

ACCESSIBILITY DESIGN REVIEW

APPENDIX S





Sydney Metro City & Southwest

Pitt Street South Over Station Development:

Accessibility and DDA Impact Statement Report

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1.0 Purpose of this report

1.1. Background

This report supports a concept State Significant Development Application (concept SSD Application) submitted to the Department of Planning and Environment (DPE) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The concept SSD Application is made in accordance with Section 4.22 of the EP&A Act.

Sydney Metro is seeking to secure concept approval for a building envelope above the southern portal of Pitt Street Station, otherwise known as the over station development (OSD). The concept SSD Application seeks consent for a building envelope, maximum building height, land use options, pedestrian and vehicular access, circulation arrangements and associated car parking as well as the strategies and design parameters for the future detailed design of development.

Sydney Metro proposes to procure the construction of the OSD as part of an integrated station development package, which would result in the combined delivery of the station, OSD and public domain improvements. The station and public domain elements form part of a separate planning approval for Critical State Significant Infrastructure (CSSI) approved by DPE on 9 January 2017.

As the development is associated with railway infrastructure and is for residential or commercial premises with a Capital Investment Value of more than \$30 million, the project is a State Significant Development (SSD) pursuant to Schedule 1, Clause 19(2)(a) of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). The full extent of the proposed development can also be considered to be SSD by virtue of Clause 8(2) of the SRD SEPP.

This report has been prepared to specifically respond to the Secretary's Environmental Assessment Requirements (SEARs) issued for the concept SSD Application for Pitt Street South on 30th November 2017 which state that the Environmental Impact Statement (EIS) is to address the following requirements:

Access and DDA Impact Statement

1.2. Overview of the Sydney Metro in its context

The New South Wales (NSW) Government is implementing *Sydney's Rail Future*, a plan to transform and modernise Sydney's rail network so that it can grow with the city's population and meet the needs of customers in the future. Sydney Metro is a new standalone rail network identified in *Sydney's Rail Future*.

Sydney Metro is Australia's biggest public transport project, consisting of Sydney Metro Northwest, which is due for completion in 2019 and Sydney Metro City & Southwest, which is due for completion in 2024.

Sydney Metro West is expected to be operational in the late 2020s (refer to Error! Reference source not found.).



Figure 1: Sydney Metro alignment map

Sydney Metro City & Southwest includes the construction and operation of a new metro rail line from Chatswood, under Sydney Harbour through Sydney’s Central Business District (CBD) to Sydenham and on to Bankstown through the conversion of the existing line to metro standards.

The project also involves the delivery of seven new metro stations, including at Pitt Street. Once completed, Sydney Metro will have capacity for 30 trains an hour (one every two minutes) through the CBD in each direction - a level of service never seen before in Sydney.

On 9 January 2017, the Minister for Planning approved the Sydney Metro City & Southwest - Chatswood to Sydenham application lodged as a Critical State Significant Infrastructure project (reference SSI 15_7400), hereafter referred to as the CSSI Approval.

The CSSI Approval includes all physical work required to construct the CSSI, including the demolition of existing buildings and structures on each site. Importantly, the CSSI Approval also includes provision for the construction of below and above-ground structures and other components of the future integrated station development (including building infrastructure and space for future lift cores, plant rooms, access, parking and building services, as relevant to each site). The rationale for this delivery approach, as identified within the CSSI

Application, is to enable the integrated station development to be more efficiently built and appropriately integrated into the metro station structure.

The EIS for the Chatswood to Sydenham component of the Sydney Metro City & Southwest project identified that the OSD would be subject to a separate assessment process.

Since the CSSI Approval was issued, Sydney Metro has lodged four modification applications to amend the CSSI Approval as outlined below:

- Modification 1- Victoria Cross and Artarmon Substation which involves relocation of the Victoria Cross northern services building from 194-196A Miller Street to 50 McLaren Street together with inclusion of a new station entrance at this location referred to as Victoria Cross North. 52 McLaren Street would also be used to support construction of these works. The modification also involves the relocation of the substation at Artarmon from Butchers Lane to 98 – 104 Reserve Road. This modification application was approved on 18 October 2017.
- Modification 2- Central Walk which involves additional works at Central Railway Station including construction of a new eastern concourse, a new eastern entry, and upgrades to suburban platforms. This modification application was approved on 21 December 2017.
- Modification 3 - Martin Place Station which involves changes to the Sydney Metro Martin Place Station to align with the Unsolicited Proposal by Macquarie Group Limited (Macquarie) for the development of the station precinct. The proposed modification involves a larger reconfigured station layout, provision of a new unpaid concourse link and retention of the existing MLC pedestrian link and works to connect into the Sydney Metro Martin Place Station. This modification application was approved on 22 March 2018.
- Modification 4 - Sydenham Station and Sydney Metro Trains Facility South which incorporated Sydenham Station and precinct works, the Sydney Metro Trains Facility South, works to Sydney Water's Sydenham Pit and Drainage Pumping Station and ancillary infrastructure and track and signalling works into the approved project. This modification application was approved on 13 December 2017.

Given the modifications, the CSSI Approval is now approved to operate to Sydenham Station and also includes the upgrade of Sydenham Station.

