City of Adelaide

Draft Disability Access and Inclusion Plan 2024-2028

Consultation Summary

April 2024

## **Background**

The City of Adelaide has been publishing disability-related plans and policies since the 1990s, with our first formal Access and Inclusion Strategy published in 2013.

Preparing a Disability Access and Inclusion Plan (DAIP) is a legislative requirement under the *Disability Inclusion Act 2018 (SA)* and must demonstrate alignment with national and state disability inclusion plans. The City of Adelaide's DAIP 2019-2022 aligns with the State Plan.

The City of Adelaide has an established Access and Inclusion Panel which provides the Administration with advice and oversight of development, implementation and ongoing monitoring and reporting of the DAIP.

The draft DAIP 2024-2028 replaces the DAIP 2019-2022 and aligns with the City of Adelaide Strategic Plan 2024-2028.

On 13 February 2024, Council endorsed the draft Plan for public consultation.

## **Public Consultation and Responses**

Consultation on the draft Plan 2024-2028 opened on 23 February 2024 to 2 April 2024. During the five-week consultation period:

- Seventeen Your Say Adelaide survey submissions were received.
- Access and Inclusion Advisory Panel Members shared the draft Plan with their respective networks and a subsequent special meeting of the Panel was held to share feedback.
- Six drop-in sessions were held across multiple days and locations, including the Fringe Vibes on Hutt event, and at libraries and community centres. Over 100 people shared feedback at these sessions.

## **Responses to Engagement and Submissions**

The response to the online Your Say Adelaide engagement was as follows:

- 1,134 'aware' visitors: Unique visits to the website.
- 201 'Informed' visitors: Respondents who explored the consultation materials to learn more about the Plan.
- 16 "engaged' visitors: respondents that submitted feedback through the online survey.
- 17 written submissions comprised of 16 via Your Say Adelaide and 1 written submission.

## Themes arising from consultation

- Support from the Access and Inclusion Panel for the Plan.
- Feedback to refine easy English and accessible formats of the Plan.
- Consultation support for the Plan including Goals, Four Year Focus areas and implementation items.
- Priorities for implementation, including:
  - Investment in key infrastructure such as footpaths and signage to enhance accessibility.
  - o Wayfinding and access to and through the city.
  - Clear paths of travel during events, construction, and associated with outdoor dining, e-scooters, bins and Aframes on footpaths.
  - Provision of public toilets across the city and an increase in the number of Changing Places facilities.
  - Transport provision and information including accessible car parking and public transport.
  - Support for businesses and events to be more accessible and promote their accessibility.

A summary of feedback and an administrative comment is provided in Table 1 to Table 3.

Table 1 – Summary of written submission from the Access and Inclusion Advisory Panel (AIAP) on the draft Disability Access and Inclusion Plan

Submission Summary	Administrative Comment
General Feedback	
<ul> <li>General feedback was that, though very long, the document is impressive. It is great to see that the discussions had by the AIAP are showing through in the plan. If the DAIP can be achieved in the next four years, then Adelaide will be quite an accessible and welcoming city.</li> <li>The real lived experience stories are great and really help bring the goals to life.</li> </ul>	Noted.
Summary at the front of the DAIP	
Advice: Have a one-page summary up front of the key deliverables to be achieved because of the DAIP – 'punchy and attention grabbing'	A one-page summary of the goals and focus areas has been included in a new section immediately following the Introduction.
Explanation of changes in language used in the DAIP	
Advice: The DAIP should include a foreword explanation about the language used – identity first or different ways people refer to themselves – as there seems to be both in the document.	A statement on person-first language and identity-first language has been added based on guidelines from People with Disability  Australia.  Refer to the new section titled The Language of disability, added following the section titled What is a disability.  Editorial amendments made throughout.
Photographs in the DAIP	
Advice: Include more images of children with disability in the city in the DAIP document	Images updated to include children and young people with disability.

