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Chair
Portfolio Committee No. 8 on Inquiry into public toilets
Parliament House
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30 April 2024

Subject: Inquiry into public toilets - Post-hearing responses

Dear Chair

Thank you for the opportunity to appear before the Portfolio Committee No. 8 - Customer Service for the inquiry into public toilets as witnesses in your hearing on 7 April 2025.

We appreciated the opportunity to contribute evidence to the Committee on behalf of the Department of Planning, Housing and Infrastructure.

Please find enclosed the Department responses to Supplementary Questions on Notice and the Questions on Notice (Attachments A and B) along with a copy of The Rocks and Darling Harbour Amenities Strategy (Attachment C). There are no suggested corrections to the transcript.

We trust this information is of assistance to the Committee.

Yours sincerely

Annie Tennant
Director, Design and Place
Placemaking NSW

Encl: Att A - Department responses to Supplementary Questions on Notice, Att B – Department responses to Questions on Notice Att C – The Rocks and Darling Harbour Amenities Strategy

Department of Planning, Housing and Infrastructure

MPS25/TBA

Response to Supplementary Questions on Notice

1. Could you advise the committee what you view as best practice for sanitation purposes (both in terms of design, and provision of items such as sanitary and/or sharps bin

I believe the following matters should be taken into consideration:

- Provision of sharps bins for those with medical conditions such as Type 1 Diabetes
- Provision of sanitary bins for all ages (baby nappies, adults with incontinence, people who menstruate)
- Adequate space to enable comfortable installation of sanitary and sharps bins within cubicles (dimensions to be determined by best practice assessment)

Department of Planning, Housing and Infrastructure

MPS25/TBA

Response to Questions on Notice

Question 1 (page 29):

The CHAIR: There's also a specific recommendation around revising disability standards across legislative frameworks. Could you provide a bit more detail around what we need to be updating from a legislation point of view?

ANNIE TENNANT: Probably not, no. I'm not a lawyer, so I'm happy to take that under advisement and come back to you on that. But I suppose our observation would be that there's not clarity on the requirements that developers or organisations are meant to deliver. There's a misalignment at different levels, whether it's BCA or NCC or other guidelines that are given to organisations. I think it's the lack of clarity that we're suggesting is revised across other toilet numbers. For example, we are providing minimum male and female toilets. Under the Building Code of Australia, you work out how many you need to provide. But, in addition to that, we're providing all-gender, and all-gender toilets don't count towards the numbers you're meant to require under the BCA for male and female, and so we oversupply toilets. Many women here would probably say that's a good thing because we're always waiting in a queue. But it's more money that's spent on providing toilets because there's no clarity on the numbers that are needed for all-gender toilets.

Response:

Nothing further to add to the response provided at this time.

Question 2 (page 29):

The CHAIR: In your opening statement you talked about wayfinding. There needs to be a toilet and people need to know how to find it. Do you have any recommendations for us in terms of what you would consider best practice?

ANNIE TENNANT: Yes. When you visit a public space, you'll notice that there are signs that tell you where to go. The City of Sydney have really great signage. They will have amenities, and then to the right on that same sign, they'll have a number of minutes to walk to a location. So if you have a disability, if you are walking with a child, you know how far it is to go to the place you're going – you know it's a five-minute walk to the amenity. I would also say that you need to have signage at all decision-making points. You need to have signage that tells you what types of toilets. If someone is looking for a Changing Places, you need to know where that Changing Places is located.

In our recommendations, we also said that online resources need to be available that are tied to physical wayfinding as well, so that the two are synchronised. And they are well lit and clear for those who may have a visual impairment. It's really important that all wayfinding is able to be accessed by the broadest range possible of people. We are developing a wayfinding strategy that is aimed at being inclusive. We are integrating braille down the side. We are making sure it's well lit. We're making sure we have minutes on the signage totems. I'm very happy to share more detail on that when it's finalised.

Response:

No further detail available at this time as the Wayfinding Strategy is still under development and

scheduled to be finalised later this year.

Question 3 (page 34):

The Hon. STEPHEN LAWRENCE: I am sure some women are — we all vary. Apart from that consideration — not suggesting that it doesn't have any weight — are you aware of any other material relevant considerations that would speak to single-use cubicles not being all-gender or unisex?

ANNIE TENNANT: I will share our amenities strategy with you because there are definitely some footnotes. There is information in there around research that's been undertaken, I believe by the City of Sydney and also an organisation in London, that there are some groups — older people and people from other cultural backgrounds — where there is a comfort in having individual cubicles.

Response:

Placemaking NSW prepared The Rocks and Darling Harbour Amenities Strategy to guide the considered and strategic upgrading and delivery of public amenities across these precincts. A copy of the Amenities Strategy is attached – see page 16 for footnote references to relevant research.



Placemaking NSW

The Rocks and Darling Harbour Amenities Strategy

January 2024



Acknowledgement of Country

As Tallowalodah (The Rocks), Barangaroo and Tumbalong (Darling Harbour) precincts' custodians, Placemaking NSW recognises that it stands on Aboriginal land, the area we know as Sydney. We acknowledge the Gadi People of the Eora Nation and their Elders as the Traditional Custodians of these areas. We celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to the lands and waters of NSW and acknowledge the Aboriginal and Torres Strait Islander people that contributed to the development of this Strategy.

We advise this resource may contain images, or names of deceased persons in photographs or historical content.

The Rocks and Darling Harbour Amenities Strategy

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More information

Prepared by Ethos Urban in collaboration with Placemaking NSW

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Executive Summary

What is The Rocks and Darling Harbour Amenities Strategy?

This strategy has been prepared to guide the considered and strategic upgrading and delivery of public amenities across these precincts.

Why is it useful?

Public amenities include public toilets and change facilities, are key to supporting the safe and inclusive use and activation of these areas. The provision, design and type of amenities provided in these precincts needs to align with the changing needs of the community.

Who is this strategy for and when should it be used?

The strategy is predominantly for internal PMNSW use, however, can be provided to stakeholders for reference.

The principles and recommendations of this strategy should be considered (but not limited to) when:

- Works are being undertaken to existing amenities
- Significant building works are being undertaken to a building within which there are existing amenities
- New building development is being undertaken
- Upgrades to the public domain and wayfinding are undertaken.

You can find a list of key tasks and project findings in **Section 12.0 Action Plan**.

1.0 Introduction

Site context

This Strategy for The Rocks and Darling Harbour, NSW, assesses the adequacy of public amenities provision in these two prominent central Sydney precincts, both of which are managed by Placemaking NSW (PMNSW).

Figure 1 below highlights the locational context of the precincts.

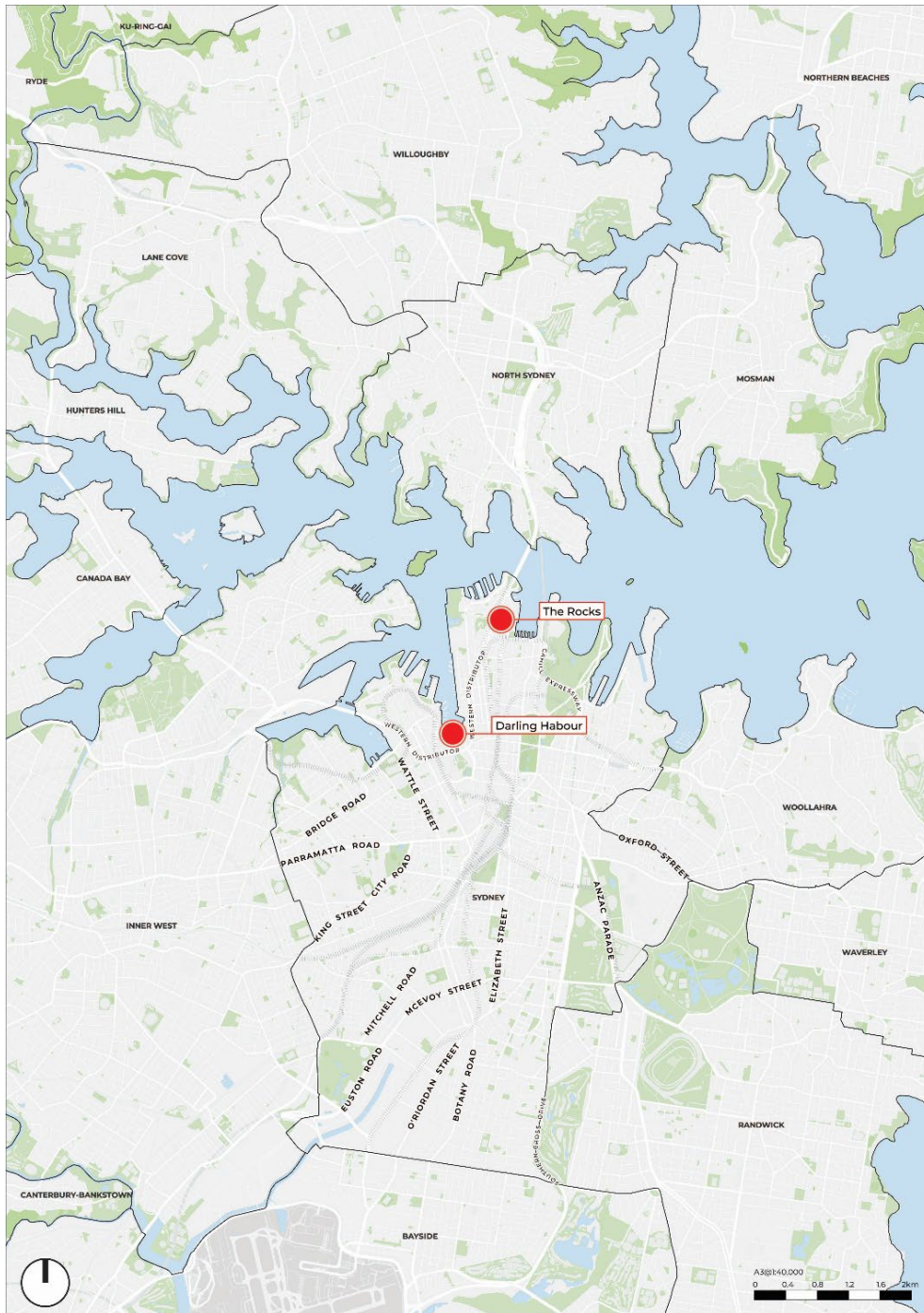


Figure 1 Locational context of The Rocks and Darling Harbour

Source: Ethos Urban / Google Maps

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

Arising from a fieldwork and desk-based assessment (as shown in **Figure 2**), the Strategy recommends both short-term and longer-term priorities for upgrading these amenities to best meet community needs, as well as ongoing delivery recommendations for future decision-making.

The Strategy has been informed by baseline research (policy review and case study research), audit and assessment (physical inspections, principles-based assessments) and a delivery strategy and Action Plan.

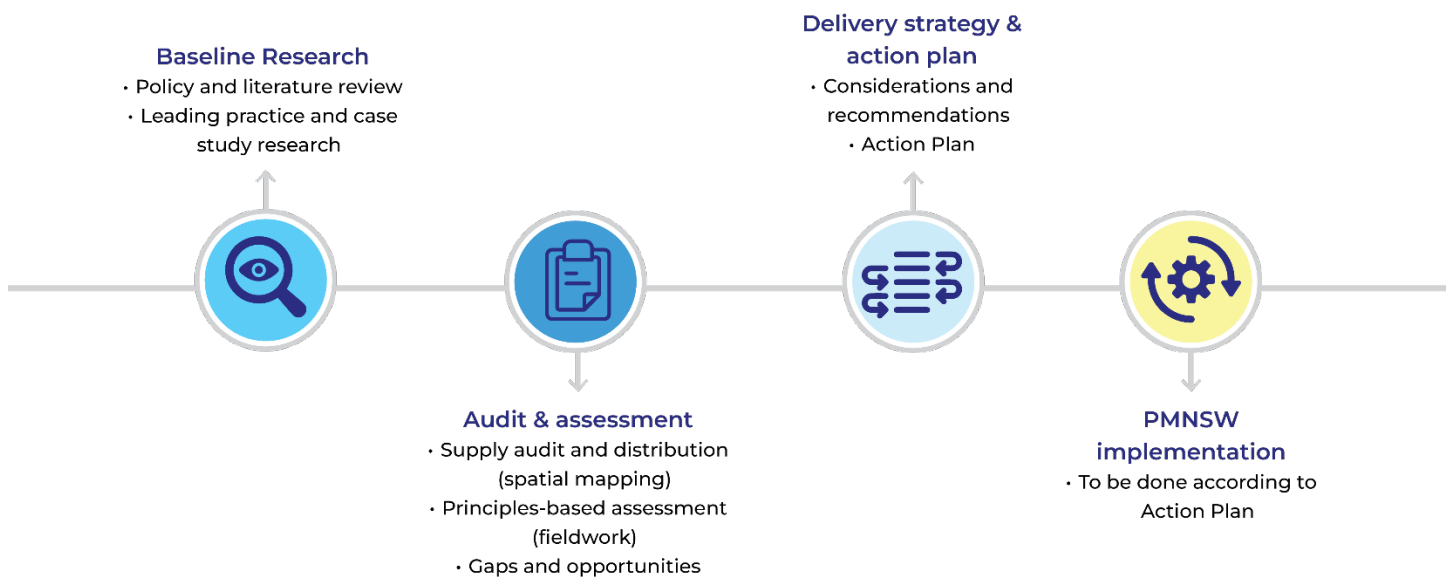


Figure 2 Methodology diagram

Source: Ethos Urban

The important role of public amenities in a contemporary urban context

Public toilets are vital community assets that contribute to the health and wellbeing of residents, workers, and visitors to the Sydney CBD.

Evidence shows that places with high-quality public amenities have superior levels of attractiveness as destinations. Further, they are an essential consideration for some groups in the community, such as people experiencing homelessness, people with disabilities, parents, carers and their children, and the elderly.

Whether public amenities are available in a particular precinct or public space can influence whether people will choose to go there at all. When it comes to Sydney's critical tourism economy, these decisions can significantly impact a location's desirability and activation. Access to toilets supports inclusion and participation, in addition to facilitating positive benefits and values, including physical activity, economic development and tourism.¹ In this context, the preparation of a robust amenities' strategy for The Rocks and Darling Harbour can play an important role in improving and enhancing the appeal of these precincts.

The delivery of high-quality amenities underpins PMNSW's commitment to inclusive and accessible public spaces that can be enjoyed by all

¹ Webber, K. 2018, 'We Need to Talk About Public Toilets', The University of Queensland Policy Futures.

Public toilets in context

What is a public toilet?

The terms 'public toilets' and 'public amenities' are used interchangeably in this document – although 'amenities' captures a broader range of facility types, including parents and babies' changing rooms.

Public toilets refer to any toilet located outside of the home. Across Australia, there are two main types of public toilets: those primarily provided by local governments located in parks and public spaces, and publicly accessible toilets provided by businesses for customers and visitors, such as those located in shopping centres. At a minimum, they are a private space within a larger public place, that supports physical and mental health and hygiene.²

For the purposes of this project, a public toilet is defined as a facility containing one or more rooms/cubicles with one or more toilets or urinals which is available for use by the public without restriction during hours of operation. The facility may be mechanised or automated and consist of stand-alone, service-hosted, and privately provided facilities.

The role of public toilets

Community infrastructure

Introduced in the late nineteenth century as a response to public health concerns and to make cities more sanitary, public toilets provide an essential piece of community infrastructure which contribute to the enjoyment and amenity of a place. Public toilets should cater to residents, workers, visitors, and those experiencing homelessness. They can support increased use of public open space and participation in local social, economic, and recreational activities, as well as supporting access and inclusion.

The NSW Government and the City of Sydney have committed to providing high quality public spaces in the Sydney LGA which are accessible and inclusive of all population groups. Public toilets are generally built on a case-by-case basis; however it is considered that a more streamlined planned network of toilets, identifying where gaps might be, would enable better provision of public toilets.

Design of public toilets

The design of a public toilet greatly influences its fitness-for-purpose, safety, and accessibility. Design is also important for promoting positive perceptions of public toilets to the community.

Public toilets can be freestanding / standalone (i.e., not attached to or within another building structure), or co-located (i.e., attached to another building or structure, depending on needs and context. Either approach can present design challenges that need to be considered.

