



Submission in response to the public inquiry on

Green Bans Park in Erskineville

Extended due date: Friday 8 May 2026

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Table of Contents

Who is the Physical Disability Council of NSW	Page 3
Introduction	Page 5
The Health and Social Benefits of Parks on Park Users	Page 7
What we have heard from people with physical disabilities about parks and recommendations	Page 10
• Accessible Parking	Page 9
• Accessible Bathroom Facilities	Page 10
• Paths (pavements and footpaths) and Stairs	Page 13
• Picnic and Dining	Page 14
• Shade and Shelter	Page 14
• Playgrounds	Page 15
Conclusion	Page 16
Annex A – Summary of Recommendations	Page 17

Who is the Physical Disability Council of NSW?

The Physical Disability Council of New South Wales (PDCN) is the peak advocacy organisation for people with physical disabilities in NSW. We stand up for the rights of people with physical disabilities, advocate for disability inclusion across Government and business, and drive systemic reform around accessibility.

The objectives of PDCN are:

- To advocate for the rights of people with physical disability in NSW.
- To educate people with physical disabilities in NSW about the range of services and programs available to support them.
- To develop the capacity of people with physical disability in NSW to identify their own goals and build the confidence needed to achieve their goals (i.e. self-advocate).
- To educate and inform stakeholders (i.e.: about the needs of people with a physical disability).

PDCN is a community led organisation. We engage members of our community through member surveys, focus groups, regional community consultations and the Lived Experience Advisory Panel. The Lived experience Advisory panel is a group of people with lived experience of physical disability who provide advice and guidance to the Physical Disability Council of NSW (PDCN). PDCN also works with local councils and communities to support council areas to be more inclusive and accessible. The following submission draws on the knowledge and experience of people with lived experience of physical disability.

PDCN is the sector coordinator of the NSW Disability Advocacy Network (NDAN), which is a network of 23 disability advocacy organisations across NSW. As a collective we advocate for people with physical disability, intellectual disability, psychosocial disability, people who are neurodiverse, have developmental delays and learning disabilities. NDAN is funded by the NSW Department of Communities and Justice.

PDCN has an existing relationship with the City of Sydney. The CEO of PDCN Mr Ed Morris sits on the Inclusion (Disability) Advisory Board for the City of Sydney. The relationship PDCN has with the City of Sydney is important. The overarching intention behind this submission is to support policy makers to design inclusive and accessible parks across NSW.

Introduction

Parks and playgrounds are public areas that all people in the community should be able to enjoy. Parks offer numerous psychological, physical, social, economic and environmental benefits to park users. The Physical Disability Council of NSW (PDCN) is working with local councils to raise awareness about inclusion and accessibility for people with physical disability. What we have heard from the community is that inclusive and accessible parks and playgrounds are important.

The City of Sydney is an important council as it represents the centre of Sydney and is a leader in local government. This submission highlights the need for inclusive and accessible parks in the centre of Sydney.

The NSW Department of Planning created a best practice resource for designing play spaces that are more inclusive *Everyone Can Play: a guideline to create inclusive play spaces 2023*. While this guide is a useful resource for local councils, inclusive and accessible design is not mandatory.

The *Everyone Can Play Guidelines* are accompanied by an academic article “*Can I get there? Can I play? Can I stay? Creating an inclusive play space guide in Australia*” authored by Jane Bringolf and Phillipa Carnemolla, The Centre for Universal Design, University of Technology. It states in this article that “...a document alone does not encourage implementation or understanding of why and how a play space should be inclusive. Educating stakeholders...is an essential factor for success...”¹

This statement is part of the motivation for this submission. PDCN wants to create an awareness of this document across local government so that people with physical disabilities can enjoy parks and playgrounds across Sydney.

¹ Jane Bringolf and Phillipa Carnemolla, Phillipa *Can I get there? Can I play? Can I stay? Creating an inclusive play space guide in Australia* The Centre for Universal Design Australia, School of Built Environment, Faculty of Design Architecture and Building, University of Technology 2016 p 104

Some local councils across NSW have made progress in the inclusivity and accessibility of playgrounds. Touched by Olivia is an organisation that advocates for accessible playgrounds. Their website lists the playgrounds across NSW that are accessible for people with physical disabilities. Expanding on this work is essential for adults and children living with physical disabilities in central Sydney.

