

**Submission  
No 62**

## **INQUIRY INTO PUBLIC TOILETS**

**Organisation:** Placemaking NSW

**Date Received:** 2 December 2024

---

The Honourable Dr. Amanda Cohn  
Chair, NSW Parliamentary inquiry into public toilets

Via submission portal: [Public toilets](#)

**RE: NSW Parliamentary inquiry into Public Toilets**

02 December 2024

Dear Chair,

Thank you for your invitation to contribute to the current inquiry into the delivery of public toilets in NSW. Placemaking NSW has reviewed the document and provide the following information and recommendations for your consideration.

Should you require any further information, please do not hesitate to contact me at

Yours sincerely,

**Susan Lee**  
Chief Operating Officer  
Placemaking NSW

## Submission to Parliamentary Inquiry into Public Toilets

---

### About Placemaking NSW

Placemaking NSW owns, manages, and transforms Sydney's most historically and culturally significant waterfront locations into vibrant, welcoming places that support, sustain, and inspire locals and visitors alike. It has the role of enhancing the state's most treasured places and spaces while supporting and enabling their transformation. PMNSW is responsible for the care and control of the Rocks and Darling Harbour, as well as Luna Park, Ballast Point Park and parks and waterfront boardwalks in Pyrmont.

These special places include more than 100 heritage buildings as well as unique venues such as the Chinese Garden of Friendship and major event facilities at the International Convention Centre Sydney. The Rocks and Darling Harbour alone contribute \$3.1 billion per year to the New South Wales economy. Including key sites such as White Bay Power Station and the Bays West Precinct, land and current projects in planning or underway are valued in excess of \$5 billion.

PMNSW brings Sydney's foreshore to life in The Rocks and Darling Harbour with a colourful mix of events and activations from small scale community events to some of the city's biggest and most popular events such as New Year's Eve and Vivid. It also cares for the natural and built environments that make the precincts the popular destinations they are today.

As a statutory corporation Place Management NSW (trading as "Placemaking NSW") has a mandate to

- protect and enhance the natural and cultural heritage of the foreshore area.
- promote, coordinate, manage, undertake and secure the orderly and economic development and use of the foreshore area, including the provision of infrastructure; and
- promote, coordinate, organise, manage, undertake, secure, provide and conduct cultural, educational, commercial, tourist, recreational, entertainment and transport activities and facilities.

Place Management NSW welcomes the opportunity to engage and provide feedback to the NSW Parliamentary Inquiry into public toilets in NSW.

### Inquiry into Public Toilets

The submission responds to the Terms or Reference set out by the Committee, which has committed to inquire into and report on public toilets, and in particular:

- (a) the provision, design, accessibility and inclusivity of public toilets across New South Wales, including toilets provided in public places and toilets provided for the use of members of the public in private premises accessed by the public,
- (b) state, national and international best practice for the provision and maintenance of public toilets,
- (c) the regulation of, and funding for, public toilets in New South Wales and whether new standards, guidelines, funding models, legislation or other forms of regulation are warranted; and
- (d) and other related matters.

## Introduction

PMNSW has recently published *The Rocks and Darling Harbour Amenities Strategy, 2024*, (the Strategy), which guides the considered and strategic upgrading and delivery of public amenities across these precincts. Extensive research and policy review underpinned this Strategy, which is attached for consideration as part of this submission.

Our objectives for the provision, delivery and maintenance of amenities in The Rocks and Darling Harbour are to:

- Deliver leading practice, high quality and well-designed amenities
- Support inclusive places where all people feel welcome
- Prioritise investment and delivery where there is the most benefit, and to
- Responsibly and sustainably design and manage amenities.

Ethos Urban were engaged to prepare the Strategy, informed by an audit of existing public and publicly accessible facilities across a range of assessment criteria and guiding principles. Amenities within the precincts are delivered and managed by PMNSW along with the relevant local council, the City of Sydney, and private third parties.