Freestanding public toilets tend to have a rigid construction and may not be able to comply with Australian Standards or Universal Design principles. Accessibility of co-located public toilets may be limited, for example constrained by the opening hours of the attached building, or accessibility features of the structure itself.

² Webber, K. 2018, 'We Need to Talk About Public Toilets', The University of Queensland Policy Futures.

Tourism and broader economic drivers

Public toilets also play an important role in tourism, supporting economic development. Research has shown that toilets are one of the most important aspects of a holiday experience, particularly for road trips. Regardless of the destination, the need for public toilets is present for all travellers, and the provision of safe, clean, and accessible toilets can greatly contribute to positive perceptions of an area among visitors, and even attract new ones.

While public toilets in areas that receive a high volume of visitors can pose challenges and costs to local authorities, facilities that are well-designed, well-maintained, and well-located tend to have a ‘flow-on effect’ for the local economy. That is, tourists will stop to use a toilet, but may also purchase food, supplies, or souvenirs.

A 2022 study by EY Sweeney finds that, following a distribution of surveys over 6 months up to and including December 2021, visitation to both precincts is positive, but confidence declined as a result of COVID-19. 42% and 28% of respondents reported they visited Darling Harbour and the Rocks in the last 6 months (respectively).³ Historically, these numbers are lower than pre-COVID figures (66% and 47%). The cultural profile of both precincts continues to build, particularly with outdoor events and the NSW Government’s 24-Hour Economy Strategy.

Regarding drivers of satisfaction in the precincts, facilities and amenities were identified as among the top three indicators of visitor experience in both The Rocks and Darling Harbour. Visitation to these precincts is on track to return to pre-COVID levels in 2024.⁴

Why plan for public toilets?

Historically, PMNSW has had an ad-hoc approach to amenities provision within The Rocks and Darling Harbour. This approach has meant the delivery and upgrading of facilities has been opportunistic rather than strategic. This has resulted in areas of under provision and amenities which no longer reflect the needs of the community.

This strategy aims to guide better planning, prioritisation, delivery and management of public amenities, to support the use of the public domain.

As community needs and preferences evolve and as the communities grow and change, it is important that PMNSW has a clear framework to guide decision-making.

It is also important that upgrades and installations of new facilities respond to community needs. Issues around the accessibility, design and safety of public toilets can result in the marginalisation of some user groups and exclude others from using public toilets, which may then foster negative perceptions about existing facilities. There are opportunities to improve the process of strategic planning for new facilities, the standard of existing toilets and improve the efficiency of the network throughout The Rocks and Darling Harbour.

The Strategy provides a rational and strategic planning framework to guide future upgrades and installation of new facilities over the next ten years. This will also ensure that investment is appropriately prioritised.

³ PMNSW & EY Sweeney 2022, ‘PMNSW Brand and precinct research July 21 to Dec 21’.

⁴ *ibid.*

Who is responsible for public toilets?

Responsibility for managing public toilets in The Rocks and Darling Harbour is shared between several different authorities – predominantly managed by PMNSW, City of Sydney Council, and other organisations such as Transport for NSW (TfNSW). Coupled with the high volume of visitation, this shared responsibility presents unique challenges for the provision and maintenance of public assets in these precincts. It is noted that in both precincts there are public toilet facilities for use by patrons of nearby food and drink premises that also serve a function as public toilets. Some of these facilities are managed by the separate building management.

The *City of Sydney Public Toilet Strategy 2014* includes key objectives that distil a shared vision for the City and public toilet provision that can be equally applied to The Rocks and Darling Harbour. These objectives include:

- Creating a liveable and sustainable city that provides a high quality of life for its residents, visitors and businesses
- The provision of public toilets contributes to the quality of the City's public domain and its liveability
- The City's vision is for a highly regarded, safe and accessible network of public toilets to meet the current and future needs of a world-class city.⁵

Due to the shared responsibility for public toilet provision, it is important to clarify the ownership and responsibilities of all authorities involved, including the provision of signage. Shared Service Agreements (SSAs) could be sought to ensure a high quality of service and maintenance of facilities, supported by periodic inspections to ensure the commitments of all parties are being met.

⁵ City of Sydney, 2014, 'City of Sydney Public Toilet Strategy 2014'

Amenities typology applied to this Strategy

The use typology of each facility in the public toilet network is identified in the network maps, and the audit at **Sections 7.0** and **10.0**.

Toilets have been classified according to the following categories:

- **Public**, which clearly identify as public toilets and do not appear to be associated with another use, for example, the toilets at the Pier Street underpass in Darling Harbour. Key features of “public” toilets are:
 - Not attached to or within another use
 - Externally accessible from public realm
 - Separate male/female/all-gender entrances or single-fronted unit doors
 - Can include separate or integrated disabled access
 - Generally open more often than co-located, or publicly accessible, facilities (see below).
- **Publicly Accessible** – refers to all other facilities within this Strategy. These are accessible directly from the street only though some are accessed through a public facility, for example, within Darling Square Library or the Museum of Contemporary Art (MCA). These facilities are generally known as ‘co-located’ public toilets. Key features of co-located (or publicly accessible) toilets are:
 - Attached to, or located within another use or building
 - Externally accessible from the public realm or only accessible from within the co-located facility
 - Either separate male/female entrances or single fronted unit doors
 - Opening hours typically restricted by building and activity (such as opening hours for adjacent uses, or event).

Refer to **Appendix 2** for other definitions noted in this strategy.

Limitations of this Strategy

Audit of facilities

A comprehensive audit of the existing public toilet facilities was conducted to inform the preparation of this Strategy. The audit included both desktop analysis, site visits and information from PMNSW to collect data on each facility against a range of variables. This Strategy uses the findings from the audit to assess the existing public toilet network against its guiding principles, further discussed in **Section 3.0**.

Disclaimer

While the audit provides an evidence-based foundation for the recommendations of the Strategy, it is important that its findings are supplemented by more fine-grained, technical assessments on a site-by-site basis where new toilets are to be provided or existing toilets upgraded. This may include an assessment of issues and opportunities for the following:

- Australian Standards
- Building Code of Australia (BCA)
- Disability Discrimination Act compliance (DDA)
- Signage and wayfinding
- Environmentally Sustainable Design (ESD)
- The condition and fitness-for-purpose of internal components
- Safety considerations, including Crime Prevention Through Environmental Design (CPTED)
- Integration with local heritage/character.

2.0 Policy context and drivers

An overview of local, state, and national policies relevant to the planning and provision of public toilets has been undertaken, as shown in the table below.

The following documents have been reviewed in the preparation of this Strategy:

- Disability Discrimination Act (Australian Government, 1992)
- Australian Standards 1428. 1:2021 (Standards Australia, 2021)
- Better Placed (Government Architect NSW, 2017)
- Changing Places Design Specifications (Changing Places & Victoria State Government, 2020)
- Public Toilet Strategy 2014 (City of Sydney, 2014)
- Inclusion (Disability) Action Plan 2021-2025 (City of Sydney, 2021)
- Disability Discrimination Act (2009) and associated Australian Standards
- National Construction Code (2019)
- Homelessness Action Plan 2020 (City of Sydney, 2020)
- OPEN Sydney: Future Directions for Sydney at Night (City of Sydney, 2013).

Theme	Implications for the Strategy	Relevant Documents
Public toilets in the Sydney CBD	<ul style="list-style-type: none"> • Key issues within the City of Sydney LGA regarding public toilets include: <ul style="list-style-type: none"> - Lack of public toilets in key locations, - Public urination in entertainment precincts, - Quality and availability of existing facilities, - Cleaning, servicing, and presentation of public toilets, - Lack of information and wayfinding related to public toilets, including location and hours of operation. • Community engagement by the City of Sydney Council indicates a preference for single-sex facilities over unisex facilities (75% of females, and 43% of males surveyed) due to enhanced privacy, hygiene, and security. Other findings include: <ul style="list-style-type: none"> - Toilets near park playgrounds and entertainment/tourist precincts attract high visitation – approximately 213 uses per day in The Rocks in 2014. - Park playground toilets are most often used by females and accompanied children. - Preference for Automated Public Toilets (APTs) or traditional (non-automated) was balanced among survey respondents. • The City of Sydney Council has identified a need for more public toilets in entertainment precincts, including 24-hour access toilets in order to support the City's vibrancy at night. Council will also set up portable toilets during events to managed increased crowds. 	<ul style="list-style-type: none"> • Public Toilet Strategy 2014 (City of Sydney, 2014) • OPEN Sydney: Future Directions for Sydney at Night (City of Sydney, 2013)
Principles for design and provision	<ul style="list-style-type: none"> • Objectives of the City of Sydney Public Toilet Strategy include equal distribution of facilities, inclusive access, safety, cleanliness, sustainability, and quality. 	<ul style="list-style-type: none"> • Public Toilet Strategy 2014 (City of Sydney, 2014)

Theme	Implications for the Strategy	Relevant Documents
	<ul style="list-style-type: none"> • Best practice CPTED indicates that toilets should be located in full view, close to active spaces or integrated/co-located with other buildings, not out of sight or isolated. • It is recommended that public toilets should be provided within 400m (5-10 minute walk) from any point within central Sydney, and within all village centres and major parks. 	
Equity and inclusiveness	<ul style="list-style-type: none"> • People living with a disability continue to experience barriers in accessing Sydney's public domain, particularly public toilets. It is necessary to improve the accessibility of existing public toilets, increase the availability of adult change facilities, and enhance wayfinding mechanisms. • The design of the built environment must seek to address growing economic and social disparity and inequity by creating inclusive, welcoming and equitable environments. • The Disability Discrimination Act (DDA) sets out the legislative framework for providing universal access under Australian Standard AS1428. AS1428 is a suite of building codes that specifies the design requirements for new building work, as required by the Building Code of Australia (BCA) and the Disability (Access to Premises – Buildings) Standards (Premises Standards), to provide access for people with disabilities. • Particular attention is given to: <ul style="list-style-type: none"> - Continuous accessible paths of travel and circulation spaces for people who use wheelchairs, - Access and facilities for people with ambulatory disabilities, and - Access for people with sensory disabilities. • AS1248 sets out the design of circulation spaces, at grade access, design fixtures and fittings (including height and spacing), floor surfaces and lighting. • Accommodating all these requirements can be challenging when seeking to retrofit older buildings, particularly if a facility is spatially constrained. Many older facilities constructed from the 1970s to 1990s are usually not DDA compliant and are expensive to retrofit. • Designs for public toilets are expected to comply with Australian Standards AS 1428.1 and AS 1428.2. • As of May 2019, the National Construction Code specified that 'Accessible Adult Change Facilities' or 'Changing Places' are to be included in the design of public buildings such as shopping centres, stadiums, swimming pools, theatres, museums, and airports. They are to be designed in accordance with the Changing Places design specifications. 	<ul style="list-style-type: none"> • Inclusion (Disability) Action Plan 2021-2025 (City of Sydney, 2021) • Better Placed (Government Architect NSW, 2017) • Changing Places Design Specifications (Changing Places & Victoria State Government, 2020) • Disability Discrimination Act (Australian Government, 1992) • AS 1428. 1:2021 (Standards Australia, 2021)

Theme	Implications for the Strategy	Relevant Documents
Safety and amenity	<ul style="list-style-type: none"> Government Architect NSW specifies that the built environment should be designed with a focus on people, specifically their safety and comfort – “The many aspects of human comfort which affect the useability of a place must be addressed to support good places for people” (Better Placed, pg. 37). It is a City of Sydney priority to improve the safety and wellbeing of people sleeping rough in the LGA. This requires maintenance of the amenity of the public domain. In order to cater to community expectations, the City of Sydney acknowledges the need for 24-hour inclusive access toilets. These should be in highly visible places and would assist in the activation of City precincts after dark. “Ideally toilets should be robust single or multiple cubicles for unisex inclusive use, with all facilities inside the cubicle to facilitate safety, with each cubicle opening onto clearly visible active space” (Public Toilet Strategy, pg. 13). 	<ul style="list-style-type: none"> Better Placed (Government Architect NSW, 2017) Homelessness Action Plan 2020 (City of Sydney, 2020) Public Toilet Strategy 2014 (City of Sydney, 2014)

Social issues and trends in amenities provision

Lack of coordination of toilet provision and impacts on users

Social planning researcher Katherine Webber has contributed extensive insights into the planning of public toilets. Her insights include inconsistencies in approach and regulation at different levels of government. Public toilets are often not planned for cohesively at a precinct or neighbourhood level, while health and wellbeing, economic development, social inclusion, and environmental sustainability remain front of mind. Webber suggests that this is a significant contradiction, as adequate public toilet provision can contribute to each of these objectives.⁶

The impact of inadequate public toilet provision can be significant and often disproportionately affects those experiencing ill health, living with a disability, and people who are gender non-conforming, among others. Toilet provision has the ability to influence where and how people travel and what they consume, leading them to ‘restrict their movement to known places’, which then “limits their full involvement in economic, social and health activities”.⁷

Figure 3 illustrates the way in which a lack of coordination in public toilet provision can result in increased barriers for users. While there may be several toilets located in a public place, there may be accessibility and/or functionality issues which limit the amount and diversity of people who are able to use them.

⁶ Stone, L “Public toilet expert creates blueprint for how Australia can improve loo management 28 March 2021. Accessed 7/7/23. Available at: <https://www.abc.net.au/news/2021-03-28/public-toilet-guidelines-so-australia-can-improve-loo-management/100028866>

⁷ Webber, K. 2018, ‘We Need to Talk About Public Toilets’, The University of Queensland Policy Futures.

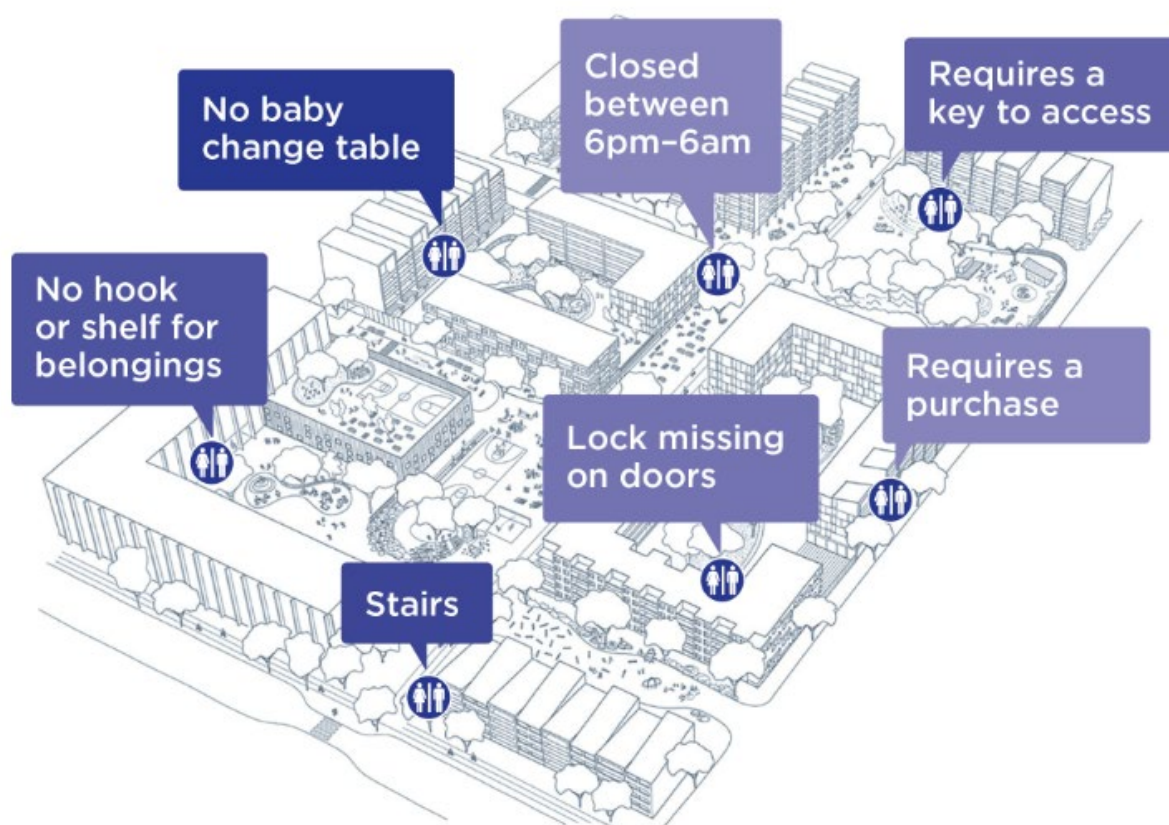


Figure 3 A closer look at public toilets⁸

Source: Webber

Importance of health and hygiene in amenities provision and management

Perceptions of hygiene, safety and accessibility of public toilets is strongly linked to how well they are managed and maintained.⁹ Cleanliness, safety and hygiene of public toilets remains a key priority for users, and conditions may affect their usability. Vandalism issues such as graffiti and damage to fixtures and fittings may further decrease the accessibility of amenities, resulting in them not serving a purpose. Regular maintenance can minimise impacts and ensure high standards of hygiene.

