



Morris Goding
Access Consulting

TOGA Group

TOGA Central, Haymarket

Access Review – DA Report v5

29 July 2022



REPORT REVISIONS		
Date	Version	Drawing No / Revision
08/04/2022	1 Preliminary Issue	Architectural drawing package by BatesSmart via Aconex 08/04/2022
05/07/2022	2 DA Issue	220617_Draft SSDA Drawing Issue
22/07/2022	3 DA Issue Final	Final SSDA Drawing Issue
29/07/2022	4. DA Issue Final	As above
29/07/2022	5. DA Issue Final	As above

This report prepared by:

Lee-May Whong
Senior Access Consultant
Morris Goding Access Consulting

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1 Executive Summary

This Access DA Report has been prepared by Lee-May Whong to accompany a detailed State significant development (SSD) development application (DA) for the mixed-use redevelopment proposal at TOGA Central, located at 2 & 8A Lee Street, Haymarket (the site). The site is legally described as Lot 30 in Deposited Plan 880518 and Lot 13 in Deposited Plan 1062447. The site is also described as 'Site C' within the Western Gateway sub-precinct at the Central Precinct.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEAR 4) issued for the SSD DA (SSD 33258337).

This report concludes that the proposed mixed-use redevelopment is suitable and warrants approval subject to the implementation of the following mitigation measures.

- Accessible paths of travel including and not limited to stairs, ramps and walkways, entrances and doorways, and circulations along the accessible path of travel.
- Accessible sanitary facilities and male and female ambulant facilities.
- Handrails, nosing strips and tactile indicators.
- Luminance Contrasts.
- Swimming pool access.
- Accessible car parking requirements.

Following the implementation of the above mitigation measures, the remaining impacts are appropriate.

Morris Goding Access Consulting has prepared the Access Report to provide advice and strategies to maximise reasonable provisions of access for people with disabilities. It is reviewed against the relevant Australian Codes and Standards under the provision of the Commonwealth Disability Discrimination Act (DDA).

The aim of this review is to ensure that the accessibility considerations comply with the relevant statutory requirements, and in addition, consideration of accessibility to meet the intent of the DDA of inclusive, dignified, and equitable access.

2 Introduction

2.1 Background

This report has been prepared to accompany an SSDA for the for the mixed-use redevelopment proposal at TOGA Central, located at 2 & 8A Lee Street, Haymarket.

The Minister for Planning, or their delegate, is the consent authority for the SSD DA and this application is lodged with the NSW Department of Planning and Environment (DPE) for assessment.

The purpose of the SSD DA is to complete the restoration of the heritage-listed building on the site, delivery of new commercial floorspace and public realm improvements that will contribute to the realisation of the Government's vision for an iconic technology precinct and transport gateway. The application seeks consent for the conservation, refurbishment and adaptive reuse of the Adina Hotel building (also referred to as the former Parcel Post building (fPPb)), construction of a 45-storey tower above and adjacent to the existing building and delivery of significant public domain improvements at street level, lower ground level and within Henry Deane Plaza. Specifically, the SSD DA seeks development consent for:

Site establishment and removal of landscaping within Henry Deane Plaza.

Demolition of contemporary additions and public domain elements within Henry Deane Plaza.

Conservation work and alterations for retail premises, commercial premises, and hotel and motel accommodation. The adaptive reuse of the building will seek to accommodate:

- Commercial lobby and hotel concierge facilities,
- Retail tenancies including food and drink tenancies and convenience retail with back of house areas,
- 4 levels of co-working space,
- Function and conference area with access to level 7 outdoor rooftop space, and
- Reinstatement of the original roof pitch form in a contemporary terracotta materiality.

Provision of retail floor space including a supermarket tenancy, smaller retail tenancies, and back of house areas below Henry Deane Plaza (at basement level 1 (RL12.10) and lower ground (RL 16)).

Construction of a 45-storey hotel and commercial office tower above and adjacent to the fPPb. The tower will have a maximum building height of RL 202.28m, and comprise:

- 10 levels of hotel facilities between level 10 – level 19 of the tower including 204 hotel keys and 2 levels of amenities including a pool, gymnasium and day spa to operate ancillary to the hotel premises. A glazed atrium and hotel arrival is accommodated adjacent to the fPPb, accessible from Lee Street.
- 22 levels of commercial office space between level 23 – level 44 of the tower accommodated within a connected floor plate with a consolidated side core.

- Rooftop plant, lift overrun, servicing and BMU.

Provision of vehicular access into the site via a shared basement, with connection points provided to both Block A (at RL 5) and Block B (at RL5.5) basements. Primary access will be accommodated from the adjacent Atlassian site at 8-10 Lee Street, Haymarket, into 4 basement levels in a split-level arrangement. The basement will accommodate:

- Car parking for 106 vehicles, 4 car share spaces and 5 loading bays.
- Hotel, commercial and retail and waste storage areas.
- Plant, utilities and servicing.

Provision of end of trip facilities and 165 employee bicycle spaces within the fPPb basement, and an additional 72 visitor bicycle spaces within the public realm.

