



DISABILITY  
COUNCIL NSW

Official **Adviser** to the NSW Government

Ms Anissa Levy  
Acting General Manager  
Land Use and Integrated Planning  
Transport for NSW  
PO Box K659  
HAYMARKET NSW 1240

Dear Ms Levy

**Re: Sydney City Centre Access Strategy - A strategy to make the Sydney City Centre accessible for all**

The Disability Council NSW ('the Council') is the official advisory body to the NSW Government on disability matters. The current Council consists of 11 members representing a diverse range of experience and expertise on disability issues.

The Council welcomes the opportunity to provide input into this important strategy for the City of Sydney, a centre of economic, political, educational, social and recreational activities in which people with disability want to fully participate. The Council has a strong track record providing advice on key transport policies such as the NSW Long Term Transport Master Plan, Mobility Parking Reviews and the Transport Disability Action Plan. We would like to see the concept of whole of journey accessibility integrated as a core element of planning and developing social infrastructure.

**Accessibility as a key principle**

Whole of journey accessibility in society is fundamental to citizenship. It plays a pivotal role in providing the means for people with disability, who make up twenty percent of the population, to access education, employment, services and cultural life. Page 14 of the Strategy lists what is important to customers. The Council is concerned however, that accessibility is absent which is of critical importance to twenty percent of the potential customers. Accessibility would allow people with disability to travel independently, confidently and with dignity. With only two references to people with disability in the whole Strategy, there is a risk of overlooking accessibility issues.

The Council believes that this important planning process needs to adopt the following Article of the UN Convention on the Rights of Persons with Disabilities as one of its core principles:

**Article 9 Accessibility**

1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:

(a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces;

In addition, the Council would like to encourage strong links between the Strategy and national and State government policy commitments including the National Disability Strategy NSW Implementation Plan, Person Centred Approaches and the Transport Disability Action Plan.

**Consultation is the key**

In any planning process it is critical to gain a detailed understanding of the barriers faced by people with disability and the potential solutions. In some circumstances the needs of people with disability are not dissimilar to other commuters and pedestrians such as parents with prams and older Australians. In other circumstances, unique solutions are required to remove barriers face by people with particularly impairment. The best way to develop a more robust strategy is to consult early so that the needs of people with disability are not an afterthought, and to consult widely to ensure that diverse needs are addressed appropriately.

The Council believes that the development of the Strategy would have benefited from consultation with forums such as the Transport for NSW's Accessible Transport Advisory Committee (ATAC). ATAC provides an important forum for identifying and considering the myriad barriers and opportunities in the current transport system. The Council would like to see a representation of people with disability on the proposed City Centre Transport Taskforce as well as a stronger focus on ongoing consultation with disability organisations and forums.

**Not just walkable, but wheelable as well**

The Strategy makes no specific mention of access issues for pedestrians with disability, other than in the context of Wynyard Walk, although there have been ongoing concerns in relation to the condition of footpath and kerb ramps. Many sections of the footpaths in the City of Sydney have uneven surfaces which present a safety risk for people with vision impairment or use mobility aids. Similarly, kerb ramps are too steep which can be dangerous for people with mobility impairments. The availability of accessible buses, trains and ferries is meaningless if access to and from the bus stop, train station or wharf is inaccessible.

The Council would like to see specific commitments made in the Strategy to ensure that safe and accessible path of travel for people with disability in the City Centre will be a reality. Particular attention needs to be paid to the design and construction of individual kerb ramps, not only to ensure that they meet Standards but also to take into account the natural slope of the landscape so that they are as functional as possible.

Other accessibility features which are important for pedestrians include an increase in the availability of undercover walkways connecting modes of transport, seating for regular rests and accessible toilet facilities that are easy to find.

### **Accessible taxi ranks**

The Council is pleased that the Strategy aims to provide more taxi ranks in better locations as this will bring particular benefits to people with disability who rely on the use of taxis. A concern for taxi users with disability is the difficulty of getting from the road to footpath independently and safely. We would like to recommend that the Strategy commits to a graduate roll out of accessible taxi ranks in the City. For further information on accessible taxi ranks please use this [weblink](#) to access an article on Sydney's first accessible taxi rank for wheelchair users recently launched at Top Ryde City.

### **Accessible parking**

The implementation of the Strategy will see a reduction in on street parking availability. The Council is pleased that the Strategy recognises the importance of preserving mobility parking spaces in the Sydney City Centre. It is not clear, however, whether the number of mobility parking spaces will increase or stay the same. With a growing ageing population the demand on mobility parking will increase. The Council would like to see that the Strategy has the capacity to address this growing demand.

Many people with disability use on street parking as private or public undercover parking are not always accessible. A significant number have height restrictions which make them impossible to access for people who use roof mounted wheel hoists. Other access barriers include a lack of lifts or wheelchair accessible parking spaces. The Strategy identifies the need for the City Centre Transport Taskforce to work in partnership with parking station owners on a number of issues. The Council suggests that the Taskforce encourages owners to provide accessibility information on their websites. This will allow people with disability to plan their trips better. Ultimately, The Council would like to see these parking stations improve their accessibility over time.

### **Accessible information**

The Strategy recognises the importance of providing information to help people plan and navigate the City. However, it makes no commitment to ensure information will be available in alternative formats as well as in community languages. Lack of equitable access to information has been a major barrier experienced by people with disability. The result is significant disadvantage and isolation. The Council recommends that the Strategy adopts a universal access approach in information provision. This means everyone, regardless of their impairments, have full access to information. Making information accessible to people with diverse impairments is

highly specialised. The Council recommends that the Taskforce actively consult with the various disability peak bodies and conduct field tests.

**Accessible destinations**

According to the Strategy, delivering a fully integrated transport network will allow more people to access the City centre. Accessing the city needs to also include consideration of how people with disability gain access to buildings within the City Centre. The Disability (Access to Premises) Standards 2010 aims to achieve better access to public buildings, however, many buildings in the City of Sydney are not accessible to people with disability. The Council would like to encourage a strong partnership between Transport for NSW and City of Sydney Council to ensure that accessibility considerations are paramount in the assessment of development applications.

The Sydney City Centre has the potential to demonstrate best practice in transport and pedestrian accessibility if the needs of people with disability are integral to the planning and implementation of the Strategy. We hope that these recommendations make a useful contribution towards achieving this goal.

Please feel free to contact me on 0411 193 753 should you have any questions.

Yours faithfully



Cain Beckett, FAICD  
Chair, Disability Council NSW

24 October 2013