The remainder of the City & Southwest project (Sydenham to Bankstown) proposes the conversion of the existing heavy rail line and the upgrade of the existing railway stations along this alignment to metro standards. This portion of the project, referred to as the Sydenham to Bankstown Upgrade, is the subject of a separate CSSI Application (No. SSI 17_8256) for which an Environmental Impact Statement was exhibited between September and November 2017 and a Response to Submissions and Preferred Infrastructure Report was submitted to the NSW Department of Planning & Environment (DPE) in June 2018 for further exhibition and assessment.

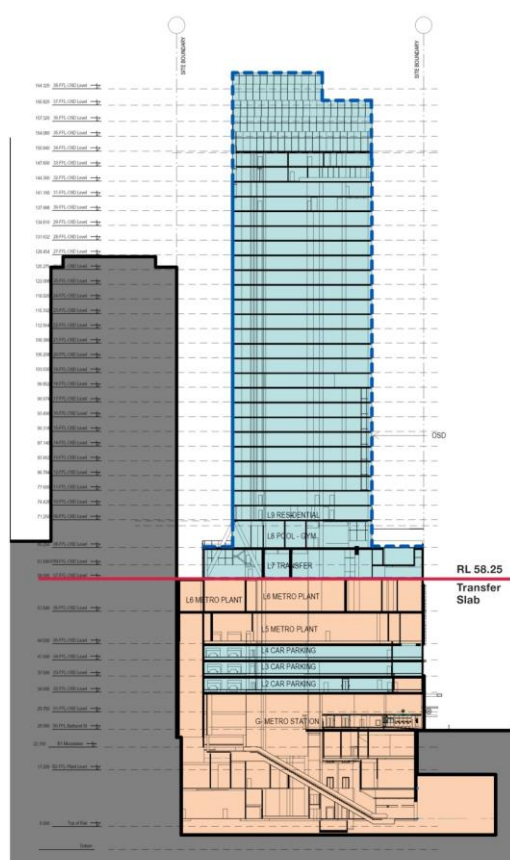
1.3. Planning relationship between Pitt Street Station and the OSD

While the southern portal of Pitt Street Station and the OSD will form an integrated station development, the planning pathways under the *Environmental Planning and Assessment Act 1979* involve separate approval for each component of the development. In this regard, the approved station works (CSSI Approval) are subject to the provisions of Part 5.1 of the EP&A Act (now referred to as Division 5.2) and the OSD component is subject to the provisions of Part 4 of the EP&A Act.

For clarity, the approved station works under the CSSI Approval included the construction of below and above ground structures necessary for delivering the station and also enabling construction of the integrated OSD. This included but is not limited to:

- demolition of existing development
- excavation
- station structure including concourse and platforms
- lobbies
- retail spaces within the station building
- public domain improvements
- station portal link (between the northern and southern portals of Pitt Street Station)
- access arrangements including vertical transport such as escalators and lifts
- structural and service elements and the relevant space provisioning necessary for constructing OSD, such as columns and beams, space for lift cores, plant rooms, access, parking, retail and building services.

The vertical extent of the approved station works above ground level is defined by the 'transfer slab' level (which for Pitt Street South is defined by RL 58.25), above which would sit the OSD. This delineation is illustrated in Error! Reference source not found. below.



Section North-South - CSSI Podium Approval below RL 58.25

Figure 2: Delineation between station and OSD

The CSSI Approval also establishes the general concept for the ground plane of Pitt Street Station including access strategies for commuters and pedestrians. In this regard, pedestrian access to the station would be from Bathurst Street and the OSD lobby would be accessed from Pitt Street.

Since the issue of the CSSI Approval, Sydney Metro has undertaken sufficient design work to determine the space planning and general layout for the station and identification of those spaces within the station area that would be available for the OSD. In addition, design work has been undertaken to determine the technical requirements for the structural integration of the OSD with the station. This level of design work has informed the concept proposal for the OSD. It is noted that ongoing design development of the works to be delivered under the CSSI Approval would continue with a view to developing an Interchange Access Plan (IAP) and Station Design Precinct Plan (SDPP) for Pitt Street Station to satisfy Conditions E92 and E101 of the CSSI Approval.

The public domain improvement works around the site would be delivered as part of the CSSI Approval.

1.4. The Site

The Pitt Street South OSD site is located near the corner of Pitt Street and Bathurst Street, comprising four individual allotments but excluding the Edinburgh Castle Hotel, above the southern portal of the future Pitt Street Station. The context of the site is demonstrated at Error! Reference source not found. below.

