

# **Attachment E**

**Public Exhibition – Submissions and  
Feedback**

# Submission and feedback on the draft Inclusive and Accessible Public Domain Policy and Guidelines

## General Comments

Comments and Feedback	Source	City of Sydney Response
<b>Comments in support of the policy and guidelines</b>		
The Draft policy and guidelines are very comprehensive and we believe they are an effective, positive resource to remove barriers and improve participation of all people in our community.	Written submission-Walk Sydney Incorporated	Noted.
Physical Disability Council of NSW would like to commend the City of Sydney on their detailed Policy and Guidelines. We strongly support City of Sydney's principal aim of ensuring all public domain spaces and events in the City of Sydney are inclusive and accessible for all members of the community. 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.	Written submission-Physical Disability Council of NSW	Noted
BIKEast support this policy and guidelines document and look forward to improved accessibility and movement of people around our city.	Written submission-BIKEast	Noted.
The Design Advisory Panel commended staff for the work and clear presentation. The Panel supported the integration of the guidelines into the City's Public Domain Design Codes.	Design advisory panel meeting	Noted

Comments and Feedback	Source	City of Sydney Response
<p><b>Agreed in principle. These suggestions have been addressed already or will be explored in the context of a different policy or action plan.</b></p>		
<p><b>Measuring performance and progress</b></p> <ol style="list-style-type: none"> <li>1. Use the pedestrian access and mobility audit to identify areas for priority to be upgraded to meet current access standards.</li> <li>2. Use a pedestrian access and mobility audit as the base line measure to determine progress. This could include measures such as #/% of compliant kerb ramps.</li> </ol>	<p>Peer led workshops</p>	<p>An audit of the City's footpath network was conducted in 2015, and identified a range of conditions including widths, condition of surface materials, and whether kerb ramps are, missing, misaligned and or non-compliant with current accessibility standards.</p> <p>This audit has informed the development of footpath and pedestrian ramps upgrade renewal programs since that time.</p> <p>The City will explore the feasibility of using such data as a baseline measure to determine progress.</p>
<p><b>Providing feedback</b></p> <ul style="list-style-type: none"> <li>• Too many silos between government agencies. There needs to be better interagency communication and cooperation on emerging access issues in public spaces.</li> <li>• People with disability would like one clear point of contact where the issues can be raised, and they are confident a solution will be achieved, especially where there are numerous agencies involved. e.g. someone will effectively case manage their enquiry and ensure all relevant parties contribute to the response. They wanted more accountability, responsiveness and follow up between agencies.</li> <li>• The snap send solve app is great, but the City's report an issue web page is hard to use and is not WCAG compliant. Ensure there is clear information about alternative ways to provide feedback about access issues in public spaces.</li> </ul> <p>Educate the disability community on the processes to raise issues, encourage, and welcome the feedback.</p>	<p>Peer led workshops</p>	<p><b>Customer Service</b></p> <p>Where the City's Customer Service Team receives feedback regarding an accessibility issue in public spaces that is the responsibility of another agency, the Customer Service Teams current practice is to report that issue directly with the appropriate agency through their mainstream channels. The Customer Service Team use this approach to provide a more streamlined experience for the customer, while educating the customer on how to report issues with the relevant agency. The customer is then provided the relevant reference details of the issue logged so they can follow up directly with the appropriate agency.</p> <p>For more complex issues where there may be numerous agencies involved, the City endeavours to work with agencies to develop a coordinated response in a timely fashion, but this relies on the timely cooperation of other agencies. The City will explore the feasibility of designating key customer service</p>

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		<p>staff as point person to act as liaison for complex accessibility issues across the City and with other agencies as relevant.</p> <p><b>Report an issue</b></p> <p>The City's Report an Issue App was converted to HTML5 responsive design in October 2017, and before its release, the report an issue page was tested by a third party confirming it passed WCAG2.0 level AA.</p> <p>The Snap Send Solve product works by generating an email to council. While it has a clean user interface, as it is a general product, it captures only some basic data. The City's Report An Issue page asks more questions and collects more data, that is written directly to the City's systems to enable further response/resolution of the issue notified. This means the City is able to investigate the issue and report back to the customer the outcome in a more efficient way. Customers are also able to call customer service on 02 9265 9333, 24 hours a day, 7 days a week to report access issues.</p> <p>The City will consider including a project to provide additional community education aimed at people with disability about reporting access issues as part of future Inclusion (Disability) Action Plans.</p>
<p><b>Need for greater whole of government approach</b></p> <ul style="list-style-type: none"> <li>With so many different agencies responsible for public space, the City has limited authority to ensure the policy is adhered to. This will impact how effective the policy is. Work closely with other authorities to ensure this policy and guidelines will be applied fairly in all situations around the LGA.</li> </ul>	<p>Peer led workshops Written Submission – WalkSydney Inc</p>	<p>The City collaborates with other landowners and agencies on how public spaces and public space infrastructure are designed in a number of ways, including through:</p> <ul style="list-style-type: none"> <li>Most public domain projects rely on coordination and collaboration with state government agencies.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Ongoing engagement and collaboration on key public domain projects such as light rail</li> <li>• Engagement with the Transport for NSW CBD Coordination working group which has meant that The City's Wayfinding Map and Signage Suite has been used in precincts not under the City's management such as Darling Harbour, Darling, Square, Circular Quay, South Eveleigh and Barangaroo.</li> <li>• Ongoing collaboration on traffic matters includes representatives from City of Sydney Council, NSW Police, Roads and Maritime Services, State Transit Authority and Property NSW.</li> <li>• Collaboration of all landowners is a key feature of major events such as New Year's Eve and Vivid.</li> </ul> <p>Following endorsement of this policy, City staff will meet with agencies in the local government area to discuss implementation and how they can use the policy and guidelines to guide the design, maintenance and management of public spaces they are responsible for.</p>

Comments and Feedback	Source	City of Sydney Response
<b>Agreed. Amendments have been made.</b>		
<p>The policy and guidelines are great and very comprehensive.</p> <p>In some parts, they could be stronger. Avoid stating “where possible” in the design objectives and performance standards, as it makes it easy for designers and agencies to say it’s not possible and not try to meet the standards.</p>	<p>Peer led workshop</p>	<p>The guidelines recognise that applying access standards in public spaces can be very difficult as result of constraints such as heritage, topography, and elements in public spaces under the control of other agencies. The principles for addressing complex design scenarios (p.3) is designed to allow some flexibility, stating that “where full compliance with is not possible, ensure the design complies with as many of the relevant performance standards and access standards set out in the guidelines/design code as is practicable”. Given this overarching principle informs users of the guidelines on how to apply the standards, use of terms such as “as far as is possible/feasible/practicable... XXXX will...” has been amended to more simply state “XXXX should...”.</p> <p>However, there are a few instances where “as far as is possible/feasible/practicable... “remain in specific performance standards, in recognition that applying standards in these scenarios is particularly complex. These scenarios include:</p> <ul style="list-style-type: none"> <li>• Providing ramps within 50m of stairs – topography and space constraints can make this very challenging</li> <li>• Designing on street mobility parking spaces to comply with width dimensions of relevant standards – the size of existing roads and footways in the City is narrower than contemporary standards assume is available in many circumstances</li> <li>• Providing inclusive play experiences in every playground – smaller playgrounds may not</li> </ul>

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		<p>have adequate space to meet all needs</p> <ul style="list-style-type: none"><li>• Ensuring wayfinding systems are consistent in areas managed by other agencies</li><li>• Providing kerb ramps with associated super taxi ranks – this requires a very wide footway to work effectively.</li></ul>

