

**ATTACHMENT C**

**SUMMARY OF PUBLIC EXHIBITION  
SUBMISSIONS RECEIVED TO A CITY FOR  
ALL: INCLUSION (DISABILITY) ACTION  
PLAN 2017-2021**



## **ATTACHMENT C: DRAFT INCLUSION (DISABILITY) ACTION PLAN 2017 – 2021 SUBMISSION SUMMARY**

### **BACKGROUND AND APPROACH**

The draft A City for All: Inclusion (Disability) Action Plan 2014-2017 was placed on public exhibition on 17 May 2017 until 5.00 pm on 14 June. Advertisements were placed in print media advising of the exhibition period.

The key digital platform used was Sydney Your Say website [www.sydneyyoursay.com.au](http://www.sydneyyoursay.com.au). Printed copies were also made available for inspection at the City's neighbourhood service centres and at Town Hall House.

The draft plan was distributed to a range of disability and community sector stakeholders including the relevant state and local government agencies, peak organisations and non-government organisations.

In addition, people with disability and other stakeholders who participated in the disability action planning workshops in December 2016 were directly invited to view the draft plan and provide further comment.

Organisations representing the mental health sector were specifically invited to comment, as they were not able to participate in earlier consultations.

### **SUBMISSIONS RECEIVED**

A total of 295 visits to [www.sydneyyoursay.com](http://www.sydneyyoursay.com) took place between 17 May and 5.00 pm on 14 June 2017.

During this time: the action plan was downloaded a total of 124 times

- Standard PDF – downloaded 94 times,
- accessible e-text - downloaded 16 times,
- easy English - downloaded 11 times
- large print - downloaded 3 times)

The Auslan video was played 25 times across the public exhibition period.

A total of 9 submissions were received through sydneyyoursay, via email, and over the telephone.

Details of the comments and the City's proposed responses follows over-page.

#	Author	Summary of submission	City of Sydney response
1	Inclusion Advisory Panel	General wording suggestions throughout the plan, particularly within the 'understanding disability' section, for example, using term 'people with disability of all ages'.	This is supported and wording throughout the plan has been amended.
		General wording suggestions around how accessible housing is referred to. Use the term accessible housing and not adaptable housing.	This is supported and wording throughout the plan has been amended.
		Suggestion to include images of people with disability practising art.	This is supported and new image will be provided on page 15 in the final graphic design.
		Include a statement within the plan that notes many of the actions are broad and that they are supported by detailed internal implementation plans.	This is supported. An explanatory statement has been included on page 48.
		Provide a definition of 'Changing Places toilets' or Lift & Change Facilities within plan.	This is supported. A definition of Lift & Change Facilities is now provided on page 27.
		Under the community profile section add a paragraph on the Deaf community.	Noted and supported. An explanatory paragraph is included on page 15.
2	Resident	Concern around the design of seating in the public domain seating within Council operated buildings, specifically not providing appropriate back support.	<p>The City understands that seating that includes back rests and arm rests is essential to many people in the community.</p> <p>This will be addressed within the forthcoming Public Domain Access and Inclusion Policy and its implementation.</p> <p>No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>
3	Visitor	Investigate a 2 hour parking limit for accessible parking bays within close proximity to key facilities and locations to ensure continuous turnover throughout the day and in turn providing increased access for more people.	<p>Action 8 in the plan details the City's commitment to reviewing provision of on-street mobility parking spaces in the City and identifying where additional spaces may be provided in association with neighbourhood shopping precincts and community facilities.</p> <p>Transport for NSW are investigating the introduction of time based mobility parking spaces, via amendments to the Mobility Parking Permit Scheme. If implemented by the</p>