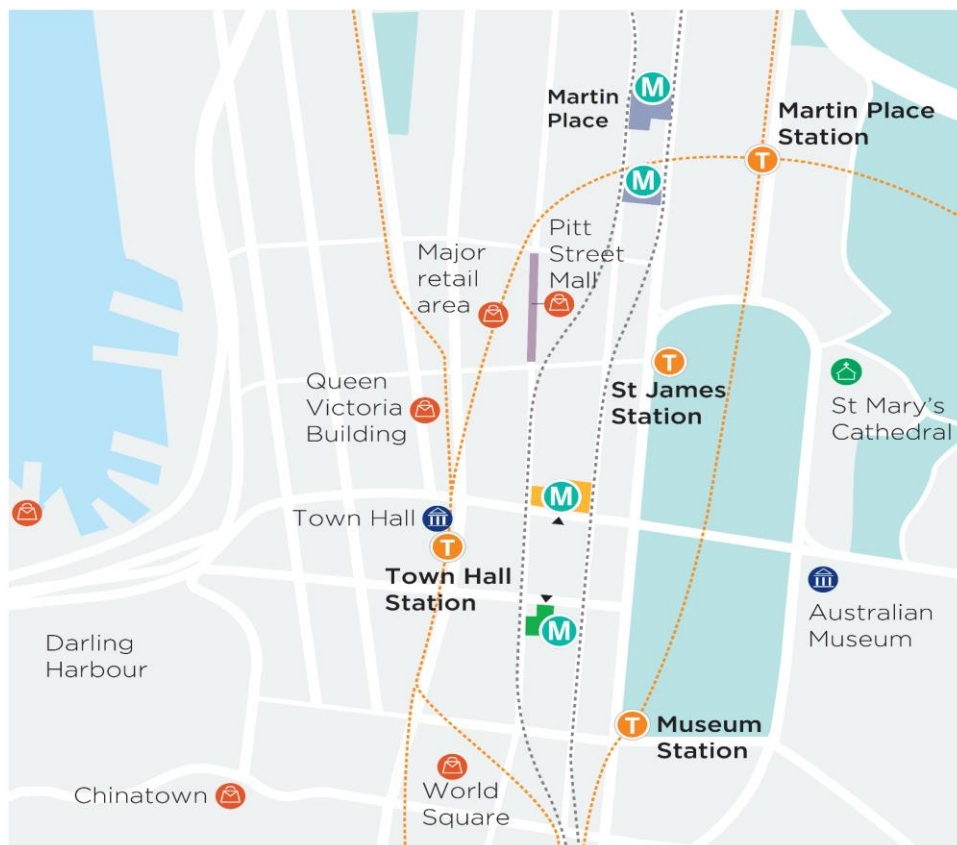


Figure 3: Pitt Street Station location plan

The site is located in the City of Sydney Local Government Area. The site (refer to **Figure 4** below) is irregular in shape, has a total area of approximately 1,708 square metres and has street frontages of approximately 32 metres to Pitt Street and 24 metres to Bathurst Street.

The Pitt Street South site comprises a number of individual properties which front Bathurst Street and Pitt Street. Specifically, the site comprises the following:

- 125-129 Bathurst Street, Sydney (Lot 1 in DP60293)
- 131-135 Bathurst Street, Sydney (Lot 1 in DP59101)
- 296-300 Pitt Street, Sydney (Lot 1 in DP436359)
- 302 Pitt Street, Sydney (Lot 1 in DP62668)

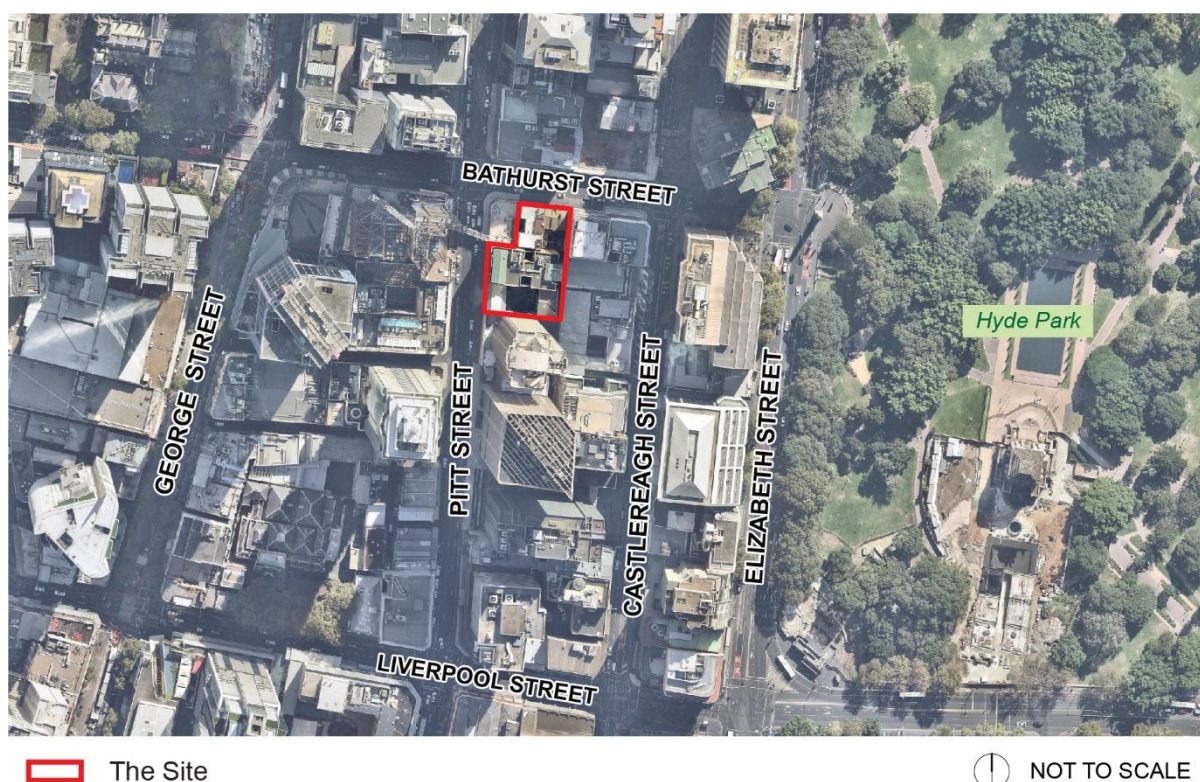


Figure 4: Aerial photo of Pitt Street South

1.5. Overview of the proposed development

This concept SSD Application comprises the first stage of the Pitt Street South OSD project. It will be followed by a detailed SSD Application for the design and construction of the OSD to be lodged by the successful contractor who is awarded the contract to deliver the integrated station development.