The *Disability Discrimination Act 1992* section 23 'Access to Premises' also plays a role in expanding inclusive and accessible parks and playgrounds. Section 23 requires non-discriminatory access to premises which the public is entitled or allowed to use. The City of Sydney has undertaken good work in meeting its obligations under this legislation through its engagement with the disability community in developing their Disability Inclusion Action Plan (DIAP) 2025-2029.

The DIAP 2025-2029 has a strong focus on liveable communities for people with disabilities. Enhancing the accessibility of parks and playgrounds is part of this focus. The DIAP states the City of Sydney will "Continue to improve the accessibility of streets, footpaths, parks and open places through renewal programs, upgrades and new capital works projects in line with the inclusive and accessible public domain policy and guidelines".² PDCN can help share the perspective of people with physical disabilities who use parks (or wants to use parks more often).

PDCN understands that when it comes to inclusive and accessible parks and playgrounds funding is a critical issue; capital works are costly. Evidence about the social and health benefits of parks for park users assists councils and the disability advocacy sector to argue for the funding needed to enhance inclusivity and accessibility in parks.

² '*Disability Inclusion Action Plan 2025-2029*', City of Sydney p 50

The Health and Social Benefits of Parks for Park Users

Health and social benefits of parks

Research by Sia and Henderson-Wilson *et al.* (2017) demonstrates that parks deliver significant health, social and economic benefits, including supporting physical activity, improving mental wellbeing, and facilitating social connection.

Health outcomes and participation gaps

Park users are more likely to report higher self-rated health, with 49% rating their health as very good and 25% as excellent³. This suggests a participation gap among cohorts who may not identify as healthy, including people with physical disabilities. There is an opportunity for local governments to increase inclusive park use through targeted accessibility improvements and community messaging.

Exercise, mobility and equitable access

Parks provide accessible, low-cost opportunities for physical activity, particularly walking, which supports mobility and fitness⁴. This is critical given that people with disability experience poorer health outcomes and face barriers to participation in physical and social activities⁵. For individuals unable to afford private exercise options, accessible public parks are an essential health resource.

Mental health and social connection

Parks contribute to improved mental wellbeing and social participation, with users reporting benefits associated with connection to nature and opportunities for interaction⁶. Given that people with disability are at higher risk of social isolation⁷, improving park accessibility is an important mechanism to support inclusion and community connection.

³ Henderson-Wilson, C., Sia, K.-L., Veitch, J., Staiger, P., Davidson, P. and Nicholls, P. (2017) 'Perceived health benefits and willingness to pay for parks by park users: Quantitative and qualitative research', *International Journal of Environmental Research and Public Health*, <https://parksleisure.com.au/wp-content/uploads/parc-library/409-0-Health%20benefits%20Parks%20Pilot%20-%20Final%20Report%20July%202016.pdf> p4

⁴ Henderson-Wilson *et al.*, 2017 p6

⁵ Australian Institute of Health and Welfare, 2024 p74

⁶ Henderson-Wilson *et al.*, 2017 p6

⁷ Australian Institute of Health and Welfare, 2024 p147

Value of parks and accessibility gaps

Access to parks is highly valued, with 84% of users strongly agreeing on their importance, 89% using parks for physical activity, and 98% reporting improved wellbeing (Henderson-Wilson *et al.*, 2017 p6). However, existing research does not adequately capture the experiences of people with disability. Stakeholder evidence, including from PDCN members, indicates many parks remain inaccessible, highlighting the need for inclusive design and further research.

Conclusion

Parks are a critical public health asset. However, without targeted action to address accessibility barriers, their benefits remain unevenly distributed. Inclusive planning, design and policy reform are required to ensure equitable access for people with physical disabilities.

What we have heard about parks from people with physical disabilities

PDCN is a member-led organisation, we listen to our community and use their advice and feedback to set priorities and advocate for inclusion. We connect and listen to our members through direct one on one interviews, focus groups, member surveys, local council community consultations, regional community consultations and the Lived Experience Advisory Panel. Inaccessible parks and playgrounds are an issue often raised. These issues are discussed below for your information.