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			<p>NSW Government, this will allow councils to implement time based mobility parking spaces in accordance with guidelines. Any such changes will be referred to the Local Pedestrian, Cycling and Traffic Calming Committee for consideration as and when appropriate.</p> <p>No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>
4	Resident	<p>1. Will the plan address streetscapes and public domain spaces that are currently not accessible? For example:</p> <ul style="list-style-type: none"> <li>• Narrow footpaths between Lawson and Wilson Streets, Redfern due to trees, garbage bins and houses <ul style="list-style-type: none"> <li>• Inaccessible pathways between Carriageworks and public transport locations</li> </ul> </li> <li>• Tactile navigation from St James Station to Hyde Park and other key landmarks in Hyde Park.</li> </ul> <p>2. How will the City conduct access inspections of buildings within the LGA?</p>	<p>As public domain spaces are upgraded every effort is made to maximise the accessibility outcomes in that area. The Sydney Streets Code outlines the design principles the City aspires to. These include minimum 1.8m wide pedestrian areas, and defined zones for streets and street furniture.</p> <p>However, in some instances, such as older neighbourhoods like Redfern, existing narrow footways mean such outcomes cannot be achieved.</p> <p>Action 4 in the plan describes a range of ways the City continues to improve access in the public domain. Through dedicated access improvements to bus stops, though public domain renewal programs</p> <p>Planned upgrades to the path network in Hyde Park will ensure paths are accessible, and detectable and support navigation through the park.</p> <p>There is no requirement for any public authority to inspect all buildings in terms of accessibility.</p> <p>The <i>Disability (Access to Premises – Buildings) Standards 2010</i> specify requirements for the design of buildings</p> <p>These standards only apply to new buildings and new work (renovations) on existing buildings. As part of any development requiring a construction certificate or complying development certificate, the certifying authority responsible for issuing a building approval is required to ensure regulations, building codes and standards are compliant, including confirming that the premises adhere to the <i>Disability (Access to Premises – Buildings) Standards 2010</i>.</p>

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			<p>The City can act as a principal certifying authority, but developers may choose the services of a private principal certifying authority.</p> <p>No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>
5	Mental Health Carers NSW	Support for the plan and pleased to see a focus on mental health and the inclusion of people with lived experience of mental health within some of the proposed City activities and employment outlined within the plan.	The comments are noted.
6	Guide Dogs	Overall, the draft plan reads well. Guide Dogs noted concern of accessibility of the infographic on page 14.	<p>The comments are noted.</p> <p>Accessibility of the infographic has been addressed in final plan.</p>
7	Carers NSW	<p>Carers NSW are pleased to see the plan is inclusive of carers and reflects their input from the consultation.</p> <p>Positive to see the City proposes to actively engaging with staff about their needs and experiences as carers and support the target regarding raising awareness of carer needs in the workplace and engaging managers and supervisors around flexible work.</p>	The comments are noted.
		<p>Support recognition of carer legislation, however noted that reference to the legislation needs to be corrected on page 5.</p> <p>Inclusion and recognition of carers and their contribution to be stated under the four directions.</p>	<p>Amendments to the carer legislation reference has been made on page 5.</p> <p>Additional reference and recognition of carers has been included under the four directions on page 5 as well as further throughout the plan.</p>

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8	2RPH	<p>Overall, positive feedback on the plan, layout, information and rationale.</p> <p>Positive to see the new access symbol and the 'Accessing Sydney Collectively' initiative.</p> <p>2RPH would be pleased to support all parts of the plan, particularly Action 33.</p> <p>2RPH would be happy to work with the City to provide recorded or live presentations of key information and current news such as the City's newsletter.</p> <p>The plan could be strengthened in the area of public transport. 2RPH noted that there pressure needs to be applied on the government to improve access to, on and from public transport.</p>	<p>The comments are noted.</p> <p>The City is committed to working with the state government to ensure a whole of journey approach in access to public transport and surrounding public domain</p>
9	Disability Council NSW	<p>The Disability Council of NSW noted the following strengths of the Draft Action Plan.</p> <ul style="list-style-type: none"> <li>• Engaging with and gaining advice from the Inclusion (Disability) Advisory Panel</li> <li>• The staged approach to develop the plan is inclusive</li> <li>• Engaging with people with disability, carers, service providers, peak bodies and the Advisory Panel</li> <li>• Reference to the cultural diversity of the City, including Aboriginal and Torres Strait Islander people</li> <li>• Provides an overview of international, nation and State legislation has influenced the plan, including the NSW Carers (Responsibilities) Act</li> <li>• Includes and targets broad disability community</li> </ul>	<p>The comments are noted.</p>