**Comments and feedback on the Design of Streets, Parks and public domain infrastructure  
(Chapters 1 and 2)**

Comments and Feedback	Source	City of Sydney Response
<b>Agreed. Amendments have been made.</b>		
<p><b>Pebbles in (verge) gardens</b></p> <p>Some planter boxes on Devonshire street have the white pebbles in them. When it rains they move onto footpath creating slip and trip hazards, which could be far more dangerous than softer bark material used further up Devonshire street.</p>	<p>Meeting of Public housing Neighbourhood advisory Boards</p>	<p>The guidelines have been updated to include this consideration in association with verge and kerb extension gardens. The City’s Footpath Gardening Policy requires that verge gardens should be built and maintained so as to prevent run-off of materials onto the footpath.</p>
<p><b>Stairs</b></p> <ul style="list-style-type: none"> <li>• Contrasting nosing on stairs in public spaces should be required as standard. At present, it is inconsistent in certain parks, e.g. Hyde Park and Surry Hills. Designs should be more standardised.</li> <li>• Don’t build stairs with open or transparent risers. This can be really scary for people with intellectual disability, or anyone who isn’t good with heights.</li> <li>• Some steps are too high, make sure they aren’t too high</li> <li>• The distance between stairs and nearest access ramp is often too far. Try and make them closer.</li> </ul> <p>Disappearing stairs - on Martin Place there are several sets of stairs that reduce to one or no stairs on one edge. These are very hard to see for people with low vision, and there should be greater contrast provided.</p>	<p>Peer led workshops</p>	<p>The Draft Inclusive and Accessible Public Domain Guidelines require stairs in the public domain are built in accordance with AS1428.1 (2009). This standard requires stairs are built with minimum 30% luminance contrast on the nosing, without transparent risers.</p> <p>These standards do not dictate appropriate height of risers. However the Volume 2 of the 2019 National Construction Code recommend that stairs are constructed with minimum height of 115mm and maximum height of 190mm per stair. The guidelines will be updated to include this range.</p> <p>Further the guidelines require that where a ramp cannot be provided near to stairs, that the location of the alternative accessible route is clearly indicated.</p> <p>Providing stairs on inclines, such as at Martin Place often results in what is described as “disappearing stairs”. As noted above, all new stairs constructed will be required to have contrasting nosing as per AS1428.1 (2009), however this does make the stairs legible from a distance.</p> <p>The guidelines have been amended to articulate that where stairs on the public domain are provided on sloping topography resulting with diminishing risers, nosing should also be visible on the riser (not just the step) to increase visibility to everyone, including people with low vision.</p>

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<p><b>Taxi Ranks on one way streets</b></p> <p>Accessing the passenger seat when the taxi rank is located on the right hand side of a one way street is not safe for guide dog users as they must navigate around the front/back of the taxi and walk along the road.</p> <p>Where taxi ranks are located on one way streets – as far as possible locate them on the left side, so that passengers using assistance animals can access the front passenger seat safely from the footway. The most appropriate seat for guide dog users to use is the front passenger seat. This seat has enough space for the person and their guide dog to sit at their feet.</p>	<p>Peer led workshops</p>	<p>The draft Inclusive and Accessible Public Domain Guidelines have been updated to include this requirement for future taxi ranks provided on one-way streets.</p>
<b>Agreed in principle – already addressed by the policy and guidelines.</b>		
<p><b>Bollards and crowded place management</b></p> <p>The current design and placement of the concrete blocks along George St is hazardous for a number of reasons:</p> <ul style="list-style-type: none"> <li>• They are too close together, and not placed in a consistent manner which makes it very difficult to navigate using a motorised scooter. Some scooter users have damaged their scooters as a result. The Guidelines should consider the biggest wheelchair and accommodate that.</li> <li>• They are not visible enough – people trip over them and walk into them. Consider making them more visible and detectable, e.g. through LED Light strips</li> </ul>	<p>Meeting of Public housing Neighbourhood advisory Boards</p>	<p>The Inclusive and Accessible Public Domain Guidelines (see 1.7) require</p> <ul style="list-style-type: none"> <li>• A minimum of 1200mm clearance between bollards and crowded place measures. The 1200mm dimension accounts for 90% of all wheelchair dimensions to travel safely between elements.</li> <li>• That where bollards and crowded place measures cross the path of travel, they should include high luminance contrasting to make them more visible to everyone, including people with low vision.</li> </ul> <p>The City has considered LED strips, but bright lights can in fact be disorienting for people with low vision.</p>
<p><b>Onsite mobility parking</b></p> <p>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 who hold accessible parking permits (from elderly through to those with disability)</p>	<p>Written submission Physical disability council of NSW</p>	<p>Part 2.11 on the inclusive and accessible public domain guidelines requires that where on site mobility parking is provided in association with parks, that a minimum of one dedicated accessible space is provided for each 50 parking spaces – which is equivalent of 2%.</p> <p>This is consistent with requirements of the Building Code of Australia.</p>

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<p><b>Planting</b></p> <p>BikEast support more effective choice and placement of plantings. They advise some of their elderly riders on blood thinners were injured whilst cycling on cycleways - scratched by sharp twigs.</p> <p>On Page 44, we suggest that alongside pathways, that cycleways be mentioned specifically to be explicitly included in this requirement.</p>	<p>Written Submission - BikEast</p>	<p>While effective planting choices can minimise potential hazards, ultimately all plantings next to cycle ways and footways should be maintained to ensure the plantings do not encroach on the continuous accessible path of travel.</p> <p>The policy requires “tree and plant (horticultural and arboricultural) pruning and maintenance to prevent obstructions and litter on the continuous accessible path of travel”.</p>
<p><b>Seating</b></p> <p>More seating, particularly around Circular Quay.</p> <p>This will make it easier for people who cannot walk far easily to walk from Circular Quay to the Opera House if more frequent rest points are provided.</p>	<p>Peer led workshops</p>	<p>The Liveable Green Network aims to create a pedestrian and cycling network that connects people with the city and village centres as well as major transport and entertainment hubs, cultural precincts, parks and open spaces.</p> <p>The provision of regular seating opportunities has been identified as a priority as part of the Liveable Green Network. The Sydney Streets Design Code (p.122) requires that Seats are provided generally every 100–250m with max 30–50m spacing along main Village Streets.</p> <p>This is reflected in the Guidelines at 1.6 Street Furniture which states that seating will be provided at regular intervals to provide predictable rest opportunities, as informed by the streets code.</p> <p>However, the City is not the managing landowner at Circular Quay. This feedback will be passed on to Property NSW.</p>
<p><b>Agreed in principle. These suggestions have been addressed already or will be explored in the context of a different policy or action plan.</b></p>		
<p><b>Assistance animal watering and toileting points</b></p> <p>There need to be more green spaces especially in the CBD where people can toilet their assistance animals. These should be mapped and communicated with assistance animal users.</p>	<p>Peer led workshops</p>	<p>The City will consider identifying the location of appropriate assistance animal watering and toileting points within existing parks and open spaces as part of the as part of future Inclusion (Disability) Action Plans.</p>
<p><b>Automated Public Toilets</b></p> <p>In general more outdoor toilets is important, and there should be an advertised list of where they are.</p>	<p>Peer led workshops</p>	<p>The City’s Public Toilet Strategy (adopted 2014) determines the where and when public toilets are provided, including automated public toilets.</p>