The COVID-19 pandemic has also changed the patterns of use surrounding public toilets, due to both restrictions of access and a heightened risk of infection in shared facilities. The National Collaborating Centre for Environmental Health has outlined several factors which may increase or decrease ones' likelihood of contracting COVID-19 or other highly contagious viruses from a public toilet facility, including length of use, physical distance between users, amenity options (e.g., hand soap dispenser, hand drying mechanism), ventilation, and cleaning schedules.

As there are many high-touch surfaces within public toilets, touchless amenities can decrease the risk of re-contamination after hand washing. Touchless hand wash dispensers and taps can significantly decrease re-contamination risk for users, but also decrease the frequency of cleaning required. However, there is recent research that indicates that the technology for touchless hand

⁸ *ibid.*

⁹ City of Ballarat, 2023 "Draft Public Toilet Strategy" City of Ballarat.

washers can result in inherent racial bias as they struggle to respond to darker skin tones.¹⁰ Touchless systems also often fail and require consistent ongoing maintenance.

Recommendations for public toilet operators to improve health and hygiene include:

- Augmentation of ventilation,
- Determination and advertisement of capacity limits,
- Provision of hand hygiene reminders, and
- Maintenance of amenity stock (e.g., handwash, paper towels).¹¹

Paper towels are also considered the safest option with regard to hand drying in decreasing transmission of COVID-19,¹² however, the use of paper towels is not sustainable as they are not always recyclable.¹³

Ensuring social diversity and inclusive facilities

Diversity and inclusion are important considerations in the planning and provision of public toilets. Cities across the globe have been making a move towards more accessible public washroom facilities. In the Canadian context, universally designed washrooms can come in the form of single-user washrooms, multi-stall washrooms, and change rooms. Benefits of universal washrooms include inclusivity for people with disabilities, families, and transgender and non-binary people, as well as increased privacy and safety, efficiency, and forward-thinking design.¹⁴

Australian research published by Griffith University in 2021 highlights that current design and provision of public toilets are failing many different population groups, including wheelchair users, trans and gender diverse people, parents and carers, and unhoused people.¹⁵ In another study, providing all-gender toilets in primary and secondary schools was shown in a recent study to reduce bullying, improve mental and physical health and address broader issues of inequality and inclusivity.¹⁶ This research suggests that universal design processes can help ensure that public toilets can be used by everyone.

Making space for gender diversity within public toilets has been the cause of moral panic in countries like Australia, the UK, and the USA, with conservative thinking producing unfounded fears surrounding the enablement of sexual predators.¹⁷

While all-gender bathrooms offer many benefits, some individuals fear that phasing out of sex-segregated toilets will make facilities less safe and suggest that they may be avoided by some women due to religious and cultural reasons¹⁸. Data gathered by the City of Sydney indicates that a

¹⁰ <https://reporter.rit.edu/tech/bigotry-encoded-racial-bias-technology>

¹¹ National Collaborating Centre for Environmental Health, 2020, 'Public washrooms in the time of COVID-19: Facility features and user behaviors can influence safety'. Posted on September 23, 2020. Available from: <https://ncceh.ca/resources/evidence-briefs/public-washrooms-time-covid-19-facility-features-and-user-behaviours-can> Accessed on: 27 October 2023

¹² Ibid.

¹³ Smith, B, 7 November 2018 'Paper towels or hand dryers: which is better for the environment or hygiene?' ABC News. Available at: <https://www.abc.net.au/news/science/2018-11-07/paper-towels-warm-air-jet-hand-dryers-environment-hygiene/10468580> Accessed on: 27 October 2023

¹⁴ HCMA architecture and design, February 2018, "Designing for Inclusivity- Strategies for Universal Washrooms and Change Rooms in Community and Recreation Facilities" City of Surrey

¹⁵ Webber, K 2021, "Everyone, everywhere, everyday: A case for expanding universal design to public toilets" Published Brisbane, Australia 2021

¹⁶ Francis et.al. "Gender-Neutral Toilets: A Qualitative Exploration of Inclusive School Environments for Sexuality and Gender Diverse Youth in Western Australia" Int J EnvironRes Public Health 2022.

¹⁷ Fileborn, B & Marshall, L. 2021, 'Increasing public toilet safety for gender-diverse populations', ArchitectureAU.

¹⁸ Taylor, A April 16, 2023. "The Sydney Council that wants to make toilets gender-neutral". Available from: <https://www.smh.com.au/national/nsw/the-sydney-council-that-wants-to-make-toilets-gender-neutral-20230413-p5d0bx.html> Accessed on: 27 October 2023

large proportion of people prefer single-sex restrooms, particularly women, older patrons, and those from multi-cultural backgrounds (noting that this data is from 2014 and may not be reflective of current attitudes). Recent evidence from the UK finds that those in support of single sex toilets are likely to reference issues with predatory behaviour/spying in toilets and family use.¹⁹

Support for different types of toilet provision was evident in this same research, particularly in relation to non-gendered toilets in addition to single sex toilets.

While converting disabled or female toilets into all-gender facilities is often cheaper than removing urinals in male toilets, this can exacerbate the inadequate provision of existing toilets for disabled and female populations.²⁰

There is a need to balance the safety and wellbeing requirements of all people in the design of public toilets.

Culturally diverse hygiene practices are another consideration for the inclusivity of public toilets. Patterns of usage and hygiene practices within public toilets are not uniform worldwide and differ significantly between Western and Eastern societies. Facilities and amenities such as 'squat latrines' and shattafs (water hose/sprayer) or bidets for cleansing are commonplace in other countries due to cultural and religious beliefs, but rare to come across in Australia. Economical solutions to provide inclusive toilet options include installation of shattafs and the provision of 'toilet converters' or a squat/step stool for "improved squatting experience while using the Western sitting toilets".²¹

Provision of sharps disposal facilities in public toilets is also important for inclusion and safety – they may be used for a number of reasons such as those with diabetes, and they must be kept out of waste and recycling systems to ensure safe disposal²².

As stated by the Rick Hansen Foundation, an internationally recognized charity focused on breaking down physical barriers, "Universal Design anticipates the needs of users now and well into their futures".²³

By focusing on their function, universally designed washrooms welcome everyone.

Disability inclusion best practice: Changing Places facilities

Changing Places facilities were introduced in Australia in 2014 and there are currently over 50 certified facilities across the country. Originating in the United Kingdom in 2006, Changing Places facilities are designed for people who require a hoist to use a toilet, and differ from standard accessible or disabled toilets as they include additional features such as an adult change table, hoist, shower, screens and large circulation spaces. Research has shown that Changing Places Facilities (also referred to as Accessible Adult Change facilities) are best located within a high use area, such as a shopping precinct or open space. Provision of a Changing Places facility is a requirement in new buildings of a certain class such as galleries, museums, performing arts centres or sports stadiums, as per the National Construction Code (NCC). There has been increasing interest in the provision of Changing Places facilities across both the private and government sectors, particularly in locations that attract regular crowds, such as regional sports and recreation facilities.

¹⁹ UK Government, 13 August 2023 'Toilet provision for men and women: call for evidence – analysis of responses received' – Available at: <https://www.gov.uk/government/calls-for-evidence/toilet-provision-for-men-and-women-call-for-evidence/outcome/toilet-provision-for-men-and-women-call-for-evidence-analysis-of-responses-received#analysing-responses-by-reading-of-support-for-different-types-of-toilet-provision> Accessed 13 September 2023

²⁰ Francis et.al. 2022 "Gender-Neutral Toilets: A Qualitative Exploration of Inclusive School Environments for Sexuality and Gender Diverse Youth in Western Australia" Int J Environ Res Public Health 2022.

²¹ Othman, Z. & Buys, L. 2016, 'Towards more culturally inclusive domestic toilet facilities in Australia', Frontiers of Architectural Research, vol. 5, issue 3.

²² Diabetes Australia 2023, "Safe disposal of sharps" Available from: <https://www.diabetesaustralia.com.au/resources/safe-sharps/> Accessed on: 27 October 2023

²³ McCannell, B 2023 "From where I sit: Busting Five Myths of Universal Design" Available from: <https://www.rickhansen.com/news-stories/blog/where-i-sit-busting-five-myths-universal-design> Accessed on 7 July 2023

“Changing Places enable many people with high support needs to enjoy the day-to-day activities that many of us take for granted, such as going to work, school or university, playing in the park, or attending cultural, sporting or social and family events... With the introduction of the NDIS – more people now have the support they need to be able to fully participate in social, recreational and economic activities. Changing Places continue to play a vital role in enabling this connection and interaction.”²⁴

Design features of Changing Places rooms include an automated door, ceiling hoist, accessible toilet and fittings, privacy screen, washbasin, change table, changing rails, clothes and towel hooks, sling hook, disposal bins, signage, shower and temperate control. In addition to providing an inclusive facility for adults with severe disabilities, the Changing Places facilities may also benefit the homeless and rough sleepers, as it provides a dignified and appropriate shower and cleaning opportunities in a private environment.

The provision of changing places facilities requires significant capital investment. Over the next 3 years (to 2026), the Commonwealth Government is investing more than \$32 million in helping to build more Changing Places facilities across Australia. The funding program is being implemented in tranches, with a focus on ‘build ready opportunities’.²⁵



Figure 4 Example of Changing Places facility at Bayside Council's Thomas Street Reserve Playground

Source: Bayside Council

Accessible facilities opening hours

Limited access to facilities prevents individuals from fully engaging in a space for fear of being unable to meet their regular needs. While cities around the world have taken steps to ensure their facilities are accessible, standard operating hours vary depending on location.

- In Sydney, Automated Public Toilets (APT) can be found in Hyde Park, Belmore Park, Wynyard Park, and Fitzroy Gardens.²⁶

²⁴ Changing Places, 2023 ‘Why Changing Places?’ Available from: <https://changingplaces.org.au/why-changing-places> Accessed on 7 July 2023

²⁵ City of Ballarat, 2023 “Draft Public Toilet Strategy”. City of Ballarat, 2023.

²⁶ City of Sydney ‘Public Toilets’ Accessed on 7 July 2023. Available at <https://www.cityofsydney.nsw.gov.au/public-health-safety-programs/public-toilets>

These stand-alone, barrier-free facilities are open 24 hours a day. The City of Sydney's 2014 Public Toilet Strategy notes that peak use of APTs occurs between 10am and 4pm, and at night between 8pm and 10pm.²⁷

- In Portland, Oregon, The Portland Loo® is a standard restroom style used in parks around the city.²⁸

All facilities are universally accessible, single user-washrooms, built to accommodate a wheelchair, bicycle, or stroller. These facilities are available during park hours and are subject to seasonal closing. In addition to public parks, there are five downtown loos that are open 24 hours a day.

- In 2018, the 'Berliner Toilette' was designed in consultation with several citizen groups, including persons with disabilities, seniors, and tourism operators.²⁹

Since then, the City of Berlin has unveiled 278 barrier-free, stand-alone toilets, of which 107 are equipped with an additional urinal and 103 with changing tables. Due to public vandalism, a nominal user fee was introduced in December 2021, however, 50 facilities within the city area remain free of charge. The operating hours of these facilities vary by location.

- In 2020, the Vancouver Parks Board adopted the Parks Washroom Strategy which strived to provide safe, clean, and accessible washroom facilities to enhance the park experience for all.³⁰

Universal washrooms can now be found in select public parks and are available 24 hours a day,³¹ in community centers during regular operating hours,³² and in schools during regular operating hours.³³

Best-practice family rooms

Family rooms offer a safe, private place for parents to feed, change, and care for their children while they are outside of their home. A family room should provide: easy pram access; a place to feed in privacy; comfortable seating; clean environment; nappy changing area; sink with hand drying facilities; and waste containers³⁴. Some also have a confined play area and smaller toilets for toddlers. They are commonly found in shopping centres and within small businesses, many of which

²⁷ City of Sydney 2014 'Public Toilet Strategy'. City of Sydney NSW

²⁸ Portland.gov, 'The Portland Loo'. Accessed on 7 July 2023. Available from: <https://www.portland.gov/parks/loo>

²⁹ Offentliche Toiletten Fur Berlin "Public toilets for Berlin". Senate Department for Mobility, traffic, climate, protection and the environment. Accessed on 7 July 2023. Available at: <https://www.berlin.de/sen/uvk/mobilitaet-und-verkehr/infrastruktur/oeffentliche-toiletten/>

³⁰ Vancouver Board of Parks and Recreation 2020 'Parks Washroom Strategy' 2020 Accessed on 7 July 2023. Available from: <https://vancouver.ca/files/cov/parks-washroom-strategy.pdf>

³¹ DeRoss, K March 23, 2021. "Flush with cash: Vancouver's \$645,000 public toilet raises eyebrows" Vancouver Sun. Accessed on 7 July 2023. Available from: <https://vancouversun.com/news/local-news/vancouvers-645000-public-toilet-raises-eyebrows>

³² Judd, A March 27 2015. "Vancouver community centre installs signs for Universal Washrooms". Global News. Accessed on 7 July 2023. Available from: <https://globalnews.ca/news/1907558/vancouver-community-centre-installs-signs-for-universal-washrooms/>

³³ MacLellan, J May 10, 2022 "NWSS set to pilot gender-neutral universal washrooms" Accessed on 7 July 2023. Available from: <https://www.newwestrecord.ca/local-news/nwss-set-to-pilot-gender-neutral-universal-washrooms-5354808>

³⁴ Penrith City Council 2023 "Parents rooms". Accessed on 7 July 2023. Available from: <https://www.penrithcity.nsw.gov.au/community-library/community/parents-rooms>

will display a 'Breastfeeding Welcome Here' sticker (available from the Australian Breastfeeding Association)³⁵.

When provided, they are generally co-located within other facilities such as community centres, libraries, museums, airports, and within community health centres.

Locally in Sydney, public family rooms can be found in various locations such as the Art Gallery of NSW³⁶ and Australian Museum.³⁷

Both are free to enter and are available during opening hours. There are several "private" family or parents rooms throughout Sydney CBD in shopping centre, such as the QVB and Westfield. The opening hours align with the hours that the retail stores are open (usually 9.30am to 7.00pm). While these contribute to the network of parents' rooms across Sydney, like all public facilities, access is limited to the opening times of the buildings within which they are located, which limits how diverse user groups may be able access them. It would be suggested that parents and family rooms are accessible at earlier hours, to be used by a wider range of users.

The City of Palmerston, NT has taken a pledge to make their buildings breastfeeding friendly and are encouraging local businesses to do the same.³⁸ The City has identified cleanliness, privacy, comfortable seating, and having space to move a pram as being of prime importance. Twenty-one (21) community partners have taken the pledge to make their spaces convenient and comfortable for breastfeeding mothers and their families.

The Greater Shepparton City Council, VIC, is also striving to be a breastfeeding friendly city.³⁹

The Council lists breastfeeding support services, breastfeeding friendly locations, and information on breastfeeding in the workplace for both mothers and employers on their website. However, the Council does not appear to have invested in any public family rooms to date or to our knowledge.

³⁵ Australian Breastfeeding Association 2023 "Breastfeeding Friendly Workplaces" Accessed on 7 July 2023. Available from: <https://www.breastfeeding.asn.au/community-workplaces/breastfeeding-friendly-workplaces>

³⁶ Art Gallery of NSW 2023 'Toilets and carers facilities'. Accessed on 7 July 2023. Available at: <https://www.artgallery.nsw.gov.au/visit/access/physical-access/#toilets-and-carers-facilities>

³⁷ Australian Museum 2023 'Location and Access'. Accessed on 7 July 2023. Available at: <https://australian.museum/visit/access/>

³⁸ City of Palmerston "Breastfeeding Friendly Spaces" Accessed on 7 July 2023 Available at: <https://palmerston.nt.gov.au/community/community-and-culture/health-and-wellbeing/breastfeeding-friendly-spaces>

³⁹ Greater Shepparton Council 'Breastfeeding' Accessed on 7 July 2023. Available at: <https://greatershepparton.com.au/community/childrens-services/maternal-and-child-health/breastfeeding>

3.0 Guiding principles

This section serves as a reference guide for future provision of amenities in both precincts.