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		<ul style="list-style-type: none"> <li>• Good to see Auslan, Easy English, PDF/Word and large print versions are available</li> <li>• The plan is easily located on Council's website</li> <li>• Each pillar has themed actions that reflect the feedback provided in the consultation</li> <li>• Each action has strategies, measures, timeframes (over four years to 2021) with allocated personnel</li> <li>• A governance structure is provided to oversee the implementation and evaluation of the plan</li> </ul>	
		<p>The Disability Council of NSW made the following suggestions:</p> <ul style="list-style-type: none"> <li>• Provide clarity around how consultation outcomes were included in the plan and provide consultation report.</li> <li>• Include specific reference to consultation with culturally and linguistically diverse people, Aboriginal and Torres Strait Islander people, women and children with disability</li> <li>• Provide statistics for the City of Sydney</li> </ul>	<p>The comment is noted and supported. A summary of suggestions from initial consultation and how they have been considered in the final plan have been included at Attachment B.</p> <p>Peak groups representing culturally and linguistically diverse people, Aboriginal and Torres Strait Islander people and women and children with disability were invited to participate in our consultations and provide comment on this draft.</p> <p>No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p> <p>Demographic characteristics are included on pages 12-14 of the draft plan. No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>
		<ul style="list-style-type: none"> <li>• Provide information on how the community can provide feedback throughout the lifetime of the plan</li> <li>• Needs to be linked to the NSW Disability Inclusion Plan</li> </ul>	<p>This information is included in the plan. No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p> <p>The draft plan has been aligned to the four directions outlined in the NSW Disability Inclusion Plan. No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>

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		<ul style="list-style-type: none"> <li>• Ensure that tables and text boxes are compatible with screen readers</li> <li>• The need to include budget and human resources assigned to each action</li> </ul>	<p>An accessible Word version has been produced in addition to the PDF to ensure compatibility.</p> <p>The Inclusion (Disability) Action Plan will be delivered within existing staffing and operational budgets, or through future capital works projects or procurement contracts and agreements.</p> <p>The planning process for the 2017/18 operating and capital budgets has taken into account the costs associated with delivering actions scheduled to occur in the 2017/18 financial year as outlined in the draft Inclusion (Disability) Action Plan 2017-2021.</p> <p>Availability of budget resources is subject to final Council approval of the 2017/18 budget.</p> <p>Implementation plans will contain details of budget and human resources.</p> <p>No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>
10	Mental Health Commission of New South Wales	<p>Explicit acknowledgement of psychosocial disability throughout the Plan.</p> <p>Run Mental Health First Aid training alongside disability awareness training for City of Sydney staff.</p>	<p>The comment is supported, and definition has been included on page 15.</p> <p>The City runs a range of mental health awareness and resilience training programs for staff as part of its Workplace Health and Safety program. Additionally, staff can access training that develops understanding of mental illnesses and provides staff with strategies to ensure our services remain inclusive of people with a lived experience of mental illness. These training outcomes will be included in the reporting of the plan.</p> <p>No change to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>
		<p>Incorporate the principles of trauma informed care in service design and delivery.</p>	<p>The City recognises the role that trauma can play in impacting an individual's mental health. The principles of Trauma Informed Care have influenced the City's approach to engaging with people experiencing homelessness in particular.</p> <p>The City will consider how to apply the principles of trauma informed care in the</p>

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			<p>broader service design and delivery in future plans.</p> <p>No change is proposed to A City for All: Inclusion (Disability) Action Plan 2017-2021.</p>
11	Physical Disability Council of NSW (PDCN)	<p>The Physical Disability Council of NSW has made the following suggestions:</p> <p><b>Action 1:</b> Measure the percentage of community members with disability who agree that City staff display appropriate disability awareness behaviours when they interact with them.</p> <p><b>Action 4:</b> The plan identifies as a measure for continuous accessible paths of travel the percentage of accessible kerbside ramps and signalised crossings. PDCN advises the need to address additional features associated with continuous accessible paths of travel, including; signage and on-street dining.</p> <p><b>Actions 7, 8 and 9:</b> To ensure the most effective use of accessible parking arrangements, PDCN would suggest wherever possible the provision of a range of accessible spaces, including wider spaces for wheelchair users, ambulant mobility spaces, and those for parents with prams are all provided.</p> <p>In addition, clearly delineated signage for the differing uses mentioned above may assist in further ensuring appropriate parking is available for the particular groups described at the time of use.</p>	<p>The City does not have the mechanisms at present to capture this, however, the City will explore how this type of information could be captured in the future.</p> <p>No change is proposed to A City for All: Inclusion (Disability) Action Plan 2017-2021.</p> <p>The measures of the kerb ramp is intended to be used as a key performance indicator only. The City acknowledges that an accessible footway comprises more than just the presence of a kerb ramp.</p> <p>No change is proposed to A City for All: Inclusion (Disability) Action Plan 2017-2021.</p> <p>The City notes that in commercial car parks there are often a number of different parking arrangements as described by PDCN. At present the regulatory framework for on-street mobility parking does not allow for these arrangements.</p> <p>Designated on-street mobility parking spaces should be designed in accordance with AS2690.0.</p>

