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Date: 14 November 2011

Submission:

Directorate of Environment and Sustainable Development
Transport Policy for Canberra

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About People With Disabilities ACT (PWD ACT)

PWD ACT is a systemic advocacy organisation which is operated by people with disabilities for people with disabilities and which represents their views and interests. PWD ACT works to improve access to information and community activities and to inform the community about disability issues. Our commitment is to improve access to all amenities and to all forms of information and activities in the ACT community. PWD ACT also works to inform the community about disability issues.

PWD ACT's Perspective – Transport and Human Rights

PWD ACT approaches the subject of this Review, the ACT Government's draft Policy for Transport in Canberra, from a human rights and disability rights perspective. This means that we start from the premise that people with disabilities have a right to accessible, timely and affordable transport to enable them to participate fully in the community and contribute to the economic, social and cultural life of the community. Accessible, affordable and safe transport is central to the practical realisation of these rights as without transport a person with a disability cannot attend a school or educational institution, travel to and from their work or participate in social and recreational activities.

The rights of people with disabilities to access to transport are contained in Commonwealth and ACT Anti-discrimination laws. Transport is also one of the areas for Commonwealth action under the current Commonwealth Disability Strategy. In Addition, the Act Human Rights Charter is binding on the ACT Authorities which provide and regulate public transport and which set public transport policy in particular on ACTION buses, the Directorate of Environment and Sustainable Development and the Directorate of Territories and Municipal Services. The right of people with disabilities to accessible, affordable and safe public transport is provided for in the United Nations convention on the Rights of People With Disabilities which the Commonwealth Government has ratified. In particular Article 9 of this Convention refers to the accessibility of services such as transport and Article 20 of this Convention refers to the right to safe and independent mobility.

Recommendation 1

PWD ACT recommends that the Transport Policy for Canberra should reference these Commonwealth and ACT human rights laws in the same way it references the ACT adoption of international instruments relating to cycling and walking.

General Comment

The Draft Transport Policy for Canberra gives inadequate consideration to the transport disadvantage experienced by people with disabilities and the policies needed to address this disadvantage. The policy contains 32 recommendations for action, only one of which is directly relevant to people with disabilities. That recommendation requires only that the ACT Government implement the 2009 Plan for Accessible Transport. We remind the ACT Government that under this Plan, by 2012, 55% of the bus fleet and 55% of the transport infrastructure needs to be fully accessible for people with disabilities.

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While the restatement of commitment to the 2009 Plan is welcome, more needs to be done than mere implementation of this Plan to provide an accessible timely and affordable transport system for people with disabilities. In particular the Transport Policy deals with transport on its own. It does not deal with the interaction between transport and other social policies such as planning. The need for a co-ordinated approach between areas of social policy such as transport and planning is acknowledged by the release of the Transport Policy and the Planning Policy at the same time. Yet we see many current examples of a lack of co-ordination between transport, planning and disability service delivery. An example is the current tendency to put together community centres and hubs in closed down schools on single bus roots. This makes these centres difficult to access by the people who need to use the services. An example is the siting of the vitally important rehabilitation services at the Village Creek Health facility in Kambah and the ongoing failure to address the access issues and transport costs facing people with disabilities who have to use these services.

Another example is the siting of services for people with arthritis, epilepsy and diabetes at Holder which requires people from the North Canberra and Belconnen areas to have to take three buses each way and spend one and a half hours each way to travel to these services which provide essential support for them. A coordinated approach to planning, transport and service delivery would see space set aside in town centres and long high frequency transport routes for community organisations so that people who need to use their services can access them by public transport.

Recommendation 2

The Transport Policy should recognise that more than a mere implementation of the 2009 Accessible Transport Plan is required to address the transport disadvantage experienced by people with disabilities. The Draft Policy should be amended to include specific recommendations to provide accessible, timely and affordable transport for people with disabilities.

Transport Disadvantage

We welcome the recommendation for the conduct of a study of transport disadvantage as it is experienced by people from an Aboriginal and Torres Strait Islander background. We point out that people with disabilities experience substantial transport disadvantage in terms of accessibility, timeliness and affordability of transport and that particular groups of people with disabilities, ie women with disabilities and people with psycho-social disabilities experience particular transport disadvantages.

Recommendation 3

That the ACT should also commit to conduct a study of the transport disadvantage experienced by people with disabilities and in particular the transport disadvantages experienced by women with disabilities and people with psycho-social disabilities with a view to getting up-to-date evidence of this disadvantage and using this evidence to develop and implement policies to address this transport disadvantage.

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Parking

The Policy's recommendations for parking are confusing and potentially detrimental for people with disabilities. The Policy proposes an overall increase in the percentage of designated parking spaces from 2% to 3%. These percentages are low in themselves. However, the Policy also proposes a reduction in the overall numbers of parking spaces as a means of changing peoples behavior so that they use buses instead of cars. It is highly probable that the percentage decrease in overall parking spaces will be greater than 1% and this will result in a real decrease in the numbers and availability of designated disability parking spaces.

Recommendation 4

The Policy should contain a clear recommendation as to parking. This recommendation should ensure that any decrease in the numbers of parking spaces should not be implemented in a way which results in a decrease in the number of designated parking spaces for people with disabilities.

Location of Parking Spaces

Planners and developers need to take care to ensure that designated disability parking spaces are located near to entrances and near to services. Planners also need to ensure that where a site is being redeveloped; existing designated disability parking spaces are not interfered with. In instances where there is a need to relocate an existing designated disability parking space ACT Roads and the developers should consult people with disabilities with a view to relocating the space to minimise disadvantage to people with disabilities.

Transport and Housing

The Policy refers to the interaction of transport and housing and sets a target of 10% of housing being located in the vicinity of Canberra's hubs ie Civic, Woden, Belconnen and Gungahlin. This Transport Policy demonstrates that while it is possible to provide reasonable transport to these hubs, it is very difficult to provide transport to surrounding suburbs where most people live. This suggests that it might be possible to reorganise social housing so that a greater proportion of social housing is provided around town centres and along high frequency transport routes without of course creating enclaves or ghettos of social housing.

Also, if people with disabilities are to be able to live in this 10% of housing, it needs to be accessible for them, ie the housing must be designed, built and constructed in accordance with universal design principles. Although the DDA Access to Premise Standards and the access provisions of the Building Code of Australia do not apply to all residential premises, they do provide good guidance as to building for accessibility.

Recommendation 5

That housing policy be revised to reorganise a greater percentage of social housing around town centres and along high frequency transport hubs, taking care to do so in such a way that does not give rise to an enclave or ghetto. That the housing and Transport policy include a target of at least 33% of housing built within the

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vicinity of a transport hub to be designed, constructed and built in accordance, with universal design principles and in accordance with the access provisions of the Building Code of Australia.

Safety Concerns

The Transport Policy has as one of its priorities the promotion of the active transport options of walking and cycling and increasing the numbers of people using these options. The promotion of walking and cycling needs to be implemented in a way which is sensitive to the practical reality that these options are not open for the majority of people with disabilities. In particular, issues of personal safety are barriers to participation of people with disabilities in general and women with disabilities in particular in walking and cycling. Many people with disabilities report feeling unsafe when walking in town centres even during daylight hours. If people in general and people with disabilities in particular are to be encouraged to adopt the active travel options of walking and cycling, then this would require considerable improvements in the provision and maintenance of footpaths and street lighting and a greater police presence to reduce crime and improve perceptions of safety in public areas in bus interchanges, at bus stops and in town centres.