

Physical Disability Council of New South Wales



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Mr Robert Domm
Acting General Manager
City of Sydney
GPO Box 1591
Sydney NSW 2001

Friday, 27th February 2004

Dear Mr Domm,

City of Sydney Draft Access Development Control Plan

The Physical Disability Council of NSW (PDCN) is the peak non-government agency representing the interests of people with physical disability in NSW. We are funded by the NSW Government, through DADHC, to provide systemic advocacy services on behalf of people with physical disability.

Our first comment is general. We wish to congratulate the Council for acknowledging that access for people with disability requires a detailed Development Control Plan. We believe it to be important that planners, regulators and providers of goods and services give detailed thought to the needs of people with disability, integrating measures to ensure people's rights are met into the totality of the policies, procedures and standards that govern the activities of organisations seeking to engage with the public. An 'access DCP' helps to achieve this goal.

Secondly, we are broadly supportive of the Objectives set out in Section 1.3 of the draft Access DCP. We propose, however, a specific alteration to the third of the specified objectives regarding housing design and access. We do so mindful of the announcement by the NSW Minister for Infrastructure, Planning and Natural Resources on 18th February 2004 that a discussion paper would be forthcoming that may require all new housing to be vailable and adaptable. We are aware, also, that the Australian Building Codes Board has commissioned research into the provision of accessible new housing that is highly likely to result in alterations to the Building Code of Australia that go further than the proportions set out in Section 5 of the City of Sydney draft Access DCP.

Thirdly, we note that one of the objectives set out in section 1.4 is *"To clarify the various standards, codes and regulations and Acts with regard to their requirements for both new and existing development."* It is not our intention to specify appropriate references, alterations or amendments to all the technical specifications set out in Part 4 – Design Criteria. We suggest that the City of Sydney Council commission an external, accredited access consultant to ensure that the access DCP accurately relates to the most recent and current instruments that inform the legislative requirements under Federal and State laws.

We recommend to the City of Sydney Council that its draft access DCP be amended to incorporate the technical requirements of the draft DDA Disability Standard on access to premises published in January 2004. It is clear that a broad consensus has emerged around the requirements of the draft DDA Disability Standard. There is a very high probability that the federal Attorney General will introduce the draft to parliament within the next eighteen months to two years. It seems prudent and desirable that the City of Sydney Council recognise the context of developing standards nationally. In short, we believe the City should 'get ahead of the game'.

Fourthly, we wish to comment on Section 4.2.10 Accessible Room Requirements. We believe that the proportion of units / dwellings / rooms proposed on page 20 of the document will not ensure that real choice of accommodation type will be possible for visitors with disability to the city. We are especially concerned that low cost accommodation will, to all intents and purposes, remain inaccessible.

We propose that 10% of all dwellings / rooms / units with up to 100 beds be at least visitable by wheelchair users. We further propose that in all larger developments, those with 100 beds or more, all rooms should be visitable by wheelchair users. At least 10% of all rooms in all developments of all sizes should have shower and toilets that conform to the appropriate Australian Standard for accessible facilities.

Fifthly, we wish to comment on Part 5, Adaptable Housing. We welcome the acknowledgement by the City of Sydney Council of the crucial role that appropriate housing plays in the lives of people. Our home is the base from which people develop the relationships of fulfilled lives. The houses that we plan and build today must meet the needs of the population as a whole that we can envisage in the future.

The effects of demographic change over the next 50 years have been discussed and documented by many agencies. It is clear that our population is ageing. Over the next twenty years the 'baby boomer generation' will move into retirement. There will be an irreversible shift in our population. More of us will live longer. Almost all of us will 'age in place' as the jargon puts it. That 'place' must be a visitable and adaptable home.

At the same time as our population ages, policies in favour of social inclusion of people with disability mean that more and more people with physical, sensory, intellectual and psychiatric impairments will live in the community than ever before.

The NSW Government has started to consider and plan for the consequences of these predictable and foreseeable social changes. We note that on 18th February, Minister Knowles

issued a statement on SEPP5. We agree with his assessment that it no longer meets the need of the state's population of older people and people with disability.

The NSW Minister's report on SEPP5 includes this recommendation, page 4 (underline by the report's author)

"People with a Disability and Accessible Housing - Prepare a Discussion Paper to review methods of achieving greater provision to allow public debate on the issue

It is recommended that:

- 1 A discussion paper be prepared that should canvas options to achieve from housing a greater level of stock which is accessible and adaptable for people with physical disability of all ages.
- 2 Options could include introducing new controls that would require all new housing to be accessible to the UK standards i.e. for private path, entry, ground level circulation space and visitable toilet that allows use by a person with a disability

Some developers, such as Masterton Homes, are to be congratulated for already incorporating adaptable features in their homes. This is recognition by the market of the need to make housing more user friendly for an ageing population and people with a disability."

We are sure that the state Government has realised that the time is now here for all new private dwellings to be visitable and adaptable. We agree with them.

We believe that Table 4 in Section 5.3 Rates of Adaptable Housing Units and Parking Spaces to be Provided does not represent an adequate strategy for meeting the housing needs of people with disability and their families in the decades ahead.

We must provide accessible housing that makes living in the community a reality. People with disability do not live in a vacuum. There is a need to ensure that all new houses in all communities allow people with disability to fulfil the whole range of social roles that we think of us normal: family member, parent, grand parent, neighbour, colleague. To make it possible for people with disability to be active citizens and residents new housing must not perpetuate the barriers of inaccessibility of the past.

Finally, we urge the City of Sydney council to re-constitute a standing committee on access. It would play an indispensable and valuable role in ensuring that the access DCP will be as effective as all stakeholders must surely hope it can be.

Yours sincerely,

David Brice
PDCN President