



Draft Public Toilet Strategy 2013

City of Sydney

September 2013

Prepared by the Physical Disability Council of NSW

Jordana Goodman
Policy Officer
Physical Disability Council of NSW
St Helens Community Centre
3/184 Glebe Point Road
Glebe NSW 2037

Freecall: 1800 688 831

Phone: 02 9552 1606

Fax: 02 9552 1606

Fax: 02 9552 4644

Web: <http://www.pdcn.nsw.org.au/>

Email: admin@pdcnsw.org.au

Who is the Physical Disability Council of NSW?

The Physical Disability Council of NSW (PDCN) is the peak body representing people with physical disabilities across New South Wales. This includes people with a range of physical disability issues, from young children and their representatives to aged people, who are from a wide range of socio-economic circumstances and live in metropolitan, rural and regional areas of NSW

The objectives of PDCN are:

- To educate, inform and assist people with physical disabilities in NSW about the range of services, structure and programs available that enable their full participation, equality of opportunity and equality of citizenship
- To develop the capacity of people with physical disability in NSW to identify their own goals, and the confidence to develop a pathway to achieving their goals (ie self advocate).
- To educate and inform stakeholders (ie about the needs of people with a physical disability) so they are able to achieve and maintain full participation, equality of opportunity and equality of citizenship.

PDCN would like to thank the City of Sydney for the opportunity to make comment on the Draft Public Toilet Strategy 2013, and would like to support its recognition in the provision of universal access to public toilets, and commend its integration universal access and disability into the strategic plan.

The following recommendations have been included in the 2013 Draft Public Toilet Strategy as part of the Strategy Action Plan. Implementation of actions included in the Plan is subject to the annual budget bid process:

1. The provision of public toilets within 400 metres (5-10 minute walk) of any point within central Sydney and at all village centres and major neighbourhood parks;
2. Construction of nine new public toilets in key village centres
 - Railway Square, Haymarket,
 - Lawson Square, Redfern;
 - Regent Street Waterloo;
 - Erskineville Road, Erskineville;
 - William Street, Darlinghurst;
 - Darlinghurst Road, Kings Cross;
 - Oxford Street, Paddington;
 - Cowper Wharf Road, Woolloomooloo; and,
 - King Street Newtown – jointly with Marrickville Council to service the Newtown shopping and entertainment precinct.
3. Upgrading of five public toilet facilities in the City's parks;
 - Sydney Park, Alexandria;
 - Wentworth Park, Glebe;

- Observatory Hill Park, Millers Point;
 - Victoria Park, Chippendale;
 - Green Park, Darlinghurst; and,
 - The Glebe Foreshore Parks
4. Advocate for the provision of new public toilets to service urban renewal areas and projects:
- George St light rail corridor;
 - Barangaroo; and
 - *Green Square*.
5. Install permanent retractable public urinals in the George Street and Kings Cross entertainment precincts;
6. Install Inclusive access toilets available to the public at Town Hall House, Kent Street.
7. Trial free-use JC Decaux automated public toilets with the aim to permanently abolish feebased public toilets;
8. Implement a “City Cares” program where businesses promote and provide access to their toilets for public use.
9. Promote the public toilet network through a range of media including toilet maps, wayfinding signage, accessible print and digital information including apps.

The City of Sydney currently owns and manages 54 out of 117 public toilet facilities with approximately a quarter of these do not providing access to people with disability.. (See appendix 1 for more detail about the location of accessible public toilets in the City of Sydney). Toilet facilities are located as part of Council facilities at ovals, sport fields, parks, pools, libraries and community centres. The remaining public toilets are provided by retail facilities, public transport providers, the Sydney Harbour and Foreshore Authority, the Centennial and Moore Park Trust and the Royal Botanic Gardens and Domain Trust.

The importance of being able to access public toilets is highlighted in recommendation 1, which recommends the provision of public toilets within 400 metres (5-10 minute walk) of any point within central Sydney and at all village centres and major neighbourhood parks. PDCN believes that this provision needs to apply to both regular public toilets and accessible public toilets. People with disabilities may need to access toilets more frequently so provision of accessible public toilets within 400 metres (5-10 minute walk) of any point within central Sydney and at the ten village centres in the City of Sydney needs to be seen as a priority.