This concept SSD Application seeks approval for the planning and development framework and strategies to inform the future detailed design of the OSD. It specifically seeks approval for the following:

- a building envelope
- a maximum envelope height of Relative Level (RL 171.6) which equates to approximately 35 storeys, including the podium height of RL 71.0 which equates to approximately 8 storeys above ground
- use for the OSD component of the development for uses, subject to further detailed applications, which could include:
 - residential accommodation; or
 - commercial premises
 - use of the conceptual OSD space provisioning within the footprint of the CSSI Approval (both above and below ground), including the OSD lobby areas, podium car parking, storage facilities, services and back-of-house facilities

- car parking for a maximum of 34 spaces located across three levels of the podium
- loading, vehicular and pedestrian access arrangements from Pitt Street
- strategies for utilities and service provision
- strategies for the management of stormwater and drainage
- a strategy for the achievement of ecologically sustainable development
- indicative future signage
- a strategy for public art
- a design excellence framework
- the future subdivision of parts of the OSD footprint (if required)

As this concept SSD Application is a staged development pursuant to section 4.22 of the EP&A Act, future approval would be sought for detailed design and construction of the OSD. Concept indicative designs showing potential residential and commercial building form outcomes at the site have been provided as part of this concept SSD Application at Appendix E and Appendix F, respectively.

Pitt Street Station is to be a key station on the future Sydney Metro network, providing access to the Sydney CBD. The proposal combines the metro station with an OSD component. The OSD would assist in strengthening the role of Central Sydney as the key centre of business in Australia and would contribute to the diversity, amenity and sustainability of the CBD.

It is noted that Pitt Street Station northern portal OSD is subject to a separate application and does not form part of this concept SSD Application.

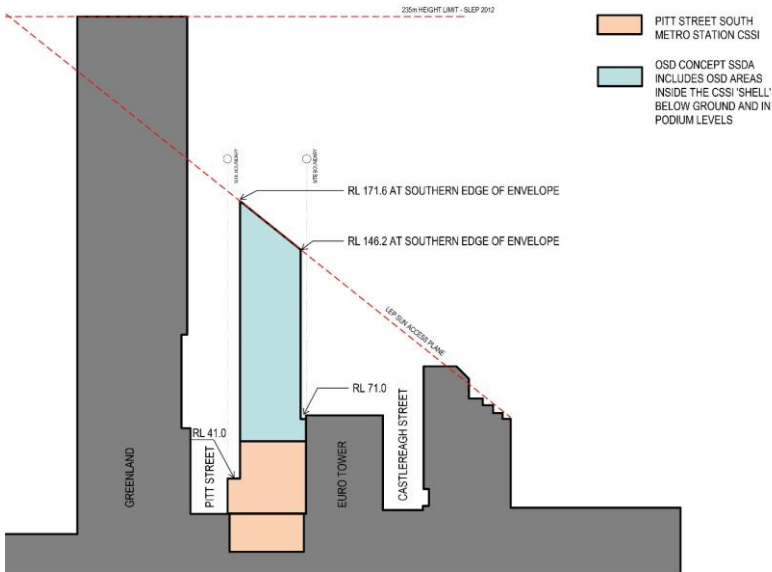


Figure 5: Pitt Street South OSD envelope, including OSD components (Blue) and station box (Orange)

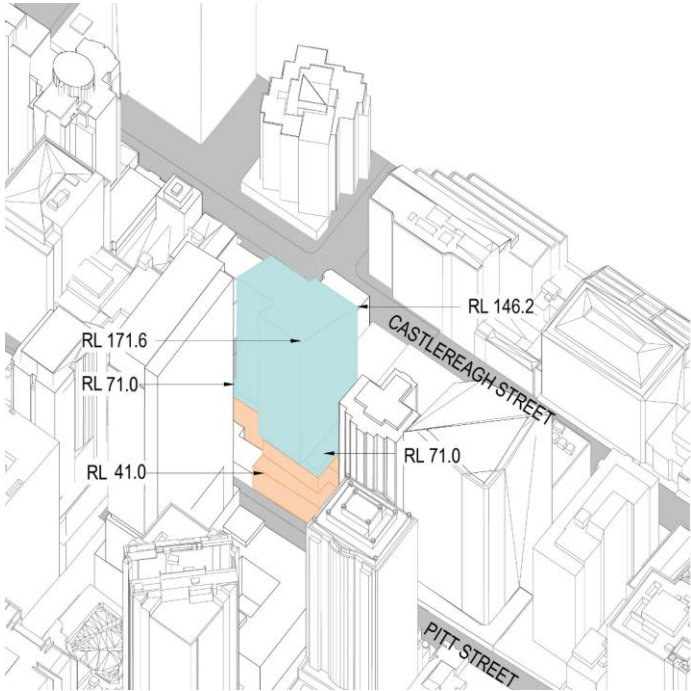


Figure 6: Pitt Street South OSD axonometric diagram, as seen from the south-west

1.6. Staging and framework for managing environmental impacts

Sydney Metro proposes to procure the delivery of the Pitt Street South integrated station development in one single package, which would entail the following works:

- station structure
- station fit-out, including mechanical and electrical
- OSD structure
- OSD fit-out, including mechanical and electrical.