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<p>Where they are provided ensure:</p> <ul style="list-style-type: none"> <li>• Accessible toilets doors do not open inwards. These are hard to get in and move around if the door is in the way</li> <li>• There are clear easy to understand instructions about how to operate and access the automated public toilets, including: <ul style="list-style-type: none"> <li>○ Which button to press to open close – ensure it is a button that is easy to press, and is easily located</li> <li>○ How long the door will remain open for. People using wheelchairs or others within limited mobility get worried the door will close on them while they are still making their way through.</li> </ul> </li> </ul>		<p>The draft inclusive and accessible public domain policy and guidelines includes certain design requirements for accessible public toilets.</p> <p>The Guidelines require that all public toilets are built to comply with AS1428.1 (2009). The Australian Standards outline requirements for</p> <ul style="list-style-type: none"> <li>• Outward opening doors or sliding doors (Clause 15.2.9)</li> <li>• Maximum force to open door (Clause 13.5.29e).</li> </ul> <p>All of the City of Sydney s Automated Public Toilets have operating instructions in various formats including tactile buttons, tactile signage, Braille elements, and audible instructions. Some models have an intercom to staff who can provide assistance.</p> <p>The doors are similar to the automated doors on lifts and will reopen if the sensor detects a person or object is in the way and will not close.</p> <p>Note that the maximum force to open a door is not applicable here because the door opening and closing mechanism is automated.</p> <p>The City’s Public Toilet Strategy will be reviewed in consultation with the disability community and the wider public in the coming year.</p>
<p><b>Accessible adult change facilities aka Changing places toilets</b></p> <p>Two submissions and several participants of the peer led workshops noted that there needs to be more Accessible adult change facilities in the City of Sydney. It’s hard to spend time in the city for work or social activities, and participate in events when there you can’t go to the toilet</p> <p>They are essential to help people with profound disabilities participate in activities in the City.<sup>1</sup></p>	<p>Peer led workshops</p> <p>Written submission – Individual</p> <p>written Submission Physical Disability Council of NSW</p>	<p>Accessible Adult change facilities are generally provided in buildings, and as such are outside the scope of this policy and guidelines, as the policy and guidelines only apply to outdoor spaces and infrastructure.</p> <p>The City of Sydney’s Inclusion (Disability) Action Plan 2017-2021, commits the City to exploring ways in which we can facilitate the delivery of Changing Places toilets /Adult change facilities in our area.</p> <p>The City has recently installed a Changing Places toilet at the Abraham Mott Hall in Millers Point, and a further Changing Places Facility will be provided at the Gunyama Park Aquatic Centre. The City managed changing places facilities are/will be publicly accessible</p>

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		<p>with entry not restricted to patrons of the Pool or the Centre.</p> <p>In addition, an Adult change facility will be provided as part of the new Sydney Football Stadium.</p> <p>Together with similar existing facilities at Westfield shopping centre Pitt St, the International Convention Centre and Parliament House, there are 4 existing and two planned in the local government area.</p> <p>Furthermore, from 1 May 2019, the Building Code of Australia requires Adult Change facilities in Class 9b public assembly buildings, including:</p> <ul style="list-style-type: none"> <li>• sports venue that has design occupancy of not less than 35000 spectators, or</li> <li>• sports venue that contains a swimming pool with perimeter of 70M or greater</li> <li>• museum art gallery or the like with design occupancy of not less than 1,500 patrons</li> <li>• Theatre or the like with design occupancy of not less than 1,500 patrons</li> </ul> <p>These requirements will need to be met by the City at such time as relevant public buildings are upgraded.</p>
<p><b>Drop off Points</b></p> <ul style="list-style-type: none"> <li>• There are not enough formal drop off points, like the kiss and ride areas near train stations. These allow people with disability and others with limited mobility people to be dropped near their destination, especially when available parking is not near the destination while the people they are with go and park the car, which often too far away for those people to walk. It also means that more people can use the drop off point near the destination as compare to one mobility parking space.</li> <li>• Provide better information about where drop points are located, e.g. signs and maps.</li> </ul>	<p>Peer led workshops</p>	<p>Holders of mobility parking permits are legally allowed to stop for up to 5 minutes to drop off or pick up passengers or goods in areas marked 'No Parking'.</p> <p>As part of the next review of the City's Neighbourhood Parking Policy and Central Sydney On Street Parking Policy, the City will explore a more strategic approach to the provision of formal drop-off points and no stopping zones at key destinations.</p> <p>The City will consider making more information available about the locations of drop off areas and no stopping areas as part of future Inclusion (Disability) Action Plans.</p>

Comments and Feedback	Source	City of Sydney Response
<ul style="list-style-type: none"> <li>There should be exemptions for people with disability to use no stopping zones as drop off points.</li> </ul>		
<p><b>Sensory Gardens</b></p> <p>Some parks can be difficult for people with disability to experience. Create more sensory gardens in the City of Sydney area that enable people with a range of disabilities to experience nature.</p>	<p>Peer led workshops</p>	<p>The Inclusive And Accessible Public Domain Guidelines (part 2.9) encourage a range of <b>sensory experiences</b> (sound, touch smell and sight) are provided in parks, especially where nature experiences may by their nature may not be accessible to everyone.</p> <p>However, a <b>sensory garden</b> is a self-contained area that uses plants and other materials with a variety of aromas, textures, colours, noises and shapes, allowing everyone – including people with various disabilities - to enjoy a wide variety of sensory experiences. Sensory gardens are designed to provide opportunities to stimulate the senses, both individually and in combination, in ways that users may not usually encounter.</p> <p>Sensory gardens require careful design including consideration of plantings and other materials, and careful maintenance programs to ensure the plants continue to provide sensory experiences over time. The ongoing maintenance of plantings is often more resource intensive than other parks and gardens.</p> <p>It is not possible to provide sensory gardens in every park, and it is outside the scope of this policy to determine when and how the City could deliver specific sensory gardens.</p> <p>The City will consider including a project to investigate opportunities to provide a dedicated sensory garden in our area as part of future Inclusion (Disability) Action Plans.</p>

Comments and Feedback	Source	City of Sydney Response
<b>Noted. No amendments made.</b>		
<p><b>Bus stop design and placement</b></p> <p>Before upgrading bus stops to the Disability Standards for Accessible Public Transport look at moving to a safer location (after intersection)</p> <p>Reduce clutter from within bus stops to allow disabled easier access to public transport</p>	Written submission – Individual	<p>Bus stop locations in the City of Sydney area are determined by Transport for NSW are installed to comply with the <i>Disability Standards for Accessible Public Transport 2002</i>. It is not always possible to locate bus stops after intersections.</p> <p>The City is responsible for Tactile Ground Surface Indicators at existing bus stops.</p> <p>The City aims to ensure the placement of all elements on the footway, including street furniture, bus stops and signs are coordinated to minimise clutter and facilitate good access for everyone. Further the City works with other agencies as far as possible to coordinate these elements.</p>
<p><b>Commercial Car Parking</b></p> <p>Many commercial parking stations aren't accessible to people using mini buses with hoists. There simply isn't enough height clearance. This makes it hard for group trips into the City (especially from local respite services), and very few come into the City because of this reason.</p>	Peer led workshops	<p>Commercial car parking structures are outside the scope of the Inclusive and Accessible Public Domain Policy and Guidelines, as commercial car parks are buildings that are required to be designed in accordance with the Building Code of Australia.</p> <p>The Building Code of Australia and AS2690.6 (2009) requires minimum height clearance of 2500mm above the dedicated space and 2200mm on the path to the dedicated space.</p>
<p><b>Footpath and Kerb Ramp Upgrade program</b></p> <ol style="list-style-type: none"> <li>1. The Druitt street footpath, especially outside the Town Hall is really bumpy and has narrow footpaths. This should be renewed as a priority.</li> <li>2. The City should prioritise the provision of missing kerb ramps and realignment of misaligned kerb ramps as a priority. This will improve access on the street scape for many people. There are still too many non complaint and missing kerb ramps.</li> <li>3. Take care of potholes in the road, especially where pedestrians cross</li> </ol> <p>Where there are inclines, it is really important the paved surface has enough slip resistance to provide traction for</p>	Peer led workshops  Meeting of Public Housing Neighbourhood Advisory Boards	<p>The public domain renewal program is outside the scope of this policy. The draft Policy and Guidelines will not retrospectively apply and will not determine when public domain spaces and infrastructure are renewed to current standards. Existing approaches to scheduling public domain capital works projects apply.</p> <p>However in response to these specific comments about the City's renewal program for footpaths and kerb ramps:</p> <ol style="list-style-type: none"> <li>1. The Druitt Street Footway will be scheduled for renewal after the completion of works on George Street.</li> <li>2. In general, the City does not renew kerb ramps in isolation.</li> </ol>