Submission Summary	Administrative Comment
Notes on the Easy Read version - language and_interpretation	
<ul> <li>Advice: Notes on interpretation for the Easy English version, which is also used by neurodivergent people.</li> </ul>	The 'types of disability' section highlights the range of disabilities included in the Australian Bureau of Statistics data.
<ul> <li>Neurodivergent is missing from the 'You may have a disability' section.</li> </ul>	Use of the ABS term "intellectual" has been updated to cognitive on the advice of the CoA AIAP.
The 5 Big Ideas are hard to interpret from this document.	CoA has included additional content about neurodivergence.
<ul> <li>Consider language in every sentence, and ask a speech pathologist or a disability inclusion advisor to review this document for AIC users</li> </ul>	A one-page summary of the goals and focus areas has been included in a new section immediately following the Introduction.
Change 'intellectual' to 'cognitive' disability (page 7)	
Wayfinding	
<ul> <li>Feedback: Wayfinding is a major barrier. Legislation for buildings to have numbering in a particular size and font on the left of the main entrance will not be ready for many years. New technologies are helpful, but if they are audio, they require an earplug to use, which compromises safety because the user is less aware of ambient sound.</li> <li>Advice: Prioritise large font street signs in obvious locations</li> <li>Advice: If wayfinding technology is being considered, then careful research and testing should be done before committing resources to such a project. Checking with the AIAP network early in such a process would be worthwhile.</li> </ul>	The Transport Strategy is highlighted as a four-year focus project where many of the concerns regarding ramps, crossing, footpaths and timing can be addressed.  In the section that sets out the City of Adelaide's role, Goal 1, Facilitate, Wayfinding, has been updated to state:  Facilitate the early adoption of building numbering to the left of business entrances ahead of legislative requirements coming into effect in 2025.
Physical access to the city	
Feedback: The main barrier for people with disability is physical access to the city. The current system is inconsistent - pedestrian paths are clear one day but full of surprise obstacles the next, particularly a-frame signs and e-scooters.	Clear guidelines and increased policing of e-scooters are a commitment of the City of Adelaide in line with the extension of the trial use of e-scooters in the City of Adelaide and SA Government regulatory review.
	In the section that sets out the City of Adelaide's role, Goal 1, Advocate, Public Transport, has been updated to state:

Submission Summary	Administrative Comment
Advice: If the State Government report recommends e-scooters be allowed to continue, there will need to be storage and regulations to keep them clear of the pedestrian paths.	Public and Active Transport  Advocate for improvements in the storage and regulation of e- scooters to ensure safe pedestrian paths.
Providing Information	
Feedback: Information provision is a key issue, from information on menus, information to help plan the journey to get into the city and then to venues, and about how to enter a building and how to leave.	
Events	
<ul> <li>Advice: Information provision should be included in the requirements to be met for being granted a permit for city events.</li> <li>Advice: Find ways to improve information delivery to event organisers early in the event planning stage and change the process for approvals for events and festivals permits to include accessibility - reaching and moving around the event or festival area.</li> <li>Advice: Under events, seek ways to re-connect and improve connection with State Government, so Local Government is included in the planning for major events, such as at the Adelaide Oval and Festival Centre and other Events SA run events including Valo 500, particularly where footpaths and wayfinding information are being discussed.</li> </ul>	There is an accessible event checklist that is part of the event permit process, and accessible event training was offered as part of the DAIP 2019-2022. CoA will continue to build upon the successful implementation of event accessibility initiatives through the implementation of the DAIP 2024-2028.  In the section that sets out the City of Adelaide's role, Goal 3, Partner, Events, has been updated to state:  Event Accreditation  Investigate opportunities to partner with the State Government on accessible and inclusive major events in the City of Adelaide accreditation with the events sector.
Inclusion of more statistical data	
<ul> <li>Feedback: Could the DAIP include information on the percentage of people with a disability who come to the city, and on what types of disability they have? This would help bring focus on where change is most needed, help prioritise change, and identify KPIs for investment. This would provide a basis for measuring improvements, the impact made by the DAIP, which are improvements for everybody's experience of the city.</li> </ul>	The section titled Diversity in the City of Adelaide is updated to Demographic Profile. NDIS Market Monitoring data for City of Adelaide has been added to this section to ensure the full scope of disability is represented, acknowledging that not everyone who identifies as having disability has access to the NDIS.

