

20 June 2019

**RE: Submission to the City of Sydney: Draft policy and guidelines for inclusive and accessible public spaces and events**

Thank you for your request for feedback on the City of Sydney's Draft Inclusive, Accessible Public Domain Policy and Guidelines. The Physical Disability Council of NSW (PDCN) appreciates the opportunity to provide comment on the Draft Policy and Guidelines.

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 comprehensive guidelines for inclusive and accessible public spaces and events are essential to ensure the safe and easy access to public spaces and events 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 detailed Policy and Guidelines. We strongly support City of Sydney's principle aim of ensuring all public domain spaces and events in the City of Sydney are inclusive and accessible for all members of the community. We are pleased to see the City of Sydney is committed to ensuring its events and the public domain are inclusive and accessible, providing people with disability equal opportunities for social participation and guaranteeing people with disability can access events in the City of Sydney.

PDCN acknowledges that the guidelines require all events/public domains to have accessible toilet facilities, either permanent fixtures or hired portable accessible toilets, however PDCN recommends that, where possible, the City of Sydney go a step further and ensure a *Changing Places* facility be provided. *Changing Places* are a 'step up' from accessible toilets again, allowing people with severe or profound disabilities, whom need adult change tables and hoisting arrangements, to attend and make for truly inclusive and accessible events.<sup>1</sup>

Without these, many people with severe or profound disabilities are unable to remain out in the community and away from toileting facilities for more than a couple of hours at a time. PDCN notes that portable *Changing Places* facilities are available for hire for event purposes, however PDCN strongly encourages the City of Sydney place permanent facilities in strategic locations throughout the City to improve inclusive access for people with significant levels of disability.

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<sup>1</sup> Changing Places website <https://changingplaces.org.au/>

In relation to accessible parking, PDCN would suggest that the ratio of onsite accessible parking spaces should be increased to a minimum of 2% of all parking spaces, to allow for a growing cohort of people whom hold accessible parking permits (from elderly through to those with disability).

PDCN also notes the guidelines make reference to providing an accessible ticketing system that allows people with disability to book tickets that best suit their needs and abilities and to sit with family and friends, however we would like to see it explicitly stated that this be a requirement for events with online bookings, and if this is not feasible, there be a dedicated phone number provided for accessible bookings, with trained staff who are aware of all available options.

PDCN is encouraged by the City of Sydney's reference to the *Disability Discrimination Act 1992*, the *Disability Inclusion Act 2014*, *A City for All: Social Sustainability Policy and Action Plan 2018-2028*, and the *Inclusion (Disability) Action Plan 2017-2021*, and use of these to inform the guidelines.

PDCN commends the City of Sydney for its commitment to a best practice framework that ensures consistent, vibrant, diverse and positive events for all who live, work or play in the City of Sydney, and looks forward to working collaboratively on future accessible projects with the City of Sydney.

Sincerely

A handwritten signature in black ink, appearing to read 'ADW', is positioned above the typed name.

Alice Dixon-Wilmshurst  
**Policy Officer**  
**Physical Disability Council of NSW**