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<p>wheelchairs. Parts of Martin Place (especially near the train station) have so little traction that people using wheelchairs (both manual and power chairs) cannot travel up, even with people pushing them, because the surface has become so polished and slippery, and natural incline is so steep.</p>		<p>Instead, the City prefers to renew the footway and associated infrastructure of the whole block to address all aspects of pedestrian amenity and accessibility on that block. This reduces the occasions on which footways are out of use from renewal activity, and provides greater economies of scale for the projects, delivering greater value for ratepayers and the community.</p> <p>The majority of intersections in the City of Sydney have been renewed to ensure provision of kerb ramps where they were once missing, or new kerb ramps installed to ensure correct alignment and provision of Tactile Ground surface Indicators in line with the Australian standards.</p> <p>Those outstanding include:</p> <ul style="list-style-type: none"> <li>• Ramps within signalised intersections are the responsibility of Roads and Maritime Service (now Transport for NSW), and often involve other changes such as new lane markings.</li> <li>• Intersections where existing services and above ground electrical infrastructure need to be relocated in order to position and align kerb ramps according standards.</li> </ul> <p>In both these scenarios, the renewal of kerb ramps involves greater coordination with other services and agencies and significantly higher costs associated with relocating services.</p> <p>3. At present the City manages local roads in our area, and that includes maintaining road surfaces. The City regularly inspects the pedestrian crosswalk area of intersections to ensure</p>

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		<p>the surface remains safe and accessible.</p> <p>4. The granite used on some footways and open spaces can over time lose some of its slip resistance due to build-up of grime. In affected areas, such as Martin Place, high-pressure steam cleaning is used to remove grime and restore slip resistance.</p>
<p><b>Kerb ramp design</b></p> <ol style="list-style-type: none"> <li>1. All new or upgraded ramps should be the full width of pedestrian crossing more than 2.4 metres</li> <li>2. Kerb ramps that have a lip can be hazardous for people walking and those using wheels. Include a specific requirement for kerb ramps to be smooth (and not have a lip) in the guidelines</li> <li>3. Line pedestrian ramps up with pedestrian push button allowing wheelchairs direct access.</li> </ol>	<p>Written submission – Individual</p> <p>Written submission- Walk Sydney Incorporated</p>	<p>The design of pedestrian kerb ramps in Australia generally follows the design requirements of Australian Standards AS1428.4.1 (2009) Design for access and mobility part 4.1 and AS1428.1 (2009).</p> <ol style="list-style-type: none"> <li>1. The width of kerb ramps is determined by the amount of pedestrian traffic and Australian Standards. Providing kerb ramps that are the width of the pedestrian crossing would create a risk to pedestrian safety, as it would enable vehicles to mount the footway more easily.</li> <li>2. The Draft guidelines (1.5) already include a requirement for “a smooth transition from the roadway to the ramp”.</li> <li>3. The location of push button assemblies in relation to the kerb ramp is ultimately at the discretion of the Roads and Maritime Service as part of their approval of the Traffic Signals Control Plan. The location of the push button assembly is required to be no more than 700mm from the ramp incline.</li> </ol>
<p><b>Pedestrian crossings</b></p> <ul style="list-style-type: none"> <li>• Extend Auto-Introduction of pedestrian crossings to 24hrs a day 365 days a year same as NYC</li> </ul> <p>Install more Pedestrian Countdown Timers at all crossings without vehicle conflict</p>	<p>Written submission – Individual</p>	<p>The NSW Roads and Maritime Service has primary responsibility for signalised intersections in NSW, including determining where signalised intersections are located and the phasing of traffic signals - even on local roads. As such, is it outside the scope of this policy to mandate the phasing of signalised pedestrian crossings. However the City is advocating for better crossing opportunities for pedestrians in</p>

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		<p>a number of projects, including collaboration with the NSW Government. Pedestrian countdown timers provide increased safe and legal crossing opportunities. They are authorised for use in appropriate locations. The City supports the installation of more countdown timers and is working with the NSW government to identify intersections where they should be provided as a priority.</p>
<p><b>Phone holders in public spaces</b></p> <p>Deaf people who sign as their main form of communication use FaceTime to communicate. To sign using FaceTime you need to have both hands free. It would be great to see the provision of phone holders in some key locations where power points are, and on trains. Like the adjustable ones used in cars.</p>	<p>Peer led workshops</p>	<p>The City currently does not provide such infrastructure in public spaces, and the design of much of the street furniture palette (including seating, bollards, tree-guards) is already established and endorsed via the Sydney Streets Public domain design codes.</p> <p>The inclusion of such small and potentially breakable items in public domain furniture is not considered feasible at this time.</p> <p>This feedback will be provided to Transport for NSW to consider on trains.</p>
<p><b>Shared Paths</b></p> <p>Deaf people and the hard of hearing find shared paths difficult as they cannot hear bicycle bells. Consider installing the fisheye reflective mirrors in high traffic areas and high conflict areas so people can see if there are people who cycle approaching from behind.</p> <p>BikEast support the City of Sydney's proposed standard of 2m for shared paths and to advocate for wider paths, especially around recreational areas to accommodate diverse mobility options.</p> <p>BikEast support that all paths within parks are designated as shared paths.</p>	<p>Peer led workshops</p> <p>Written Submission - BikEast</p>	<p>The provision of such mirrors is not currently part of the City's design for shared paths. Mirrors are highly vulnerable to vandalism, and any benefit they may provide must be considered in the context of wider amenity, including any negative impact of maintaining a clear accessible path of travel.</p> <p>The City is committed to educating people walking and riding about courteous behaviour on shared paths. The City's Share the Path Program is a face-to-face education program held four times a week where City staff talk to people walking and riding about courteous behaviour. Staff remind people to always give way to people walking, slow down, pass at a safe distance, and 'ring their bell early' as a courtesy when passing. Staff also remind people walking to be alert to people on bikes, listen out for bells and keep left.</p> <p>It is acknowledged that Deaf and hard of hearing people are not able receive warnings from bicycle bells. However, people riding are required to give way to people walking on shared paths at all</p>