Separate delivery packages are also proposed by Sydney Metro to deliver the excavation of the station boxes/shafts ahead of the integrated station development delivery package, and line-wide systems (e.g. track, power, ventilation) and operational readiness works prior to the Sydney Metro City & Southwest metro system being able to operate.

Three possible staging scenarios have been identified for delivery of the integrated station development:

1. Scenario 1 – the station and OSD are constructed concurrently by constructing the transfer slab first and then building in both directions. Both the station and OSD would be completed in 2024.
2. Scenario 2 – the station is constructed first and ready for operation in 2024. OSD construction may still be incomplete or soon ready to commence after station construction is completed. This means that some or all OSD construction is likely to still be underway upon opening of the station in 2024.
3. Scenario 3 – the station is constructed first and ready for operation in 2024. The OSD is built at a later stage, with timing yet to be determined. This creates two distinct construction periods for the station and OSD.

Scenario 1 represents Sydney Metro's preferred option as it would provide for completion of the full integrated station development and therefore the optimum public benefit at the site at the earliest date possible (i.e. on or near 2024 when the station is operational). However, given the delivery of the OSD could be influenced by property market forces, Scenarios 2 or 3 could also occur, where there is a lag between completion of the station component of the integrated station development (station open and operational), and a subsequent development.

The final staging for the delivery of the OSD would be resolved as part of the detailed SSD Application(s).

For the purposes of providing a high level assessment of the potential environmental impacts associated with construction, the following have been considered:

- Impacts directly associated with the OSD, the subject of this SSD Application
- Cumulative impacts of the construction of the OSD at the same time as the station works (subject of the CSSI Approval)

Given the integration of the delivery of the Sydney Metro City & Southwest metro station with an OSD development, Sydney Metro proposes the framework detailed in Error! Reference source not found. to manage the design and environmental impacts, consistent with the framework adopted for the CSSI Approval.

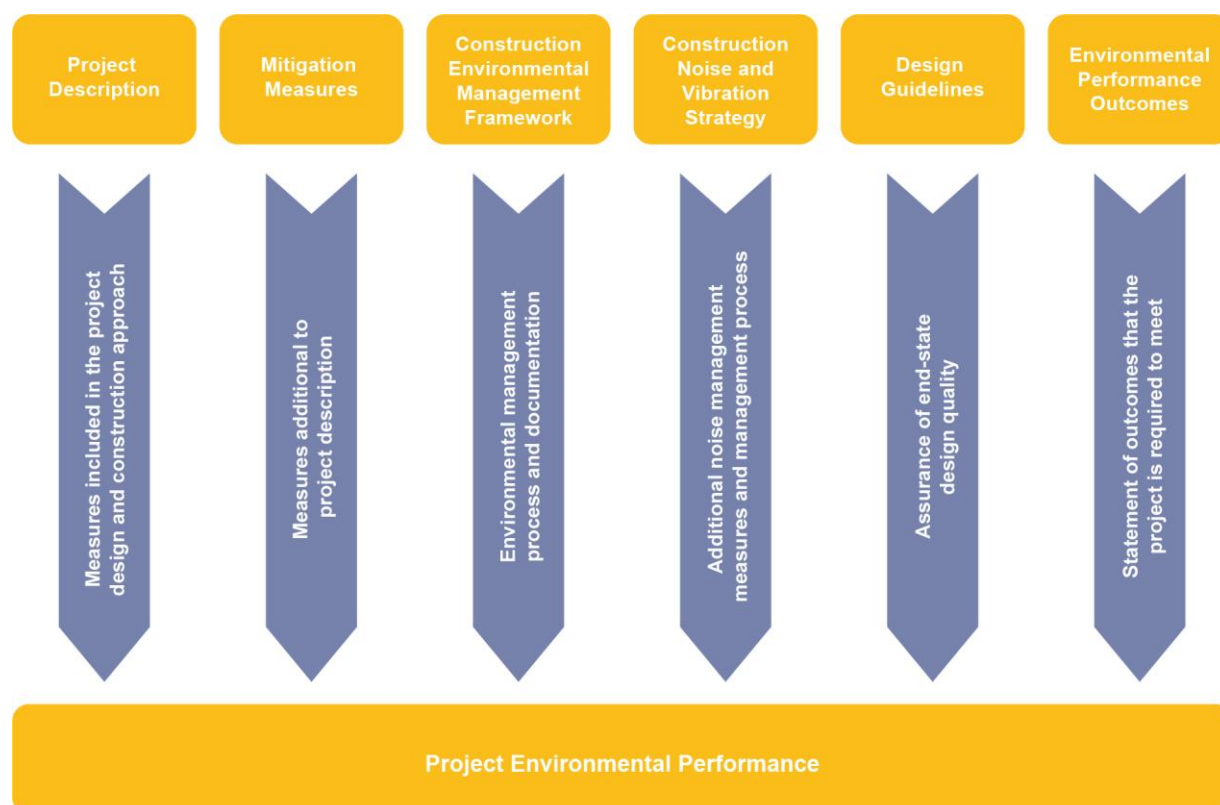


Figure 7: Project approach to environmental mitigation and management

Sydney Metro proposes to implement a similar environmental management framework where the integrated delivery of the CSSI station works and the OSD occur concurrently. This would ensure a consistent approach to management of design interface and construction-related issues.