Delivery of a revitalised public realm across the site that is coordinated with adjacent development, including an improved public plaza linking Railway Square (Lee Street), and Block B (known as 'Central Place Sydney'). The proposal includes the delivery of a significant area of new publicly accessible open space at street level, lower ground level, and at Henry Deane Plaza, including the following proposed elements:

- Provision of equitable access within Henry Deane Plaza including stairways and a publicly accessible lift.
- Construction of raised planters and terraced seating within Henry Deane Plaza.
- Landscaping works within Henry Deane Plaza.
- Utilities and service provision.
- Realignment of lot boundaries.

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 17 December 2021 and issued for the SSD DA. Specifically, this report has been prepared to respond to the SEAR 4 requirement issued below.

Item	Description of requirement	Section reference (this report)
3. Operation	<ul style="list-style-type: none"> ▪ Provide details of the existing and proposed operations, including staff and student numbers, and hours of operation. ▪ Provide a detailed justification of suitability of the site to accommodate the proposal. 	Section X.X.X

2.2 The Site

The site is located within the City of Sydney Local Government Area (LGA). The site is situated 1.5km south of the Sydney CBD and 6.9km north-east of the Sydney International Airport within the suburb of Haymarket.

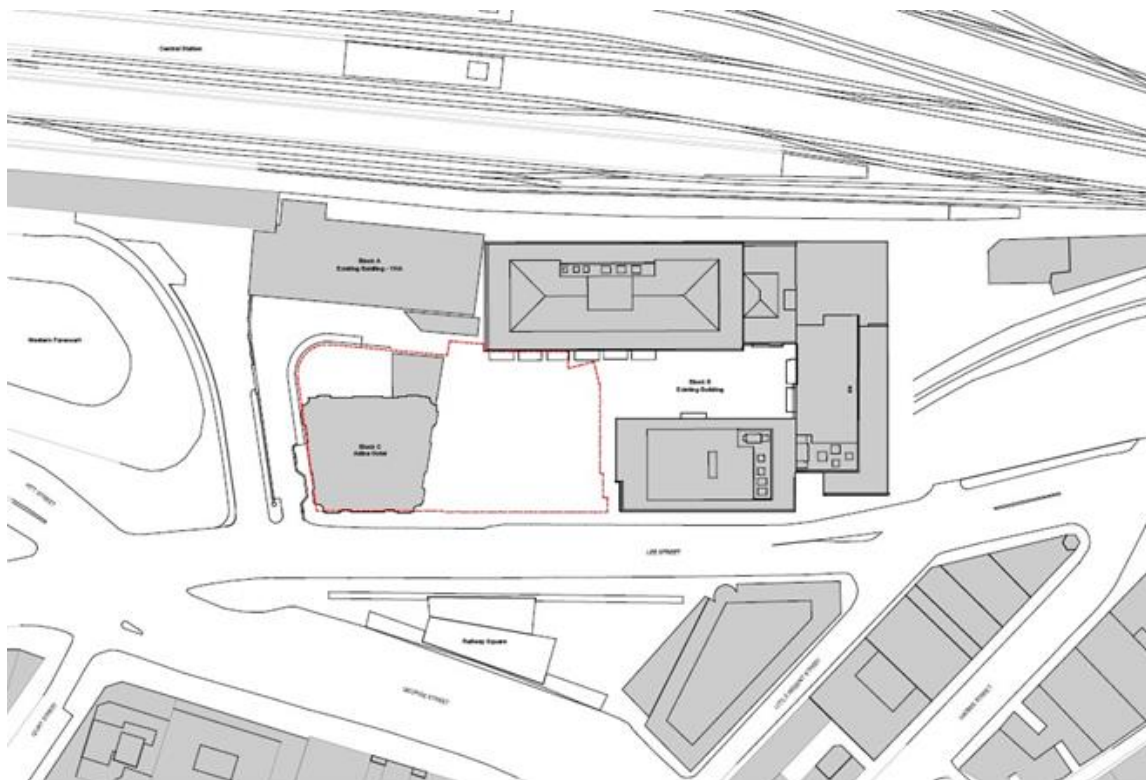
The site is located within the Western Gateway sub-precinct, an area of approximately 1.65ha that is located immediately west of Central Station within Haymarket on the southern fringe of the Sydney CBD. Immediately north of Central Station is Belmore Park, to the west is Haymarket (including the University of Technology, Sydney and Chinatown), to the south and east is rail lines and services and Prince Alfred Park and to the east is Elizabeth Street and Surry Hills.

Central Station is a public landmark, heritage building, and the largest transport interchange in NSW. With regional and suburban train services, connections to light rail, bus networks and to Sydney Airport, the area around Central Station is one of the most-connected destinations in Australia.

The site is located at 2 & 8A Lee Street, Haymarket and is legally described as Lot 30 in Deposited Plan 880518, Lot 13 in Deposited Plan 1062447 and part of Lot 14 in Deposited Plan 1062447. The land that comprises the site under the Proponent's control (either wholly or limited in either height or depth) comprises a total area of approximately 4,159sqm.

The location of the TOGA Central site is illustrated in Figure 1.