Comments and Feedback	Source	City of Sydney Response
		times, and the City's Share The Path program will continue to reinforce this message and raise awareness amongst people who ride that not everyone can hear the bell.
<p><b>Wayfinding infrastructure and signage</b></p> <ul style="list-style-type: none"> <li>• Reduce the number of sign stems by installing signs onto smart poles same as NYC, and where possible putting multiple signs on the one smart pole.</li> <li>• Wayfinding signage should not indicate the distance in minutes, but rather distance. Using instead the distance is a more equitable measure, as each person is able to estimate how long that would take to travel based on their own abilities, which will vary.</li> <li>• There needs to be clearer signage identifying where lifts in public spaces are located.</li> <li>• Deaf people and people with intellectual disability aren't confident asking strangers for directions. Consider developing self-serve digital touch screen kiosks that provide directions – like they have in shopping centres. This will allow people to gain this information independently. The kiosk could include features such as Video (with Auslan) and live messaging to a customer service operator or emergency services in case of need for assistance</li> <li>• Use raised paint similar to road rumble strip to direct blind pedestrians along centre of footpath</li> </ul> <p>The Design Advisory Panel recommended the following:</p> <ul style="list-style-type: none"> <li>• The City consider working with app developers like Google to provide accessible wayfinding solutions using technology, including the development of accessible wayfinding maps and applications.</li> </ul>	<p>Peer led workshops</p> <p>Written submission – Individual</p> <p>Design Advisory Panel</p>	<p><b>Smart Poles</b></p> <p>Where smart poles are provided, they are used to accommodate a range of signs to minimise the number of poles. However, it is not appropriate to move all signage to a smart pole. Some signage, such as regulatory signage about parking restrictions must be placed in proximity to the parking area.</p> <p><b>Wayfinding signage</b></p> <p>The City of Sydney's on Street Wayfinding Signage and Infrastructure is outlined in the Legible Sydney Wayfinding Strategy endorsed in 2013. New signage has been progressively rolled out across the City since that time. The signage uses pictograms and provides walking estimates in minutes, not distance.</p> <p>The current design - featuring average minutes to walk to a destination - was based on extensive international research that shows most pedestrians have a better understanding of distance as shown in minutes walking – as opposed to distances in metres and kilometres. Many visitors and people born overseas are more familiar with the imperial system, so can find it difficult to conceptualise metres and kilometres. The time distance is based on an average walking speed of 5km per hour.</p> <p>In regards to signage identifying where lifts are located, the City's on Street Wayfinding System includes details of lifts accessible to the public. These are detailed on the precinct maps as part of the pylon signs, and where a key destination involves a lift on the route, the lift is indicated on a directional sign next to the destination.</p> <p>The City is also working to collate this information and include on the City of Sydney online accessibility map.</p> <p><b>Digital Information Kiosks</b></p>

Comments and Feedback	Source	City of Sydney Response
<ul style="list-style-type: none"> <li>Where there is steep topography, the use of physical signs would be less effective than an app.</li> </ul>		<p>On street digital kiosks are currently provided in limited locations as part of Telstra Payphones, and the content is managed by Telstra.</p> <p>The City of Sydney's Digital Strategy identifies digital infrastructure as a key element of a Smart City, but acknowledges that most digital infrastructure improvements will require partnerships with public and private sectors.</p> <p>The City would need to consider in detail the benefits of on street digital information kiosks compared to information accessed in personal computing devices) and also consider feasibility and viability in consultation with relevant public and private sector partners. This has not been identified as a priority for the City at this time.</p> <p><b>Digital Wayfinding</b></p> <p>The City's Inclusion (Disability) Action Plan 2017-2021 includes a commitment to maintain the City's online access map and explore emerging technologies to empower all people, including people with disability to navigate public spaces independently. The City's online access map currently includes information about topography and identifies where there are moderate and steep inclines. The City will explore how this data can be used by mainstream navigation and map services to provide route navigation tools that allow people with disability and access needs to plan routes that avoid barriers, including stairs and inclines.</p>

## Comments and feedback on the management of public spaces (Chapters 3)

Comments and Feedback	Source	City of Sydney Response
<p><b>Agreed in principle. These suggestions have been already addressed or will be explored in the context of a different policy, strategy or action plan.</b></p>		
<p><b>Bike sharing bikes</b></p> <p>Obstructing the path of travel us a real hazard for people who are blind or have low vision, as well as people with limited mobility who cannot manoeuvre around them safely.</p>	<p>Peer led workshops</p>	<p>The <i>Guidelines for bike share operators: Inner Sydney bike share guidelines</i> include the following requirements for safe bike placement</p> <ul style="list-style-type: none"> <li>• Bikes must be parked in an upright position and not placed on footpaths that are narrow, or where they could pose a safety hazard.</li> <li>• Bike placement must not interfere with pedestrian access or amenity. Bikes should be placed kerbside away from the building. Operators will educate customers on the impacts of bike placement to mobility and vision impaired.</li> </ul> <p>Since the NSW Government introduced higher fines for share bikes, operators have improved compliance and now respond quickly to complaints from the public.</p>
<p><b>Blocked footways/Driveways</b></p> <p>Cars parking across driveways and footways are a big barrier for people who are blind or have low vision. There should be more community education around how this impacts people who are blind or have low vision and other pedestrians.</p>	<p>Peer led workshops</p>	<p>While not mentioned explicitly in the Inclusive and Accessible Public Domain Policy and Guidelines, the City Rangers are responsible for enforcing parking controls. If our rangers observe illegal or unsafe parking – including illegal parking on footways or across driveways - they will issue a penalty notice in line with the road rules.</p> <p>Rangers also play a customer service role – informing and educating people about a range of topics. Where people report illegally parked cars, City Rangers will investigate, and where possible speak with those who have parked illegally about impacts on people with vision impairment and issue penalties as appropriate.</p>
<p><b>Construction Activity</b></p> <p>There has been a lack pf planning in some instances for the provision of safe and inclusive access during temporary disruptions, including in works to construct/renew cycleways. Two recent examples include:</p> <ul style="list-style-type: none"> <li>• Closure of Bourke St Cycleway resulting from Light rail works - , parents with cargo bikes carrying their children, and people with</li> </ul>	<p>Written submission- Walk Sydney Incorporated</p> <p>Written submission- BikEast</p>	<p><b>Cycleway construction/renewal</b></p> <p>Where cycleways are constructed or renewed as part of the City’s capital works program, staff and contractors are required to ensure that where access to the footway and or cycleway is temporarily obstructed, that safe alternative access is provided for both people walking and people riding bikes. This City is committed to improving how these spaces are managed during construction and renewal.</p>

Comments and Feedback	Source	City of Sydney Response
<p>wheelchairs were obstructed from continuing their daily travel.</p> <ul style="list-style-type: none"> <li>Closure of Kent street footpath and cycleway, pedestrians were diverted across a cycleway and into oncoming traffic without traffic control.</li> </ul> <p>Consider stronger consideration for detours and distances needing to be travelled around construction. The recent works on Devonshire street meant elderly people and less mobile must detour long distances to get where they are going.</p> <p>On page 70, it states “kerb ramps must not be obstructed”. As sometimes kerb ramps are obstructed, we suggest adding a note that temporary kerb ramps must be installed to facilitate safe travel.</p> <p>Map information about construction activity in real time. The City should explore requiring developers whose work will impede access on public spaces to upload details of when and where this will occur on a publically available map and maintain this throughout construction. This should be a condition of consent. For example the construction areas on George Street move almost daily as they resurface the footway. This is incredibly hard for people who are blind or have low vision to navigate, and will also impact those who go a certain way to avoid stairs.</p>	<p>Peer led workshops</p>	<p>Depending on the specific context, this may mean safe access on the other side of the street, and traffic control where necessary. However, other agencies and developers will from time to time effectively close cycleways and footways to facilitate works nearby.</p> <p>The Bourke Street cycleway closure was managed by Transport for NSW to facilitate works associated with light rail. The City’s usual consent powers in relation to the road and footpath have been diluted by the declaration of the route as a Light Rail Route. This declaration enables RMS to act as the consent authority, meaning the City was not the approver for this closure and was not able to impose conditions.</p> <p>The Kent Street cycleway closure was to allow hoisting of materials to a work site. The <i>Draft local approvals policy and code of practice: hoisting and construction activities in public places</i> requires that where hoisting activity occurs “appropriate and adequate traffic control measures including:</p> <ul style="list-style-type: none"> <li>detour signs and traffic control personnel;</li> <li>pedestrian exclusion barriers; and</li> <li>safe movement of traffic, bicycles and pedestrians,</li> </ul> <p>must be fully implemented and in place at all times during the placement and operation of the hoisting device”</p> <p>Some of the above requirements may also form conditions of an approval (permit).</p> <p>The City’s Local Pedestrian, Cycling and Traffic Calming Committee and the Construction Regulation Team are responsible for granting approvals for full and partial temporary lane roadway and footway closures to allow hoisting operations over public roads using mobile devices. The Construction Regulation team also monitors some worksite operations that affect public places to check for compliance with relevant conditions of development consent and permits. The team are not able to supervise all activity to ensure compliance in all instances, as in this instance. The Construction Regulation Team will discuss this issue with the relevant developer.</p>

