

1 May 2019

RE: Submission to the City of Sydney: Draft Local Approvals Policy and Code of Practice: Hoisting and Construction Activities in Public Places

Thank you for your request for feedback on the City of Sydney's Draft Local Approvals Policy and Code of Practice: Hoisting and Construction Activities in Public Places, The Physical Disability Council of NSW (PDCN) appreciates the opportunity to provide comment on the Draft Policy and Code of Practice. We note that much of the policy is out of our area of expertise and to this end we will only make comment on those parts which are relevant to site management and the safety of and access for people with disability.

PDCN is the peak body representing people with physical disabilities across New South Wales (NSW). 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.

As a systemic advocacy organisation, PDCN seeks to ensure barriers present in the community that prevent people with disability from achieving full access and inclusion are addressed and removed. We believe strict guidelines for hoisting and construction activities are essential to ensure the safe and easy access to public spaces for all persons in the community and align with our policy priority of improving physical access to the built environment for people with disability

PDCN would like to commend the City of Sydney on their comprehensive Policy and Code of Practice as we strongly support its principle aim of maintaining accessible pathways and ensuring that hoisting operations and other physical works have minimal impact on the safe and convenient passage of all members of the community. We are pleased to see the City of Sydney is committed to ensuring the public domain is inclusive and accessible, providing people with disability equal opportunities for social and economic participation and guaranteeing people with disability can easily live, work and visit the City of Sydney.

PDCN feels the Code of Practice and Guidelines clearly communicate that accessible pathways must be maintained to facilitate pedestrian movement through and around worksites. However, PDCN would like to see the Code of Practice explicitly mention minimising adverse impacts on people with disability, including wheelchair users, people with vision impairment and persons with reduced mobility.

In addition, when making temporary pathways during construction or other operations, ensuring that pathways are safe and easy to traverse, for example they are flat or with a gradual gradient over an object and are a solid structure (not gravel or dirt as this presents barriers to movement).

In the Code of Practice, under temporary works and barricades to isolate work areas (2.7), the guidelines propose that *“at least half of the existing clear footway width or 1200 mm (whichever is the greater) must be provided and maintained past the works. In exceptional circumstances 1000 mm”*. This width is sufficient to maintain accessibility for wheelchair users but may be too narrow for some larger mobility scooters. Therefore, we believe it is imperative to include that clear instructions or assistance be provided to pedestrians with disability to safely pass the work area if the footway is too narrow. For example, this may mean being directed to another footway opposite the site to maintain appropriate, accessible and safe movement past the work area.

PDCN is pleased to note that in the Local Approvals Policy accessibility is considered alongside safety, convenience and amenity as an aspect of the application assessment process. PDCN is encouraged by the City of Sydney’s reference to the Inclusive and Accessible Public Domain Draft Guidelines and its commitment to having best practice approaches to accessibility and universal design be considered in the design of new and upgraded public spaces.

Sincerely

A handwritten signature in black ink, appearing to read 'ADW', is positioned below the word 'Sincerely'.

Alice Dixon-Wilmshurst
Policy Officer
Physical Disability Council of NSW