



13 November 2019

Mr Rodger Roppolo  
Planner  
State Significant Development  
NSW Major Projects  
Department of Planning, Industry and Environment

Submission via online portal

Dear Mr Roppolo,

**RE: The new Sydney Fish Market – Stage 2:** *Construction and operation of a new fish market including land and water based structures for the use of the site for the fish market including waterfront commercial and tourist facilities and ancillary uses*

Thank you for the opportunity to comment on this state significant development. Guide Dogs NSW/ACT has a particular interest and expertise in accessibility of public spaces and facilities for people who are blind or have low vision.

Guide Dogs NSW/ACT is the provider of specialist orientation and mobility services, supports and training across NSW. In addition to providing individual supports, equipment and training, we have significant access advisory and advocacy experience.

Our expert assessment and advice is provided to individuals, businesses and government through participation on panels such as Australian Standards, the Accessible Transport Advisory Committee (ATAC), and numerous other private and public forums. We have a particular interest in accessible and inclusive design for people who are blind or have low vision, and the implementation of these practices in public spaces and facilities.

We support the NSW Government's commitment to promoting inclusion of people with disability and recognise you will have knowledge of the obligation for accessible design and construction as prescribed within Article 9 of the United Nations Convention of the Rights of Persons with Disabilities; the Disability Discrimination Act 1992 (Cth), Building Code of Australia (BCA) 2019, Disability (Access to Premises — Buildings) Standards 2010 (Cth), the Disability Inclusion Act 2014 NSW) and other legislative instruments and guidelines including the AS 1428.4.2 Wayfinding Standard.

Additionally, the National Construction Code (2019) has recently been updated to prescribe the minimum necessary requirements for safety and health; amenity and accessibility, and sustainability in the design, construction, performance and 'livability' of new buildings (and new building work in existing buildings) throughout Australia.

In relation to the design of *The new Sydney Fish Markets*, Guide Dogs NSW/ACT has reviewed the Accessibility Compliance Report as prepared by Group DLA dated 27/9/2019.

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After reviewing the Accessibility Compliance Report, we are pleased to note the consideration of the principles of Universal design, NSW better placed design policy guidelines & AS 1428.2 as well as other legislative and applicable guidelines.

We applaud the cohesive design linking the outdoor domain to transport route connecting the development and the commitment to achieving a continuous accessible path of travel as promoted and required under the Commonwealth Disability Standards for Accessible Public Transport and associated Whole of Journey Guidelines.

Despite the published commitment to accessible design within the Development Application and findings of the Accessibility Compliance Report, we do have a number of concerns as to the appropriateness and completeness of accessibility compliance and design within the plans as currently presented.

In an effort to provide constructive feedback and recommendations for your consideration in further refining the plans, we provide the below comments and would welcome the opportunity to discuss these further with you and your department.

## **Areas of concern requiring further consideration and consultation**

### **1. Substantial use of stairs and bleachers throughout the site**

Although difficult to ascertain the exact design looking at the development application drawing, we do note the presence of a substantial number of steps around the venue and advise that these may provide a significant barrier to inclusion of people with Disability as well as a safety risk if appropriate wayfinding principles are not incorporated into the use of steps and bleaches as a design feature.

#### 1.1 Detection of stairs / Appropriate Wayfinding

We concur with the Accessibility Compliance Report at page 31, which advised that *“[t]o improve the safety of the fixed tiered seating (especially at top landing, upper ground level) for people with vision impairment when located adjacent to the accessible path of travel and for safe movement on the stair flights where they interface with tiered seating areas “*

We recommend:

- There must be a definite separation between the stairs and the bleachers.
- Application of clear, easily identified signage and directional information must be present to direct people who are blind or have low vision to the stairs and not the bleachers.

#### 1.2 Detection and Protection at bleachers

We also support the findings of the Accessibility Compliance Report at Page 27 that it is necessary *“[t]o improve the safety of the bleacher seating (especially at top landings, upper ground level) for people with vision impairment when located adjacent to the accessible path of travel; and to improve the safety on stair flights where stairs extend beyond the main stair width on intermediate landings and/or where they interface with bleacher seating areas”*

We recommend:

- That it is particularly essential that appropriate barriers are installed at the top of the bleachers, where there needs to be a definite protection to ensure that people who are blind or have low vision do not stop off the edge.

- A visual element (with appropriate Luminance contrast) is also highly recommended to detect the drop off.

### 1.3 Detection of stairs and handrails

Further consideration must be given to determining how a person who is blind or has low vision will to be directed to the handrails of the stairs and not inadvertently find themselves attempting to navigate the bleachers.

## 2. Warning Tactile Ground Surface Indicators, particularly application on stairs

It was noted in the Accessibility Compliance Report that that an access performance solution may need to be required if discontinuous handrails and/or stair handrail design was implemented to facilitate side access to the fixed tiered seating area.

We recommend:

- A consistent and functional design of the stairs is required – especially with the installation of TGSIs and handrails.
- Given the varied lengths of landings on the stairs (and consequent bleachers), warning TGSIs will need to be installed at the top and bottom of the stairs, but potentially on some of the landings if the landing exceeds 3 metres in length. If so, this will result in an inconsistent installation of TGSIs on the stairs and consequent confusion for people who are blind or have low vision.
- If the handrails are not continuous of both sides of the stairs, warning TGSIs will need to be installed. Again, this will result in an inconsistent installation of TGSIs on the stairs and consequent confusion for people who are blind or have low vision.

## 3. Application of Luminance Contrast

We agree with the statement, *“Consider providing 30% min. luminance contrast between key surfaces to assist people with vision impairment in orientation/way-finding and improve safety e.g. between wall and floor finishes, between ramps/stairs and adjacent flooring, between handrails and walls, between door hardware and doors etc”* Accessibility Compliance Report, p 23. This will help assist with wayfinding and independent travel.

Guide Dogs NSW/ACT looks forward to providing further advice and assistance to the NSW Government as the design of this state significant development progresses.

To arrange further consultation or clarification on any of the matters raised within our correspondence, please contact Jennifer Moon, Principal Advisor, Access & Stakeholder Engagement, Service Delivery - Operations & Governance, Guide Dogs NSW/ACT at [jmoon@guideodgs.com.au](mailto:jmoon@guideodgs.com.au).

Yours sincerely,



**Mr Dale Cleaver**  
Chief Executive Officer  
Guide Dogs NSW/ACT