

17 October 2025

Our Ref: SYD225_224-2 (ACCESS DA) JLS

Arc Projects
Sent via Email

Attention: Brad Swanson

ACCESSIBILITY CAPABILITY STATEMENT FOR DA SUBMISSION
PROJECT NAME: ROYAL MAIL HOTEL, LAKE CARGELLIGO

1. Introduction

An assessment of the subject development has been undertaken by DC Partnership at the request of Arc Projects and relates to the existing hotel development located at 14 Foster Street, Lake Cargelligo, NSW.

This assessment has been prepared to address the existing hotel development, which consists of a ground floor pub, commercial kitchen, dining and a separate laundry building, with the first floor being hotel rooms, workers rooms, sanitary facilities and a managers residence.

2. Background

DC Partnership has been engaged to provide building regulatory advice regarding the compliance status of the proposed development when assessed against the relevant prescriptive requirements as contained within the Building Code of Australia (BCA) 2022 – Volume 1 Amendment 2, including the Part D4 Access for People with a Disability, Parts E3D7 and E3D8 Passenger Lifts, Parts F4D5, F4D6, and F4D7 Accessible Sanitary Facilities as applicable to this development.

This correspondence has been provided to assist with development of the design documentation. A broad assessment has been undertaken of the proposed design as detailed within the documentation listed in **Appendix 1**.

The advice being provided to date has been in the context of the following—

- Building Code of Australia (BCA) 2022 – Volume 1 Amendment 2;
- AS1428.1-2021 Design for access and mobility Part 1: General requirements for access – New building work;
- AS1428.4.1-2009 Means to assist the orientation of people with a vision impairment – Tactile Ground Surface Indicators; and
- AS2890.6-2009 Off-street parking for people with disabilities.

Fire Safety Engineers

Inclusive Accessibility Consultants

Building Code Consultants

3. Assessment

In the context of this report and the BCA the building use can be described as follows—

Table 1 – Building Classification

STOREY	CLASSIFICATION	DESCRIPTION
Ground	Class 3 & Class 6	Hotel & Pub
Level 1	Class 3	Hotel

In addition to undertaking a detailed assessment of the design against the prescriptive requirements of the BCA a preliminary performance-based assessment has also been undertaken.

The implementation of a performance-based approach in lieu of compliance with the deemed-to-satisfy (DtS) provisions of the BCA shall be disclosed to the relevant stakeholders and is subject to the approval of the certifying authority.

The **Table 2** below lists scenarios where we believe the adoption of a performance design may add value to development in-lieu of complying with the prescriptive (DtS) provisions—

Table 2 – Performance Solutions

ITEM	PROPOSED PERFORMANCE SOLUTION	BCA DtS CLAUSE	PERFORMANCE REQUIREMENT
1.	Unisex facilities are provided in lieu of separate male and female facilities.	F4D5	F4P1
2.	Reduced latch side clearance to sliding doors.	D4D2	D1P1
3.	Reduced clear open width to single hinged doorways throughout.	D4D2	D1P1
4.	Reduced clear open width to operable leaf to double hinged doorway.	D4D2	D1P1

Table 3 below outlines the relevant accessibility measures that will be provided as part of the development such that compliance with the BCA is achieved, specifically with Part D4 Access for People with a Disability, Parts F4D5, F4D6, and F4D7 Accessible Sanitary Facilities.