Submission Summary	Administrative Comment
Feedback: Segregating disability data can be important for marginalised groups and can help balance a tendency to focus on physical types of disability more than those with less obvious disability, such as cognitive, psycho-social and deafness. The NDIS is a good source of statistical information.	
Recognise the limitations of Universal Design	
Advice: Universal design looks to improve generalised accessibility but does not include the reasonable adjustments that should be provided on a tailored basis for individuals. There will never be a universal design that will meet everyone's needs.	The City of Adelaide Policy statement is updated to acknowledge that universal design does not provide for all specific adjustments for all individuals.
Planning and Design of major building developments	
Feedback: Can recognition of the change in the City of Adelaide's power to control aspects of public realm interface on major building developments be included in the DAIP? How can council gain more influence to advocate for and have changes made to major developments, including major building reuse and upgrade works?	The proposed Business Access and Inclusion Project will have scope to work with businesses on initiatives that respond to the priorities outlined including street numbering, business marketing materials such as A-frames, menus and journey planning information.
Implementation priorities	
<ul> <li>Unanimous support to prioritise:</li> <li>Wayfinding</li> <li>Clear footpaths (including signage, scooters, bins, outdoor dining)</li> <li>"If we can't access the space, then we can't access all the other things."</li> </ul>	Noted as priorities for implementation.

Table 2 – Summary of verbal submissions on the draft Disability Access and Inclusion Plan (individuals)

Submission Summary	Response
Hutt Street Fringe	
<ul> <li>Key Themes:</li> <li>E-Scooter management is needed to ensure they are used but don't create hazards across the city</li> <li>More journey planning information needed, toilets, public transport, parking</li> <li>Autism/neurodivergent friendly events and spaces needed</li> <li>More accessible curb ramps and crossings, more time needed to cross, wider footpaths</li> <li>Less traffic would be safer and quieter</li> <li>Separate paths/roads for cars, bikes and pedestrians.</li> </ul>	Clear guidelines and increased policing of e-scooters are a commitment of the City of Adelaide in line with the extension of the trial use of e-scooters in the City of Adelaide and SA Government regulatory review.  In the section that sets out the City of Adelaide's role, Goal 1, Advocate, Public Transport, has been updated to state:  Public and Active Transport  Advocate for improvements in the storage and regulation of e-scooters to ensure safe pedestrian paths.  Journey planning is included in the draft Plan.  CoA has included additional content about neurodivergence.  The proposed Business Access and Inclusion Project will have scope to promote business accessibility through a dedicated role and funding. This role will promote initiatives that respond to the priorities outlined including street numbering, business marketing materials such as A-frames, menus and journey planning information.  A four-year focus is 'Sensory Friendly Spaces' in which there is a commitment to investigate potential locations and cost for quiet/sensory friendly spaces in the city.  The Transport Strategy is highlighted as a four-year focus project where many of the concerns regarding ramps, crossing, footpaths and timing can be addressed.

Submission Summary	Response
Community Centre and Library	
General theme:  Recognise hidden disabilities Relevant to Goal 1  Value free and accessible public transport  Lack of traveller information support is felt – loss of Adelaide Metro Service Centre. Travellers Aid in Railway Station has limited hours and scope of service  Smooth and clutter free footpaths needed  More time to cross roads  More accessible parking bays wanted, especially close to medical and community facilities  Bus stops and buses are not welcoming or accessible much of the time, anti-social behaviour noted as well.  Relevant to Goal 2  More public toilets that are better signposted and open all hours, and cleaned regularly  More shade needed across the city	The draft Plan has been updated to NDIS data and additional content about neurodivergence.  There consultation indicated support across the goals of the draft Plan.  Goal 1  The DAIP outlines CoA's role in leading the delivery of car parking and public amenities that meet the needs of people with disability.  It also outlines that CoA will advocate to the state for changes to major public transport stops to ensure water and toilets are nearby and for broad-scale implementation of a Traveller's Aid service.  The Transport Strategy is highlighted as a four-year focus project where many of the concerns regarding ramps, crossing, footpaths and timing can be addressed.  Goal 4 and Goal 5  Focus on customer experience.  The proposed Business Access and Inclusion Project will have scope to promote business accessibility through a dedicated role and funding. This role will promote initiatives
Regular seating, rest stops are needed for kids and others  Relevant to Goal 4	that respond to the priorities outlined including street numbering, business marketing materials such as A-frames, menus and journey planning information.
<ul> <li>Relevant to Goal 4</li> <li>Many private buildings don't meet access needs e.g. lifts, numbering etc</li> </ul>	menus and journey planning information.  Some of the comments provided relate to initiatives in the COA Housing Strategy and Homelessness Strategy.
Support for the business accessibility proposal	