Sydney Metro proposes this environmental management framework would apply to the OSD until completion of the station and public domain components of the integrated station development delivery contract (i.e. those works under the CSSI Approval). Should the OSD be constructed beyond the practical completion and opening of the station, standard practices for managing construction related environmental impacts would apply in accordance with the relevant guidelines and Conditions of Approval for the detailed SSD Application(s).

1.7. Purpose of the review

This review addresses the access provisions and considerations for the proposed development. It outlines the requirements for access by people with a disability or who are older, as residents, staff and visitors, and is reviewed for capability to comply with the Building Code of Australia 2016 (BCA); Australian Standards on Access and Mobility and the Disability (Access to Premises - Buildings) Standards 2010.

The purpose of the report is to address the SEARs and to establish the vision, planning and development framework for which the future detailed development application will be assessed.

The key issue in the provision of appropriate access for all persons to the new development is the provision of a continuous accessible path of travel:

- from points of arrival to and linking to the principal building entrance
- from accessible / adaptable resident and visitor parking to the principal building entrances
- continuous accessible paths of travel and circulation spaces for internal paths of travel to unit entries on accessible levels of the development
- to and within adaptable apartments.

We have reviewed the concept SSD Application, to assess the potential for compliance with the relevant codes, standards and legislation for accessibility. The preliminary designs have been assessed so that in ongoing design, equitable and dignified access for people with disabilities can be provided. In carrying out an accessibility assessment, the main objective is to ensure access is provided through the provision of accessible facilities and continuous paths of travel to and within all appropriate areas of the development.

The assessment of the design is an assessment of the indicative design only (for example, one design scenario for the site) in order to demonstrate that relevant standards can be met re: environmental impacts, quality of design, functional and operation requirements for a residential development of the scale anticipated by the concept.

In accordance with the principles of the Disability Discrimination Act 1992 (DDA) we recommend adopting best practice in the design of the proposed new work.

1.8. Proposed Building

The site is located near the corner of Pitt Street and Bathurst Street, comprising four individual allotments but excludes the Edinburgh Castle Hotel. Accordingly, the site has two separate street frontages, to Pitt Street to the west, and to Bathurst Street to the north. The site has a combined area of 1,708m².

The proposal is a concept SSD Application (in accordance with Section 4.22 of the EP&A Act) which sets out the concept proposal for the development of the site and establishes the planning and development framework which will form the basis for the detailed design of the future building and against which the future detailed DAs will be assessed.

The concept SSD Application seeks approval for the maximum building envelope for the proposed residential or commercial building. The proposed residential or commercial building is to be located immediately above and integrated with the approved Pitt Street Station southern portal. The indicative design includes potential commercial use or residential use in a built form of up to 35 storeys.

The development may include class 2 (residential) building and class 5 (commercial) under the BCA. Under the BCA 2016, table D3.1 Requirements for access for people with a disability, access to these building classes is required:

- Class 2: From a pedestrian entrance required to be accessible to the entrance doorway of each sole occupancy unit and to and within resident common areas
- Class 5: To and within common areas all areas normally used by the occupants.

For apartments, SEPP 65 and the Apartment Design Guide requires 20 percent of dwellings to meet Liveable Housing Silver level. The City of Sydney DCP requirements for adaptable housing may be considered as a guide in ongoing design.

2.0 Context for Planning & Design

2.1 Legislation & Standards - Overview

The following legislation, standards, guidelines and other documents are of relevance to the concept proposal:

- *Commonwealth Disability Discrimination Act (1992)*
- *Disability (Access to Premises - Buildings) Standards 2010*
- *Australian Human Rights Commission Advisory Notes on Access to Premises 2013*
- *Building Code of Australia (2016) Parts D3, E3.6 and F2.4.*
- *Australian Standard AS1428.1 (2009) Design for access and mobility Part 1 (including Amendment No. 1): General requirements for access-New building work*
- *AS2890.6 (2009) Car Parking Spaces and Access for People with Disabilities*
- *AS1735.12 (1999) Lifts, escalators and moving walks Part 12: Facilities for persons with disabilities AS1428.4 (1992) Design for access and mobility. Part 4: Tactile ground surface indicators for the orientation of people with vision impairment*
- *AS1428.4 (2009) (Incorporating Amendment No 1): Design for access and mobility Part 4.1: Means to assist the orientation of people with vision impairment -tactile ground surface indicators*
- *City of Sydney Access DCP (2004) (Referenced as a Guide only)*
- *AS4299 1995 Adaptable Housing*
- *State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development under the Environmental Planning and Assessment Act 1979; July 2015*
- *Livable Housing Design Guidelines*

2.2 Disability Discrimination Act

The objectives of the *Disability Discrimination Act 1992 (DDA)* – section 23, focus on the provision of equitable, independent and dignified access to services and facilities for people with mobility, sensory and cognitive disabilities.