Table 3 – Accessibility Measures

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
General building access requirements Clause D4D2	Buildings and parts of buildings must be accessible as required by this clause, unless exempted by D4D5. Class 3 Access is required to be provided— a) From a pedestrian entrance required to be accessible to at least one (1) floor containing sole-occupancy units and to the entrance doorway of each sole-occupancy unit located on that level; and	Room 04 has been designated as accessible, thereby complying with the minimum requirements of this clause.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	To and within not less than one (1) of each type of room for use in common by the residents.	
	Class 6	
	a) Access is required to and within all areas normally used by the occupants.	The building is capable of compliance, subject to design detail being developed (door schedule, internal finishes, ramp and stairway details and etc.)
		Refer to Drawing Mark-ups for areas of concern.
Access to buildings	An accessway must be provided to a building required to be accessible—	The building is capable of achieving compliance with this clause.
Clause D4D3 (1)	a) from the main points of a pedestrian entry at the allotment boundary; and b) from another accessible building connected by a pedestrian link; and from any required accessible carparking space on the allotment.	
Access to buildings	In a building required to be accessible, an accessway must be provided through the principal pedestrian entrance, and—	The building is capable of achieving compliance with this clause.
Clause D4D3 (2)	a) through not less than 50% of all pedestrian entrances including the principal pedestrian entrance; and b) in a building with a total floor area more than 500 m ² , a pedestrian entrance which is not accessible must not be located more than 50 m from an accessible pedestrian entrance, except for pedestrian entrances serving only areas exempted by D4D5.	
Access to buildings	For the purposes of Clause D4D3 (3), an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where—	The building is capable of achieving compliance with this clause.
Clause D4D3 (4)	a) all doorways serve the same part or parts of the building; and b) the distance between each doorway is not more than the width of the widest doorway at that pedestrian entrance (see Figure D4D3); and For the purposes of Clause D4D3 (3), a doorway is considered to be the clear, unobstructed opening created by the opening of one or more door leaves (see Figure D4D3).	
Access to buildings	Where a doorway on an accessway has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850 mm in accordance with AS 1428.1.	The building is capable of achieving compliance with this clause.
Clause D4D3 (5)		

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
General building access requirements Clause D4D2	Buildings and parts of buildings must be accessible as required by this clause, unless exempted by D4D5. Class 3 Access is required to be provided— b) From a pedestrian entrance required to be accessible to at least one (1) floor containing sole-occupancy units and to the entrance doorway of each sole-occupancy unit located on that level; and a) To and within not less than one (1) of each type of room for use in common by the residents. Class 6 Access is required to and within all areas normally used by the occupants.	Room 04 has been designated as accessible, thereby complying with the minimum requirements of this clause. The building is capable of compliance, subject to design detail being developed (door schedule, internal finishes, ramp and stairway details and etc.)
Access to buildings Clause D4D3 (1)	An accessway must be provided to a building required to be accessible— c) from the main points of a pedestrian entry at the allotment boundary; and d) from another accessible building connected by a pedestrian link; and e) from any required accessible carparking space on the allotment.	The building is capable of achieving compliance with this clause.
Access to buildings Clause D4D3 (2)	In a building required to be accessible, an accessway must be provided through the principal pedestrian entrance, and— c) through not less than 50% of all pedestrian entrances including the principal pedestrian entrance; and d) in a building with a total floor area more than 500 m², a pedestrian entrance which is not accessible must not be located more than 50 m from an accessible pedestrian entrance, except for pedestrian entrances serving only areas exempted by D4D5.	The building is capable of achieving compliance with this clause.
Access to buildings Clause D4D3 (4)	For the purposes of Clause D4D3 (3), an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where— c) all doorways serve the same part or parts of the building; and	The building is capable of achieving compliance with this clause.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	d) the distance between each doorway is not more than the width of the widest doorway at that pedestrian entrance (see Figure D4D3); and For the purposes of Clause D4D3 (3), a doorway is considered to be the clear, unobstructed opening created by the opening of one or more door leaves (see Figure D4D3).	
Access to buildings Clause D4D3 (5)	Where a doorway on an accessway has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850 mm in accordance with AS 1428.1-2021.	The building is capable of achieving compliance with this clause.
Parts of building to be accessible Clause D4D4 (a)	In a building required to be accessible, every ramp and stairway, except for ramps and stairways in areas exempted by D4D5, must comply with— a) for a ramp, except a fire-isolated ramp, clause 7 of AS 1428.1; and b) for a stairway, except a fire-isolated stairway, clause 8 of AS 1428.1; and c) for a fire-isolated stairway, clause 8.1(f) and (g) of AS 1428.1.	The building is capable of achieving compliance with this clause.
Parts of building to be accessible Clause D4D4 (c)	In a building required to be accessible, accessways must have— a) passing spaces complying with AS 1428.1 at maximum 20 m intervals on those parts of an accessway where a direct line of sight is not available; and b) turning spaces complying with AS 1428.1— i. within 2 m of the end of accessways where it is not possible to continue travelling along the accessway; and ii. at maximum 20 m intervals along the accessway.	The building achieves compliance.
Exemptions Clause D4D5	The following areas are not required to be accessible: a) An area where access would be inappropriate because of the particular purpose for which the area is used. b) An area that would pose a health or safety risk for people with a disability. c) Any path of travel providing access only to an area exempted by (a) or (b). The following rooms / areas and associated accessways have been afforded the concession under D4D5 based on the health or safety risk and therefore access for people with disabilities need not be provided to these areas – a) Plant and equipment rooms; b) Servers meters; c) Cleaners rooms;	Written confirmation at CC stage required from client confirming areas to be considered under D4D5 exemptions.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	d) Kitchen	
Accessible carparking Clause D4D6 (1)	Accessible carparking spaces— a) subject to (b), must be provided in accordance with Clause D4D6 (2) in— i. a Class 7a building required to be accessible; and ii. a carparking area on the same allotment as a building required to be accessible; and b) need not be provided in a Class 7a building or a carparking area where a parking service is provided and direct access to any of the carparking spaces is not available to the public; and c) subject to (d), must comply with AS/NZS 2890.6; and d) need not be identified with signage where there is a total of not more than 5 carparking spaces, so as to restrict the use of the carparking space only for people with a disability. For each Class of building to which the carpark or carparking area is associated, the number of accessible carparking spaces required is as follows:	An accessible car bay is proposed to be provided outside the site boundary. Design documentation indicates compliance with the relevant standards will be achieved.
Accessible carparking Clause D4D6 (2)	Class 1b and 3 buildings: a) For a boarding house, guest house, hostel, lodging house, backpackers' accommodation, or the residential part of a hotel or motel, the number of accessible carparking spaces required is to be calculated by multiplying the total number of carparking spaces by the percentage of — i. accessible sole-occupancy units to the total number of sole-occupancy units; or ii. accessible bedrooms to the total number of bedrooms. b) For the purposes of (a), the calculated number is taken to the next whole figure. c) For a residential part of a school, accommodation for the aged, disabled or children, residential part of a health-care building which accommodates members of staff or the residential part of a detention centre — 1 accessible space for every 100 carparking spaces or part thereof.	
Accessible carparking Clause D4D6 (2)	Class 6 a) with up to 1000 carparking spaces — 1 accessible space for every 50 carparking spaces or part thereof; and b) for each additional 100 carparking spaces or part thereof in excess of 1000 carparking spaces — 1 accessible space.	