Figure 1 – Site Identification Plan



Source: Bates Smart

The site currently comprises the following existing development:

- Lot 30 in Deposited Plan 880518 (Adina Hotel building): the north-western lot within the Western Gateway sub-precinct accommodates a heritage-listed building which was originally developed as the Parcels Post Office building. The building has been adaptively re-used and is currently occupied by the Adina Hotel Sydney Central. The eight-storey building provides 98 short-stay visitor apartments and studio rooms with ancillary facilities including a swimming pool and outdoor seating at the rear of the site.
- Lot 13 in Deposited Plan 1062447 and part of Lot 14 in Deposited Plan 1062447 (Henry Deane Plaza): the central lot within the Western Gateway sub-precinct adjoins Lot 30 to the south. It accommodates 22 specialty food and beverage, convenience retail and commercial service tenancies. The lot also includes publicly accessible space which is used for pop-up events and a pedestrian thoroughfare from Central Station via the Devonshire Street Tunnel. At the entrance to Devonshire Street Tunnel is a large public sculpture and a glazed structure covers the walkway leading into Railway Square. This area forms part of the busy pedestrian connection from Central Station to Railway Square and on to George and Pitt Streets, and pedestrian subways.

The site is listed as an item of local significance under Schedule 5 of the Sydney Local Environmental Plan 2012

‘Former Parcels Post Office including retaining wall, early lamp post and building interior’, Item 855.

The site is also included within the Central Railway Station State heritage listing. This is listed on the State Heritage Register ‘Sydney Terminal and Central Railway Station Group’, Item SHR 01255, and in Schedule 5 of the Sydney Local Environmental Plan 2012 ‘Central Railway Station group including buildings, station yard, viaducts and building interiors’ Item 824.

The site is not however listed independently on the State Heritage Register. There is an array of built forms that constitute Central Station, however the Main Terminal Building (particularly the western frontage) and associated clocktower constitute key components in the visual setting of the Parcel Post building.

2.3 Building Classification

The development falls under the following BCA classifications, to be confirmed by the Principal Certification Authority (PCA):

- Class 3 (Hotel)
- Class 5 (office, commercial)
- Class 6 (retail)
- Class 7a (carpark)
- Class 7b (storage)

- Class 9b (assembly building).
- Class 10b (swimming pool).

The general building access requirements for the above classifications are:

- Class 3– from an accessible pedestrian entrance to the entrance doorway of each sole-occupancy unit. To and within 1 of each type of room for use in common by the residents.
- Class 5 and Class 6 – to and within all areas normally used by the occupants.
- Class 7a – to and within any level containing accessible carparking spaces.
- Class 9b – to and within all areas normally used by the occupants.
- Class 10b – to and into swimming pools with a total perimeter greater than 40m.

2.4 Objectives

The objective is to ensure compliance with statutory requirements, and in addition, considers the over and above minimum regulatory requirements under best practice approaches.

It considers the building user groups and ensures equality, independence and functional access for people with disability, inclusive of people:

- with a mobility impairment (ambulant and wheelchair).
- with a sensory impairment (hearing and vision); and
- with a dexterity impairment.

The report assessment aims to meet the intent of the Disability Discrimination Act; which is, as far as possible; to eliminate discrimination against persons on the ground of disability.

The requirements of the investigation are to:

- Review supplied drawings of the proposed development.
- Provide a report that will analyse the provisions of disability design of the development, and
- Recommend solutions that will ensure the design complies with the Disability Discrimination Act (DDA), Building Code of Australia (BCA), and relevant Australian Standards.

2.5 Limitations

This report is limited to the accessibility provisions of the building in general. It does not provide comment on detailed design issues, such as: internals of accessible/ambulant toilet, fit-out, lift specification, slip resistant floor finishes, door schedules, hardware and controls, glazing, luminance contrast, stair nosing, TGSIs, handrail design, signage etc. that will be included in construction documentation.

2.6 Statutory Requirements

The relevant statutory and regulatory requirements are:

- Federal Disability Discrimination Act (DDA).
- Disability (Access to Premises – Buildings) Standards 2010.
- Building Code of Australia (BCA) 2022, Draft issue, Part D4, E3, F4.
- AS 1428.1:2009 – General Requirement for Access.
- AS 1428.4.1:2009 – Tactile Ground Surface Indicators.
- AS 2890.6:2009 – Parking for People with Disabilities.

- AS 1735.12:1999 – Lift Facilities for Persons with Disabilities.

Additional advisory standards not currently referenced, and other relevant guidelines considered include:

- Universal Design Principles.
- Premises Standard Guideline V2 2013.
- Guide to Building Code of Australia (BCA).

3 General Access Planning Considerations

The Disability Discrimination Act 1992 (DDA) is a legislative law that protects the rights of all people. The Act makes disability discrimination unlawful and promotes equal rights, equal opportunity, and equal access for people with disabilities. The Australian Human Right Commission is the governing body who control and enforce DDA compliance.

Nevertheless, building elements that provide insufficient accessible provisions for people with disabilities remain subject to the DDA. The improvement of non-compliant building elements and areas to meet current access requirements will mitigate the risk of a DDA complaint being made against the building owner.

Since the 1st May 2011, the Commonwealth's Disability (Access to Premises – Buildings) Standards 2010 (DDA Premises Standards) apply to all new building works and to affected parts of existing buildings.

The DDA Premises Standards' requirements (DDA Access Code) are mirrored in the access provisions of the BCA. New building work and affected parts must comply with the DDA Premises Standards and AS1428.1-2009 in the same manner as they would comply with the BCA by meeting deemed-to-satisfy provisions or by adopting an alternative solution that achieves the relevant performance requirements.

