



Physical Disability Council of NSW
Ordinary People Ordinary Lives

**The City of Sydney
Neighbourhood Parking Policy
Draft for Discussion
Comment prepared by
The Physical Disability Council of NSW
for The City of Sydney
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The Physical Disability Council of New South Wales (PDCN) is the peak organisation for people with physical disability across the state. PDCN welcomes the opportunity to comment on The City of Sydney Neighbourhood Parking Policy Draft for Discussion.

PDCN appreciates the need for any policy in this area needs to include a range of parking controls and permit types.¹ PDCN believes that people with physical disability or mobility impairment would be affected by any change to the management of street parking and the available permit types, due to the impact on the limited space available to address the existing shortage of accessible parking spaces (Mobility parking Zones). For this reason PDCN's contribution to this discussion will focus on Section 5 Mobility Parking.

PDCN understands that the sustainability and efficiency of Sydney's transport network is crucial to on-going liveability and prosperity.² The Neighbourhood Parking Policy Draft for Discussion also articulates key principles to be upheld. PDCN supports a flexible and adaptive policy for changing needs of The City of Sydney. PDCN believes this balance and flexibility should not be at the expense of any of the key groups.

PDCN agrees that people with disability and mobility impairments are highly dependent on car travel to maintain their mobility and independence.³ The importance of mobility and independence is also articulated by the principles for parking management within the Neighbourhood Parking Policy Draft for Discussion, especially Public access and Non- Discrimination.⁴ PDCN also supports the City of Sydney's commitment to prioritise the availability of parking for this group.⁵

PDCN seeks to highlight that some elements of Section 5 Mobility Parking, undermine these aforementioned principles and priorities.

5.1 Mobility Parking entitlements

PDCN concedes that the adoption of the National Mobility Parking minimum entitlements by the City of Sydney would go some way to reduce the demand on the existing number of parking spaces available. PDCN understands that at present the Australian Disability Parking Scheme provides for the existing concessions in each state and territory, including the present concessions in NSW. The National Mobility Parking minimums mentioned are yet to be

¹ The City of Sydney Neighbourhood Parking Policy Draft for Discussion, p1.

² *ibid.*, p3

³ *ibid.*, p10.

⁴ *ibid.*, p4.

⁵ *ibid.*, p10.

finalised.⁶ PDCN supports strategies to reduce misuse, particularly when used in conjunction with consistent monitoring and enforcement by Parking Officers, as highlighted in section 4 Monitoring Compliance, but utilising the national minimum guidelines alone as the main tool to reduce misuse could unfairly punish legitimate permit holders.

5.2 Mobility Parking Zones.

PDCN agrees that Mobility Parking Zones need to be placed in areas where they will be most effective in encouraging and maintaining the mobility and independence of people with disability and mobility impairments, as articulated by the principles of parking management on the policy. However, this should in no way be “appropriate only in limited locations.”⁷ PDCN advocates a Parking policy that embraces a holistic approach, including signposted on street parking and disability zones, along with monitoring and compliance.

PDCN supports increasing the number of effective Mobility Parking Zones together with education and enforcement of Mobility Parking Permit conditions, to promote effective use of Mobility Parking Zones for those who require the blue space, as well as encouraging other permit holders to better utilise the signposted on-street parking.

PDCN is concerned by the question about removing Mobility Parking Spaces or Zones when they are no longer needed.⁸ The City of Sydney Neighbourhood Parking Policy Draft for Discussion has already highlighted that people with disability and mobility impairments are highly dependent on car travel to maintain their mobility and independence.⁹

PDCN agrees with that assessment, according to PDCN research on Ageing and Disability, 43 percent of people surveyed drive a vehicle. The lack of accessible parking at shopping and medical centers was evident in the responses. The degree of mobility determines access to social activities, essential goods and services and thus people who are not mobile are restricted to community transport and public transport which may not be accessible.¹⁰ Based on this research, PDCN would suggest it is unlikely that removing either sign posted parking or Mobility Parking Spaces or Zones would alleviate this dependence, as many people with disability are not able to access reliable alternative forms of transport.¹¹

⁶ Australian Disability Parking Scheme. <http://www.disabilityparking.gov.au/>

⁷ The City of Sydney Neighbourhood Parking Policy Draft for Discussion, p10.

⁸ loc.cit.

⁹ loc.cit.

¹⁰ Report on Ageing and Disability, The Physical Disability Council. 2010, p1.

¹¹ loc. cit.

Instead, removal of any Disabled Parking Zones would place an additional barrier preventing people with a disability using the MPS from participating in their community. To remove Disabled Parking Zones in such a way, contravenes the Federal Social Inclusion Agenda which states that the *Australian Governments vision of a socially inclusive society means that all Australians will have the resources opportunity and capability to learn work and engage in their community.*¹²

PDCN does not support the removal of Mobility Parking Spaces or Zones as a viable part of this or any subsequent policy, as it would clearly undermine the articulated principles within the document. These principles also underline the concept of equality of citizenship for people with disability in the broader community and society at large.

PDCN commends The City of Sydney on a policy that seeks to maintain flexibility and balance. PDCN believes a key element to this balance is the maintenance of, and where possible strategic increase in Mobility Parking Zones. Mobility Parking Permits and Zones are crucial if people with disability and mobility impairment are to maintain access to the diverse and changing community that is The City of Sydney. Mobility Parking Permits and Zones have a clear benefit to the wider community as part of a holistic approach in a policy that seeks to maintain the access and participation of all citizens.¹³ This includes a consistent approach to monitoring and compliance across the policy to ensure no single group benefits to the detriment of another.

¹² <http://www.socialinclusion.gov.au/about/what-social-inclusion>

¹³ Convention on the Rights of Persons with Disability. Article 9 Accessibility.
<http://www.un.org/disabilities/convention/conventionfull.shtml>