflexible Flexibus?

In preparing this submission we received some lived experience feedback which pointed to difficult and stressful interactions with Canberra's Flexibus system. These include:

- Uncertainty about levels of assistance being provided in on boarding vehicles
- Inconsistency in policy where vehicles were sometimes late but conversely were unwilling to wait for short times while users prepared themselves to board
- Inconsistent approaches to the carriage of mobility devices.

Concerns were raised that providing feedback on assistance issues could see services cease and/or people being asked to become a community transport client or attempting to get transport added to a home care package.

Transport that works for older Canberrans

Canberra's population is ageing, with those aged 65 and over projected to increase at higher rates than for those aged under 65.¹³ Over the life of the 2019-2045 strategy it is projected that the population aged 65 and over will increase from 55,410 to 97,128 – an increase of 75%.¹⁴ Between 2017 and 2022:

- the population aged 65 to 84 years is projected to increase by 18 per cent, with its share of the total population projected to increase slightly from 11 per cent to 12 per cent; and
- the population aged 85 years and over is projected to increase by 16 per cent, with its share of the total population projected to increase slightly from 1.5 per cent to 1.6 per cent.¹⁵

12 ACTCOSS, *ACT Cost of Living Report: Transport, Full data report*, ACTCOSS, Canberra, 2016, accessed 28 March 2019, <<http://www.actcoss.org.au/publications/2016-report-act-cost-of-living-transport-full-data.pdf>>.

13 ACT Government, *ACT population projections 2018 to 2058*, Chief Minister, Treasury and Economic Development Directorate, ACT Government, Canberra, January 2019, accessed 28 March 2019, <<https://apps.treasury.act.gov.au/snapshot/demography/act>>.

14 *ibid*, pp.41-42 (derived from Table 6.6 Population projections by age cohort and by sex, 2017 – 2058).

15 *ibid*, p.8.

Between 2017 and 2058:

- the population aged 65 to 84 years is projected to increase by 125 per cent, with its share of the total population projected to increase from 11 per cent in 2017 to 15 per cent in 2058; and
- the population aged 85 years and over is projected to increase by 228 per cent, with its share of the total population projected to double from 1.5 per cent in 2017 to 3 per cent in 2058.¹⁶

The Council on the Ageing (ACT) held a transport forum in early 2019 and some of the issues highlighted included:

- That the overall safety aspects for older Canberrans and pertains to more than 'transport' but also surrounding infrastructure
- Street lighting especially near bus stops and on paths through neighbourhoods needs to be increased and attended to when reported that lights are out
- Paths from shops to retirement villages all need attention and regular upkeep
- Bus interchanges all need to be safe and accessibility for older people including lighting, seating and cameras
- Getting people with less mobility from their home to a bus line could maybe into the future, involve a fleet of smaller buses (much like the Flexibus now)
- Access to the light rail crossing Northbourne, the narrow walkways on entry to the platforms and the gradient up to the platform all look to be a challenge for those who have limited mobility
- The signs on the buses need to be checked to ensure those with visual issues can read the number and destination of the bus (this has been an issue brought to us a few times).¹⁷

Marginalised families

In 2013, an evaluation was undertaken of the 'Improving Services with Families' initiative (now known as the 'Strengthening Families' program). The initiative involved 'participants [...] drawn from marginalized [sic] groups that have experienced consistent difficulties in navigating and accessing the service system'.¹⁸ The evaluation of this initiative noted that 13% of participants involved experienced transport problems.¹⁹

16 *ibid.*, pp.8-9.

17 COTA ACT, email to ACTCOSS, 14 March 2019.

18 M Evans, *Improving Services with Families: A perfect project in an imperfect system*, ANZSOG Institute for Governance, University of Canberra, Canberra, 2013, p. 2.