By utilising AS 1428 suite of Standards, the overall aim is to provide continuous accessible paths of travel to connect the proposed development to and through public domain areas and between associated accessible buildings in accordance with the DDA Access Code.

MGAC supports the use and consideration of universal design (UD) principles into the design to maximize access for all people. We will assist the design team to incorporate UD principles where possible within the project, while still meeting mandatory compliance requirements.

Universal design principles consider the needs of a broad range of people including older people, families with children and pushing prams, people from other cultures and language groups, visitors in transit and people with disability. By considering the diversity of users, the design will embed access into and within it, so that benefits can be maximized, without adding on specialized 'accessible' features that can be costly, visually unappealing and may perpetuate exclusion and potential stigma.

The seven key Universal design principles to consider in the on-going design include:

- Principle 1: Equitable Use
- Principle 2: Flexibility in Use
- Principle 3: Simple and Intuitive Use
- Principle 4: Perceptible Information
- Principle 5: Tolerance for Error
- Principle 6: Low Physical Effort
- Principle 7: Size and Space for Approach and use

4 Premises Standards Affected Part

4.1 Affected Part

When new building works (e.g. make goods to commercial tenancy, provision of new toilets etc.) are being undertaken in an existing building that requires a building approval (CC or CDC), the requirements for upgrading access are limited to the area of new works and the affected part.

The affected part is defined as the principal pedestrian entrance and the continuous accessible path of travel from the principal pedestrian entrance to the new building works, which needs to be compliant with AS1428.1-2009.

Depending on the location of the new building works in the existing building, the affected part could include the main entry, entry foyer, lift lobbies, passenger lifts, corridors and doorways. The affected part should be reviewed on a case-by-case basis. It does not include other items such as sanitary facilities and car parking.

4.2 Affected Part Concession Outline

Under Part 4.3 of the Premises Standards, lessees or any other persons (building certifier, building developer and building manager) are not required to upgrade the affected part of the building, if an application for approval of building work is made by one of the lessees for work on the area of the building that they lease. This concession does not apply if the building is leased to only one person.

4.3 Lift Concession

Under Part 4.4 of the Premises Standards, existing passenger lifts, when triggered under a building approval, will require a lift floor that is 1100 x 1400mm. Lift access features are not under this concession and will be required to be upgraded.

4.4 Toilet Concession

Under Part 4.5 of the Premises Standards, the existing accessible toilets when triggered under a building approval, should at a minimum, comply with the AS1428.1-2001 version of the Standard in lieu of the 2009 version. New building work over 500msq under a CDC application triggers the requirement of accessible toilet as well as male and female ambulant toilet facility on that floor.

The concession allows the accessible toilet facility to have a minimum of 1600 x 2000mm clear circulation space for the toilet pan.

4.5 Heritage and Other Constraints

It is noted that the Human Rights and Equal Opportunities Commission (HREOC) advisory notes allows for a defence of unjustifiable hardship in situations where the provisions of full access within existing premises would prove too demanding because of heritage limits.

Section 23 of the DDA recognises that it may not be possible or fair to enforce the requirements of access to premises in all situations. In these types of circumstances, because the provision of full access to or use of existing premises might amount to an unjustifiable hardship, it may still be possible to address access issues in some way by providing an alternative or equivalent access to the actual service operating out of premises. Those aspects that cannot be addressed by changes to the premises may be addressed by changes to the management or operation of the premises.

5 Ingress & Egress

5.1 External Linkages

The BCA and DDA Premises Standards contain requirements for site approaches for the use of persons with disabilities. These requirements can be summarised as follows:

- It will be necessary to provide an accessible path of travel from main pedestrian entry points at the site allotment boundary to all building entrances compliant with AS1428.1:2009.
- An accessible path of travel between buildings (or parts of buildings) that are connected by a pedestrian linkage, within the site allotment boundary, compliant with AS1428.1:2009 is also required.
- An accessible path of travel to building entrances (required to be accessible) from associated accessible car-parking bays, compliant with AS1428.1:2009 is required.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail, all access requirements appear capable of achieving compliance.

Access to building entrances and accessible paths of travel from the allotment boundary to the entrances has been provided and are conducive for appropriate accessibility.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

5.2 Entrances

The BCA and DDA Premises Standards contain requirements for building entry for the use of persons with disabilities. These requirements can be summarised as follows:

- Access through at least 50% of entrances, including the principal pedestrian entrance/s to all buildings or parts of buildings (ie. when they have a separate function and/or use eg. external retail tenancy). Note it is preferred that all entrances are accessible.
- A non-accessible entry located no more than 50m distance from an accessible entry (for buildings greater than 500msq).
- All accessible doors with 850mm min. clear width opening and suitable door circulation area, compliant with AS1428.1:2009.
- An accessible path of travel eg. ramp or lift provided adjacent (or in reasonable proximity) to any stair access. Note: providing choice of access route directly adjacent so that people can start and finish in the same location/travel similar route promotes inclusion and UD principles.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail, all access requirements appear capable of achieving compliance.

Access to building entrances and accessible paths of travel from the allotment boundary to the entrances has been provided and are conducive for appropriate accessibility. The main access point will be via Lee Street entry, which will have automated sliding doors.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

5.3 Emergency Egress

The BCA has requirements for all fire-isolated egress stairs from areas required to be accessible (not communication stairs) to include at least one continuous handrail designed to be compliant with AS1428.1 Clause 12.