Submission Summary	Response
Relevant to Goal 5	
Wi-Fi and computer access is valuable	
Free spaces like libraries are valued, need to be better signage and promotion	
Want to maintain face to face services/assistance	
Related CoA Strategies	
Housing support needed for DV victim/survivors with disability	
Support for the social work in libraries proposal	

Table 3 – Summary of Your Say Adelaide submissions on draft Disability Access and Inclusion Plan

Submission Summary	Response
I live with a person with a disability but have also experienced what it is like with a temporary disability (torn ankle ligaments). I found no mention of appropriate surfaces e.g. the tiles on Grote St near the Central Markets are very slippery when damp / wet. Additionally, there is a prioritisation of car traffic over pedestrians - pedestrians have long waits for light changes which can be quite short. Pedestrians have to step down to road level rather than cars needing going over continuous footpaths. There are few street crossings (e.g. zebra crossing) so you are forced to walk to the end of city blocks to cross streets. The city is 'Manhattanised' to the point you can go around a corner and be buffeted by strong winds. There are not enough disability car parks in enough locations and e-scooters are parked so close as to make opening the door to the full extent impossible. Clean public toilets are too far apart, or maybe not well sign posted. I am not sure the focus is correct, its seems to be about what can be done without inconveniencing other users, although when you suit disabled pedestrians / bus users you really suit all users.	Alignment with Goal 1  City of Adelaide will review construction design and materials to ensure surfaces and materials meet standards and are fit for purpose.  A commitment to more accessible parking bays and better information provision about availability is outlined in the Plan.  In the section that sets out the City of Adelaide's role, Goal 1, Advocate, Public Transport, has been updated to state:  Public and Active Transport  Advocate for improvements in the storage and regulation of escooters to ensure safe pedestrian paths.
I would like to see more handrails through Rundle Mall. A special Adelaide city mobile app designed to include all facilities and events updated continuously with and changes. This could include all events and utilities to assist not just disabled but elderly or other people with special needs. A specific disability event that includes support workers and families. Improved lighting and better wider pathways through the parklands. During wet seasons and poor lit areas foot paths become unsafe.	Alignment with Goal 1, Goal 4 and Goal 5  Event accessibility is a focus within the Plan.  The DAIP outlines CoA's role in leading the delivery of car parking and public amenities that meet the needs of people with disability. It also outlines that CoA will advocate for the state to ensure major public transport stops to ensure water and toilets are nearby and for broad-scale implementation of a Traveller's Aid service.

Submission Summary	Response
For the entertainment/cultural side of things – it would be great if access objectives had to be included in people's grant applications. For instance, an exhibition applying for a grant would have to allocate some funding in their budget to audio description/a temporary ramp. There are many good definitions and explanations – However, I don't think there's an explanation of people-first, identity-first and interchangeable language, and which ones you've chosen to use for the document.	Alignment with Goal 3  Accessibility requirements are a criterion for Council grants and permits.  A statement on person-first language and identity-first language has been added based on guidelines from People with Disability Australia.  Refer to the new section titled The Language of disability, added following the section titled What is a disability.  Editorial amendments made throughout.
Scooters need to be removed from being a danger.	In the section that sets out the City of Adelaide's role, Goal 1, Advocate, Public Transport, has been updated to state:  Public and Active Transport  Advocate for improvements in the storage and regulation of escooters to ensure safe pedestrian paths.
Broad description of plans without detailed explanation of what will happen to support classroom excursions with 10 students with severe multiple disabilities sitting in wheelchairs. Our biggest problem is to access Changing Places toilets in the city. There are only 2-3 available and far from each other. With 10 students, each taking 15 minutes of changing time, a single changing places toilet would be occupied by our class for 150 minutes, which is more than 2 hours. This can jeopardise curriculum outcomes. Suggestions: - Changing Places toilet minimum 10 locations – hoist and change bench – calculate ratio of people with disabilities in the Australian population – multiple rooms at a Changing Places locations, so classrooms can go easier with time management – easier access to	Additional Changing Places are a priority for the Plan. The DAIP outlines CoA's role in leading the delivery of car parking and public amenities that meet the needs of people with disability.