19 *ibid.*

Young people

Public transport is fundamental in meeting the transport needs of young people. Yet the needs of young people do not seem to be addressed in mainstream transport planning. In its 2016 survey of Canberrans aged 12-25, the Youth Coalition of the ACT found that 56% of young people use public transport once a week or more often, with more than a third using public transport almost every day.²⁰ The survey also identified that lack of transport is one of the key barriers to participation in activities with 33% identifying transport as a barrier to participating in activities in Canberra – this rose to 36% for those aged 12-15 and to 40% for those aged 16-17.²¹ The Youth Coalition had previously investigated this issue and their findings were consistent:

In a 2007 Youth Coalition submission that surveyed over 200 young people in the ACT on public transport, the frequency of services was highlighted as the most important issue. Also, in a 2012 consultation, young people identified that there is a need for additional evening, late night and weekend services. This is particularly important for young people who are more likely than the general population to be engaged in part-time employment or recreational activities during the evenings and weekends, or those who live in Canberra's outer suburbs.²²

Transport and food insecurity

Access to transport has been found to impact on access to affordable, healthy food in the ACT.²³ Detailed analysis of the data and research related to food insecurity in the ACT was undertaken in 2013 Anglicare ACT and the Australian Red Cross in 2013 and by ACTCOSS in 2018 (forthcoming). Anglicare ACT and the Australian Red Cross noted that:

Transport accessibility is a crucial part of food security, particularly in a car - oriented city like Canberra. Two thirds of respondents to our client survey listed bus, foot or bike as the form of transport they used. A current proposition by ACTION to increase the average walking distance to access a bus²⁴ could have unintended consequences negatively affecting people

20 Youth Coalition of the ACT, *Rate Canberra 2016*, Youth Coalition of the ACT, Canberra, 2016, p.12, accessed 28 March 2019, <<https://youthcoalition.net/assets/rate-canberra-2016-report.pdf>>.

21 *ibid*, pp.49 & 60.

22 Youth Coalition of the ACT, *Policy Platform: Transport*, Youth Coalition of the ACT website, 2013 accessed 20 July 2016, <https://www.youthcoalition.net/dmdocuments/Transport_Policy_Platform_13.pdf>.

23 See, for example: A Hutchison, *Physical activity and healthy eating promotion to ACT women: a guide to getting it right*, Women's Centre for Health Matters, Canberra, 2018; T Lawlis, A Devine & P Upton, 'Vulnerable, single and living in poverty: women's challenges to accessing food in the Australian Capital Territory', *Australian and New Zealand Journal of Public Health*, 2018 online, doi: 10.1111/1753-6405.12845, accessed 28 March 2019, <<https://onlinelibrary.wiley.com/doi/10.1111/1753-6405.12845>>.

24 This proposal was considered as part of the 'straightening' of routes on which the government consulted in 2013.

who depend on public transport to do grocery shopping, as well as older people or those with disabilities.²⁵

Transport and access to health services

Transport has been acknowledged as an issue impacting on access to health services. In their 2014 Comprehensive Needs Assessment, which documents health needs in the ACT, Capital Health Network²⁶ states:

Difficulty accessing transport is a significant barrier for accessing primary health care and specialist services. Access to safe and timely transport is a social determinant of health and is a significant need particularly for older people, mental health consumers and the homeless. Limited availability of cross border transport is a particular issue for Aboriginal and Torres Strait Islander people who access services in the ACT and live in surrounding NSW.²⁷

Transport needs and the challenge of meeting transport costs are also raised in research and analysis by the Health Care Consumers' Association of the ACT (HCCA). The HCCA submission to the 2014 Commonwealth Senate Inquiry into Out-of-Pocket Costs in Australian Healthcare, for example, identifies transport costs to specialist appointments as a major cost issue for health care consumers.²⁸ The following anecdote illustrates transport challenges faced by people with chronic healthcare needs:

I see one specialist weekly and when I cannot drive, Cab Charge [taxi subsidy scheme] pays 50% of my fee, leaving me out of pocket \$40 per visit. My husband takes carer's leave from work every few months so we can drive from Canberra to Sydney to see my Neurologist. There is no rebate for travelling costs and the resultant overnight stay in Sydney.²⁹

In their 2011 submission to the ACT Government on expanding opioid maintenance treatment and needle and syringe programs, the Alcohol, Tobacco and Other Drug Association ACT (ATODA) offer the following example of the challenges that public transport in a geographically dispersed territory can raise:

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- 25 Anglicare ACT & Red Cross, *Mapping food insecurity in the ACT*, Anglicare ACT & Red Cross, Canberra, 2013, p.28, accessed 5 May 2016, <<http://www.anglicare.com.au/data/foodmappingbasic.pdf>>.
- 26 Now known as the Capital Health Network, the report was published when the organisation was known as the ACT Medicare Local.
- 27 ACT Medicare Local, *Connecting Care: A Comprehensive Needs Assessment 2014: Major Issues and Key Points*, ACT Medicare Local, Canberra, 2014, accessed 16 June 2016, <<https://www.chnact.org.au/sites/default/files/CNA%20Major%20Issues%20and%20Key%20Points.pdf>>.
- 28 E Kerdo, *HCCA Submission to the Senate Select Committee on Health*, HCCA, Canberra, 2014, accessed 16 June 2016, <<http://www.hcca.org.au/index.php/component/rsfiles/download-file/files.html?path=HCCA%20Submissions%202014/Health%20Care%20Consumers%20Association%20of%20the%20ACT%20Inc%20Submission%20to%20the%20Senate%20Select%20Committee%20on%20Health%20September%202014.pdf>>.
- 29 *ibid*, p.14.

Case study: Sarah

A single mother in her 20s, has two children under five and is accessing drug treatment as part of tier one OTS [Opioid Treatment Services]. She did not complete year 10, she has never been employed, she was a child in care, has experienced repeated homelessness, is a Centrelink recipient and does not have family and social supports in Canberra. The only health and community service she accesses is through the OTS program. She is in poor health, particularly for her age, began using heroin in her teens and after 10 years began treatment as part of the OTS program. She, and her two children, is required to attend The Canberra Hospital daily via public transport for her to receive her medication. They reside in Gungahlin in public housing, their house is a bus ride from the Gungahlin towncentre. On the weekend, her small family will spend 5 hours a day travelling to and from Woden to access the mother's treatment. The demands on her family to access treatment mean that she is not able to engage in education and training and therefore her chances of reaching economic and social independence are limited. Currently, Sarah would have to choose between accessing drug treatment and engaging in employment / education / training – and this is incongruous with the evidence. Sarah's chances of relapsing into heroin use, and potential overdose, are greatly increased if she ceases OTS.³⁰

As well as demonstrating the difficulties experienced around access to medical appointments, this example illuminates the broader ways in which transport is a social determinant of health. The stressful and time consuming journey that this family must regularly undertake impacts on their time and, consequently, the time that they have available for developmentally appropriate activities for the children and on the time that the mother, Sarah, has to invest in education, employment and training – all of which are protective factors that correlate to better long-term health outcomes.

Cross-border issues: failing to connect people and services

Because public transport is a state/territory government responsibility, transport systems are designed to operate within jurisdictional borders despite the fact that for many ACT residents and commuters these jurisdictional borders are arbitrary. Pittman and Day, for example, report that:

approximately 11,500 workers commute from [Queanbeyan] to any employment location within the ACT; and conversely some 37.4% of jobs in Queanbeyan are filled by residents of the ACT.³¹

Despite the significant demand for cross-border services established by this data, Pittman and Day found that there was no integration of cross-border

30 ATODA, *Meeting Current and Future Demand for Drug Treatment in North Canberra: Expanding Opioid Maintenance Treatment and Needle and Syringe Programs: Paper and Proposal*, ATODA, Canberra, 2011, p.6, accessed 24 February 2016, <http://www.atoda.org.au/wp-content/uploads/Northside_ATOD_Service_Provision_Final_1013.pdf>.

31 N Pittman & JE Day, 'Locating and quantifying public transport provision with respect to social need in Canberra, Australia', *Australian Planner*, vol. 52, 4, 2015, p.327.

services travelling from ACT into Queanbeyan and that, moreover, the Queanbeyan region is significantly lacking in public transport provision.

Oaks Estate, which is within the ACT border, presents another area that must be considered significantly transport disadvantaged. Oaks Estate has a relatively high number of residents whose incomes put them in the bottom income quintiles – as indicated by the relatively high number of public housing properties in the area. At the same time, Oaks Estate reportedly has some of the worst public transport access in terms of frequency of bus service in Canberra.³² We acknowledge and welcome the new QCity Transport services to Oaks Estate that were announced in August 2016. These additional services will benefit the local community. However, we would still like to see services that connect Oaks Estate directly with Canberra city and with the Woden interchange as this would create important through-ways to services.

Detailed feedback on the draft strategy

General comments

The strategy, in its vision, appears to be predicated on the idea that the project of transport policy going forward will be to reduce travel demand and reshape mobility options and decisions going forward while being responsive to externalities – i.e. increasing use of modes that reduce emissions, changing technology, and increased densification of the city.

While these are appropriate and, in some cases, essential considerations (especially for emissions), the vision of the strategy should not lose sight of transport as an important, desirable and essential public good which enables people to experience social connection and exercise social and economic rights.