Provision of an off-set tread at the base of stair flights or an extended mid-landing that will allow a 300mm extension clear of egress route is considered appropriate for achieving a consistent height handrail (without vertical or raked sections). Such an off-set tread configuration has not been shown at some of the stair returns and are subject to further detail design.

Where fire-isolated egress stairs will also be used for communication stair purposes between levels, they should be designed to meet AS1428.1:2009.

There is currently no mandatory requirement within BCA or DDA Premises Standards for provision of independent accessible egress for people with a disability in accordance AS1428.1 and this remains an important DDA issue. Consideration of an accessible egress strategy with emergency evacuation plan should be considered as a minimum starting point.

Consideration of waiting spaces within fire-stairs is strongly recommended for people with mobility impairment. The current configuration of stairs suggests the spatial requirements would not be incorporated without layout amendments, but if provided with future design development these would generally require:

- 850mm min. clear width egress door and 510mm min. external door circulation area, compliant with AS1428.1:2009;
- Wheelchair space (800mm W x 1300mm L min. dimensions) within fire-isolated stair, outside of the required egress path, that can be accessed on a continuous path of travel.
- Alternative evacuation means eg. emergency passenger lift/s could be provided instead of/or only in addition to 'waiting spaces' in line with ABCB Handbook and/or consideration of stair evacuation devices (with appropriate storage and staff training) within fire stairs.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to resolution of some minor issues with regards to stair offset treads as identified at stair returns within some of the fire isolated stairways. Accessible emergency evacuation will be developed during design development stages.

6 Paths of Travel

6.1 Circulation Areas

The BCA and DDA Premises Standards contain requirements for circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- A wheelchair passing bay of 1800mm wide x 2000mm length be provided when a direct line of sight is not available and are to be provided at no more than 20m maximum length intervals along accessways.
- Wheelchair turning spaces of at least 1540mm width x 2070mm length, be provided within 2m of every corridor end and at 20m maximum intervals along all accessways. This is required for wheelchairs to make a 180-degree turn, compliant with AS1428.1:2009.
- All common use doors that is not exempt under Part D3.4, to be provided with a minimum of 850mm clear opening width, and to the active leaf of each double door with suitable door circulation area on both sides of the door that is compliant with AS1428.1:2009.
- All common use corridors and accessible paths of travel be provided with at least a minimum of 1000mm clear width when travelling in linear direction. Note: Increased clear widths to accessible paths of travel is required for doorway circulations, and turning areas etc.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail, all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

6.2 Passenger Lifts

The BCA and DDA Premises Standards contain requirements for passenger lifts and circulation areas for the use of persons with disabilities. These passenger lift features can be summarised as follows:

- Lift floor dimensions of not less than 1400mm wide x 1600mm deep for all lifts which travel more than 12m.
- A Lift floor dimensions of not less than 1100mm wide x 1400mm deep for all lifts which travel not more than 12m.
- Minimum clear door opening of 900mm in accordance with AS 1735.12.
- A handrail complying with the provisions for a mandatory handrail in AS 1735.12.

- Passenger protection system complying with AS 1735.12 for all lifts with power-operated doors.
- Lift car and landing control buttons complying with AS 1735.12.
- Lighting in accordance with AS 1735.12 for all enclosed lift cars.
- For all lifts service more than 2 levels –
 - Automatic audible information within the lift car to identify the level each time the car stops; and
 - Audible and visual indication at each lift landing to indicate the arrival of the lift care; and
 - Audible information and audible indication required as above is to be provided in a range of between 20 – 80 dB(A) at a maximum frequency of 1500 Hz.
- Emergency hands-free communication, including a button that alerts a call centre of a problem and a light to signal that the call has been received.
- All lift lobbies and main corridors on each level of the building to be provided with a minimum of 1800mm clear lift lobby width to allow two wheelchairs to pass each other.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail, all access requirements appear capable of achieving compliance.

All passenger lifts have been provided with a lift car size that is more than the required 1400mm x 1600mm. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

6.3 Stairs, Ramps and Walkways

The BCA and DDA Premises Standards contain requirements for stairs and ramps for the use of persons with disabilities. These requirements can be summarised as follows:

- Ramps are to have handrails on both sides and with:
 - A minimum of 1000mm clearance width in accordance with AS1428.1 for buildings.
 - A minimum of 1200mm clearance width in accordance with AS 1428.2 for public domain work that is under DSAPT.
- Landings for ramps are to be provided at:
 - 9000mm maximum ramp length under AS 1428.1 for buildings.
 - 6000mm maximum ramp length under As 1428.2 for public domain work that is under DSAPT.