Please note, that the following examples are not all related to City of Sydney Council parks and playgrounds. For privacy and confidentiality reasons we can only provide anecdotal evidence at this time.

The Green Bans Park concept design indicates that accessibility has been considered in the park upgrade. The park appears to include wheelchair-accessible paving, and the design suggests that wheelchair users will be able to access the playground.

However, the concept design does not clearly identify the full range of accessible infrastructure. It is unclear whether accessible parking spaces and accessible bathroom facilities are provided nearby, as these are not shown. Clear inclusion and identification of these elements is important to ensure the park can be used effectively by people with disability.

Accessible parking

Limited Accessible Parking Spaces

We have heard from our community that the number of accessible parking spaces in parks are limited. This can mean different things. At some parks there might be one disability parking space available near a main area of the park ie the playground. But other main areas such as picnic areas, dog park areas, basketball courts, smaller cafes/dining spots, event grounds will not have a disability parking space. The Greens Ban Park Concept Design does not show where the disability parking space will be located after the upgrade.

Another issue that has been reported is that when there is only one disability parking space in a large park, it is often in use and people with physical disabilities may not be able to find a suitable alternative parking spot. Negotiating a wheelchair out of a car can be difficult. The right amount of space is required to transition a person from a car to a wheelchair. What we have also heard is that small parks and playgrounds often do not have accessible parking at all.

***Recommendation 1:** Local councils should adopt a minimum standard requiring accessible parking at all parks and playgrounds, scaled proportionally to park size and key activity zones.*

***Recommendation 2:** The Green Bans Park Concept Design should be updated to include information about the number and locations of disability parking spaces available to park users with physical disabilities so people with physical disability and disability advocates for feedback and comment.*

Accessible bathroom facilities

Limited accessible bathroom facilities

We have heard from our community that there is usually only one accessible bathroom in parks – even larger parks. For some people with more complex physical disabilities this creates a barrier to enjoying and travelling around the parklands.

It is common for people with complex physical disabilities to experience incontinence or bowel leakage. Continence Health Australia state that *“People who have challenges with...moving their body or with how their brain and nerves work are more likely to experience incontinence (bladder or bowel leakage). This includes many conditions in children and adults such as cerebral palsy.... spinal cord injury...”*⁸

For people with complex physical disabilities there is a need to use bathroom facilities more regularly compared to a person that does not experience bladder or bowel leakage. The Green

⁸ *Living with Incontinence*, Continence Health Australia, <https://www.continence.org.au/living-with-incontinence/people-with-disability/>

Bans Park concept design does not indicate where the bathrooms will be located and if they will be accessible. This lack of detail limits the ability of people with disability and advocacy organisations to assess whether the design will meet accessibility needs.

Recommendation 3: The Green Bans Park Concept Design should be updated to include information about the number and locations of accessible bathrooms available to park users so people with physical disability and the disability advocacy sector can provide comment and feedback.

Accessible bathrooms are not suitably maintained

We have heard from our community that accessible bathroom facilities often have poor lighting, are damp and not cleaned as regularly as needed. A wheelchair to toilet transfer is important for people with limited mobility. A dry, clean and well-lit space is needed to support this transfer. It is about independence and autonomy.

Apart from general comfort it is unsafe for people requiring complex bowel care to use an unhygienic bathroom. Complex bowel care is required for individuals with spinal cord injuries and people with disabilities and health complications that affect the bowel function.

Many people with spinal cord injuries have compromised or reduced immune function, which increases their susceptibility to infection⁹ If a bathroom is damp, untidy and unhygienic it could create an environment for bacteria leading to bowel infection.

Recommendation 4: Dry, clean and well-lit accessible bathroom facilities are required to support a person with more complex bowel care requirements to manage their toileting hygienically, safely and with dignity.

⁹ Eileen Scahill Study Shows Spinal Cord Injury Causes 'Immune System paralysis', Media Release, The Ohio State University Wexner Medical Centre 7 March 2016

Adult Change Bathroom Facilities

An Accessible Adult Change Facility is a toilet and change facility that caters for users with high support needs and their carers where they require additional space, assistance and specialised equipment to allow them to use toilets safely and comfortably.