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

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

The following principles articulate the value and benefits of providing inclusive access to public toilets in The Rocks and Darling Harbour and expand on the key factors to consider in the preparation of this Strategy and the Action Plan in **Section 12.0**.

- Distribute equitably for walkability
- Focus delivery on activity nodes
- Deliver wayfinding and signage to support ongoing use
- Support cities' economic success
- Ensure amenities are environmentally sustainable for the long term
- Integrated with heritage and character of the area
- Improve safety and privacy
- Ensure accessibility and inclusion.



Distribute equitably for walkability

- Easily locatable
- Provided in the appropriate number to respond to the volume of users
- This includes considering how far people need to travel to access them
- It is recommended that public toilets should be provided within 400m (5-10 minute walk) from any point within central Sydney, and within all village centres and major parks
- Coordinate signage and wayfinding to direct users to the nearest facilities to suit their needs - for example, accessible bathrooms, baby change facilities, all-gender toilets.



Focus delivery on activity nodes

- Provide at key activity nodes. Align with existing and anticipated demand (including events)
- Consider associated infrastructure and target user group(s)
- Maximise the utility of the existing network
- Identify opportunities for refurbishment, expansion, consolidation, or alternative operational models of current facilities, before recommending new facility locations
- Include management and provision of wayfinding signage, to increase utilisation of existing facilities



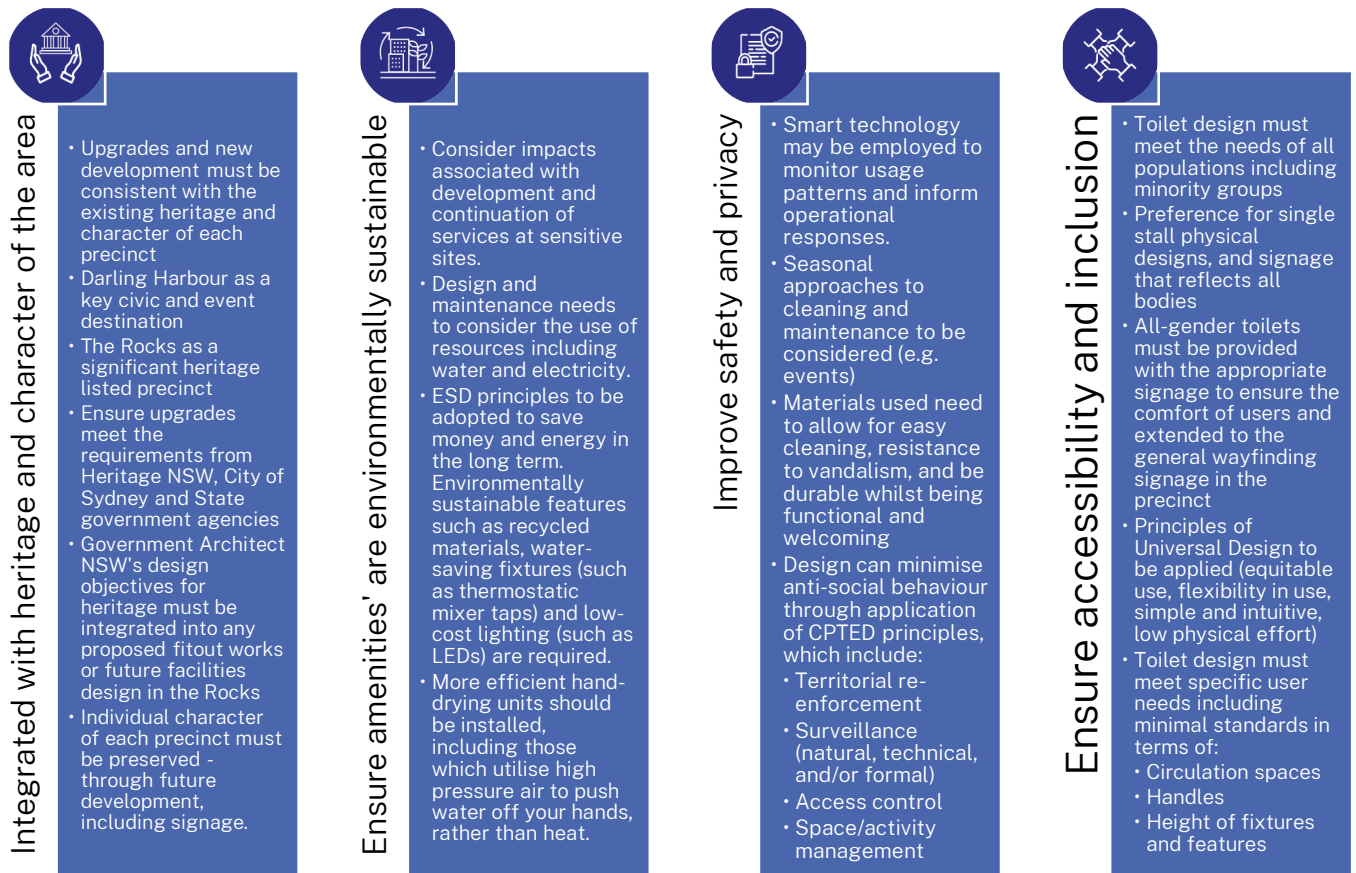
Deliver wayfinding and signage to support ongoing use

- Easy to find via signage, maps or apps
- Signage to include relevant information on opening hours, amenities and accessibility
- Apps can be used for feedback, maintenance requests, and allow users to be able to determine if a stall is available or occupied from a distance
- Wayfinding signage is vital to highlight existence of public toilets and the specific amenities they provide particularly in areas that experience a high volume of local, interstate and international visitors
- Include specific detail on signage such as directing those with specific needs through wayfinding (Changing Places, accessible / ambulant, baby



Support cities' economic success

- Locate toilets in areas that exhibit the highest levels of tourist visitation
- Availability and quality of toilets can influence patterns of visitation
- Population groups such as parents with young children, elderly people and those with a disability may be heavily influenced by the availability of amenities which cater to their needs
- Catering to these needs has flow on effects to local businesses - allowing people to spend more of their time in any location



Best practice provision - summary

When undertaking design and feasibility studies for new works and upgrades to existing facilities:

- Incorporate a comprehensive safety and CPTED review
- Undertake an environmental sustainability design (ESD) review to understand how delivery and operation can occur in a more sustainable manner. Preference low maintenance, low waste fittings, fixtures and materials
- Consider feelings of safety and comfort for minority groups including those with specific amenity needs, the elderly, women, girls, the LGBTQI+ community, multi-cultural groups and gender diverse people
- Consider character and heritage (where appropriate) of the buildings and surrounding area
- Audit surrounding existing signage and wayfinding to understand ease of navigating to and from amenities, particularly for those with specific access requirements.

Amenities Audit and Assessment

4.0 Amenities' audit approach

The methodology used for this Strategy is largely qualitative as shown in **Figure 2**, with some reference to quantitative data in the form of visitation numbers to each precinct.

Residential population data and demographics are not relevant to this study as local residents are unlikely to use existing public facilities in place of their own home facilities. Data on visitation numbers and trends, however, are useful in determining whether current provision will meet future demand. For these reasons, the Strategy has relied on geographic analysis and a physical audit of existing facilities as the primary information sources for the Action Plan.

The physical audit of each precinct has been translated into a matrix for each precinct (Refer **Sections 7.0 and 10.0**) which outlines the attributes and overall condition of each facility including:

- Number of toilets
- Management/ownership
- Typology (i.e., public, or publicly accessible)
- Opening hours
- Accessible bathroom provision
- Gender provision
- Sharps disposal
- Incorporation of family rooms
- Incorporation of baby change tables

Geographic analysis of the existing public toilet supply has been based upon the City of Sydney recommendation of 400m access within Central Sydney, which enables people to access a public toilet within 5-10 minutes' walk.

Each facility was also assessed against the following categories related to condition:

Table 1 Assessment categories for audit

Source: Ethos Urban

Category	Legend
Wayfinding	<i>Good</i> – sign on path/street and door <i>Fair</i> – sign on door only <i>Poor</i> – no sign/inaccurate/poor condition
Interface	<i>Good</i> – braille, clear indication of facilities <i>Fair</i> – does not indicate all facilities <i>Poor</i> – no indication of facilities
Condition	<i>Good</i> – contemporary and clean <i>Fair</i> – dated but clean or contemporary but unclean <i>Poor</i> – dated and unclean
Lighting	<i>Good</i> – adequate during day and night <i>Fair</i> – adequate during only day/only night <i>Poor</i> – inadequate during day and night

Refer to **Sections 7.0 and 10.0** for the full Audit Matrix for each precinct.

5.0 Study area – The Rocks | Tallawoladah

Precinct definition and geographic context

Located on the southern shore of Sydney Harbour and known as Tallawoladah and Tarra in local Aboriginal language, The Rocks is a place of exceptional cultural significance to the people of Sydney, New South Wales and Australia.

Extending from Grosvenor Street to the south through to Dawes Point to the north, The Rocks precinct is bound to the west by the Cahill Expressway / Western Distributor and Circular Quay to the east. It is the place of early contact between the First Fleet and the Gadi people and it is the site of the earliest structures of the colony and the community. Within its buildings and its landscape are untold stories of generations of people.

It is a place that is inherently connected to the past, and it is this connection to people, stories, culture, and histories that makes it special.

The heritage and archaeological significance of The Rocks has made it a unique place of discovery attracting millions of visitors every year and its character and stories are key reasons people and businesses are drawn to the precinct.

The Rocks is located between the significant sites of the Opera House and the Harbour Bridge. It is visually characterised by a shop-lined high street with an intricate pattern of corner shops and local pubs, by the pattern and scale of waterfront warehouse buildings, and by fine-grain smaller spaces. The high levels of heritage importance and naturally steep topography present significant accessibility challenges to visitors wishing to explore the precinct.

The atmosphere and attractions within The Rocks are the largest drivers of overall visitor satisfaction (PMNSW Brand and precinct research findings, August 2023, EY Sweeney). Supporting the experience of the public domain and character of The Rocks through the delivery of amenities infrastructure is key to establishing repeat visitation.

The Rocks is subject to Conservation Management Plans (CMPs) that support the ongoing protection and maintenance of heritage items across the precinct. These will need to be considered as part of any future works.

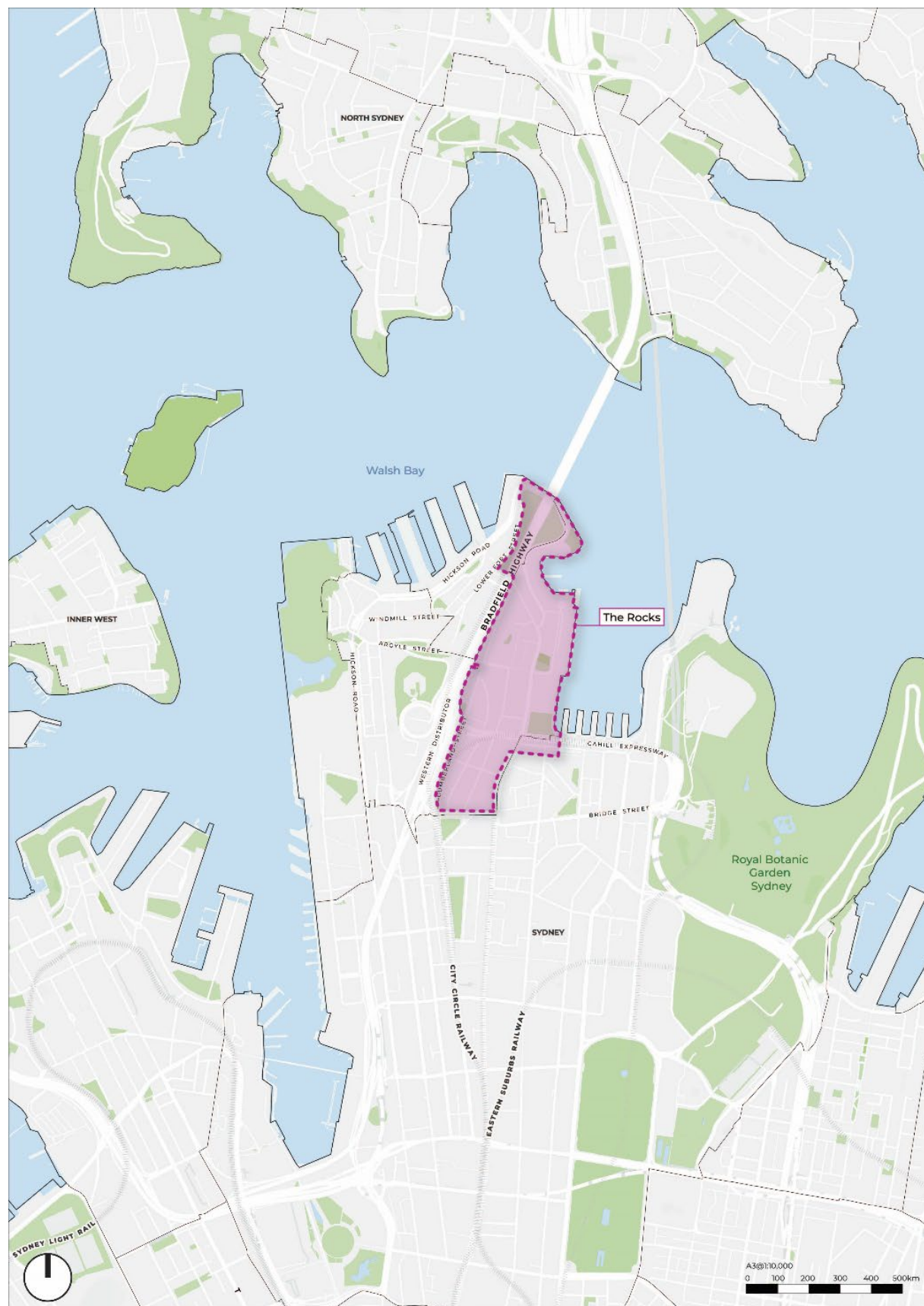


Figure 5 The Rocks location

Source: Google Maps / Ethos Urban

Public toilets have been historically scattered through the precinct, and public conveniences and streetside urinals were once common on the streets of Victorian era Sydney.

A sole survivor – the 1890s cast iron pissoir shown in **Figure 6** still exists on George St, Miller's Point. It was originally located at Observatory Hill but was relocated in 1975.