## The Rocks and Darling Harbour Amenities Strategy 2024

PMNSW identifies a public toilet as “a facility containing one or more rooms/cubicles with one or more toilets or urinals which is available for use by the public without restriction during hours of operation”. Public toilets which are accessible and inclusive consider the different needs of social, cultural and demographic user groups, as well as children, parents with young children, culturally diverse people, the elderly and members of the LGBTIQ+ community. Extending from accessibility and inclusivity, all-gender toilets ensure access and equity is provided for all members of society and broadens the scope from disability access to universal access, paving the way toward a more inclusive society (*The Rocks and Darling Harbour Amenities Strategy 2024*, p.58). Public amenities include public toilets and change facilities.

PMNSW believe that public amenities are a key contributor to participation in public life, inclusion in and enjoyment of NSW's public spaces, green and recreation spaces and key cultural and civic institutions. Provision of high-quality public amenities underpins PMNSW's commitment to inclusive and accessible spaces that can be enjoyed by all.

EY Sweeney found in 2022 that facilities and amenities were identified as among the top three indicators of visitor experience in both The Rocks and Darling Harbour. When it comes to Sydney's critical tourism economy, decisions from tourist groups, residents and community about where to patronise can significantly impact a location's desirability and activation. Access to public amenities builds inclusion and participation from the whole community.

PMNSW has a responsibility to the people of NSW to ensure that its policies and operations reflect these aspirations.

Significant capital investment is required to deliver publicly accessible changing places and public amenities to service high-use public domain areas e.g. Darling Harbour and Parks. The delivery of these facilities exclusively within privately managed/owned buildings limits opportunities for wider benefit to the community.

PMNSW notes that from 2023-36, the Commonwealth Government is investing more than \$32 million in helping build more Changing Place facilities across Australia ([Changing Places | Department of Social](#)

Services, Australian Government), signalling a priority within the built environment sector to provide high quality public facilities which are equitable and accessible.

## Recommendations

PMNSW submits the following recommendations for consideration by the Committee Chair.

### **1. Recommendation 1: Public toilet standards should be updated to reflect changing expectation for high quality amenities.**

The Greater Sydney Outdoors Study fielded responses from 6,800 Sydney residents in 2019 and found that amenities such as toilets “could be improved across all Districts.” (Greater Sydney Outdoors Study). Similar studies undertaken by local councils since 2019 have made similar findings. With the advent of Covid-19 and subsequent post-pandemic changes, a higher level of personal hygiene and public sanitation is now expected as “the new normal” from the public when using public amenity blocks and changing places.

PMNSW would support the Committee in recommending changes and updates to national Building Code of Australia Guidelines to be revised, following the completion of this inquiry.

### **2. Recommendation 2: PMNSW supports revision of outdated gender standards for public amenities across legislative frameworks applicable in NSW and within the scope of this inquiry.**

Already the City of Sydney has committed to All Gender public facilities in its public toilet strategy, published in 2014. A 2022 Report released by the NSW Advocate for Children and Young People calls for bathrooms in all NSW Schools to become all gender bathrooms, while in 2023 Inner West Council adopted a Public Toilet Strategy that includes a suggestion to “take a positive decision to remove gender-based signage” (Part 1 - Intro and Design Guidelines.pdf). In 2024 there is a growing expectation from the public that all-gender public amenities are provided and become “the new normal”.

- The impact of inadequate public toilet provision can be significant and often disproportionately affects those experiencing ill health, living with a disability, and people who are gender non-conforming, among others.
- Toilet provision can influence where and how people travel and what they consume, leading them to ‘restrict their movement to known places’, which then “limits their full involvement in economic, social and health activities”.

### **3. Recommendation 3: PMNSW supports revision of outdated disability standards for public amenities across legislative frameworks applicable in NSW and within the scope of this inquiry.**

People living with a disability continue to experience barriers in accessing Sydney’s public domain, particularly public toilets. This is of specific consideration for our rapidly aging population, which brings with it increased restrictions in mobility, and fast increasing rates of Dementia and Alzheimer’s.

Potential design solutions include continuous accessible paths of travel and circulation spaces for people who use wheelchairs, access and facilities for people with ambulatory disabilities, and access for people with sensory disabilities.