The DDA covers existing premises, including heritage buildings, those under construction and future premises. It extends beyond the building itself to include outdoor spaces and within, to address furniture, fittings and practices.

2.3 Disability (Access to Premises – Buildings) Standards

Disability (Access to Premises - Buildings) Standards (Premises Standards) 2010 which commenced on 01 May 2011, has been incorporated into the BCA (2016) to ensure that access provisions for people with disabilities more fully meet the intent of the DDA. Meeting the Premises Standards ensures fulfilment of obligations under the Disability Discrimination

Act in relation to physical access within the buildings. Schedule 1 of the Premises Standards contains the Access Code for Buildings and is equivalent to the BCA provisions for access.

2.4 Building Code of Australia

The Building Code of Australia (BCA)(2016) applies to new buildings. In this report the level of accessibility throughout the new development is generally measured against the Deemed-to-Satisfy Provisions of the BCA, in particular Parts D3, E3.6 and F2.4. Compliance with *AS1428.1 Design for Access and Mobility Part 1: General requirements for access – New building work (2009)* is required to satisfy the BCA with respect to physical access provisions to and within buildings.

The BCA (2016) includes the following parts relevant to accessibility requirements to meet the deemed to satisfy provisions to satisfy the performance requirements DP1, DP4, DP6, DP8 and DP9:

- Table D3.1 which outlines the Class of building required to be accessible that must comply with AS1428.1(2009)
- D3.2 access to buildings which outlines requirements for accessways, doors and entrances
- D3.3 the parts of buildings required to be accessible and meet the requirements of AS1428.1 (2009)
- D3.4 exemptions
- D3.5 accessible car parking requirements
- D3.6 signage requirements for identification of accessible facilities, services and features
- D3.7 hearing augmentation requirements
- D3.8 tactile ground surface indicators
- D3.9 wheelchair spaces in Class 9b Buildings
- D3.11 ramps
- D3.12 glazing on an accessway
- Specification D3.6: Braille and tactile signs
- E3.6: requirements for passenger lifts in accessible buildings.
- F2.4: requirements for unisex accessible sanitary facilities, accessible showers and cubicles for people with ambulant disabilities designed to meet the requirements of AS1428.1 (2009).

2.5 AS1428 – Standards for Access & Mobility

The Australian Standards design for access and mobility are a suite of standards relating to the inclusion of features in the built environment that improve access and mobility for people with a disability.

AS1428.1 (2009) sets out minimum requirements for design of buildings and facilities, while AS1428.2 includes enhanced and additional requirements that are not covered in AS1428.1, such as street furniture and reach ranges.

AS1428.4.1 (2009) *Design for access and mobility Part 4.1*: Means to assist the orientation of people with vision impairment primarily details the requirements for the application of tactile ground surface indicators (TGSI).

2.6 Adaptable Housing

Adaptable dwellings incorporate design and construction elements that can be readily modified to cater for an occupant with access and mobility restrictions, such as a person with a disability or an older person.

Adaptable housing enables accessibility to be easily accommodated not only for people who use a wheelchair, but for people with reduced mobility as a result of age or temporary illness. Adaptable housing also provides more space for residents to be assisted by carers. AS4299 *Adaptable Housing* provides design requirements for adaptable dwellings.

While not applicable to this State Significant Development, the City of Sydney Access DCP 2004 is referenced here as a guide for consideration in ongoing design. To meet Part 5.3 of the City of Sydney DCP, 15 percent of all dwellings must be designed in accordance with the *Australian Adaptable Housing Standard (AS4299-1995)*, to be capable of adaptation for people with a disability or elderly residents.

Where a residential development provides adaptable housing units in accordance with the DCP, one accessible car parking space shall be provided for every adaptable unit. This is in addition to any accessible parking required by Section 4.2.9 of the DCP. In order to reduce car dependency in the Central Sydney CBD, the City of Sydney, in some exceptional circumstances, will grant an exemption for the provision of car parking.

2.7 SEPP 65 & Liveable Housing

SEPP 65 - *Design Quality of Residential Apartment Development* states that: (2) Development consent must not be granted if, in the opinion of the consent authority, the development or modification does not demonstrate that adequate regard has been given to:

- (a) the design quality principles, and
- (b) the objectives specified in the *Apartment Design Guide* for the relevant design criteria.

Objective 4Q-1 of the *Apartment Design Guide* states that: Universal design features are included in apartment design to promote flexible housing for all community members. Design guidance: Developments achieve a benchmark of 20 percent of the total apartments incorporating the *Liveable Housing Guideline's* silver level universal design features for

dwelling access, dwelling entrance, internal doors and corridors, toilet, shower and reinforcement of bathroom and toilet walls.

3 Design Review

3.1 Documentation

This assessment is based on discussion with the design team and review of the following documentation prepared by GHD Woodhead, issued to Funktion (access consultant) on 09/05/18:

- Integrated design drawings for Pitt Street South over station development, general arrangement plans FD01-FD17; elevation 2 A201 and section 1 A202.

It is noted that the plans, schedules and illustrations represent the broad status of the envelope and indicative design that are to be the basis of the concept SSD application. It is also noted that the schedules reflect the latest building stack and apartment mix for demand estimation, and will require revision for the submission in order to meet Council mix requirements.