Figure 6 1890 men's urinal at George St, Miller's Point, owned and managed by the City of Sydney

Source: <https://www.visitsydneyaustralia.com.au/george-street-north.html>

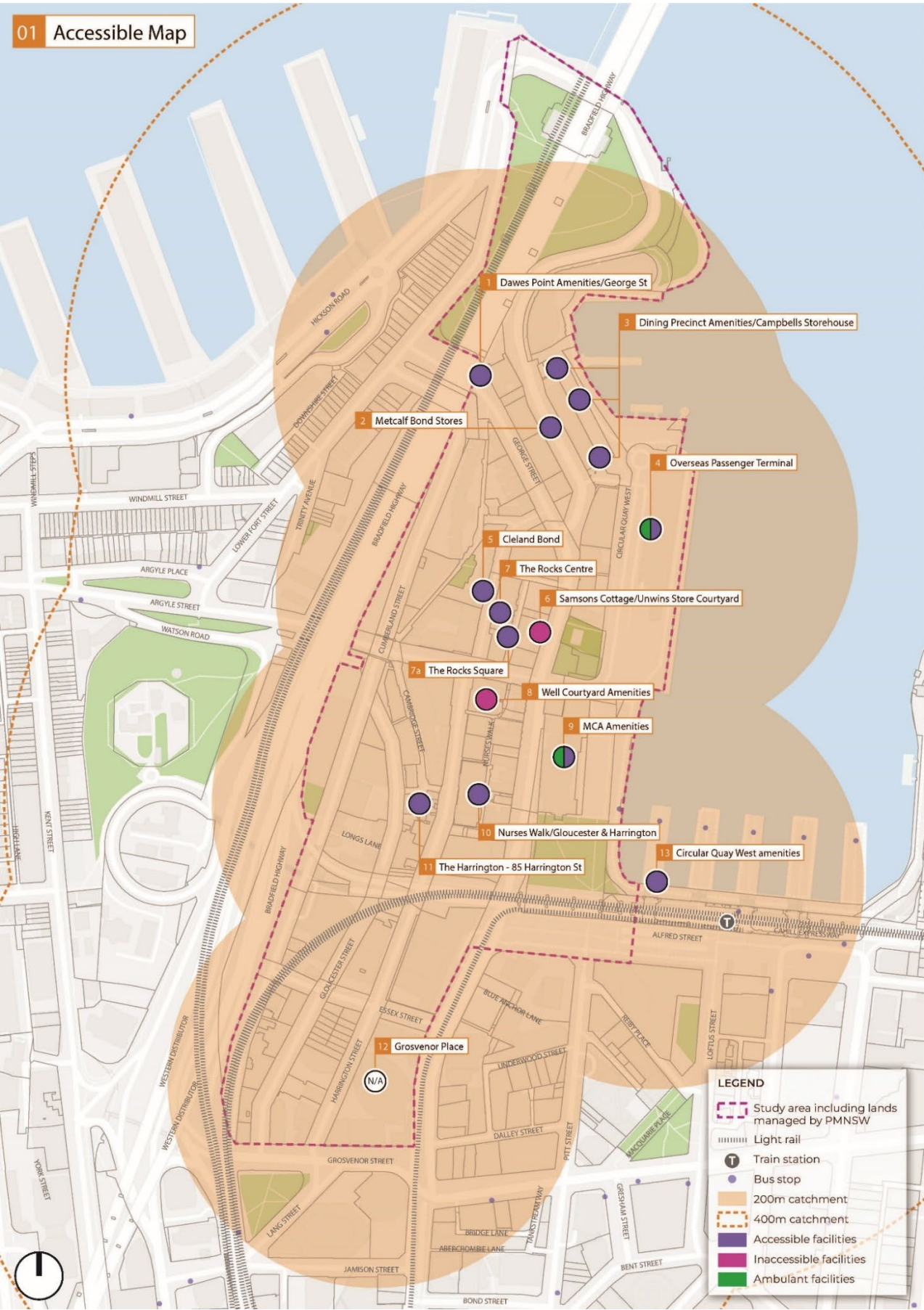


Figure 7 The Rocks spatial distribution of existing amenities (Accessible/Not Accessible)

Source: Ethos Urban



Figure 8 The Rocks spatial distribution of existing amenities (Unisex / All-gender)Source: Ethos Urban



Figure 9 The Rocks spatial distribution of existing amenities (Change Facilities)

Source: Ethos Urban

6.0 Supply audit and distribution – The Rocks

The following section provides a summary of the amenities audit for The Rocks precinct.

Supply summary

The Rocks has sixteen (16) public amenities facilities of varying condition, cleanliness, safety (CPTED) compliance, and wayfinding/signage. These differences make the facilities somewhat inconsistent in terms of their appearance, potentially leading to inabilities in identifying if they are public, as well as difficulties in locating them from the public realm. Of the public amenities provided, one was not able to be assessed (Grosvenor Place) at time of the site visit. There are public amenities in close proximity to The Rocks at Circular Quay West, Sydney Place and Gateway. CQ West were included in the audit due to them being fully public amenities and also being located right on the precinct boundary. However, Sydney Place and Gateway amenities have not been included in the assessment as they are within developments and further from the Rocks precinct boundary. They do, however, due to their proximity to the Rocks contribute to the provision of amenities for visitors to The Rocks.

Most facilities have more than two (2) cubicles or toilets for each male and female gendered facility, however it is noted that the best quality facilities in terms of supply, diversity and accessibility characteristics are co-located with other uses (for example, inside the MCA). The only Family Room is also provided in the MCA, though it is noted there are combined accessible and baby change facilities in other locations (for example Circular Quay Train Station – at time of site visit, the baby change room was locked with a sign noting they can be accessed ‘on request’). It is noted Circular Quay Train Station is planned for renewal, with new public amenities proposed.

The majority of public amenities in the precinct are designated as ‘public’ (exclusively for public toilet use, and generally not co-located) toilets, and have combined accessible, unisex, and baby change facilities. There are two (2) facilities that have no accessible or unisex facilities (Well Courtyard and Unwin’s Store Courtyard).

Approximately 30% are considered to have generally ‘poor’ wayfinding. Approximately half of the facilities have ‘poor’ safety / CPTED compliance with only two facilities having ‘good’ CPTED compliance.

Key gaps and opportunities

The primary issue observed afflicting toilet provision in The Rocks is the irregularity of its topography, and the limitations of heritage-listed sites. This presents barriers to upgrading accessibility for several toilet facilities, such as the Well Courtyard and Unwin’s Courtyard.

These barriers include narrow access points, stairs and unstable footing (cobblestone paths as a barrier to wheelchairs for example). These same toilets are also inhibitive to all genders, as they do not explicitly provide all-gender facilities. If these specific issues cannot be addressed in these locations, general wayfinding signage in the vicinity must indicate where alternative toilets are located, which can serve the specific needs of people with limited mobility, parents and families, and other needs, such as all-gendered facilities.

There is a need to significantly improve interface signage across the precinct, as the majority of baby change room provisions are not explicitly marked, but rather hidden inside the accessible unisex cubicles or within the male/female facilities separately. This is likely to decrease the utilisation of baby change tables. It is also suggested that all unisex facilities are re-marked as ‘all-gender, representing best-practice and consistent with the MCA facilities. An all-gender toilet is an inclusive provision for use by persons of any gender, which benefits population groups who identify

themselves as transgender, genderqueer, intersex (or any identity outside the boundaries of male/female).⁴⁰

Improved lighting and activation of areas adjacent to some of the facilities, particularly at night, should be undertaken, in an effort to improve the safety of the amenities.

The Rocks precinct contains a good coverage of public toilet facilities geographically, however, this is disadvantaged by gaps in wayfinding and interface signage, and several physical barriers to accessibility. This is highlighted in The Rocks Heritage Access Strategy (Draft, McIntosh and Phelps, 2020), with an extract below.

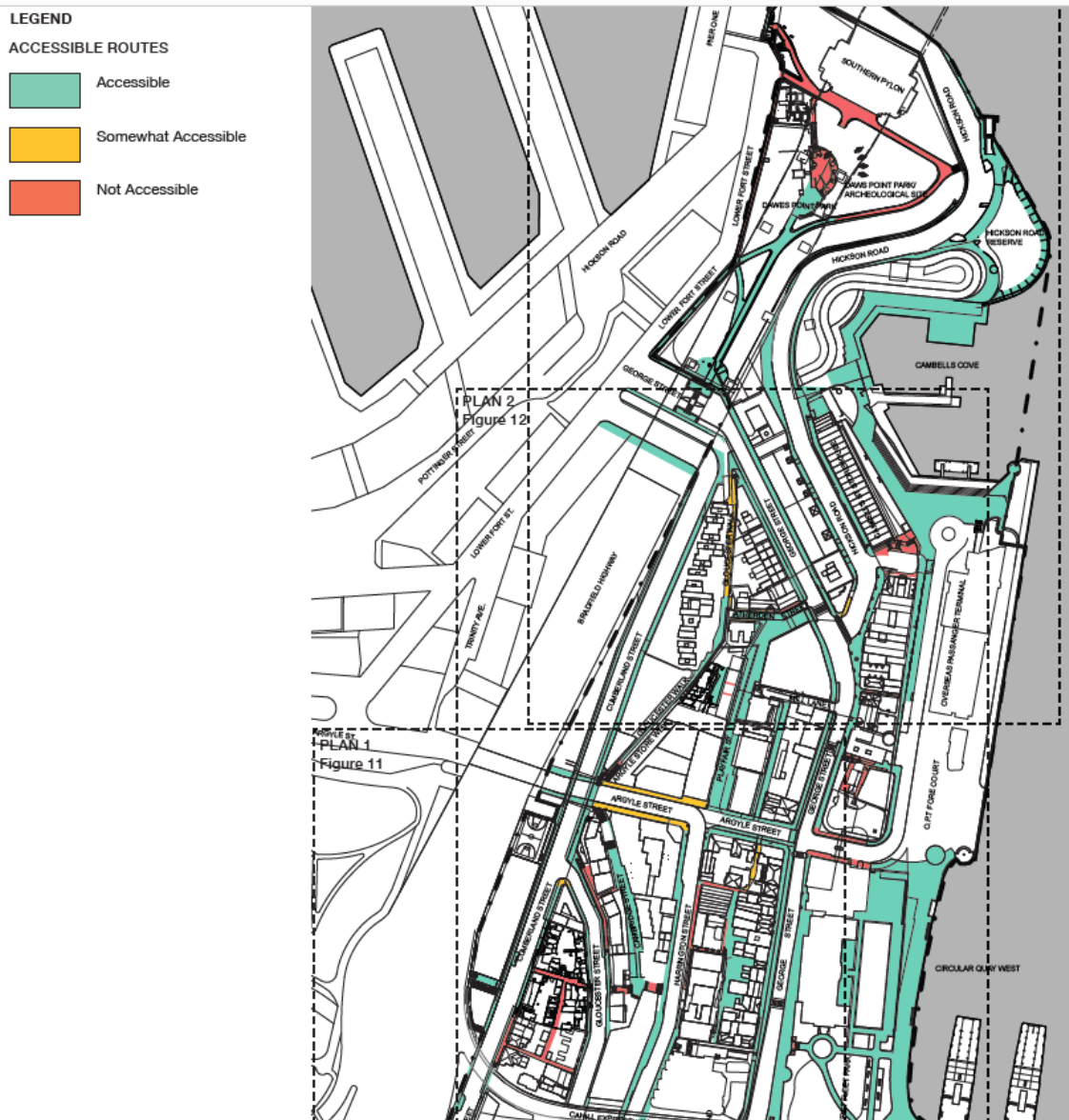


Figure 10 Accessibility Map – The Rocks Heritage Access Strategy (draft)

Source: McIntosh and Phelps

In addition to upgrades to the existing public access to Cleland Bond building, including a new ramp at Level 4 from Gloucester Walk to improve the accessibility to the facility, the City of Sydney has approved new APTs throughout the LGA, with one proposed near to The Rocks precinct at corner of

⁴⁰ Cowell, T, Equal Access Consultants, February 1 2017 'Why Can't I Have a Unisex Ambulant Toilet', Accessed on: 2 November 2023 from <https://www.disabilityaccessconsultants.com.au/cant-unisex-ambulant-toilet/>

Alfred Street and George Street (24/7) to replace one that was removed during the construction of the light rail.⁴¹

The prominent location of The Rocks Square presents an opportunity to provide a Changing Places facility and/or a Parents' / Family Room, which would inclusively respond to the community's needs at a location that experiences a high number of visitors, including tourists. Further, the highly accessible location of the Overseas Passenger Terminal facility presents an opportunity to enable greater utilisation through extended opening hours (i.e. outside terminal operation). The majority of public toilets close at 9 or 10pm, with only two facilities in the precinct open 24 hours a day.

⁴¹ City of Sydney, 2023 "New automatic public toilets". Accessed on 3 November 2023 at <https://www.cityofsydney.nsw.gov.au/improving-streets-public-spaces/new-automatic-public-toilets-2021-22>



7.0 Audit matrix and summary – The Rocks | Tallawoladah

- Existing public toilet facilities in The Rocks are quite densely located, with the majority of facilities located within less than 200m of each other. The toilets are distributed equitably across the precinct, with little room to provide additional facilities. Walkability and accessibility across The Rocks is complex, with topography and level changes, small laneways and uneven surfaces including heritage listed sandstone and stone footpaths. This distribution both meets and succeeds best-practice public toilet provision of 400m.
- Public toilets within The Rocks are effectively located next to key visitor destinations, such as The Rocks Visitor Centre, the MCA, the Overseas Passenger Terminal (OPT), dining precincts, Circular Quay Train Station and other tourist attractions. Whilst well situated, the OPT facilities appear only to be open while the terminal is in operation. As its operation is not daily, and rather aligned with cruise ship arrivals, this leaves the facility significantly underutilised.
- Wayfinding signage in The Rocks ranges from ‘fair’ to ‘poor’. This means that signage is largely only found at the entrance of public toilets, rather than on streets and thoroughfares throughout the precinct which would direct visitors to them from a distance. In some cases, signage is dated, in poor condition, or excluding of some population groups, particularly minorities. Interface signage also presents some issues. In most cases, where there are baby change facilities, there is a lack of signage which would indicate so. These amenities are often located within the unisex accessible cubicle (where provided) and would only be discovered if a patron were to enter that cubicle.
- Freestanding signs throughout the precinct provide directions to some facilities, but not all available facilities are shown on these signs.
- While there is a considerable supply of standard toilets, including regular accessible toilets and those with baby change amenities, there is a lack of other typologies to cater to all population groups. This includes adult change facilities (or Changing Places).
- There are also minimal inclusions made for all genders, with most toilets offering a unisex accessible toilet only – this may not feel appropriate/comfortable for some individuals. The MCA facilities are an exception to this, providing ‘all-gender’ toilets.
- Water saving and other ESD initiatives were not observed in the area’s facilities. Minimal natural light in most of The Rocks facilities is possible due to the locations which are largely within other older buildings. There may be heritage constraints in upgrading some of the facilities, given their location in heritage buildings.
- All toilet facilities offer adequate privacy to ensure the comfort of users. Lighting, however, differs greatly between facilities and hours of the day. It was noted that during the evening audit many facilities had poorer lighting, and significantly lacked activation, with some allowing for the possibility of entrapment (Cleland Bond, The Rocks Visitor Centre, and The Harrington – 85 Harrington St).
- The majority of public toilets close at 9 or 10pm, with only two facilities in the precinct open 24 hours a day.
- All toilet facilities were found to be clean and well-maintained. While the appropriate hygiene amenities were provided in all facilities, sharps disposals were uncommon (only one (1) public toilet contains a sharps disposal). Most facilities were contemporary, with no need to update fit outs or finishings, while some were considerably dated (Unwin’s Courtyard, Well Courtyard).