Comments and Feedback	Source	City of Sydney Response
		<p><b>Temporary Kerb Ramps</b></p> <p>The Local Approvals Policy and Code of Practice for Construction Activities in Public Places and the Hoardings and the Scaffolding Policy and Guidelines require that kerb ramps are never obstructed.</p> <p>However, there are times where construction activity means that the footway is no-longer accessible, and temporary footway is provided on a roadway. The guidelines have been updated to require ramps with appropriate transition from the kerb to the roadway to facilitate access from the kerb to the temporary footway.</p> <p><b>Mapping Construction Activity</b></p> <p>The City will consider including a project to explore the feasibility of mapping such construction activity and its impacts on access in public spaces as part of future Inclusion (Disability) Action Plans.</p>
<b>Noted. No amendments made.</b>		
<p><b>Community Gardens</b></p> <p>The community garden within the Lawrence Hargreave Reserve was designed with accessibility in mind, and the thoroughfares within the garden are wide enough for wheel chairs, walkers and prams. We plan to have a garden bed with space for a wheel chair user to work in phase 2 of the Garden.</p>	<p>Kings Cross Community Gardening group</p>	<p>Community Garden design and management requirements from the policy and guidelines will be incorporated into future revisions of the Community Gardens Guidelines.</p> <p>The City of Sydney Community Garden and Volunteer Coordinator will continue to work with community garden groups to ensure that the design and management of community garden is as inclusive and accessible as possible.</p>
<p><b>Utility and telecommunications providers not adhering to standards</b></p> <ul style="list-style-type: none"> <li>Utility and telecommunications providers often install infrastructure that creates barriers for people with disability in public spaces, including installation of utility pits and towers occurs in that obstruct access.</li> <li>An example is poorly located Ausgrid boxes on Devonshire street created two obstructions in the centre of a walking and cycling space / intersection on Devonshire street.</li> </ul>	<p>Written submission- Walk Sydney Incorporated</p> <p>Peer led workshops</p>	<p><b>Regulation of works and items installed by Utilities in public spaces</b></p>

Comments and Feedback	Source	City of Sydney Response
<ul style="list-style-type: none"> <li>At other times damage to footways a result of utilities accessing their service for repair or upgrade is not restored in a timely manner</li> <li>Set up compliance and inspection mechanisms and fine the non-compliant agencies as a deterrent.</li> </ul>		<p>Utility service providers including water, and energy and telecommunications services have infrastructure throughout the City of Sydney. They regularly need to conduct works on roadways and footways to access these services for repair or upgrade. In some instances, developers will require similar access to arrange the installation and connection of new utility services to developments. The provision of new services may also require installation on City infrastructure including pillar-boxes and other “low impact facilities”.</p> <p>Where access is required, the partial temporary closure of a road or footway may be necessary. The City has little control over the works undertaken by utility service providers and their contractors. In many cases, the legislation governing utility provides overrides City approval processes including the imposition of conditions to limit potential adverse impacts, or issue fines or penalties.</p> <p>While the City does not have oversight of the installation and access for low impact facilities, there are protocols, guidelines and standards that various utilities have developed to minimise impacts of these works on the local community.</p> <p><b>Inspection and Compliance</b></p> <p>In the instance of utility works accessing footways, there are three stages:</p> <ol style="list-style-type: none"> <li>Works in progress: the utility provider is responsible for providing <i>temporary restorations</i> while the work is in progress. These may include steel plates and asphalt over pits for example. Such temporary restorations are often put in place to ensure safety once work has finished for the day, but allow continued access the following day.</li> <li>Once the work is completed, the utility is generally responsible for temporary restorations for a further 6 months or until the completion of the permanent restoration – whichever happens earlier.</li> <li>Utilities may elect to do their own permanent restorations or pay the City to do them. Once the permanent restoration is finished responsibility for the site reverts to the City.</li> </ol>

Comments and Feedback	Source	City of Sydney Response
		<p>The City works with utility authorities and private developers in an effort ensure the City's footways and roadways remain accessible and are maintained. However, utilities are responsible for the management and control of their temporary restorations – the City has limited capacity to direct them to deliver them to its own standards.</p> <p><b>Ausgrid Pillar Boxes in Devonshire St</b></p> <p>With regard to the particular Ausgrid pillar boxes on Devonshire street, electrical services along the length of Devonshire Street have been changed as part of the light rail work. Ausgrid assets including the pillars have been altered and upgraded to their network standard. This network standard includes the use of above-ground pillars to serve each property.</p> <p>Section 8.5 of Ausgrid's <a href="#">Network Standard NS224</a> requires that for the location of the pillars <i>“Designers shall give consideration to visually impaired persons when determining the location of the cabinet and base unit combination (pillar). Wherever possible, pillars shall be installed adjacent to an existing pillar or within an existing set-back along the frontage.”</i></p> <p>The new pillars along Devonshire Street have been placed against the building line. They are not next to existing pillars, nor are they placed within a setback.</p> <p>The City's usual consent powers have been diluted by the declaration of the route as a Light Rail Route. This declaration enables RMS to act as the consent authority, meaning Ausgrid does not require the City's approval for the placement of these pillars on the footway of Devonshire Street.</p> <p>City staff, have and continue to raise concerns with appropriate utilities about the impacts of their works and low impact infrastructure on the accessibility of footpaths, noting that placemen of pillars on the building line can create hazards and barriers for pedestrians with low vision. City staff have been advised Ausgrid will not entertain moving these pillars underground or kerbside.</p>

## Comments and feedback on the Disability Inclusive Event Guidelines

Comments and Feedback	Source	City of Sydney Response
<b>Agreed. Amendments have been made to the guidelines.</b>		
<p><b>Name of the events Guidelines</b></p> <p>Rather than <i>Disability Inclusive Events</i>, call it <i>Inclusive and Accessible Events Guidelines</i>. This is more welcoming of people who don't identify as having a disability but benefit from good access.</p>	<p>Property NSW</p> <p>Peer Led workshops</p>	<p>The content of the guidelines indicates one of the main areas of focus is disability inclusion. The title has been amended to <i>A City for All: Inclusive and Accessible Events Guidelines</i>.</p>
<p><b>Accessible viewing areas</b></p> <ul style="list-style-type: none"> <li>• When there is bad weather, provide shelter for accessible viewing areas - e.g. tent</li> <li>• In addition to the ticketed accessible viewing area, consider establishing a flex zone, for those presenting at the last minute requiring access.</li> </ul>	<p>Peer led Workshops</p>	<p>Consideration of shelter will be added as a best practice consideration for accessible viewing areas in the guidelines.</p> <p>The City has considered the suggestion of the flex zone for Major events. Given large volumes of spectators and participants at major events, quarantining spaces for exclusive use of people with disability (and family, friends) in addition to accessible viewing areas already provided would result in a loss of potential spectating space for the broader community. The City must balance the needs of all spectators, and the provision of existing type of accessible viewing areas is appropriate. The City will continue to monitor the demand of accessible viewing areas for the major events it delivers.</p> <p>However, where accessible viewing areas are provided, the City's current practice are to make any spaces left vacant by no-shows or early departures to others who present on the day requiring the accessible viewing area.</p>
<p><b>Accessible seating</b></p> <p>Should be a minimum requirement for all events for this to be provided</p>	<p>Peer led Workshops</p>	<p>The events guidelines have been updated to require accessible seating options at all events.</p>
<p><b>Food trucks/catering at events:</b></p> <p>Food trucks are hard to order from for people who use wheel chairs, Deaf people and people who are blind and have low vision.</p>	<p>Peer led Workshops</p>	<p>The event guidelines include suggestions about making services areas more accessible to people with disability, (page 13). It includes providing accessible counter heights or alternative means for people who</p>