The strategy might better articulate how the transport system will line up with the objectives of, and contribute to, the outcomes of the Territory Plan Review, the Affordable Housing Strategy and public housing renewal investments, the Better Suburbs Strategy, the adoption of the recommendations of the Housing Choices Hub and group centre reviews, as well as the reality of rapid accelerating medium and high density development happening all around the major group centres and in new suburbs.

The strategy might better articulate that the key project of transport is to serve the entire public who either need to travel or who find it hard to travel – starting with those who have the least options, the most isolation and/or the most pressure to travel.

³² With thanks to Australian Catholic University students Margo Bulic, Johann Deraadt, Patricia Finkel, Jonathan Grady and Rebekah Spann for their research into this issue.

There is a need for the strategy to frame transport as a tool to address the barriers, hardship and stress experienced by people who are on low incomes or face other barriers to participating socially and economically.

While the strategy discussed accessibility for people with physical disabilities or who are frail, there are other dimensions to accessibility including those relevant to young people, women, low-income people and people with psycho-social or cognitive diagnostic disabilities.

The commentary on need in the second half of the document (from p. 46 on) are detailed and insightful showing some understanding of the multidimensional facets of transport disadvantage and the detailed issues facing some transport users, like travellers with disabilities.

It would be good to see more of this content on multidimensional, intersectional needs acknowledged in and influencing the commentary in the earlier sections scoping the case for change, the Movement and Place Framework, the factors we need to consider and the actual vision, future directions and investment priorities which the strategy sets out for transport in Canberra over coming decades.

There are two thin references to flexible and community transport in the strategy. On-demand transport responses are framed in a way that suggests that they sit outside of the conventional/mainstream transport responses rather than being an integral part of a comprehensive, modern transport network that has a significant role in providing mobility as a service to people who experience transport disadvantage.

Specific issues to address

Policy context

In the scene setting sections (p. 12 on) there is a focus on broad issues like emerging technology, environmental challenges and a changing population, but a lack of context setting on the narrative on a growing group of people who experience transport disadvantage. Some of these issues include the growing groups of people working in industries which offer low incomes and precarious employment who battle with transport costs. The strategy mentioned an ageing population but doesn't sit this issue in the context of growing expectations around improved access and mobility.

Limitations of the Household Travel Survey

The strategy draws heavily (p. 11 on) on the Household Travel Survey 2017 which provides insights into the day-to-day travel behaviour of people in the ACT and Queanbeyan. While the survey provides some interesting insights on current travel behaviours and patterns, there are deficits in our understanding and we would recommend some caution in using it to frame a finished discussion about future needs and gaining a complete understanding of the transport needs of those with the greatest barriers to access.

There is a need to understand the demographic breakdown of travellers by income, mobility and location; to ask what people wanted their transport experiences to be like rather than simply what they were like; and to identify what issue might have been stopping people from using particular modes of transport or even going out at all.

As with all averages in the ACT, there is a danger that they are skewed by large groups of transport advantaged people – fit, mobile, multi-vehicle people in good jobs and stable family situations.

A more challenging analysis would have greater qualitative elements and inquire into the transport careers of people on Centrelink benefits juggling compliance requirements, people living in their cars or people who are ageing and have recently lost a licence.

Hierarchy of prioritisation by mode

In the hierarchy of prioritisation by mode (p. 13), the strategy needs to acknowledge that, for the foreseeable future, there will always be people for whom maintaining a car is both a personal lifeline and a community good. Some of these people are not on high incomes or doing so as a convenience.

They include homeless people for whom the car is a sole asset and people with disabilities who cannot interact with the public transport system as it is currently organised.

This is especially relevant where this hierarchy is being used to make decisions about investments, fees, taxes and penalty arrangements which may have disproportionate impacts on vulnerable people.

Articulating the full value of transport

The strategy talks about transport in the context of reducing obesity through active travel but doesn't sufficiently acknowledge transport as an enabler of health, social connection, community access, service access and family resilience.

The strategy argues (p. 14) that a crosscutting aim and the key to all three strategy goals is reducing demand by working whole of government to influence the delivery of non-transport projects, like office hubs that reduce the need for travel. Other parts of the strategy speak to drones and home-based work.

While we acknowledge that this is one desirable social and environmental outcome, reducing travel demand is also a problematic underpinning for this strategy.