- Recent research in disability also provides practical, nuanced solutions for people living with disabilities which are accompanied by specific sensory sensitivities. The Rick Hansen

Foundation, an internationally recognised charity focused on breaking down physical barriers states, “Universal Design anticipates the needs of users now and well into their futures”.

- The *NSW Better Placed Design Guide for Health, 2023* ([Design Guide for Health](#)) provides practical solutions for improved design in a healthcare setting. Principles and solutions could be adapted to public amenities.
- 2018 Churchill Fellow Katherine Webber published comprehensive research through the [University of Queensland](#), and in 2021 by [Griffith University](#) highlighting current design provision of public toilets are failing many different population groups, including wheelchair users, trans and gender diverse people, parents and carers, and unhoused people.
- Canada has already implemented national and provincial legislation supporting accessible, All gender facilities, and provides a comparable model for a NSW context ([Designing for Inclusivity: Strategies for Universal Washrooms and Change rooms in Community and Recreation Facilities](#), and [Guidelines for Inclusive Design – Universal Washroom Facilities for Alberta Infrastructure](#))

#### **4. Recommendation 4: Greater consistency in NSW between online resources available, and federally funded resources**

The [National Toilet Map](#) serves as a key resource, managed by the Australian Department of Health and Aged Care, as part of the National Continence Program. Currently this map does not link to resources such as Google Maps which can have more detailed and up to date information.

#### **5. Recommendation 5: Placemaking NSW supports Greater funding and guidance toward the creation of consistent and inclusive best practice facility design guidance for amenities to cater for a diverse range of the community, as well as for the delivery of best practice facilities.**

The Rocks and Darling Harbour have geographically well-distributed amenities, however conditions outside of the amenities limit their effectiveness in supporting the use of our precincts. Wayfinding, lighting and public domain accessibility limit the effective use of these amenities.

Placemaking NSW would support a consistent design guidance including signage, signalling all gender public amenities, creating a more inclusive experiences for our diverse communities by embedding a level of respect afforded to traditionally gendered people. This support extends to:

- The delivery of all-gender amenities, separate to the required unisex accessible facilities and gender facilities is important to PMNSW to ensure our places are equitable and inviting.
- The delivery of inclusive public amenities that support caregivers, families, people with different physical and sensory needs, LGBTIQ+ communities, and the aging population.
- Design guidance including signage, should be established to ensure application is consistent,
- Consideration given to an allocation of funding for State and Local Government entities to support delivery of improved toilet infrastructure.
- There is a lack of consistency around all-gender signage with use of the split male/female symbol or use of a toilet symbol. PMNSW would support the development of a new symbol to represent all-gender amenities to be rolled out across the state.
- PMNSW recommends that existing public facilities in NSW should be required to comply with Crime Prevention Through Environmental Design (CPTED) guidelines.
- PMNSW recommends that all-gender changing places and amenities which are Master Locksmith Access Key (MLAK)-accessible be required under the National Construction Code

(NCC), rather than continue to be “additional” facilities to be delivered at the discretion of landowners.

**6. Recommendation 6: Placemaking NSW supports the exploration in to reducing the public cost of providing high quality public amenities and changing places.**

It is noted that as of May 2019, the *National Construction Code* specified that ‘Accessible Adult Change Facilities’ or ‘Changing Places’ are to be included in the design of public buildings such as shopping centres, stadiums, swimming pools, theatres, museums, and airports. They are to be designed in accordance with the Changing Places design specifications.

- PMNSW would support further investigation into legislative or regulatory provisions to allow for public changing places to be incorporated within these facilities as part of the public benefit works in major developments, especially those in high traffic areas.
- Locally in Sydney, public family rooms can be found in various locations such as the Art Gallery of NSW and Australian Museum. While free to enter, they are generally only available during opening hours – limiting how diverse user groups may be able to access them.
- The co-location of new facilities located in high-visitation areas would provide efficiencies in shared mechanical, water and sewage systems, build costs, economies of scale in materials, access, and other savings in development, cleaning and maintenance over time. Existing NSW legislative mechanisms such as section 7.10 or 7.11 funding (Environmental Planning and Assessment Act, 1979) could be amended to allow for such provisions.