Accessible adult change facilities were developed and established in Australia in 2009 originally as 'Changing Places'. These facilities are suitable for people with high support needs who cannot use standard accessible toilets. An adult Changing Places facilities include:

- a height-adjustable adult-sized change table
- a constant-charging ceiling track hoist system
- a centrally-located peninsula toilet
- additional circulation space more than standard accessible toilets
- an automatic door with a clear opening of 950 mm at a minimum
- and a privacy screen. ¹⁰

Access to Changing Places facilities in parks across NSW is extremely limited. There are currently 59 Changing Places facilities statewide, indicating a significant gap in provision. The closest adult change facility to Erskineville is Gymea park Recreation and Aquatic Centre, highlighting limited local access for inner-city users.

Changing places facilities enable people with complex bowel care needs to be able to access and enjoy parks in the Sydney area. We encourage all local council to invest in more adult change facilities in their local parks. If community events are being held in Green Bans Park the council can hire a portable adult changing facility.

Recommendation 5: The City of Sydney should invest in more adult change facilities in their local parks. As a more immediate solution, City of Sydney should hire portable adult change facilities when hosting events at Green Bans Park to enable people with complex bowel care needs to be able to access and enjoy park events.

Paths (pavements and footpaths) and Stairs

¹⁰ Changing Places, *Why changing places?* <https://changingplaces.org.au/why-changing-places>

We have heard from people with physical disabilities that parks often have uneven paths around and through the park. This makes it difficult for people who use wheelchairs to navigate steadily and safely around park pathways.

What we have also heard is that often paths in parks do not lead to all main areas of a park. For example, they might lead to a playground but not to other main common areas such as picnic areas, dog park areas, basketball courts, smaller cafes/dining spots, event grounds. This makes parks largely inaccessible for people who use wheelchairs. It is not clear if the netball hoop located at section 11 will be accessible for people in wheelchairs.

There are risks for people with disabilities trying to manoeuvre through parks without suitable pathways. We heard a story where a person who is a wheelchair user was travelling to the picnic area with friends. The pathway led to the general picnic area but did not extend to the picnic tables and seats. This person had to travel across a grassy area to reach the picnic tables. Their wheelchair became unstable, it tipped over, and they fell out of their wheelchair. This is a safety issue, but it also about a person being navigate park pathways with ease and dignity.

Recommendation 6: The pathways in parks should be maintained to ensure they are smooth and even. Pathways should also lead to all main areas of the park where possible.

People with mobility issues may have difficulties using stairs and people in wheelchairs are not able to negotiate stairs. The Green Bans Park concept design shows that stairs are located leading to section 3 of the park. This section enables park users to view the trains which people in wheelchairs will not be able to access.

Recommendation 7: When designing, building or upgrading parks, councils should ensure that if stairs are to be used there are also ramp options to make sure people with physical disabilities are not excluded from park areas.

Picnic and dining

We have heard that picnic areas, with picnic tables and chairs are often not accessible. Apart from the above example of the picnic area being located across a grassy area from the pathway, there are other issues.

We heard from one person in the community that the picnic tables and chairs at their local park are situated on a concrete slab which is elevated. This means that people in wheelchairs cannot sit next to their friends and family. They must sit apart from their family at a lower level.

Inclusive design is a critical part of park development. Parks are for everyone in the community to enjoy. We have heard that it is upsetting to sit away from friends and family. A simple design flaw such as an elevated picnic area can have a big impact on the way a person is able to socialise and enjoy a park. It is not clear from the concept design if wheelchair users will be able to access the picnic area located in section 9 from the pathway, it looks like there might be a lip separating the path from the picnic area.

Recommendation 8: Picnic tables and chairs should be level to the floor so people in wheelchairs can sit beside their friends and family at the picnic table. The pathway leading to the picnic areas should be even.