For many people travel is a necessary social good involving connectivity to services, economic rights and social connection. Generally speaking, people with the greatest transport disadvantage are also some of the people with the least flexibility about when, where and how they travel. For example, people on low incomes meeting Centrelink compliance requirements, women needing to move often to escape an abusive partner, people with disabilities who have no choice about how they travel and people accessing specialist services, like drug

and alcohol services or a foodbank and needing to travel to maintain daily continuity in core areas of life.

Vision principles

The vision principles (p. 15) are largely focussed on policy objectives and external change rather than articulating that the core vision of transport is to serve the public and those with the most precarious travel experiences. We recommend including 'removing transport disadvantage' as a vision principle.

The Movement and Place Framework

The strategy outlines its Movement and Place Framework (p. 17).

This might usefully acknowledge that shared zones and areas of private mixed-use development are already blurring some of these concepts of place and movement in precincts and public space. This will merit a distinct response.

Perverse outcomes need to be considered in changing the way spaces are shared, occupied, reached and navigated – closing off some 'places for people' to cars may exclude some older people and people with disability who can only travel there by car.

Fixed-place hierarchies need to be tested against reality. Some groups of people co-opt or repurpose public spaces and use them in nonlinear ways – to find refuge in climate extremes, to socialise in places that don't involve spending money or as paths to find workarounds when there are inaccessible paths of travel.

Integration

In the integrated network vision (p. 20), it is not clear where the rest of the ACT's busy planning and development fits into the considerations outlined – including the Territory Plan Review, the implementation of the Housing Collaboration Hub recommendations, the Moving Canberra Transport Integration, the City and Gateway Strategy and various group centre redesign projects.

Trade-offs

Page 22 discusses the move towards transport hubs with higher frequency of services between transport hubs but potentially fewer connections. There needs to be appropriate and honest conversations about trade-offs

Lack of focus and integration for on demand transport

A relatively small section of the draft strategy paper (p. 23) canvasses the need to provide for people who cannot access 'conventional' public transport services and says that 'community and demand responsive transport must still remain part of the picture'.

We agree, however, we would want the convention to include and frame community and on-demand transport as part of the picture for transport in Canberra.

We need to avoid suggesting that that on-demand transport and meeting the needs of people who cannot access buses exists outside of mainstream transport planning and the Movement and Place Framework.

Uber

The draft strategy indicates that Uber has shown an 'active interest in providing accessible rideshare and other on demand transport services in the ACT' (p. 24).

We have not seen evidence that ridesharing app companies have shown an interest or the capacity to acquire accessible rideshare vehicles for older people and people with mobility issues.

Groups like PWD ACT have reported in the past that there is limited evidence that there are sufficient numbers of underutilised access compliant vehicles to create an accessible rideshare market.

A recent edition of the ABC television investigative program 4 Corners revealed widespread issues and concerns about the lack of quality standards, planning, safety considerations and governance within ridesharing apps. Consideration of ridesharing apps and other very new transport technology in a policy context needs to reality check the promises of this technology with its potential pitfalls, under-delivery and the potential for real life dilemmas, perverse outcomes and inaccessibility for specific groups in the community.

City vision

The 'Transport that is Part of Our City' vision (p. 36) does not canvass transport as a people-centred service focussed on need. We would suggest alternative objectives like, 'More people with barriers getting where they need to go when they need to go. A network which provides more equality of access and outcome'.

Economics of transport

Page 38 provides a useful economic analysis of the costs of congestion and transport delays. An economic analysis might also be validly used to understand other costs from inefficient and inequitable access to transport including the ways that transport costs distorts people's travel usage and acts as a stopper to economic activity. The cost ledger might include a lack of access to preventative health services to keep people out of acute systems, a lack of social and economic participation by people with transport disadvantage, and unlocked consumer spending and economic potential by people with barriers and blockages to moving around the city. This analysis might look at the income collected from public transport fares set against the costs of exclusion; the potential to unlock economic participation and the costs of collecting fares and maintaining a concessions system. This analysis might result in a recommendation that public transport should be free for everyone or for large parts of the community.

Need for internal strategy coherency

Pages 40 onwards of the strategy analyse customer needs. They provide a really strong focus on transport disadvantage and take a close look at the need to meet obligations for customers with a disability. These sections of the draft also speak well to the need to consider the surrounding street infrastructure that impacts journeys. However, this welcome analysis appears to play little part in shaping the earlier parts of the strategy setting out the visions, goals, frameworks and actions within the integrated transport strategy.