To improve access to public toilet facilities PDCN supports the recommendation in the Draft Public Toilet Strategy to audit public toilet facilities to identify where existing public toilets need to be upgraded or replaced.

To enhance availability in commercial and community settings across the City of Sydney, PDCN supports the recommendation as a high priority for funding for nine new accessible public toilets in the following key village centres:

- Railway Square, Haymarket,
- Lawson Square, Redfern;
- Regent Street Waterloo;
- Erskineville Road, Erskineville;
- William Street, Darlinghurst;
- Darlinghurst Road, Kings Cross;
- Oxford Street, Paddington;
- Cowper Wharf Road, Woolloomooloo; and,
- King Street Newtown – jointly with Marrickville Council to service the Newtown shopping and entertainment precinct.

Additionally regular public toilets with inclusive accessible public toilets need to be included as part of all new works such as for the following:

- George St light rail corridor;
- Barangaroo; and
- Green Square

All new facilities Improvements need to comply with AS 1428 Part 1- Design for access and mobility, with a minimum circulation space of 1900mm X 2300mm. (See appendix 2 for accessibility requirements) It is recommended that accessible public toilets be integrated into regular public toilets, rather than being constructed as standalone facilities. This will eliminate the need for MLAK keys or the need to locate assistance to gain access to the toilet facilities, and will enhance crime prevention through environmental design.

The availability of regular and accessible public toilets is limited in the King St. Village, and the Green Square and City South Village. The King St. Village is located towards the most western part of the CBD and comprises of the following suburbs: Camperdown, Newtown, Erskineville, St Peters and a small portion of Alexandria (west of Euston Road). The Green Square and City South Village consists of Zetland, Roseberry, Beaconsfield, the southern half of Waterloo and the majority of Alexandria. Together these two villages accommodate just over 20% of the population of the City of Sydney.

Due to the lack of availability of accessible public toilets in Newtown, Darlington and Eveleigh in the King St. Village, and Beaconsfield, St Peters and Waterloo in the Green Square and City South Village, PDCN would urge the City of Sydney to reconsider the low priority for the installation of new automated facilities in Waterloo and Erskineville and provide sufficient funds for the implementation of the nine projects listed below:

:

1. Medium priority - New automated accessible public toilets at Lawson Square, Redfern

2. Medium priority - New automated accessible public toilets at The Hub Square, Newtown
3. Low priority - New automated accessible public toilets at Regent St. Waterloo
4. Low priority - New automated accessible public toilets at Erskineville Rd. Erskineville
5. High priority - New toilet facilities at key parks such as at Sydney Park, Alexandria
6. Medium priority - New toilet facilities at key parks such as at Victoria Park, Chippendale
7. Medium priority - Upgrade and opening of toilets to the public during daylight at Erskineville Oval, Waterloo Oval and Jubilee Oval.
8. High priority - Modification of toilet facilities at Alexandria Park to allow public use
9. Within current funding – Upgraded facilities at Perry Park.

Improvements to Sydney Town Hall House need to comply with AS 1428- Design for access and mobility for the provision of inclusive access toilets for the general public. Additionally accessible toilet facilities for employees need to be considered as part of these Council improvements.

People with disability are generally in the lowest percentage wage quartile and as a consequence PDCN is not in favour of fees charged for the use of public toilets. Subsequently PDCN is in favour of illuminating any charges associated with using public toilets, as in recommendation 7 of the Draft Public Toilet Strategy.

The Draft Strategy suggests a “City Cares” program where businesses promote and provide access to their toilets for public use. PDCN is not in favour of a ‘City Cares’ program without the availability of accessible public toilets, as private businesses may not necessarily provide accessibility. Where businesses may not provide complete access, this may put the safety of the person with disability at increased risk of injury.

Where community events are being organised by the Council or an organisation supported by Council the provision of temporary portable public toilet facilities may be necessary to cater to the expected number of patrons. PDCN believes that providing a minimum of one accessible portable toilet per ten regular portable toilets is satisfactory, with the possibility of needing more for events where a greater number of people with disability are likely to attend, such as for International Day of Disability celebrations.