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
Signage Clause D4D7 and Specification 15	Signage in accordance with this clause and details within AS1428.1 are to be provided to identify sanitary facilities, hearing augmentation, non-accessible pedestrian entrances, directional signage and exit levels, where applicable.	The building is capable of achieving compliance with this clause. Signage package to be submitted with detailed design documentation in accordance with this clause, Specification 15 and AS1428.1.
Tactile indicators Clause D4D9 (1)	For a building required to be accessible, tactile ground surface indicators must be provided to warn people who are blind or have a vision impairment that they are approaching— a) a stairway, other than a fire-isolated stairway; and b) an escalator; and c) a passenger conveyor or moving walk; and d) a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp; and e) in the absence of a suitable barrier— i. an overhead obstruction less than 2 m above floor level, other than a doorway; and ii. an accessway meeting a vehicular way adjacent to any pedestrian entrance to a building, excluding a pedestrian entrance serving an area referred to in D4D5, if there is no kerb or kerb ramp at that point, except for areas exempted by D4D5.	The building is capable of achieving compliance with this clause. Further details of tactile indicators to be submitted with detailed design documentation in accordance with this clause.
Tactile indicators Clause D4D9 (2)	Tactile ground surface indicators required by (1) must comply with sections 1 and 2 of AS/NZS 1428.4.1.	The building is capable of achieving compliance with this clause.
Glazing on accessways Clause D4D13	On an accessway, where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening, must be clearly marked in accordance with AS 1428.1.	The building is capable of achieving compliance with this clause. Further details of glazing decals to be submitted with detailed design documentation in accordance with this clause.
Accessible sanitary facilities Clause F4D5	In a building required to be accessible— a) accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and b) accessible unisex showers must be provided in accordance with F4D7; and c) an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or	The building is capable of achieving compliance with this clause.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	bench top and adequate means of disposal of sanitary products; and d) the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; and e) an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and f) where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right-handed mirror image facilities must be provided as evenly as possible; and g) where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; and h) an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.	
Accessible unisex sanitary compartments Clause F4D6	Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building is as follows: Class 3 a) in every accessible sole-occupancy unit provided with sanitary compartments within the accessible sole-occupancy unit, not less than 1; and b) at each bank of sanitary compartments containing male and female sanitary compartments provided in common areas, not less than 1. Class 6 a) 1 on every storey containing sanitary compartments; and b) where a storey has more than 1 bank of sanitary compartments containing male and female sanitary compartments, at not less than 50% of those banks. The requirements of this clause do not apply within a ward area of a Class 9a health-care building.	The building achieves compliance with this clause.
Accessible unisex showers Clause F4D7	Where required by F4D5(b), the minimum number of accessible unisex showers for each class of building is as follows:	The building achieves compliance with this clause.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	Class 3 a) in every accessible sole-occupancy unit provided with showers within the accessible sole-occupancy unit, not less than 1; and b) 1 for every 10 showers or part thereof provided in common areas. Class 6 Where F4D4 requires 1 or more showers, not less than 1 for every 10 showers or part thereof. The requirements of this clause do not apply within a ward area of a Class 9a health-care building.	
Ambulant sanitary facilities Clause F4D5 (c)	At each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and one sanitary compartment suitable for a person with an ambulant disability for use by females, must be provided. Ambulant sanitary facilities shall be designed in accordance with Clause 13 of AS1428.1.	The building is capable of achieving compliance with this clause.