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		<p>Increased publication on the City website and other appropriate sites, of the location and types of accessible parking spaces throughout the city would also be of great benefit for those planning trips throughout the City.</p> <p><b>Action 13:</b> PDNC welcome the City's initiative to encourage new housing that is universally accessible and meet the GOLD standard of the Liveable Housing Design Guidelines, however would wish to see a mandated requirement for a minimum percentage of dwellings that were delivered to be of this standard.</p>	<p>Action 8 commits the City to providing information about the locations of mobility parking spaces in the City, and include additional information about their features.</p> <p>No change is proposed to A City for All: Inclusion (Disability) Action Plan 2017-2021</p> <p>There is a complex legislative framework for Universal Design and access which includes the Disability Discrimination Act 1992 (the Act), the Building Code of Australia, and relevant Australian Standards. This framework sets consistent regulation at the national level. The City is committed to creating an inclusive and accessible city guided by its Inclusion (Disability) Action Plan. The Sydney Development Control Plan 2012 (the DCP) sets objectives for accessible design which refers to the Act, relevant Australian Standards, the Universal Housing Guidelines, and sets requirements for the provision of adaptable housing in large scale developments.</p> <p>Section 3.12 - Accessible Design in Sydney DCP aims to ensure development caters for the needs of elderly people and people who have a disability. All development must comply with the Act, the Building Code of Australia, relevant Australian Standards and controls in the DCP.</p> <p>Under Section 3.12 Accessible Design, the City requires a proportion of adaptable units to be provided in new residential flat buildings. The adaptable units must be designed to be flexible and easily modified for occupation or visitation by people with a disability, or who may acquire a disability as they age. The City requires up to 15 per cent of dwellings in larger developments to be adaptable multi-unit residential buildings, which is higher than many other local governments.</p> <p>The NSW Government Apartment Design Guide encourages achievement of Liveable Housing Silver Standard for up to 20% of new apartment dwellings. Silver level includes provision to ensure access through the entrance to the premises, but does not encourage universal design considerations that would make an apartment an accessible home.</p>

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			<p>The intention of Action 13 is to explore which available planning mechanisms can be harnessed to encourage the provision of housing that meets Livable Housing Gold Standard, which provides a higher level of access within premises.</p>
		<p>PDCN request that the City consider ensuring a percentage of this housing is also specifically designated for people with disability to access, otherwise dwellings of this nature (due to their benefit to parents with prams, the elderly and other whom like the level access and wider door widths) tend to be in high demand and missed by those that need them most.</p>	<p>The City acknowledges that accessible housing is in high demand. The City's approach to meeting this demand is to encourage more accessible housing.</p> <p>The planning framework does not enable councils to designate or monitor who can reside in new developments.</p> <p>No change is proposed to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>
		<p><b>Actions 14, 15, 18 and 19:</b></p> <p>The need for a clearly defined and accessible online booking process for a person booking an accessible seat at an event. PDCN notes that most online booking systems will not allow a person booking a wheelchair accessible seat to do this online, and that it requires calling to make the booking which is not inclusive, lengthy and problematic.</p> <p><b>Actions 20, 21 and 24:</b></p> <p>PDCN welcome the City's initiatives in the area of employment for people with disabilities, across all areas of disability.</p> <p>PDCN suggest the following with regard to employment:</p> <ul style="list-style-type: none"> <li>An additional long term measure of the % of staff (new employees entry level employees or other) that REMAIN employed at the 6 month, 1 year and 2 year points.</li> </ul>	<p>The City uses a range of booking sites and agencies for events and activities.</p> <p>As far as possible, the City will consider more accessible online booking processes for people booking a wheelchair accessible seat through implementation of the plan.</p> <p>No change is proposed to A City for All: Inclusion (Disability) Action Plan 2017-2021</p> <p>The City is committed to enabling a diverse and inclusive workplace where people from all backgrounds are welcomed, supported and have opportunities to participate.</p> <p>The 2017-2021 plan focuses on ensuring the City understands the experiences and needs of its current workforce and builds the foundations for greater employment, development and career opportunities for all of its staff, including people with disability.</p> <p>No change is proposed to A City for All: Inclusion (Disability) Action Plan 2017-2021</p>

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		<ul style="list-style-type: none"> <li>• The implementation of strategies that promote pathways to senior positions for people with disabilities would be a welcome inclusion to the City Inclusion Action Plan.</li> <li>• Ensuring all City workplaces are fully accessible, or implement appropriate workplace adjustments for employees with a disability could be an identifiable action in the Inclusion Disability Action Plan.</li> </ul>	