Submission Summary	Response
Myers food court – adult wheelchairs take up big space, hard to navigate between table and feeling bad that other customers need to move because of us. A student in a wheelchair with a carer takes up the space of 3-4 people. Skip the queue when ordering food when someone is in a wheelchair – it takes longer time to eat lunch, all safety advice need to be considered, moist food and small pieces. If we wait too long for our KFC (for example), then our usual 1 hr mealtime expands significantly – better signage of inclusive places – better Google map showing Changing Places – lots of discrepancies -You are doing a great work. We appreciate that you ask for our input. We love to go to the city to hang out with our school friends in wheelchairs. We agree but the toilets are crucial. Please hurry up with this because we love the city. We really do not want to print T-shirts saying, 'If you're in wheelchair, you can access the city but don't want to make a poo'. Whole classroom is here in wheelchairs. We trust you guys!	
No, I believe there needs to be a stronger focus on improving footpaths for better accessibility. There needs to be more consultation with disabled individuals and their experiences navigating the city. Increase pedestrian crossing times as they're currently too short (not everyone is able to walk at a faster pace).	Alignment with Goal 1  The Access and Inclusion Advisory Panel will provide ongoing advice to key projects and additional engagement opportunities will be designed to ensure a broad range of lived experiences shape city projects.
On street car parking spaces in the city are only 30 mins when all the other car park spaces are 2-3 hours. E.g. along the river Torrens on Victoria Drive. This is discrimination, it can take 20 mins to get a group of people with disabilities out and in of an access van. No time to go for a walk, have a picnic, see sights, museums etc.	Written response provided directly to the customer advising:  Accessible parking spaces (known as blue bays) are sign-posted or have the accessibility symbol painted on the road surface or signs covering the space. Accessible parking spaces are listed on the Council website via the <a href="Interactive Parking Map">Interactive Parking Map</a> .

Submission Summary	Response
	Paid parking spaces with a clearly displayed permit have the same time extensions as accessible spaces.
Things have improved but not enough. Access to toilets, assistance with transport and individual venues are atrocious. Access for disabled people on public transport platforms needs improvement. Doorways entering stores need to be kept clear e.g. stock so close to entrance there is no way to enter while in a wheelchair. Disability specific spaces to rest and eat out of the sun. And access to public toilets outside of shopping hours.	Additional business support seeks to address gaps in business owner knowledge through the proposed Business Access and Inclusion Program  Rest stops are a priority in the Plan and a budget bid has been submitted to support delivery.  The Plan outlines that CoA will advocate for the state to ensure major public transport stops to ensure water and toilets are nearby and for broad-scale implementation of a Traveller's Aid service.
Yes, mostly. The case scenarios are a great read. Larger print street signs that are more obvious. I agree with the focus areas. There are not sufficient photos of children with disability in the DAIP.	Updated images included in the Plan.
I would like hearing loops to be more common in venues with speaker presentations or audio systems (like cinemas and theatres). That is, in-built hearing loops that are well maintained and regularly checked, not the portable ones which require extra hassle to get hold of and make those of us with hearing loss conspicuous. Also, reduce music sound levels in venues like restaurants, cafes, etc, to make it easier for those with hearing loss to have a conversation.	Alignment with Goal 5  Investment in Council facilities accessibility is a priority in the Plan.  The City Library was developed with an in-build hearing loop and future Council developments would also include these. We can support greater acknowledgment of hidden disabilities through further training with our library and customer centre teams who over the past four years have become Communication Access accredited.