Table 2 The Rocks Audit Assessment Matrix

Source: Ethos Urban

#	Description	# of toilets*			Management	Typology	Opening hours	Accessible	Change facilities	Gender provision	Sharps disposal	Wayfinding	Interface	Condition	Lighting	CPTED Summary
		M	F	Unisex												
1	Dawes Point/George St	3	3	1 (acc)	City of Sydney	Public	24hr on sign (but they were closed at night)	Accessible (Unisex)	Baby change table	Unisex or gender neutral	-	Fair	Good	Good	Good	Isolated, closed at night, poor lighting.
2	Metcalfe Bond Stores	4	4	1 (acc)	PMNSW	Public	Closes at 6pm (Hickson road entrance remains unsecured)	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Poor	Good	Fair	Fair	Minimal activation, unsafe, but linked to bar
3	Dining Precinct /Campbells Storehouse	1	1	6 (1 x acc)	TBC - Tenant	Public	Closes at 10pm	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Poor	Good	Good	Good	Affiliated with restaurants, so activated until late. Braille on signage.
3a	Dining Precinct /Campbells Storehouse (Northern)	1	1	6 (1 x acc)	TBC - Tenant	Public	Closes at 10pm	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Poor	Good	Good	Good	Affiliated with restaurants, so activated until late. Braille on signage.
3b	Dining Precinct /Campbells Storehouse (Southern)	3	3	1 (acc)	TBC - Tenant	Public	Closes at 10pm	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Poor	Good	Good	Fair	Poor wayfinding
4	Overseas Passenger Terminal	0	0	2 (1 x acc)	Ports	Publicly accessible	6am to 7pm	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Fair	Good	Fair	Fair	Street access enables safer experience
5	Cleland Bond	0	0	1 (acc)	TBC - Tenant	Publicly accessible	Office hours to 10pm	Accessible (Unisex)	No	Unisex or gender neutral	No	Poor	Fair	Good	Good	Entrapment potential and no activation
6	Unwin's Store Courtyard	3	3	0	PMNSW	Public	Variable lock up times 6.45am-6.45pm + 2.00am for tenant access	No	No	Men and Women	No	Fair	Poor	Fair	Fair	Good during the day as active uses around. Stairs to Men's. No signage to George St.
7	The Rocks Centre (Visitor Centre)	3	3	1 (acc)	CBRE/PMNSW	Publicly accessible	Closes at 10.30pm	Accessible (Unisex)	Baby change table	Unisex or gender neutral	no	Good	Good	Good	Fair	Entrapment potential at evening. Half locked. Lack of food traffic.
7a	The Rocks Square	3	3	1 (acc)	CBRE/PMNSW	Publicly accessible	Closes at 10.30pm	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Good	Good	Good	Fair	Entrapment potential at evening. Half locked. Lack of foot traffic.
8	Well Courtyard	1	1	0	PMNSW	Public	Closes at 10pm	No	No	Men and Women	-	Fair	Poor	Fair	Good	Good during the day as active uses around. Wayfinding is poor. Night would be unsafe.
9	Museum of Contemporary Art	5+	5+	2	MCA	Public	Closes at 10pm, reopens at 5am	Accessible (Unisex)	Parent's room	Unisex or gender neutral	Fair	Good	Good	Good	Good	Only open during MCA opening hours
10	Nurses Walk / Gloucester and Harrington	0	0	1 (acc)	Tenant	Publicly accessible	Closes at 10pm, reopens at 5am	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Fair	Fair	Good	Good	Entrapment potential, minimal foot traffic
11	The Harrington – 85 Harrington St	1 (Amb)	2 (1 Amb)	1 (acc)	PMNSW	Public	24hr	Accessible (Unisex)	Baby change table	Unisex or gender neutral	Yes	Good	Fair	Good	Good	Minimal foot traffic; lift > stairs required
12	Grosvenor Place		N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A					N/A
13	Circular Quay West Train Station **	9	9	0	Sydney Trains	Publicly accessible	Closes at 10pm, opens at 6am	Accessible (1 x M; 1 x F)	Baby change table 'On request'	Men and Women	No	Fair	Fair	Fair	N/A	May be unsafe in evenings due to location. NB: Renewal planned

*For the purposes of this assessment, a ‘toilet’ also includes a urinal

** Circular Quay West Train Station Amenities were included because they located right on the boundary to The Rocks and are a fully public facility

8.0 Study area – Darling Harbour | Tumbalong

Precinct definition and geographic context

Extending from the southern edge of King Street Wharf in the north, through to Haymarket in the south, along the western edge of Sydney CBD, Darling Harbour is a recreational and entertainment destination that supports a diverse range of places, uses, activations and events.

Sydney coastal clans utilised this area, now known as Darling Harbour, and its abundance of resources in accordance with their traditional customs and rituals. The site was a part of a broader cultural landscape and cultural area, inclusive of ritual and ceremonial practices that occurred on this country for thousands of years.

During the 1980s, Darling Harbour was radically transformed from an industrial and maritime port in a state of decline to an international recreational and entertainment destination. Despite the radical and continuing transformation, Darling Harbour retains a significant and diverse range of heritage and culture. These include maritime structures, industrial features and infrastructure such as the former Hydraulic Pumping Station, Pyrmont Bridge and the former Goods Rail Line, alongside cultural and recreational features such as a carnival carousel, water sculptures and the Chinese Garden of Friendship.

Darling Harbour is currently experiencing significant revitalisation, delivering a new mix of residential, commercial, retail and enhanced public domain. This redevelopment has and will shift the role of Darling Harbour and its physical and legible relationship with surrounds. As the precinct evolves, the public domain spaces and infrastructure will need to continue to support the use of and visitation to the precinct.

A large proportion of visitation to the precinct is for cultural events and 46% of visitors are families. (PMNSW Brand and precinct research findings, August 2023, EY Sweeney). The food and beverage offering also continues to bolster visitation to the precinct, however recent research highlights that “value is a key consideration of Sydneysiders, and may be a barrier for some who would otherwise visit”. The provision of high-quality public spaces and amenities, including family rooms are key to ensuring that the precinct can support and attract diverse visitation.

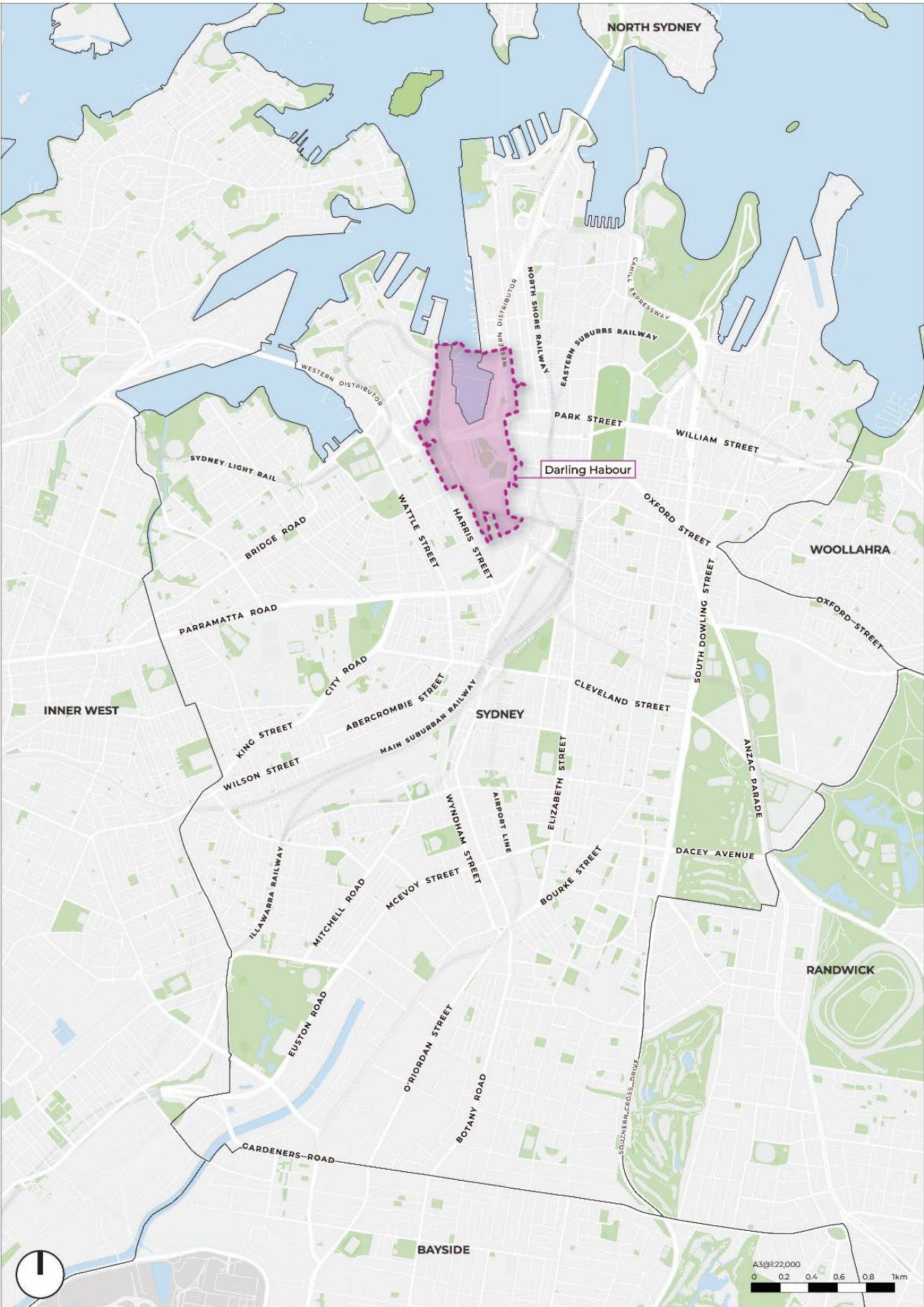


Figure 11 Location of Darling Harbour precinct

Source: Google Maps / Ethos Urban

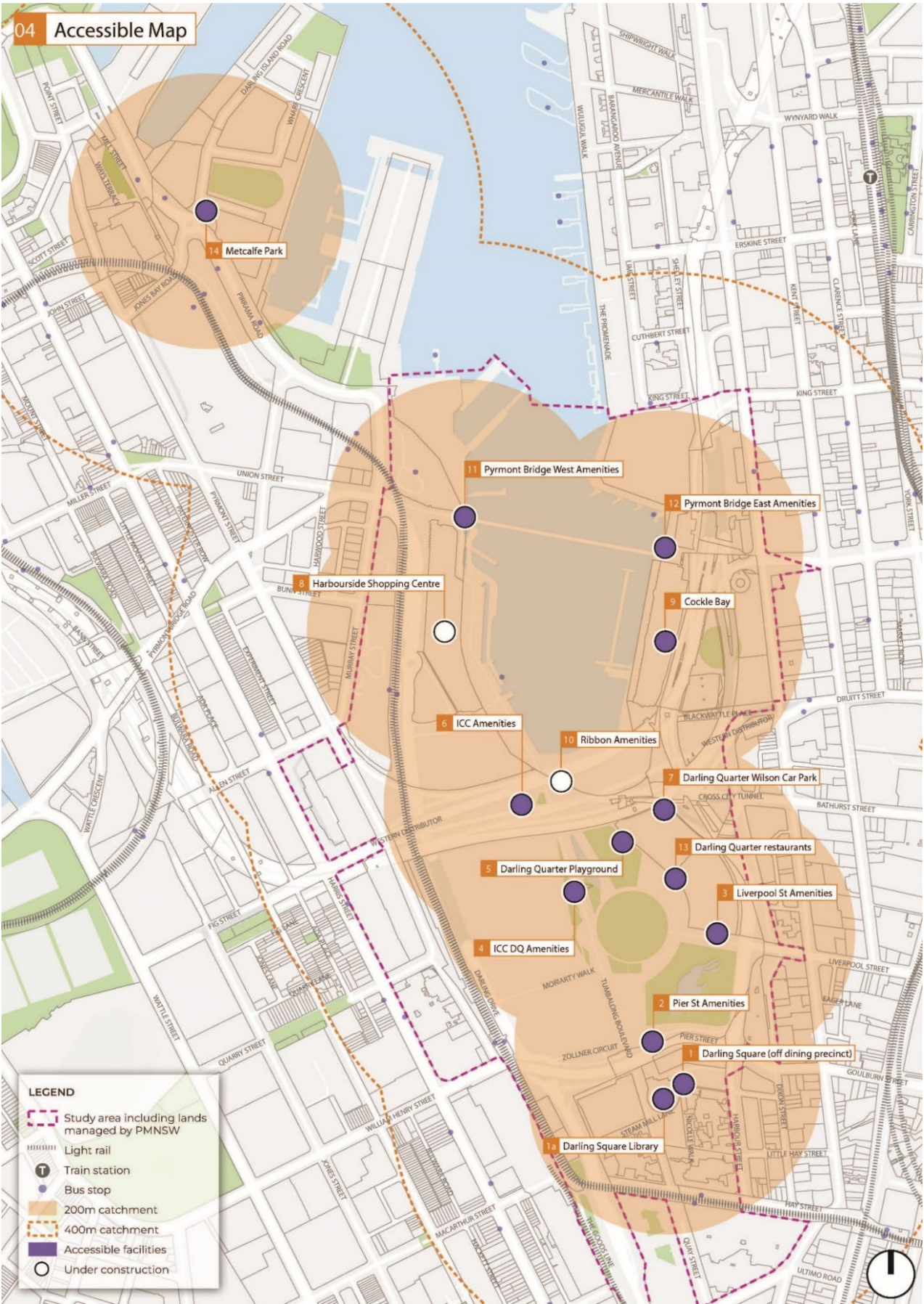


Figure 12 Darling Harbour spatial distribution of existing amenities (Accessible/Not Accessible)

Source: Ethos Urban

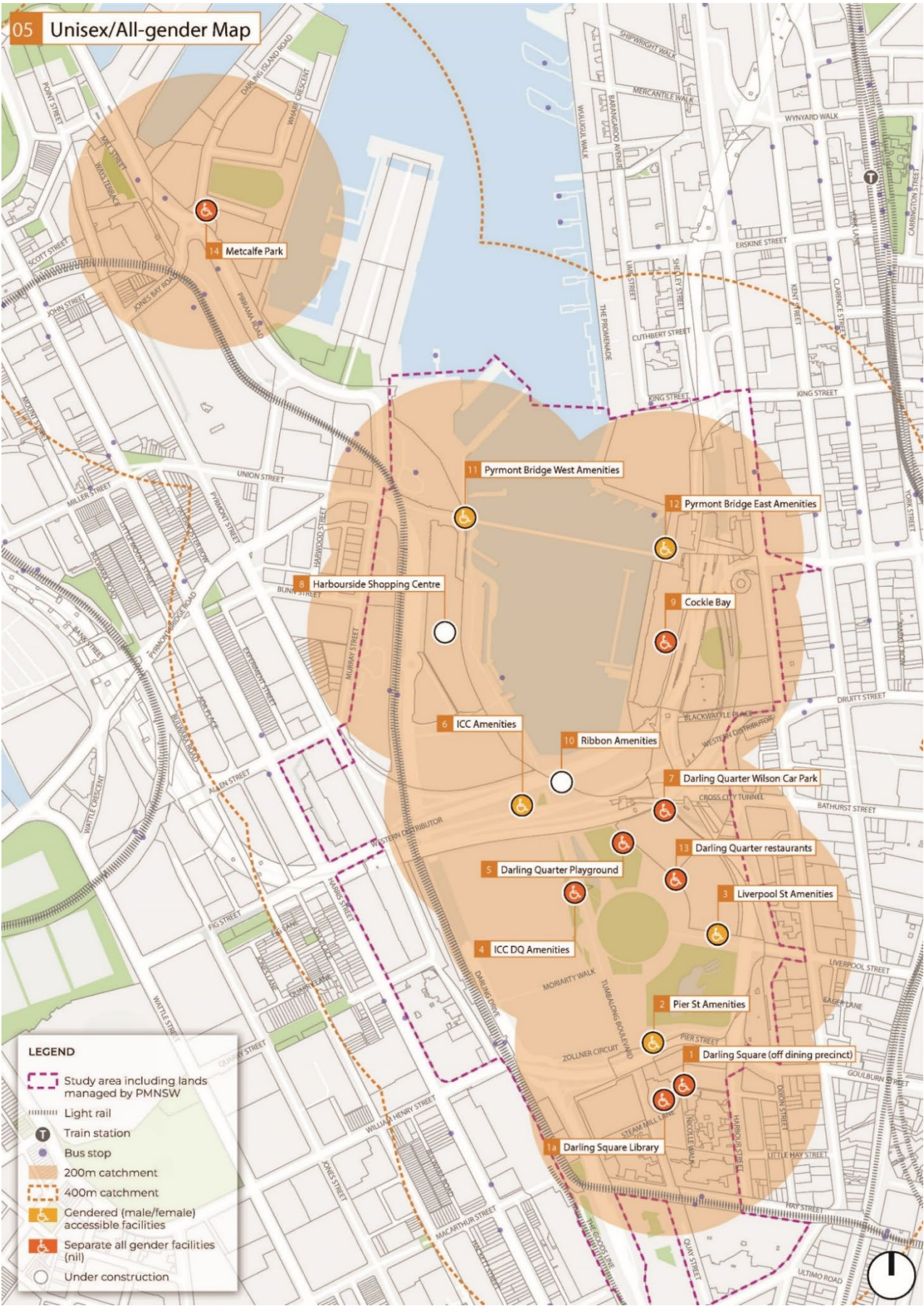


Figure 13 Darling Harbour spatial distribution of amenities (Unisex/All-gender)