<p>Ensure food truck operators and event caterers have in place mechanisms to help people order independently, including large print menus etc, are able to come from behind the counter to take orders. The height of counters on food trucks can be very limiting.</p>		<p>can't see over high counters to order, e.g. staff be to assist people with disability in accessing services that may be located behind the service area.</p> <p>The guidelines will be updated to more explicitly suggest having large print menus available</p>
<p><b>Hearing Augmentation, Captioning and Auslan interpretation</b></p> <p>Captioning should be minimum at big events, not Auslan. Captioning meets the needs of majority of people who are Deaf <b>and</b> hard of hearing, whereas Auslan only meets the needs of Deaf people whose first language is Auslan. Most people with hearing loss acquire it through ageing and are less likely to learn Auslan is they were born with hearing.</p> <p><b>Personal captioning devices at cinemas</b></p> <p>The Deaf community really dislike these. They not only draw attention to the user and make them feel different, but they are often not synchronised with the film, or even worse there have been times where the captioning was for the wrong film. Deaf people would prefer more sessions had captioning on the main screen. It would make them feel more included. More captioning at outdoor cinemas would make them far more inclusive and make it easier for everyone to understand.</p>	<p>Peer led Workshops</p>	<p>The event guidelines state that all event organisers must provide services such as Auslan and or captioning when requested by audience members (with reasonable notice), in order to meet their obligations under the <i>Disability Discrimination Act 1992</i>.</p> <p>However, it is clear that not all event organisers have a clear understanding of these different formats, and in particular who each format benefits and why.</p> <p>The guidelines have been updated to include a pop out feature on Hearing Augmentation, Auslan Interpretation and Live Captioning to detail what it is, how it works, who it helps, and when it should be provided.</p>
<p><b>Online booking and information</b></p> <p>Where tickets for people with access needs are to be booked, make sure that the booking experience is equitable. E.g. if other tickets can be booked online, the access tickets should also be able to be booked online.</p> <p>It should be 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.</p> <p>For major events, ensure information is available in an easy English format.</p>	<p>Peer led Workshops</p> <p>Written submission – Physical Disability Council of NSW</p>	<p>The events guidelines require that where on line booking is available “the online booking system should allow people to book accessible seats and request support without having to speak to someone” ( p.15)</p> <p>The guidelines will be updated to note that, where this is not possible, a phone number is provided.</p> <p>The Sydney New Year’s Eve event guide is available in easy English format which is available on line via the website.</p>
<p><b>Parking and drop off</b></p> <ul style="list-style-type: none"> <li>• More designated drop off points associated with major events. If these</li> </ul>	<p>Peer led Workshops</p>	<p>Some major events such that involve road closures, such as Sydney New Year’s Eve and Vivid, provide temporary designated drop off points</p>

<p>cannot be provided close to the destination, then more mobility buggies should be provided.</p> <ul style="list-style-type: none"> <li>• Designated drop off points should also be available to use by taxis and ride share services.</li> </ul>		<p>for the events. These are approved by the local Traffic Committee as part of the Traffic Management Plan required for any temporary road closure associated with an event.</p> <p>The guidelines will be updated to reflect that:</p> <ul style="list-style-type: none"> <li>• While the City encourages the use of public transport to events, for major events where there is a traffic management plan, that event organisers should consider providing temporary drop off points for people with limited mobility, subject to approval of the local traffic committee.</li> <li>• For smaller events that do not involve road closures, no stopping areas can be used as drop off points (for up to 5 minutes, and as long as the driver remains within 3m of the vehicle). The event organiser should identify where the nearest appropriate no stopping area is, and communicate this as part of accessibility information about the event.</li> </ul> <p>Ride share vehicles are not permitted to use Taxi Ranks, but they can use no stopping areas - (for up to 5 minutes, and as long as the driver remains within 3m of the vehicle).</p>
<p><b>Sensory spaces at Major Events</b></p> <p>Provide areas for rest and respite and sensory spaces at major outdoor events.</p> <p>An excellent example of inclusion is the Elder’s tent at Yabun Day. It’s a great place to take a seat, have a bite, and this type of tent would also be good for people with disability who may also need a space to rest, and people on the Autism spectrum who may benefit from a space to access sensory equipment to help them desensitise.</p>	<p>Meeting of Public housing Neighbourhood advisory Boards Peer led workshop</p>	<p>The event guidelines have been updated to include this as a best practice consideration for major events.</p> <p>A pop out feature has been added describing the purpose and benefits of sensory spaces.</p>

**Agreed in principle. These suggestions have been addressed already or will be explored in the context of a different policy or action plan.**

<p><b>Accessible Toilets</b></p> <p>There should be a minimum of 2 accessible toilets at every event, in case one is occupied. Ensure they are one each of left hand and right hand transfer to accommodate a wider range of needs and preferences.</p> <p><b>Portable accessible adult change facilities aka Changing places toilets</b></p> <p>Three submissions recommended that, where possible, the City of Sydney go a step further and ensure a <i>Changing Places</i> facility be provided. <i>Changing Places</i> 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.</p> <p>Provide portable changing places toilets at outdoor events.</p>	<p>Written submission – Individual</p> <p>Written submission - Physical disability Council</p> <p>Peer led workshops</p>	<p>The events guidelines require event organisers to provide a ratio of one accessible portable toilet to 10 standard portable toilets. However the guidelines will be updated to encourage a mix of left and right hand transfer options where more than two portable accessible toilets are provided.</p> <p>Where events are held inside, the availability of accessible toilets will depend on the venue.</p> <p>At present there are no such portable 'changing places' toilets available for hire in NSW. At such time as they become commercially available for hire in NSW, the City will explore providing them major events delivered by the City and encouraging other event organisers to consider this.</p>
<p><b>Crowd control and safety</b></p> <p>Crowded events and night time events can feel unsafe for some people with disability. Try and make them as safe as possible with</p> <ul style="list-style-type: none"> <li>• crowd control</li> <li>• good lighting</li> <li>• friendly security staff and others volunteers who can help. Make sure they wear clear uniforms in bright colours so we know they are meant to be friendly</li> </ul>	<p>Peer led Workshops</p>	<p>Crowd control and safety are a vital consideration for major events. City of Sydney produced major events such as New Year's Eve include an integrated crowd management plan.</p> <p>Spectator Services staff are provided with disability awareness training and wear brightly coloured t-shirts to make them easily identifiable.</p> <p>The guidelines encourage event organisers to ensure staff have disability awareness training.</p>
<p><b>Disability awareness training</b></p> <p>Ensure staff have disability awareness training. It would be great to include Deaf awareness training amongst that.</p>	<p>Peer led Workshops</p>	<p>The Guidelines encourage event organisers to ensure their staff have disability awareness training. We will update the guidelines to encourage major event organisers to consider Deaf Awareness training for staff as well.</p>
<p><b>Event set up and bump in</b></p>	<p>Peer led Workshops</p>	<p>Already included in the event guidelines p.8</p> <p>"Trucks setting up during bump in and out must not block the continuous accessible path of travel"</p>