Shade and Shelter

The other issue we hear from our members is that shelter at parks is limited or placed far and few between. Broadly speaking, people go to the park to enjoy the sunshine. However, shelter and shade are also part of this enjoyment. People seek shade when the sun is hot and seek shelter when it rains. Many people can walk to a shady area or run to a shelter from the rain. But navigating shade and shelter is more difficult for people with physical disabilities who are less mobile.

For people with disabilities, exposure to heat may result in more severe health risks or death because it exacerbates preexisting conditions, including cerebral, respiratory, and

cardiovascular diseases¹¹. Therefore, parks must provide adequate shaded areas, located in main areas of the park, with pathways leading to the shade. Shaded areas also need water fountains that can be used by people in wheelchairs.

Similarly, parks should be designed to ensure there is adequate sheltered areas located near main areas of the park for greater comfort and enjoyment. The concept design for Green Bans Park does not indicate where the shaded and sheltered areas are in the park.

Recommendation 9: The Green Bans Park Concept design should be updated to indicate where the shade and sheltered areas of the park are located so people with disabilities, and the disability advocacy sector can provide comment and feedback. If there are no plans to offer shade or sheltered areas of the park, then consideration should be given to making sure these areas are available.

Playgrounds

We have heard from our community that the space within, and equipment used, in playgrounds is inaccessible. One of the key issues is that children who use wheelchairs are unable to play on most equipment.

Again, there is also the Everyone Can Play Guidelines published by the NSW Department of Planning. This resource can be drawn on by councils to ensure playgrounds are inclusive for children with physical disabilities. The guidelines are accompanied by checklists to help decision makers navigate the features of accessible playgrounds.

Recommendation 10: When building or upgrading playgrounds councils should refer to best practice standards to ensure playgrounds are accessible for children with physical disabilities and their parents and/or carers.

¹¹ Richard Glupker 'At Risk: people with disabilities', Science and Information to Reduce Heat Risk 11 July 2025

Conclusion

PDCN recommends that local councils adopt a minimum standard requiring accessible parking at all parks and playgrounds, proportionate to park size and use, and that the Green Bans Park concept design be updated to clearly identify the number and location of disability parking spaces and accessible bathroom facilities to enable meaningful community feedback.

Accessible bathroom provision should include dry, clean, and well-lit facilities that support safe and dignified use, with increased investment in adult change facilities across City of Sydney parks and the use of portable facilities during events where permanent infrastructure is not available. In addition, park pathways should be smooth, even, and provide access to all key areas where feasible, and picnic facilities should be fully accessible, including level seating arrangements that allow people using wheelchairs to sit alongside others.

Finally, councils should ensure playground upgrades are guided by best practice standards to support full access for children with physical disabilities and their carers. Parks create opportunities for exercise, connection with nature and social connection. We believe these opportunities should be available to people with physical disabilities in the same way they are for people who do not have physical disabilities.

Annex A - Summary of Recommendations

Accessible Parking

Recommendation 1: Local councils should adopt a minimum standard requiring accessible parking at all parks and playgrounds, scaled proportionally to park size and key activity zones.

Recommendation 2: The Green Bans Park Concept Design should be updated to include information about the number and locations of disability parking spaces available to park users with physical disabilities so people with physical disability and disability advocates for feedback and comment.

Accessible Bathroom Facilities

Recommendation 3: The Green Bans Park Concept Design should be updated to include information about the number and locations of accessible bathrooms available to park users so people with physical disability and the disability advocacy sector can provide comment and feedback.

Recommendation 4: Dry, clean and well-lit accessible bathroom facilities are required to support a person with more complex bowel care requirements to manage their toileting hygienically, safely and with dignity.

Recommendation 5: The City of Sydney should invest in more adult change facilities in their local parks. As a more immediate solution, City of Sydney should hire portable adult change facilities when hosting events at Green Bans Park to enable people with complex bowel care needs to be able to access and enjoy park events.

Pathways (pavements and footpaths) and Stairs

Recommendation 6: The pathways in parks should be maintained to ensure they are smooth and even. Pathways should also lead to all main areas of the park where possible.

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Picnic and Dining

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Shade and Shelter

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Playgrounds

Recommendation 10: When building or upgrading playgrounds councils should refer to best practice standards to ensure playgrounds are accessible for children with physical disabilities and their parents and/or carers.