Source: Ethos Urban

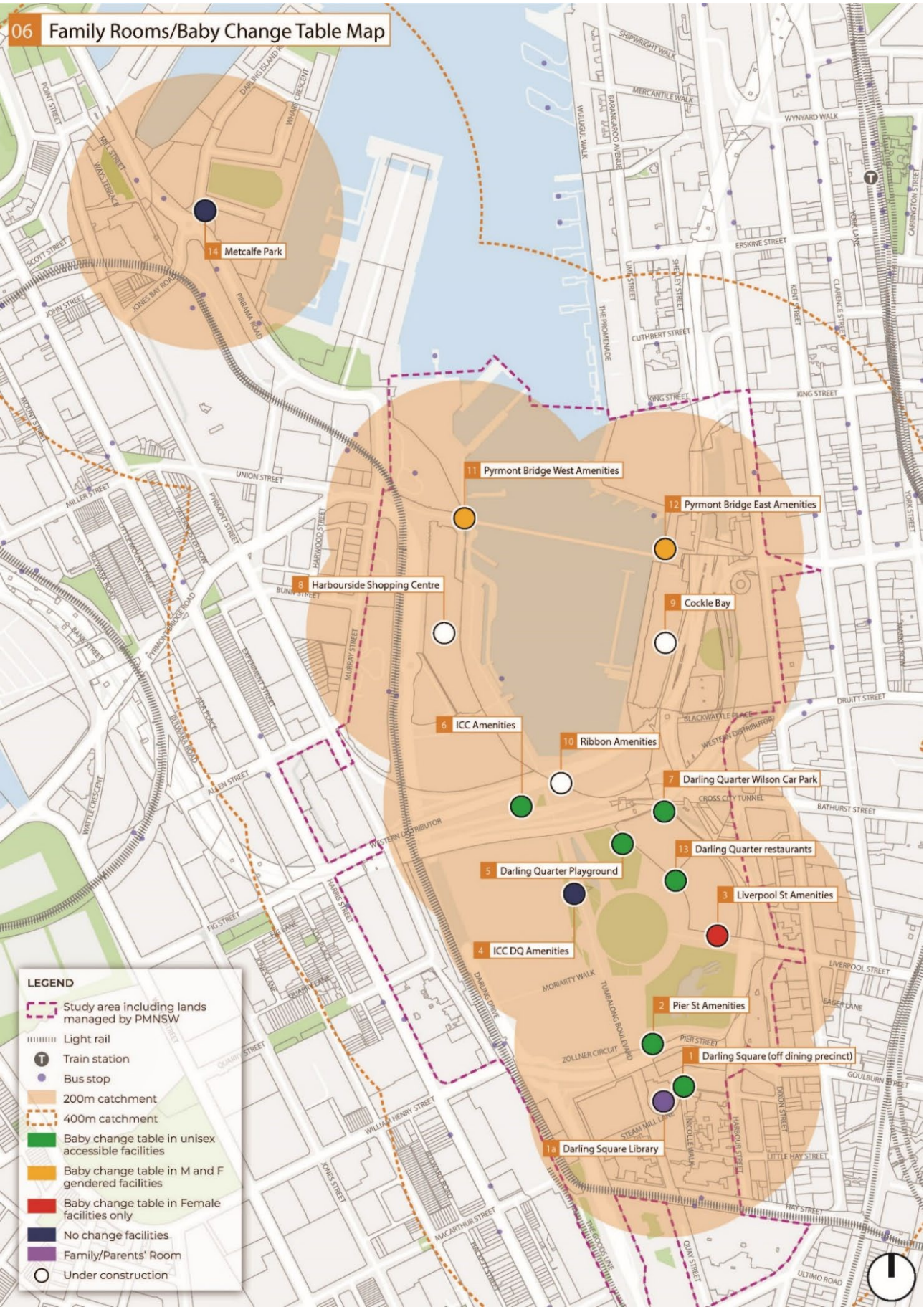


Figure 14 Darling Harbour spatial distribution of amenities (Change Facilities)

Source: Ethos Urban

9.0 Supply audit and distribution – Darling Harbour

The following section provides a summary of the amenities audit for the Darling Harbour precinct.

Supply summary

The existing public toilet facilities and characteristics as audited in Darling Harbour are outlined on the following pages. In summary, fifteen (15) facilities were audited, with the following key findings:

- Accessible facilities are available at all amenities, usually also designated as the ‘unisex’ bathroom with only one (Darling Harbour Theatre) using language such as ‘gender-neutral’ on their signage. BCA compliance varies due to the gendered nature of some facilities.
- Activation in the precinct due to the surrounding dining activities is more evident, and signage and wayfinding much more consistent and useful as compared to The Rocks.
- Most contain more than a single bathroom except for Darling Quarter Playground (noting it is earmarked for upgrades). Approximately half of the facilities are public, with the other half deemed as publicly accessible (co-located with other uses).

The Darling Harbour precinct contains several planned facilities, such as those that are to be provided in the Harbourside development. The future Cockle Bay redevelopment includes 13 male and female WCs, a unisex/accessible toilet and a family room on the retail podium level. Harbourside and the Ribbon development – which is currently under construction – are also set to provide new public toilets, including both male and female amenities, as well as a dedicated family room with private cubicles within. Public toilet facilities are proposed as part of the playground extension to the north of the existing Darling Quarter Playground.

The redevelopment of the Harbourside Shopping Centre is under construction and will comprise public amenities as part of the retail component at ground floor level and the public domain works with public amenities proposed. Temporary facilities will be erected during events as part of the Events Management Plan.

Key gaps and opportunities

Darling Harbour has a good coverage of public toilets geographically, however, this is disadvantaged by poor wayfinding and amenities signage. Through a thorough improvement of general wayfinding signage around the precinct, the location and amenity of existing facilities can be better understood by members of the public, and thus increase the utilisation of existing facilities.

Existing public toilets are well located next to key activity nodes and tourist attractions such as the ICC, Tumbalong Park, Darling Quarter, Darling Square and the Chinese Garden of Friendship. However, there are locations in Darling Harbour (Pier Street, Liverpool Street) that lack pedestrian foot traffic, casual surveillance, and activation, presenting safety issues, particularly at night, for users of these public toilets.



Figure 15 Entrance to Darling Square off dining precinct facilities.

Source: Ethos Urban

Existing public toilet facilities in Darling Harbour are quite densely located, with the majority of facilities located within less than 200m of each other. Facilities are contemporary, with little need to update fitouts or finishes. The toilets are distributed equitably across the precinct, with little room to provide additional facilities. This distribution both meets and exceeds the City of Sydney standard of 400m.

There is a need to significantly improve interface signage across the precinct, as the majority of baby change room provisions are not explicitly marked, but rather hidden inside the accessible unisex cubicles. This is likely to decrease the utilisation of this amenity. Each facility should re-mark their unisex bathrooms as ‘all-gender’.

The Darling Quarter Playground is a highly activated location in the precinct, with minimal public toilet provision to accommodate for the number of parents that would be likely to use the playground. The current facility features a singular toilet, with a baby change facility within the same cubicle. Due to the high activation of this area, it is likely that current provision does not meet demand, particularly when considering the needs of parents with children. There is an opportunity to improve facilities in this location, including the provision of a Changing Places facility.

It was noted that during the evening many facilities had poor lighting, and significantly lacked activation, with some allowing for the possibility of entrapment (ICC Darling Quarter Amenities).

The majority of public toilets close at 9 or 10pm, with only one facility in the precinct open 24 hours a day.

Audit matrix and summary – Darling Harbour | Tumbalong

- Existing public toilet facilities in Darling Harbour are quite densely located, with most facilities located within less than 200m of each other. The toilets are distributed equitably across the precinct, with little room to provide additional facilities. This distribution both meets and exceeds the City of Sydney standard of 400m.
- Existing public toilets are well located next to key activity nodes and tourist attractions such as the ICC, Tumbalong Park, Darling Quarter, Darling Square and the Chinese Garden of Friendship. However, there are locations in Darling Harbour (Pier Street, Liverpool Street) that lack pedestrian foot traffic, casual surveillance, and activation, presenting safety issues, particularly at night, for users of these public toilets.
- Wayfinding signage in Darling Harbour is well provided in some areas, for example around Darling Quarter, but lacking in others (the ICC). All public toilet facilities contained adequate signage at their entrance, many were difficult to find and are subsequently likely to be underutilised by the public.
- Interface signage also presents some issues. In most cases, where there are baby change facilities, there is a lack of signage which would indicate so. These amenities are often located within the unisex accessible cubicle (where provided) and would only be discovered if a patron were to enter that cubicle.
- While there is a considerable supply of standard toilets, including regular accessible toilets and those with baby change amenities, there is a lack of other typologies to cater to all population groups. This includes adult change facilities (or Changing Places), and shower facilities. There are also minimal inclusions made for all genders, with most toilets offering a unisex accessible toilet only – this may not feel appropriate/comfortable for some individuals. The Darling Square Library facility is an exception to this, providing a Parent's Room which is high quality and marked with inclusive signage, with 3 change tables and maximum space for easy pram access.
- Natural light is utilised in the Liverpool St facilities however most of the other facilities do not have any water saving or ESD initiatives installed. However, the majority of the newer facilities have air dryers and more contemporary fitouts therefore are likely to have LED lighting. A formal assessment is recommended by an ESD specialist.
- All toilet facilities offer adequate privacy to ensure the comfort of users. Lighting, however, differs greatly between facilities and hours of the day. It was noted that during the night that many facilities had poorer lighting, and significantly lacked activation, with some allowing for the possibility of entrapment (ICC Darling Quarter Amenities). Most public toilets close at 9 or 10pm, with only one facility in the precinct open 24 hours a day.
- All public toilets located in Darling Harbour are accessible, in that they appear to comply to DDA standards as-built. The topography of the precinct is flat in most areas which prevents many issues for people who struggle with mobility, however some facilities require navigation of several stairs to access them (i.e. Darling Quarter Theatre toilets) which prevents accessibility being achieved.
- Many facilities only provide all-gender toilets in the form of a combined 'unisex'/accessible cubicle, and whilst this meets minimum regulatory standards, this approach may not be inclusive, appropriate and/or comfortable for people who may not identify as a specific gender.
- All toilet facilities were found to be clean and well-maintained, with at least half containing sharps disposals. Most facilities were contemporary, with little need to update fit outs or finishes.

Table 3 Darling Harbour Audit Assessment Matrix

Source: Ethos Urban

#	Description	# of toilets			Management	Typology	Opening hours	Accessibility	Change facilities	Gender provision	Sharps Disposal	Wayfinding	Interface	Condition	Lighting	CPTED Summary
		M	F	Unisex												
1	Darling Square Dining Precinct	7 (1 Amb)	7 (1 Amb)	1 (Acc)	Tenant	Public	Daylight hours	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Fair	Good	Good	Good	Good street activation due to restaurant precinct
1a	Darling Square Library	5+	5+	2	City of Sydney	Publicly accessible	Mon-Fri: 10am to 6p m Sat & Sun: 10am to 4pm	Accessible (Unisex)	Parents Room	Unisex or gender neutral	No	Good	Fair	Good	Good **	Only open during library opening hours, may be perceived as not publicly accessible
2	Pier St	10	10	2 (Acc)	PMNSW	Public	Closes at 10pm, reopens at 5am	Accessible (x2) (Unisex)	Baby change table	Men and Women	No	Good	Good	Fair	Fair	Perceived poor safety due to lack of foot traffic. Under bridge which may be occupied by rough sleepers.
3	Liverpool St	5	5	0	PMNSW	Public	Closes at 10pm, reopens at 5am	Accessible	Baby change table (gendered)	Unisex or gender neutral	Yes	Poor	Poor	Fair	Fair	Perceived poor safety due to lack of foot traffic/surrounding activation
4	ICC DQ (off Boulevard next to Betty's)	5	8	1 (Acc)	ICC	Publicly accessible	Closes at 8pm, reopens at 6.30am	Accessible (Unisex)	No	Unisex or gender neutral	No	Good	Fair	Fair	Good	Entrapment potential due to corridor and built form design
5	Darling Quarter Playground	0	0	1 (Acc)	PMNSW	Public	5am-10pm	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Fair	Poor	Fair	Fair	Wayfinding is poor, may be unsafe in evenings
6	ICC Car Park (next to Planar Restaurant)	6	6	1 (Acc)	ICC	Publicly accessible	24hr	Accessible (Unisex)	Baby change table	Men and Women	Yes	Good	Good	Good	Good	Restaurants / ICC activation
7	Darling Quarter Wilson Car Park	4	4	1 (Acc)	Wilson	Publicly accessible	Closes at 10pm, reopens at 5am	Accessible (Unisex)	Baby change table	Unisex or gender neutral	Yes	Good	Fair	Good	Good	Carpark provides activation during some hours
8	Harbourside (Future)	38	30	4 (Acc)	Future - Tenant	Publicly accessible	TBC	Accessible (Unisex)	2 x Parents' Rooms	Unisex or gender neutral	N/A	N/A	N/A	N/A	N/A	Under construction
9	Cockle Bay Wharf (Existing)	5	5	1 (Acc)	CBRE /PMNSW	Public	Closes at 9pm, reopens at 9am	Accessible (Unisex)	Baby change table	Unisex or gender neutral	No	Fair	Good	Fair	Good	Activation is good, earmarked for construction [TBC]
10	Ribbon Amenities (Future)	13	16	1 (Acc)	Future - PMNSW	-	TBC - likely 9am-9pm	Accessible (Unisex)	1 x Parents Room	Unisex or gender neutral	N/A	N/A	N/A	N/A	N/A	Under construction
11	Pymont Bridge West	8	5	0	PMNSW	Public	Closes at 10pm, reopens at 5am	Accessible	Baby change table (gendered)	Men and Women	Yes	Fair	Fair	Fair	Fair	May be unsafe at certain hours due to location and lack of surrounding foot traffic/surveillance
12	Pymont Bridge East	5	7	0	PMNSW	Public	Closes at 10pm, reopens at 5am	Accessible	Baby change table (gendered)	Men and Women	Yes	Fair	Fair	Fair	Fair	May be unsafe at certain hours due to location and lack of surrounding foot traffic/surveillance
13	Darling Quarter Theatre	4	5	1 (Acc)	Tenant	Publicly accessible	Closes at 10pm, reopens at 5am	Accessible (Unisex)	Baby change table (x3 – one in each M; F; Acc)	Unisex or gender neutral	No	Good	Good	Good	Good	Activated and feels safe due to lighting and internal foyer
14	Metcalfe Park (Trouton Place)	0	0	3 (Acc)	PMNSW	Public	For events only	Accessible (Unisex)	None	Unisex or gender neutral	No	Poor	Fair	Fair	Fair	May be unsafe in evenings due to location and lack of surrounding activation, however no entrapment potential

*For the purposes of this assessment, a ‘toilet’ also includes a urinal

10.0 Future delivery considerations and recommendations

The following pages outline a comprehensive assessment against the principles described in **Section 3.0**, with reference to precincts and clear recommendations for future delivery. Specific recommended actions are outlined in an Action Plan in **Section 12.0**.

Distribute equitably for walkability

This principle relates to the proximity of toilets in each precinct, considering that toilets need to be easily locatable and provided in the appropriate number, to respond to the volume of users. A spatial assessment was undertaken, relating to the geographical locations of the amenities in each precinct.

Potential observations and limitations to equitable distribution of public toilets within The Rocks include:

- Topography - The primary issue concerning toilet provision in The Rocks is the irregularity of its topography. The topography of the precinct, includes many areas where the gradient of accessways, streets, and the like exceed limits prescribed in accessibility standards (The Rocks Heritage Access Strategy (draft) McIntosh and Phelps 2020).
- Heritage-listed buildings and sites - May result in restrictions in facilities (and access paths) being updated to meet current BCA standards.
- Access for people with specific needs - This presents barriers to accessibility for several toilet facilities, such as the Well Courtyard, and Unwin's Courtyard. These barriers include narrow access points, and unstable footing (cobblestone paths as a barrier to wheelchairs and other mobility issues). These same toilets are also inhibitive to all genders, as they do not explicitly provide unisex facilities. If these specific issues cannot be addressed in these locations, general wayfinding signage in the vicinity must indicate where alternative toilets are located which can serve the specific needs of disabled, limited mobility, and all-gender population groups.
- Spatial gap - a spatial gap (more than 400m) of public toilet provision within the southern portion, north of Grosvenor Street but south of Cahill Expressway exists. However, including the provision of amenities at Gateway and Sydney Place that are in close proximity to this area closes this spatial gap.
- Operating hours – noting some toilets (e.g. Overseas Passenger Terminal, George St/Dawes Point) were not open at the time of site visits (daytime and evening), and some co-located facilities are dependent on the anchor facility opening hours (i.e. MCA);
- Stair access required to some of the facilities, including the Metcalfe Bond stores and Unwin's Courtyard facilities (to the men's) with no lift access available.
- Narrow corridor access to some facilities including the Unwin's Courtyard facilities. The more isolated facilities are typically harder to maintain and ensure the safety of users.

It is recommended to advocate for additional facilities in the southern portion of The Rocks precinct in new private developments, and improved access to the existing facilities (i.e. improve signage and wayfinding, ensure all bathrooms are publicly available for use and accessible) to improve the spatial distribution. Additional facilities such as a Family or Parents' Room in The Rocks Square would improve accessibility and meet visitor expectations.