<p>Trucks often-obscure footways during bump in for events. Ensure event organisers are well-briefed to not to do this or at least ensure safe accessible alternative paths of travel, which may include traffic controller where necessary.</p>		
<p><b>Marketing and communication</b></p> <ul style="list-style-type: none"> <li>• Make sure you promote the event to people with disability. People with disability are used to being excluded, so major events like New Year’s Eve should invest in a long campaign promoting the access and inclusion features and services.</li> <li>• Develop a marketing strategy/ campaign for major events to promote to people with disability. The campaign should use a range of channels to reinforce to the community they are welcome. It not enough to list on a website, there must be active and sustained marketing.</li> <li>• These channels should definitely include social media. People with disability use social media extensively. Social media posts from the City shared with key groups are very effective as they are shared widely in the disability community. Even if they are not just directed at disability groups, but general public, most people know someone with disability.</li> <li>• Auslan needs to be strongly promoted, as the Deaf community are used to being excluded. When Auslan is provided and it is widely promoted, the Deaf community feel welcomed and included. It helps to break the stigma.</li> <li>• Promote via peak groups. Many such as Guide Dogs NSW/ACT have Electronic newsletters, make sure to contact the group with enough time to ensure this is in their EDM. Some may charge a fee, but they are effective.</li> </ul>	<p>Peer led Workshops</p>	<p>The events guidelines encourage event organisers to promote their events to people with disability.</p> <p>Events in the City of Sydney area are delivered by a range of organisations and groups, and each will have different marketing approaches budgets.</p> <p>The guidelines will be updated to include social media, and EDM opportunities as potential channels.</p> <p>In terms of the City of Sydney’s current practice in promoting our own events to people with disability, a range of strategies are used including:</p> <ul style="list-style-type: none"> <li>• Media releases</li> <li>• Emails sent to specialist disability services and peak bodies</li> <li>• What’s on listings tagged as “disability inclusive events”.</li> <li>• Community radio</li> <li>• Outdoor advertising</li> <li>• Print advertising</li> <li>• E-newsletters</li> </ul> <p>The City will consider recommendations regarding investment in sustained approaches to communicating and promoting access and inclusion features of events, including electronic direct mail newsletters from peak groups.</p>
<p><b>Public Transport to major events</b></p> <p>Make sure to promote road closures and public transport changes during major events to people with disability.</p> <ul style="list-style-type: none"> <li>• Big changes to transport is especially difficult for people with intellectual disability who can become distressed if they don’t know how to get home.</li> </ul>	<p>Peer led Workshops</p>	<p>The City of Sydney works with Roads and Maritime service and Transport for NSW on the major events the City delivers.</p> <p>The City will pass on this feedback to relevant agencies for Major Events, and the Transport for NSW</p>

<ul style="list-style-type: none"> <li>• Make sure to communicate changes to roads and public transport to travel training providers across NSW</li> <li>• For the Deaf community, it is important this is done using Auslan. For many deaf people, English is not their first language and they find websites with lots of information really hard to understand – they rely on word of mouth.</li> </ul> <p>When people with intellectual disability need help with public transport, they often ask transport staff, however because they are often unfriendly, people with intellectual disability may avoid asking for help. Transport for NSW and Sydney trains in particular need to learn more about intellectual disability. Transport providers should do NSWCID inclusive practices training – the staff aren't always friendly.</p>		<p>Accessible Transport Advisory Committee.</p>
<p><b>Wayfinding at events:</b></p> <ul style="list-style-type: none"> <li>• Venue maps should be available online to allow people with disability to understand what access is available and to plan their attendance at major events. This should be a minimum for all major events. These maps should include <ul style="list-style-type: none"> <li>○ Key event locations</li> <li>○ Location of mobility accessible parking and drop off points</li> <li>○ Key transport hubs</li> </ul> </li> <li>• Trial the use of iBeacon wayfinding technology at outdoor events to help people who are blind or have low vision to navigate more independently. They should help people find key destinations in the outdoor event, including help, toilets and identify the location of barriers such as stairs.</li> </ul>	<p>Peer led workshop</p>	<p><b>Online venue maps</b></p> <p>The event guidelines suggest that where a major event has its own webpage, that an online map is provided to enable people with disability to plan their journey and attendance (p.30)</p> <p><b>Beacon Technology</b></p> <p>The City's current Inclusion (Disability) Action Plan 2017-2021 commits the City to exploring "the use of emerging technologies to empower all people, including people with disability, to independently navigate and access public spaces". The City's first Disability Expo in June 2019 featured beacon wayfinding technology provided by Bindi Maps.</p> <p>The market for such innovative technology is still emerging and City will explore opportunities and the feasibility of using beacon technologies into the future.</p>
<p><b>Collaborate</b></p> <p>For major events like New Year's Eve, ensure to collaborate with Transport for NSW, other land owning agencies and key destinations like Museum of Contemporary</p>	<p>Peer led workshop</p>	<p>For New Year's Eve and other major events, the City works extensively with NSW Police, Transport for NSW, Department of Premier and Cabinet, Royal Botanical Gardens, the Opera House, Destination NSW, Place Management NSW and other</p>

<p>Art and the Opera House to ensure a seamless experience.</p>		<p>partners to ensure a coordinated event experience.</p>
<p><b>Feedback and continuous improvement</b></p> <ul style="list-style-type: none"> <li>• Ensure that there are opportunities for event patrons to provide feedback on accessibility features in an easy way. One option could be to have anonymous access reviewers attend events and give the event organisers some feedback on the accessibility of the event. There is always room for improvement, and ensuring people with disability are part of the feedback loop is essential.</li> <li>• The City should have a full time inclusive events coordinator, to ensure events the City delivers and collaborates on the delivery. However, they recommended that this position be full time. It could support the development of the above working groups.</li> <li>• Establish an inclusive events working group to ensure the City and other major events organisers the City sponsors or collaborates with share learning and best practice, and foster a culture of continuous improvement.</li> </ul>	<p>Peer led workshop</p>	<p>The City will explore user experience surveys for the accessible viewing areas it manages for New Year's Eve and the use of event reviewers with lived experience of disability as part of major outdoor events it delivers from the 2020 summer season.</p> <p>The City of Sydney major events unit has a dedicated access officer in place from mid-November to mid-January each year. Their role is to manage and respond to all customer enquiries regarding accessible areas for Sydney New Year's Eve, liaise with other stakeholders regarding access, availability of tickets and communication of vantage point information. They also manage the City's accessible golf cart service, and ensure all communications surrounding accessibility are accurate and distributed to the correct channels.</p> <p>The City collaborates with its delivery partners to ensure New Year's Eve and other events we deliver are inclusive and accessible</p> <p>The City will consider including a project to explore the establishment of an inclusive events working group - subject to interest from the sector and available resourcing – as part of future Inclusion (Disability) Action Plans.</p>

**Noted**

**Concession ticket naming**

Expressed concern about naming of concession tickets. For example if a person with a disability asks for a Senior Ticket, then the ticket should be described as a senior ticket, not a disability ticket.

Written submission  
– Individual

The naming of different tickets is at the discretion of the event organiser.

Some events may have concession tickets for seniors. Other events accept companion cards allowing the companion of a person with disability to attend at no charge. There may also be ticketed entry to accessible viewing areas at certain events.

The City is not aware of any examples of events where there are tickets labelled as disability tickets, but there are commonly accessible viewing areas for events, some of which are ticketed. The Event Guidelines recommends these areas are labelled as “accessible viewing areas” instead of “disabled seating”.