- Walkways are to have maximum 1:20 gradient with landings at no more than 15 metre intervals.
- Landings are to have 1200mm landing length for forward direction.
- Landings are to have 1500mm landing length for 90-degree turns.
- Stairs are to have handrails on both sides in accordance with AS1428.1.
- Stairs and ramps are to set back to ensure no encroachment of handrail extensions into from transverse path of travel at the top; and at the bottom of the stairs or ramps.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to resolution of some minor issues as identified:

- *We recommend consideration of consistent treads and risers to the stair from lower commercial lobby to upper lobby on lower ground level (advisory note).*
- *Subject to the provision of DSAPT (TBA), ramps are required to comply with AS1428.2 in the Lee Street tunnel on basement level 1.*
- *Ensure Lee Street stairs (including Henry Deane Plaza) are set back minimum 900mm from the boundary line as required by AS 1428.1*

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

7 Facilities & Amenities

7.1 Sanitary Facilities

The BCA and DDA Premises Standards contain requirements for sanitary facilities suitable for the use of persons with disabilities. These requirements can be summarised as follows:

- For Class 5, 6, 7a, 9b, the requirements are:

At least 1 unisex accessible toilet, adjacent to every bank of toilets (where provided) on each storey, compliant with AS1428.1 under the BCA/DDA Access Code. If more than one bank of toilets is provided on each level, the accessible toilet is required at a minimum, 50% of the toilet banks at each level.
- For Class 9b buildings:

If common use change facilities are provided (that is, both toilets and showers combined) a separate combined accessible toilet facility and accessible shower adjacent to the male and female change rooms is required and is to be compliant with AS1428.1 under the BCA/DDA Access Code Part F2.4.
- An equal distribution of left hand (LH) and right hand (RH) transfer toilet pans (accessible toilets) are required within the building. It is recommended that the LH and RH layouts alternate on each subsequent level is the most appropriate and inclusive approach.
- The circulation spaces for the accessible toilet to be provided with 1900mm wide by 2300mm length around the toilet pan. The handbasin is to sit outside this area in accordance with AS1428.1.
- A male and female ambulant toilet cubicle be provided within each bank of toilets adjacent to an accessible toilet under DDA Access Code Part F2.4 compliant with AS1428.1:2009.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to resolution of some minor issues as identified:

- *Basement level 1: Ensure male and female ambulant toilets are provided within the male and female EOT toilets on basement level 1.*
- *It is noted that the staff accessible WC in loading area is only for use by F&B tenancy*

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

7.2 Common Areas

The BCA and DDA Premises Standards contain requirements for common use areas suitable for the use of persons with disabilities. These requirements can be summarised as follows:

- For class 3 buildings, access to a unique common use facility such as sauna, common laundry, entertainment rooms.
- Accessibility to common use courtyards within buildings.
- Wheelchair access is required to any external and outdoor terrace areas including roof terraces compliant with AS1428.1.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail, all access requirements appear capable of achieving compliance.

All common spaces such as the gym and pool areas have been provided with paths of travel and accessibility that is conducive for wheelchair users and people with disability

Accessibility to Henry Dean Plaza has been achieved via shuttle lift from Lee Street. There appears to be suitable accessibility throughout the Plaza. The design of the plaza including stairs will be further developed during later design stages.

Further work for all common elements will be required during design development stage to ensure appropriate outcomes are achieved.

7.3 Accessible Car Parking

The BCA and DDA Premises Standards contain requirements for accessible parking which are applicable to this project. These requirements can be summarised as follows:

- Class 3 hotel: The number is determined by the total number of car parking spaces x (accessible SOU/SOU). The calculated number to be taken to the next whole figure.
- Class 5 commercial: 1 accessible car bay for every 100 car bays or part thereof, compliant with AS2890.6.
- Class 6 retail development: 1 accessible car bay for every 50 car bays or part thereof, compliant with AS2890.6.
- Accessible car bays to have a width of 2400mm wide for the parking space and a width of 2400mm wide for the shared space.
- All accessible car parking bays to be located near the relevant lifts and associated building entry points to reduce the travel distance to lifts and entrances. Ensure the path of travel is accessible between the accessible car parking bays; the building entrances and the passenger lifts.

- Ensure that the accessible car parking bay and its associated shared space have a minimum of 2500mm head clearance height from the finished floor that is compliant with AS2890.6, figure 2.7 (over the accessible car bays). A minimum of 2200mm head clearance is required from the entrances of the carparking leading to the accessible and adaptable unit car parking bays (Note that consideration of 2300mm to 2400mm minimum head clearance height is preferred).

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail, all access requirements appear capable of achieving compliance.

There are a total of 110 car parking spaces provided for hotel, retail and commercial uses. The BCA requirement for the Class 3 accessible carparking are: Total CP 110 x (accessible SOU 10/SOU 204). A total of 6 accessible car parking spaces has been provided in accordance with the BCA formula.

Accessible car bay will be required for commercial (1% of total) and retail (2% of total). These have not been provided on the plans however can be accommodated in later design drawings.