Appendix 1 – Location of accessible public toilets in the City of Sydney:

Alexandria

- Sydney Park
- Sydney Park- Alan Davidson Oval Pavilion
- Sydney Park Playground
- Sydney Park Wetlands

Annandale

- Federal Park

Camperdown

- Prince Alfred Park and Aquatic Centre

Centennial Park

- 7 accessible public toilets located at Centennial Park identified on the Centennial and Moore Park Trust website
- 2 accessible public toilets located at Queens Park identified on the Centennial and Moore Park Trust website

Darling Harbour and Cockle Bay

- 4 accessible public toilets located at Paddy's Market
- 3 accessible change rooms at the Ian Thorpe Aquatic Centre
- 16 accessible public toilets located at Darling Harbour and Cockle bay identified on the Sydney Harbour and Foreshore Authority website

Darling Point

- Rushcutters Bay Park

Elizabeth Bay

- Beare Park
- Fitzroy Gardens

Erskineville

- Erskineville Town Hall (Access to public toilets only available when the town hall is being occupied)

Glebe

- Glebe Library
- St Helens' Community Centre
- Foley Park
- Glebe Town Hall
- Wentworth Park Sports field
- Foreshore area- Accessible public toilets provided by the Sydney Harbour and Foreshore Authority

Haymarket

- Belmore Park

Moore Park

- 4 accessible public toilets located at Moore Park identified on the Centennial and Moore Park Trust website

Paddington

- Trumper Park
- Taylor Square, Oxford Rd

Pymont

- Pirrama Park
- Pirrama Park, kiosk

Redfern

- Redfern Park
- Old Redfern Town Hall
- Redfern Community Centre

Rosebery

- Turruwul Park

Rushcutters Bay

- Rushcutters Bay Park- Reg Bartley Oval

Surry Hills

- Ward Park

Sydney

- Customs House Library
- Lang Park
- Elizabeth St
- Hyde Park- North
- Hyde Park- North 1
- Hyde Park- North 2
- Hyde Park- North 3
- Hyde Park South
- Town Hall Square
- Wynyard Park
- Wynyard, Town Hall, Central, St James, and Martin Place train stations- Accessible public toilets provided by NSW Transport

- 5 accessible public toilets located at Sydney Harbour Bridge, the Rocks, Circular Quay and Sydney Opera House identified on the Sydney Harbour and Foreshore Authority website
- 17 accessible public toilets at Bennelong Point, Farm Cove, Mrs Macquarie's Point and Woolloomooloo Bay identified from the Royal Botanic Gardens and Domain Trust website

Ultimo

- Ultimo Library

Woolloomooloo

- Bourke St Park
- Wallamulla Park

Zetland

- Joynton Park
- Nuffield Park
- Tote Park
- Green Square Library

Appendix 2 – Disability (Access to Premises – Buildings) Standards

F2.4 Accessible sanitary facilities

In a building required to be accessible, accessible sanitary facilities need to comply with:

- (a) *Accessible unisex sanitary compartments* must be provided in *accessible* parts of the building in accordance with Table F2.4 (a); and
- (b) *Accessible unisex showers* must be provided in accordance with Table F2.4 (b); and
- (c) at each bank of toilets where there is one or more toilets in addition to an *accessible unisex sanitary compartment* at that bank of toilets, a *sanitary compartment* suitable for a person with an ambulant disability in accordance with AS 1428.1 must be provided for use by males and females; and
- (d) an *accessible unisex sanitary compartment* must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary towels; and
- (e) the circulation spaces, fixtures and fittings of all *accessible* sanitary facilities provided in accordance with Table F2.4 (a) and (b) must comply with the requirements of AS 1428.1; and
- (f) an *accessible unisex sanitary facility* must be located so that it can be entered without crossing an area reserved for one sex only; and
- (g) where two or more of each type of *accessible unisex sanitary facility* are provided, the number of left and right handed mirror image facilities, must be provided as evenly as possible; and
- (h) Where male sanitary facilities are provided at a separate location to female sanitary facilities, *accessible unisex sanitary facilities* are only *required* at one of those locations.