Road user pricing

We agree that the proposals on page 44 proposing to examine road user pricing initiatives raises equity considerations which need to be better understood.

Accessible communities

The directions outlined on page 49 which prioritise accessible communities for walking by building and planning on a human scale are welcomed but need to be woven throughout the strategy.

Zero emission transport

Work to achieve net zero carbon emission transport (detailed from page 53 onwards) is welcome. Low-income and marginalised people are among the first people effected by climate change including Canberra's harsh summers and winters, while community organisations are the first responders in these events. Low-income people and those with health conditions also stand to benefit from improved air quality and livability. Shared resources like bikeshare also benefit low-income people.

A just transition will be important. Not everyone can undertake active travel and mode shifting given the barriers to transport access, and some people will need to retain older fossil fuel-based vehicles for some time.

Some policy considerations include strategies for electrification of vehicles that will prioritise growing the second-hand market for electric vehicles while ensuring the incentives for adoption of electric vehicles do not have perverse outcomes on those who can least afford them. These include penalties in fees and charges related to vehicle registration to low- and middle-income households who continue to drive internal combustion engine vehicles or for people with disability access requirements or modifications unable to be achieved with these vehicles.

Additional data collection, analysis and consultation to inform development of the strategy

In finalising the strategy, the government should undertake further work in the following areas with the community:

1. Clearly articulate the value proposition for transport in enabling safe access to goods, services, places, spaces, social connections and economic participation by all members of the Canberra community. Travel is an enjoyable, reasonable and necessary part of our lives while functioning transport modes are a service, a right, an enabler and a protective factor
2. Be informed by lived experience, evidence and data, including asking why people don't travel and how they want to travel in the future. This should include data on people experiencing transport disadvantage as well as some other groups including: older people, Aboriginal and Torres Strait Islander people, people with safety considerations, young people, people from culturally and linguistically diverse (CALD) backgrounds, people in housing renewal transition, people using complex services, people without cars, low-income people especially people on income support, and people using non-registered personal mobility options, e.g. personal or mobility scooters, electric bikes. It must include people who don't currently use public transport and people who are isolated.

Some considerations in developing this evidence base include:

- a. Current community transport network needs to be mapped drawing on existing data sets
 - b. Better understanding of Flexibus
 - c. A default open data process to enable community access to transport data (with mitigations against perverse outcomes like safety).
3. Clearly state and recognise the importance of addressing transport disadvantage and that people with low incomes and barriers often have the least agency over when, how and where they travel and are therefore the most impacted by decisions that impact on transport availability, costs and disruption
 4. Include plans to address transport disadvantage through a comprehensive needs assessment, addressing gaps and improving concessions. The needs assessment should consider the relationships between transport modalities, living infrastructure and changing travel patterns and should inform the proposed Movement and Place Framework
 5. The Movement and Place Framework must be mapped to Canberra. Specifically, it must capture people's lived experience and attempt to articulate common and continuing relationships between movement and place as the city changes, i.e. as new suburbs emerge and others with compact and higher buildings
 6. Be joined up:
 - a. Articulate how busy agendas for transport planning and urban and city planning and renewal will: synchronise across time, contribute to lower costs of living and improved transport amenity for people experiencing transport disadvantage, and connect ACT Government to the community sector

- b. Demonstrate internal coherence including with the bus network integration.
7. Look outside buses and trams – consider community and on-demand transport as part of a mainstream transport system that is comprehensive, contemporary and sustainable
 8. Support a full and just transport response to reducing carbon emissions, i.e. consider in discussion on road pricing regimes
 9. Clearly articulate the rationale and risks of trade-offs between frequency and ubiquity of coverage and explain how equity considerations for people lacking travel alternatives have been addressed
 10. Consider the full range of economic implications including the costs of transport disadvantage to services, individuals and the economy (see break out box ‘Case study: Inflexible Flexibus?’). Beyond economic value, the strategy should acknowledge the full/wholistic value of transport as an enabler of social sustainability, wellbeing and liveability: costs, benefits and issues around a lack of access to transport for those with disadvantage. A good example is domestic and family violence where the availability of transport may support a person at risk of violence to leave the situation
 11. Articulate an ongoing process for assessing, monitoring and enabling ongoing community engagement about the strategy, including with the community sector and Canberra citizens.