3.2 Car Parking & Link to Principal Entrance

Car parking spaces may be proposed in the development. If adopted as a guide, to meet the City of Sydney Access DCP, accessible car spaces may be required to be allocated to the adaptable units. Accessible parking spaces must include dimensions and a layout to meet the requirements of *AS2890.6 (2009)*. This includes overhead clearance from the carpark entrance to the spaces of minimum 2.2m and overhead clearance over the accessible car parking spaces of minimum 2.5m.

The City of Sydney Access DCP states that in order to reduce car dependency in the Central Sydney CBD, the City of Sydney, in some exceptional circumstances, will grant an exemption for the provision of car parking. Exemptions will only be granted where:

1. the building is located within the Central Sydney CBD (i.e. has a post code of 2000 or 2001; and
2. it is proposed that no parking is to be provided in the development; and
3. it can be shown that the development is within 500 metres of accessible public transport; and
4. that the provision of parking would have an undesirable effect on the surrounding road network.

3.3 Principal Entry & Internal Areas

Building Entrance and Common Areas

To meet the Premises Standards and BCA part D3.1 for a new Class 2 development access is required:

- From an accessible pedestrian entrance via the proposed lift to all floors containing sole occupancy units and to the entrance doorway of each unit.
- To and within one of each type of common area including garbage bins, letterboxes, intercom, gym, pool and landscaped areas.

To meet the Premises Standards and BCA part D3.1 for a new Class 5 development access is required:

- To and within all areas normally used by the occupants.

To meet the Premises Standards and BCA D3.2, the entrance to the building must meet the requirements of *AS1428.1*. This includes doors with a level landing that provide adequate circulation space to meet *AS1428.1* clause 13.2 and 13.3.

To meet the requirements of the Premises Standards and BCA part D3.1, continuous accessible paths of travel meeting the requirements of *AS1428.1 (2009)* must be provided throughout the building via the provision of circulation space at doorways, corridors and within common areas, with the exception of the areas which meet the BCA part D3.4 as exempt areas (such as plant areas). Circulation space for turning must be provided at the end of corridors (1540mm x 2070mm).

Adaptable & Liveable Apartments

If adopted as a guide, to meet the City of Sydney DCP requirements, 15 percent of the apartments are required to be designed as adaptable.

Adaptable apartment layouts are required to include an accessible layout to meet the essential design criterion as listed in *AS4299* and include circulation spaces to comply with the functional requirements of *AS1428.1* for the entry doorway, internal doors, living room, kitchen, laundry, bedroom and bathroom.

In addition, to meet the requirements of The Apartment Design Guide, apartment design should consider the need to achieve a benchmark of 20% of the total apartments incorporating the *Liveable Housing Guideline's* silver level universal design features for dwelling access, dwelling entrance, internal doors and corridors, toilet, shower and reinforcement of bathroom and toilet walls.

3.4 Vertical Links

Lifts

Passenger lifts with dimensions proposed to meet the Access to Premises Standards and the BCA part E3.6 and *AS1735.12* are proposed to link all OSD levels of the development. To comply with BCA E3.6 the lifts must include features in accordance with *AS1735.12*.

Emergency Egress

To meet BCA D2.17 fire isolated stairway handrails are required to be continuous and comply with Clause 12 of *AS1428.1* including an offset riser so that the height of the handrail is consistent throughout the stairway and landing; and handrail endings in accordance with *AS1428.1* figure 26(B). Fire isolated stairway handrails are recommended to meet *AS1428.1* clause 11 to include handrails on both sides of the stairs.

To meet the intent of the DDA refuges are recommended to be provided in the stair entry landings of a central fire isolated stairway for a wheelchair user or a person with ambulant mobility equipment and an accompanying person, with a recommended unobstructed space of 1300mm x 800mm outside of the egress route.

Places of refuge which are fire rated, areas such as the areas adjacent the entry landings of fire stairs or within fire rated residential units where people who are unable to negotiate stairs, can wait for assisted evacuation, are considered a possible way of making an appropriate provision for emergency egress for people with disability.

4 Conclusion

Having reviewed the listed preliminary drawings, it is our opinion that at this stage of the planning and design, the access provisions for people with physical and sensory disabilities can comply with the performance requirements of *BCA (2016) sections D3, E3.6 and F2.4; AS1428.1, AS1428.4.1, AS2890.6, AS4299, AS1735.12, SEPP 65 Liveable Housing Guidelines Silver Level* and the *City of Sydney Access DCP*.

The provision of access for people with a disability in the concept proposal, whether it is of residential or commercial use, can provide continuous accessible paths of travel and the equitable provision of accessible facilities to provide inclusive design to meet the anticipated requirements of staff and visitors.

Consequently, in our opinion the proposed drawings and ongoing inclusion of the recommendations can meet the objectives of the Disability Discrimination Act through its intention to provide non-discriminatory access and the equitable and dignified use of all appropriate areas of the new development.

I certify that I am an appropriately qualified and competent person practising in the relevant area of work. I have recognised relevant experience in the area of work being reviewed. My company is holding appropriate current insurance policies.

A handwritten signature in black ink, appearing to read 'Jen Barling', with a stylized flourish at the end.

Jen Barling | Access + Inclusion Consultant

Qualifications: Bachelor of Applied Science (Occupational Therapy) (1999)

Affiliations: Accredited with Association of Consultants in Access, Australia (No.300)
Registered Occupational Therapist (no: OCC0001724072)