

Director Key Sites Assessments
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

To whom it may concern,

**Re: SSD-8924: The new Sydney Fish Market Concept and Stage 1
SSD-8925: The new Sydney Fish Market Stage 2**

As the peak representative body for people with physical disability in NSW, I am writing on behalf of the Physical Disability Council of NSW (PDCN), and its members and stakeholders, the 1.37 million people in NSW with disability (20% of the NSW population) to object to the above State Significant Development Applications for the new Sydney Fish Market.

This objection is made on the basis that the current development application discriminates against people with disability including wheelchair users and people with mobility impairment.

The Sydney Fish Markets is an iconic location, and its long overdue redevelopment provides the NSW Government with an opportunity to create a truly inclusive and accessible venue. The design concept proposes four external stepped promenades (northern, eastern, southern, western) that will allow for movement between levels, function as seating, and connect the Glebe Foreshore walk, which it acknowledges as one of the best in the world, to the Fish Markets, the second biggest tourist attraction in Sydney after the Opera House.

I would like to acknowledge that while the concept design meets minimum requirements for accessibility via the use of lifts, the proposed stepped promenade forces wheelchair users and people with mobility issues (as well as seniors and parents with prams) to use a lift, located inside the building. This means people who are unable to use stairs will not be able to enjoy the promenade as any able-bodied person would, or as its intended purpose as a way of allowing movement between levels. This is in clear contravention of one of the objectives of the Disability Discrimination Act 1992 (DDA), which is to provide independent, dignified, and **equitable** access to buildings, facilities and services for people with disability.

Buildings are broadly defined under Section 23 to include all aspects of the built environment, including streetscapes and open space areas. As there is no ramp access on any of the four promenades, wheelchair users and people with mobility issues would be forced to enter the building and use the lift in order to change levels, or access and enjoy the ambience of the promenade, an integral part of the new design. This is neither dignified, nor equitable.

PDCN call for a review of the design to include the integration of **at least** one ramp, at either the northern or southern promenade. I appreciate that it may be difficult due to the height of the building, however it is not impossible, and considering it is an iconic public facility designed by high profile architecture firms, is worth undertaking.

Consideration could also be given to adjusting the internal escalator. This is currently not DDA compliant as it is a stepped escalator, however a slight adjustment to design to make it a ramp escalator would give wheelchair users and people with mobility issues another, albeit lesser, option to access the promenade. It would also mean everyone could use the escalator to access all internal areas of the building, rather than relying on lifts, thereby redistributing user numbers across various conveyances and easing wait times.

PDCN would also strongly urge you consider providing a turning bay in front of the lockers within End of Trip facility, as well as a unisex ambulant toilet within the Parents Room facility, as per the Accessibility Compliance Report 4.12 – Accessible and Ambulant Sanitary Facilities. This would ensure the design is truly inclusive and doesn't simply meet minimum requirements.

Finally, PDCN would like consideration to be given to the number of accessible car parking spaces. The design indicates there will be six accessible car spaces, and while this meets the minimum requirements, PDCN suggests increasing the number to 18 and including a mixture of wheelchair accessible, ambulant, seniors' and parents with prams spaces, to avoid possible competition for the currently limited spaces. In addition, the current plans to do not indicate how big the spaces will be or where they will be located, and PDCN strongly encourages these be included in the design plans.

PDCN would welcome the opportunity to work with the Department of Planning, Industry and Environment, along with any other stakeholders as the project progresses, to assist in ensuring this development provides a fully inclusive and equitable experience for all users, and can provide considerable expertise in the area of disability access.

Thank you for the opportunity to make a submission to the proposed Sydney Fish Markets development application, we look forward to working with you to address the current barriers to access and complete a world class venue for all!

Yours sincerely,



Alice Dixon-Wilmshurst
Policy Officer
Physical Disability Council of NSW