We note part of this building is heritage listed and are of an existing condition. Due to existing structural and other constraints, a performance solution may be sought for minor column encroachment within the front section of the shared space as this will have minimal impact for disability users. However, ensure the encroachment is of a minor nature to continue to facilitate access and use of these accessible car parking spaces for wheelchair and other disability users.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

7.4 Hearing Augmentation

The BCA and the Premises Standards have access requirements for the provision of Hearing Augmentation Systems. The key requirements of this provision are:

1. A hearing augmentation system must be provided where an inbuilt amplification system, other than the emergency warning, is installed.
 - a. In a room in a Class 9b building; or
 - b. In an auditorium, conference room, meeting room or room for judicatory proposes; or
 - c. At ticket office, teller's booth, reception area or the like where the public is screened from the service provider.
2. If a hearing augmentation system is



- a. an induction loop, it must be provided to not less than 80% of the floor area of the room or space served by the inbuilt amplification system; or
- b. A system required the use of receivers or the like, it must be available to not less than 95% of the floor area of the room or space served by the inbuilt amplification system, and the number of receivers provided must not be less than –
 - i. If the room or space accommodates up to 500 persons but not more than 1000 persons, 20 receivers plus 1 receiver for every 33 persons or part thereof in excess of 500 persons.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Hearing augmentation details have not been provided at this early stage of the design process. Where required by the BCA, ensure detail designed to BCA and AS 1428.1 requirements. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

7.5 Swimming Pool

The BCA and the Premises Standards have access requirements for the provision of access into swimming pools. The key requirements are:

1. Not less than 1 means of accessible water entry/exit in accordance with Specification 16 must be provided for each swimming pool required by D4D2 to be accessible.
2. An accessible entry/exit must be by means of –
 - a. A fixed or movable ramp and an aquatic wheelchair; or
 - b. A zero-depth entry and an aquatic wheelchair; or
 - c. A platform swimming pool lift and an aquatic wheelchair; or
 - d. A sling-style swimming pool lift.
3. Where a swimming pool has a perimeter of more than 70m, at least one accessible water entry/exit must be provided by a means specified in (2)(a), (b) or (c).
4. Latching devices on gates and doors forming part of a swimming pool safety barrier need not comply with AS 1428.1.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to resolution of some minor issues as identified with regards to an accessible pool entry yet to be provided at this stage. It is advised accessible pool entry to be

considered at detail design. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

7.6 Signage

The BCA and the Premises Standards have signage requirements. The key requirements are:

1. Braille and tactile signage be provided to all unisex accessible toilets; male and female ambulant toilets. It is to include:
 - a. Braille and tactile components.
 - b. International symbol of access or deafness, as appropriate, in accordance with AS 1428.1.
 - c. 'LH' or 'RH' to indicate a left-hand or right-hand transfer onto toilet pan.
 - d. Appropriate font size.
2. Identify each door required by E4D5 to be provided with an exit sign and state –
 - a. "Exit"; and
 - b. "Level"; and
 - c. The floor level number or floor level descriptor, or a combination of the two.
3. Signage including the international symbol for deafness in accordance with AS 1428.1 must be provided within a room containing a hearing augmentation system identifying –
 - a. The type of hearing augmentation; and
 - b. The area covered within the room; and
 - c. If receivers are being used and where the receivers can be obtained.
4. Ensure all signage is detectable with raised symbols and 30% luminance contrast to its background, and in turn, contrasts with the background wall surface.
5. Directional signage is required at:
 - a. Banks of toilets without an accessible toilet, to direct person to the nearest accessible toilet.
 - b. Non-accessible entrances to direct persons to an accessible entrance.
6. Signage to be located on the wall, adjacent to latch side of the door, between 1200 - 1600mm AFFL (or for single line of tactile text: located between 1250 - 1350mm AFFL).

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Signage has yet to be detailed at this early stage of the design process. The

compliance with this clause can be achieved. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

8 Accessible Sole Occupancy Units

8.1 Accessible SOU Provision

The BCA and DDA Premises Standards contain requirements for accessible SOUs for the use of persons with disabilities. These requirements can be summarised as follows:

Access requirements for a Class 3 Building:

Sole-occupancy units:

Not more than 2 required accessible sole-occupancy units may be located adjacent to each other.

Where more than 2 accessible sole-occupancy units are required, they must be representative of the range of rooms available.

If the building or group of buildings contain –

201 to 500 sole-occupancy units.

9 accessible sole-occupancy units plus 1 additional accessible sole-occupancy unit for every 30 units or part thereof in excess of 200.

The following requirements are to be satisfied in the provision of accessible SOU units:

- A total number of 10 accessible units are required based on the BCA calculation.
- The accessible units are to be designed in accordance with AS1428.1.
- The accessible units are required to be representative of the range of rooms available.

Assessment

There are a total of 10 accessible sole-occupancy units proposed throughout the development. The accessible sole-occupancy units are noted as:

- *S-d access. 6 accessible sole-occupancy units are provided one on each of the levels on Level 10 to 15.*
- *1B-e access. 2 accessible sole-occupancy units are provided one on each of the levels on Level 16 and 17.*
- *1B-e access. 2 accessible sole-occupancy units are provided one on each of the levels on Level 18 and 19.*

This satisfies the BCA and the Premises Standards requirements for the provision of accessible sole-occupancy units.

8.2 Accessible SOU Design

The BCA and DDA Premises Standards contain requirements for accessible SOUs for the use of persons with disabilities. These key requirements are:

- The entry door requires a minimum of 850mm clear door width (920 or greater door leaf required) and appropriate door circulation spaces.
- An adequate size bathroom to achieve a compliant shower, toilet pan and basin with required circulation spaces.
- The bedroom to achieve a minimum of 1000mm clear space either side of a queen size bed and a 1540 x 2070mm space at the base of bed or similar configuration.
- All doors to achieve a minimum of 850mm clear opening width with appropriate door circulation spaces on both sides of the door.
- Balconies if provided, to be accessible with level threshold and appropriate door circulation and turning circulation spaces within the balconies.

Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

The accessible sole-occupancy units have been provided. The entry door circulation spaces have been documented and will be developed during later design stages. Finer internal details such as the bathroom layouts and internal room layouts can be documented at detailed design stages.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

9 Conclusion

MGAC has assessed the proposed mixed-use development for Toga Central. The proposed architectural documentation has indicated that the accessibility requirements, pertaining to the external site linkages, building access, common area access, sanitary facilities and accessible car parking facility at the design application stage can be achieved subject to the mitigation measures as outlined in this access report. The remaining impacts associated with the proposed development are appropriate and acceptable.

It is advised that MGAC will work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in building design and external domain design.

10 Appendix – Drawings Reviewed

DPE SSDA Submission Document Register

Revision: A

Date: 27 July 2022

Appendix	Document No.	Document Title	Final Revision
Cover	URBI-TP-REP-00000001[A]	Environmental Impact Statement	Revision A , dated July 2022
Appendix A	URBI-TP-REP-00000002[A]	SEARS Compliance Assessment	Revision A , dated July 2022
Appendix B	URBI-TP-REP-00000003[A]	Statutory Compliance Assessment	Revision A , dated July 2022
Appendix C	URBI-TP-REP-00000004[A]	Compliance Assessment	Revision A , dated July 2022
Appendix D	URBI-TP-REP-00000005[A]	Engagement Summary	Revision A , dated July 2022
Appendix E	NORT-SU-DRW-01GF0001[A] NORT-SU-DRW-01GF0002[A] NORT-SU-DRW-01GF0002[A]	Survey Plan	Revision A, dated 30 June 2022
Appendix F	Refer to Appendix F1 – Project Document Register / Transmittal	Architectural Plans	Issue A , dated 1 July 2022
Appendix G	BATES-AR-REP-00000001[A]	Urban Design Report	Revision A, July 2022
Appendix H	WTPA-QS-REP-00000001[A]	QS Report	Revision A, July 2022
Appendix I	URBI-TP-REP-00000006[A]	Design Excellence Strategy	Revision A
Appendix J	URBI-TP-REP-00000007[A]	Design Competition Report	Version 4
Appendix K	URBI-TP-REP-00000008[A]	Design Integrity Statement	Revision A
Appendix L	WSP-CO-REP-00000001[A]	Engagement Report	Revision A, dated July 2022
Appendix M	ARCA-LA-REP-00000001[A] Refer to Appendix M1 – Project Document Register / Transmittal	Landscaping and Public Domain Plan	Revision A, dated July 2022
Appendix N	COXI-AU-REP-00000001[B]	Connecting with Country Framework Response	Revision B, dated 30 May 2022



Appendix O	URBI-HT-REP-00000001[A]	Aboriginal Cultural Heritage Assessment Report	Revision A, dated 15 July 2022
Appendix P	URBI-HT-REP-00000002[A]	Historical Archaeological Assessment	Revision A, dated 15 July 2022
Appendix Q	URBI-HT-REP-00000003[A]	Statement of Heritage Impact	Revision A, dated 15 July 2022
Appendix R	URBI-HT-REP-00000004[A]	Schedule of Conservation Works	Revision A, dated 15 July 2022
Appendix S	URBI-HT-REP-00000005[A]	Conservation Management Plan	Revision A, dated 15 July 2022
Appendix T	FREE-HT-REP-00000001[B]	Heritage Interpretation Plan	Revision B, dated 25 July 2022
Appendix U	RBG-ST-REP-00000001[A]	Structural Report	Revision A, dated 15 July 2022
Appendix V	RWDI-WR-REP-00000001[A]	Air Quality and Odour Impact Assessment	Revision A, dated 21 July 2022
Appendix W	RWDI-WR-REP-00000002[A]	Reflectivity Assessment	Revision A, dated 21 July 2022
Appendix X	URBI-TP-REP-00000009[A]	Visual Impact Analysis	Revision A, dated July 2022
Appendix Y	RWDI-WR-REP-00000003[A]	Pedestrian Wind Impact Assessment	Revision A, dated 26 July 2022
Appendix Z	URBI-TP-REP-00000010[A]	Social Impact Assessment	Revision A, dated July 2022
Appendix AA	URBI-TP-REP-00000011[A]	CPTED Assessment	Revision A, dated 19 July 2022
Appendix BB	ECOL-AB-REP-00000001[A]	Arboricultural Impact Assessment	Revision A, dated 22 July 2022
Appendix CC	ATEL-ES-REP-00000001[A]	ESD Report	Revision A, dated June 2022
Appendix DD	STAN-TR-REP-00000001[A]	Traffic and Transport Assessment	Revision A, dated July 2022
Appendix EE	ARUP-TR-REP-00000001[A]	Pedestrian Modelling Analysis	Revision A, dated July 2022
Appendix FF	URBI-TP-REP-00000012[A]	BDAR waiver	Dated 28 April 2022
Appendix GG	RENZ-AC-REP-00000001[B]	Noise and Vibration Assessment	Revision B, dated 25 July 2022
Appendix HH	NORT-CV-REP-00000001[C] Refer to Appendix HH1 – Project Document Register / Transmittal	Integrated Water Management Plan	Revision C, dated 15 July 2022