Submission Summary	Response
Yes, mostly. The case scenarios are a great read. Feeling safe is a big part of being able to participate in anything, particularly for people who have an intellectual disability or are neurodivergent. As a parent I do not feel comfortable letting my young adult child with an ID go out to the city, even with support it can feel unsafe. Everyone needs to be helped so that people who do feel desperate don't make bad choices that endanger other people, particularly more vulnerable people. Safety is hard, but big.	Safety has been added as a principle in the Plan.
We are a family of four that live in the city, and our youngest son is 11 years old and is on the Autism Spectrum. I know other local families where a member of their family has a disability. It would	Alignment with Goal 1
have been nice to include their experiences of city life in this plan. I	Noted. Clear paths of travel are a priority of the Plan.
think a big focus needs to be on safe access to footpaths that are clear and not obstructed with e-scooters and rubbish bins. We also	The Transport Strategy is highlighted as a four-year focus project
find cars have become a big risk, with more cars on the road and having them drive very fast down side streets. If there was some way of reducing the amount of cars in the CBD, would make a safer	where many of the concerns regarding ramps, crossing, footpaths and timing can be addressed.
environment for all. We walk a lot to access shops, the library and school. The lack of supermarkets and free public transport can make things difficult. The e-scooters are very expensive to use. Yes, there	In the section that sets out the City of Adelaide's role, Goal 1, Advocate, Public Transport, has been updated to state:
is so much that needs to change. There are so many bins lines up	Public and Active Transport
over the footpath or spewed over the road that we are forced to walk on the road to get to school. As a parent and carer, I feel nervous about allowing my son to walk alone on those days, knowing he may have walk on the road and be at risk of being hit by a car. We would	Advocate for improvements in the storage and regulation of escooters to ensure safe pedestrian paths.
love to see a new solution for bins on those streets that have narrow footpaths.	Noted: bin presentation shared internally with relevant teams.
Not really, there is a keen lack of disability-based opportunities for facilities and parking. There is a long way to go, I offer the ability for people with a disability the option to play sports. Yet we lack basic	In the section that sets out the City of Adelaide's role, Goal 2, Lead, Community Buildings, has been updated to state:

Submission Summary	Response
infrastructure to allow people with a disability to use toilets without having to cross a busy road to use the facilities not at my club even though my program promotes inclusion we are not able truly offer this. Provide and better support clubs to fulfill basic requirements. The 100+ building are lacking basic facilities and parking is limited.	Improvements to community buildings in the Adelaide Park Lands to consider accessibility and inclusion that supports participation in sport.
I hope the training for employees emphasises that autistic people may show emotion differently. In fact, they are often honest, loyal and truthful to a fault. Impressed with the direction. Maybe you could aim for Hidden Disabilities (sunflower lanyard scheme) accreditation in your customer centres, libraries, and community centres. I just want to reinforce the importance of quiet spaces, sensory gardens, businesses that are sensory welcoming spaces etc. It would be great to have a sensory map of the city with spaces like picnic areas, gardens, and quiet spaces to enjoy and make the city more accessible for people with disabilities like autism.	A four-year focus is 'Sensory Friendly Spaces' in which there is a commitment to investigate potential locations and cost for quiet/sensory friendly spaces in the city.  We can support greater acknowledgment of hidden disabilities through further training with our library and customer centre teams who over the past four years have become Communication Access accredited.  Sensory processing is recognised and explained in the Plan.
Would like a disability park for day parking. I can't take public transport due to my back and having to walk sometimes 4 blocks and then get up those stairs in the work building really drains me and having to do that 3 times a day is not good on my body at all.  Can I use residential parking in the street opposite.	Written response provided directly to the customer advising that disability permits extend existing parking limits.
Yes, however I think there should mention of scooters across paths and management of roadworks to ensure access is not lost. Yes, I think Adelaide is an easy city to physically navigate, however with the rise in the reliance on technology I think it's important to continue to offer alternative ways for people to continue engage without	Alignment with Goal 1

Submission Summary	Response
having the latest technology, this could also extend to instructions whether directional or for using equipment like parking meters, for example I witnessed an elderly couple who were unable to determine how to use a parking meter because they couldn't	Clear paths of travel are a focus in the Plan. Our Community Safety staff are active in ensuring clear paths of travel are maintained and respond to complaints.
understand the instructions. If there was a way to communicate with people when they are planning their activities in the city if we can alert them to any major events or other irregular activity that might	In the section that sets out the City of Adelaide's role, Goal 1, Advocate, Public Transport, has been updated to state:
affect their visit, e.g. public transport being crowded, maybe a city	Public and Active Transport
sensory map, like a heat map that is live time and then make sure city businesses understand about hidden disabilities etc. Equal consideration needs to be giving to the customer service exchange as it does to the physical environment, people that work in the city play an incredibly important role to welcome the disability community.	Advocate for improvements in the storage and regulation of escooters to ensure safe pedestrian paths.
	A commitment to access and inclusion training for employees, volunteers and Elected Members is outlined in the Plan.