4. SUMMARY

Based upon the information contained in the above tables, it can determine that the existing hotel is capable of achieving compliance with the relevant accessibility provisions of the BCA, subject to the comments provided above being incorporated into the design.

Compliance can be achieved either by meeting the deemed-to-satisfy requirements of the BCA, as are principally contained within Part D4 Access for People with a Disability, Parts F4D5, F4D6, F4D7 Accessible Sanitary Facilities, or via a performance-based approach.

We trust that the above information is sufficient for the consent authority in assessing the merit of the architectural design from a planning perspective.

This statement should not be construed as relieving any other parties of their legislative or contractual obligations.

Kind regards,

Report by



John La Scala
Principal | Accessibility
For DC Partnership

Verified By



Luke Sheehy
Managing Director
For DC Partnership

APPENDIX 1 – ASSESSED DOCUMENTATION

This accessibility assessment was based upon the architectural documentation prepared by BVN namely—

DRAWING NUMBER	REV	DRAWING TITLE	DATE
DA-A01-XX-01	4	COVER SHEET & DRAWING LIST	15.10.25
DA-A10-00-00	5	SITE PLAN & SITE ANALYSIS	15.10.25
DA-B10-00-00	5	GA - GROUND FLOOR PROPOSED	15.10.25
DA-B10-01-00	5	GA - FIRST FLOOR PROPOSED	15.10.25
DA-B10-02-00	4	GA - ROOF PLAN PROPOSED	15.10.25
DA-B21-00-00	6	GA - GROUND FLOOR DEMOLITION	15.10.25
DA-B21-01-00	6	GA - FIRST FLOOR DEMOLITION	15.10.25
DA-B21-02-00	4	GA - ROOF PLAN DEMOLITION	15.10.25
DA-C10-XX-01	6	ELEVATIONS & SECTIONS SHEET 01 - PROPOSED	15.10.25
DA-C10-XX-02	6	ELEVATIONS & SECTIONS SHEET 02 - PROPOSED	15.10.25
DA-C10-XX-03	5	ELEVATIONS & SECTIONS SHEET 03 - PROPOSED	15.10.25
DA-C10-XX-04	5	ELEVATIONS & SECTIONS SHEET 04 - PROPOSED	15.10.25
DA-C21-XX-01	5	ELEVATIONS & SECTIONS SHEET 01 - DEMOLITION	15.10.25
DA-C21-XX-02	5	ELEVATIONS & SECTIONS SHEET 02 - DEMOLITION	15.10.25
DA-C21-XX-03	4	ELEVATIONS & SECTIONS SHEET 03 - DEMOLITION	15.10.25
DA-C21-XX-04	4	ELEVATIONS & SECTIONS SHEET 04 - DEMOLITION	15.10.25
DA-N10-XX-01	4	LANDSCAPE PLAN	15.10.25
DA-N10-XX-02	3	STORMWATER CONCEPT PLAN	15.10.25
DA-S10-XX-01	4	SCHEDULE OF FINISHES AND MATERIALS	15.10.25

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