This can be achieved with improved signage and wayfinding, and the provision of at least one Changing Places facility per precinct. Signage should be consolidated, viewable from the street and

direct patrons to nearest accessible facilities. Coordination with The Rocks Access Strategy (draft), and advocating for the inclusion of public toilets in all new private developments where possible is recommended. The Darling Harbour precinct provides a better distribution of facilities and is considered to be performing well against this principle.



Figure 16 Well Courtyard public toilets, viewing facing east (left) and Unwin's Courtyard men's toilets (right)

Source: Ethos Urban

Focus delivery on activity nodes

Darling Harbour's current and proposed (in new developments) provision is adequate, while The Rocks needs greater focus.

Both precincts attract a range of user groups including a large proportion of tourists and visitors particularly during events. Signage, wayfinding and toilet provision and diversity, including all-gender facilities, therefore needs to meet these needs.

The use of signage and wayfinding should be considered in the context of activity nodes, suitably located to reflect high usage areas. Updating online tools can support the use of facilities particularly for overseas visitors and those planning their days out in the various precincts.

- Within The Rocks, key activities include retail premises, including food and drink, tourism uses such as the bike tour, cruise terminal and museum/galleries, and general connectivity including through to Circular Quay and the CBD Light Rail. Temporary events such as the weekly Rocks markets are also held.
- Nurses' Walk provides a north south link connection between George St and Harrington St, with stairs. Well Courtyard and Unwin's Courtyard are located in proximity to the food and drink uses in The Rocks precinct. Opportunities to improve the opening hours, internal fitout quality and types of facilities and ensure CPTED compliance of these facilities is recommended, to improve accessibility and activation of these areas, particularly in the evenings.
- There are several facilities in both precincts that fail to meet the requirements for the provision of accessible, activated, and all-gender bathrooms, including Well Courtyard and Unwin's Store Courtyard.



Figure 17 Well Courtyard during evening audit, approx. 10pm

Source: Ethos Urban

In Darling Harbour, adequate provision of facilities located at the food and drink and retail premises activity nodes in Darling Harbour is achieved and will be improved with future developments such as Harbourside, Cockle Bay Wharf and the Ribbon, with accessible, quality bathroom facilities provided in the Darling Square Dining Precinct, Darling Quarter Theatre precinct, and the ICC. It is understood that there are limitations to expanding some of the current facilities that are within the existing buildings (food and drink/retail premises) due to spatial constraints.

- A good example of best practice designed facilities that meet the specific community needs is at the Darling Square Library (refer **Figure 18**). A large family room is provided which comprises changing tables and benches. Varied types of bathrooms are provided to meet a wide range of users of the library, which would often include children and parents.
- However, as the library public toilet facilities are co-located, they do not offer the same level of service provision due to the restricted opening hours, design or security, therefore reducing network availability for the other patrons of Darling Harbour.

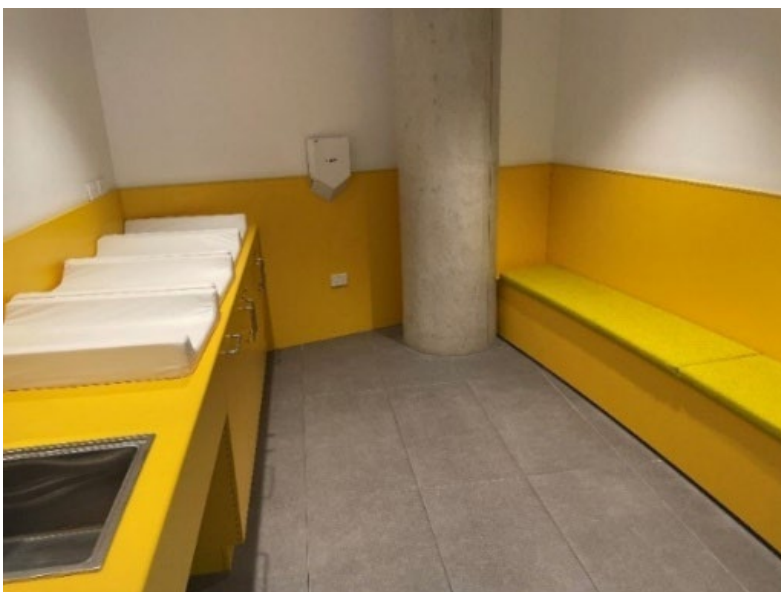


Figure 18 Darling Square Library family room is large and accommodating, but not directly accessible from the public realm

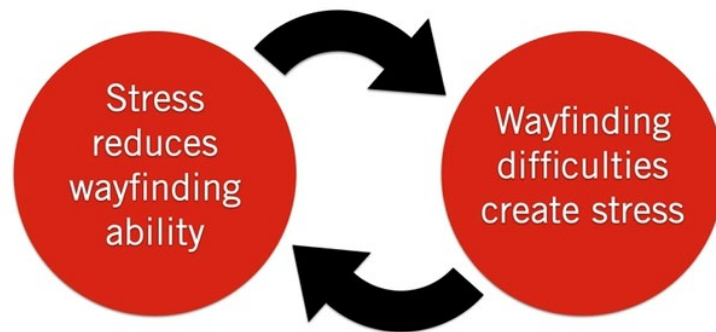
Deliver wayfinding and signage to support ongoing use

Signage can assist in achieving equality and inclusion. The City of Sydney has adopted a legible Sydney wayfinding system incorporating Braille and tactile signs, for vision impaired and blind people as shown in **Figure 19**.

Clear, consistent and accessible wayfinding information contributes to inclusive distribution of public toilets.

Signage can also include details on maintenance and cleaning schedules, contact details for maintenance, map of internal layout of amenities, and opening hours.

A legible public domain, where people walk with comfort and confidence, can be linked to adequate wayfinding. The use of public toilets, which can sometimes be stressful for users, must consider wayfinding with the knowledge of the most appropriate and efficient routes assisting those with mobility issues in particular. Stress and wayfinding are intrinsically linked - good, legible signage can assist in mitigating these impacts.



The Rocks Women's Safety Strategy 2023 also outlines the importance of wayfinding to improve safety to women, girls and gender diverse people. This includes the availability of clean and well-designed facilities such as public amenities and family rooms that support the public enjoyment of these precincts.

Both precincts have a diverse range of signage that of varying designs, age and accuracy. This signage and supporting maps, do readily include information about all public amenities in the surrounding area.

Within The Rocks, some of the signage for the facilities was not visible from the footpath or street.

To ensure amenities are easy to find, wayfinding and information signage should be provided consistently on the exterior of the facility and incorporated into surrounding public domain and directional signage.

Signage within Darling Harbour is more consistent in terms of its font and typology, as well as visibility from the public domain, however opportunities to update existing freestanding signage, as well as signage to the Pier St and Liverpool St amenities, is identified.



Figure 19 Freestanding signage in City of Sydney standard suite of wayfinding style outside Campbell's Cove

Source: Ethos Urban



Figure 20 Informal amenities signage at Campbells' Store (Note: these public facilities are often closed, fenced off, things stored in front of them)

Source: Ethos Urban

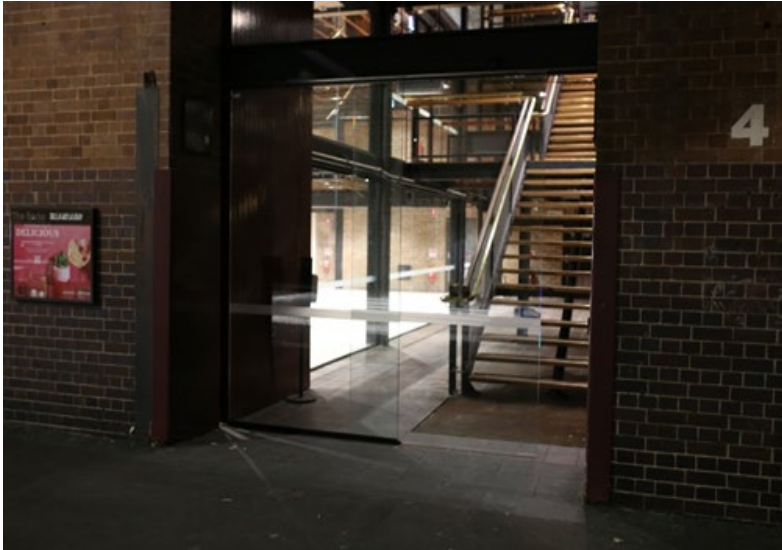


Figure 21 Metcalfe Bond Store amenities entrance from Hickson Road, with no signage visible from street directing patrons to these public facilities

Source: Ethos Urban

Support cities' economic success

Public toilets can support the increased use of open space and increased participation in local, social economic and recreational activities. Both precincts are identified tourist precincts in the Sydney Central metropolitan region, and to maximise economic impacts, the public toilet provision must align to cater to the diverse tourist and visitor market. This includes the provision of multi-lingual signage, including internationally identified pictograms, on both the toilet doors, near to the facilities, and on freestanding signage throughout the precinct to better assist with wayfinding for the City's diverse community, broader visitors to the area from Sydney metro, and tourists.



Figure 22 Information on signage assists with wayfinding, contributing to economic success of precincts

Source: Ethos Urban

During events at Darling Harbour and within The Rocks, such as markets or large community events, the provision of public toilets should be further supported with additional temporary signage and toilets if necessary, catered to the specific audience and expected visitors (for example, targeted

children's events should provide temporary parents' and family rooms, at least one Changing Places facility, and all-gender facilities).

Temporary facilities erected during Vivid Festival are representative of best practice in modern portable toilets, with a range of typologies provided, including a Changing Places facility, all-gender facilities, visible signage for wayfinding, and adequate lighting provided.

Additional directional signage within The Rocks and Darling Harbour would assist in economic benefits to the broader community – informing future designs for pedestrian navigation will enable people to walk with comfort and confidence. Utilising the City's design manual within their Wayfinding Strategy enables pedestrians to feel more confident as they traverse the Sydney CBD.

Ensure amenities are environmentally sustainable for the long-term

As well as a broader NSW state and local government priority, a key principle of contemporary public toilet design is environmental sustainability. Traditional toilet facilities can incorporate fixtures, fittings, and materials based on ESD principles that greatly improve their environmental performance.

Organisations such as the Green Building Council Australia provide guidance on ESD for buildings as well as assessments of facilities and the City of Sydney Council has policies which guide the design, construction, and renewal of buildings to incorporate ESD principles effectively.

The proposed new Automated Public Toilets in the City of Sydney include green roofs on some facilities, to improve amenity and enhance the city with greenery – contributing to broader sustainability initiatives.

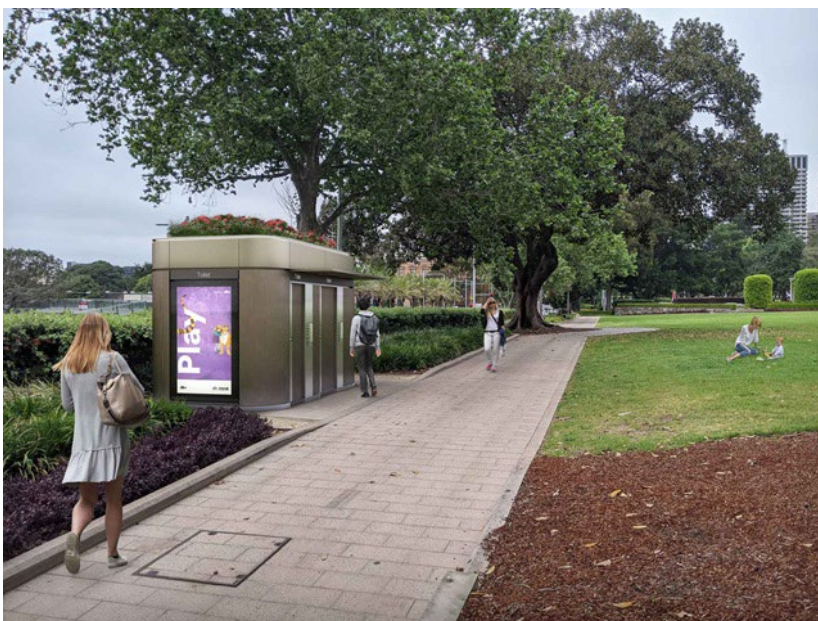


Figure 23 Artist's impression of the planned automated public toilet in Hyde Park

Source: City of Sydney

The City of Sydney *Public Toilet Strategy 2014* identifies the following key methods to embed sustainability principles into public toilet asset design:

- **Energy consumption** – solar panels, high degrees of natural light and ventilation, energy efficient lighting and appliances, sensor lighting and power controls.
- **Water consumption** – investigate feasibility of using grey water re-use for flushing, incorporate water collection and reuse from roof structures, automated flow control and sensor taps, and dual flush cisterns.

- **Reduce resource inputs** – low environmental impact cleaning products, efficient use of resources in construction and operation, source materials with low environmental impact.

A preliminary assessment of the facilities in terms of sustainability has been undertaken as part of this report, however it is recommended further assessment by technical professionals is undertaken. It is noted that some facilities rely on paper towels, do not have sensor lights, and do not include any educational signage to promote water saving techniques.

Advocating for innovative sustainable technologies in new facilities being delivered by the private sector is recommended.

Integrated with heritage and character of the area

Both precincts contribute significance to Sydney in terms of heritage and character, and to the broader city's fabric as tourist destinations. The Rocks contains many State-listed heritage buildings under the NSW *Heritage Act 1977*, and has a complex layer of significant fabric, uses and association, and is a precinct of national cultural significance. The unique heritage character of The Rocks is one of the key aspects of its appeal. It is noted some of the facilities within this audit are located in heritage-listed buildings, such as Samsons Cottage, remnants of which contribute to the streetscape of Kendall Lane and to the wider townscape character of The Rocks.

The Well Courtyard facilities also exist within a heritage site, and any upgrades would need to be undertaken in conjunction with a heritage specialist, for specific guidance as to minimising impacts on the heritage fabric. Unwin's Stores (1843-1846) is believed to be the longest continually occupied row of shops in Sydney and Australia, playing an integral role in the development of Sydney's first commercial area.⁴² Argyle Bond Stores and Cleland Bond Stores are also State heritage items, and new signage and facility upgrades must take consideration of heritage impacts and be sympathetic in design and construction, for example, ensuring they are not affixed in a way that would impact sandstone walls. Works should be proposed in consultation with PMNSW, an independent built heritage specialist, and/or Heritage NSW and the City of Sydney Council if applicable.

Darling Harbour has a historic presence in Sydney as detailed earlier in this report. The character of the Darling Harbour precinct is less about the physical built form and rather it's historical context-recommended upgrades to facilities in Pier St and Liverpool St, and the Darling Quarter Playground could incorporate historic elements and character into the public toilet facilities, to enhance activation and interest for tourists and visitors alike. New stand-alone facilities if constructed in Tumbalong Park would need to consider the character of the surroundings, appropriate landscaping and signage, to integrate with the rest of the precinct.

⁴²Pocket Guide to Sydney 'George Street North Heritage Walk'. Available at: <https://www.visitsydneyaustralia.com.au/george-street-north.html> Accessed on 2 November 2023

Improve safety and privacy

User perceptions of safety can be as influential as actual or recorded incidents/level of unsafety. If a toilet is perceived to be unsafe, unhygienic or dangerous, users will generally avoid usage of the facility. There are many ways that design can minimise antisocial behaviour and contribute to positive perceptions of safety.

The **Crime Prevention Through Environmental Design** (CPTED) framework establishes guiding principles to reduce the incidence and perceptions around crime and safety. Developed by the Queensland Government in association with the Queensland Police in 2007, CPTED principles consider factors such as surveillance, legibility, territoriality, ownership, management and vulnerability.

According to the four key CPTED principles, public toilets should be characterised by the following:

Visibility	<ul style="list-style-type: none"> Facilities should be highly visible to the surrounding area and receive passive surveillance from passers-by and surrounding buildings Provision should avoid areas of low activity Maximise use of natural light during day hours and provide artificial external lighting at night
Access Control	<ul style="list-style-type: none"> Facilities should be clearly identified with visible entry/exit points and appropriate signage
Territorial Reinforcement	<ul style="list-style-type: none"> Clearly mark facilities as public toilets and apply overarching design principles for ease of identification Incorporate landscape and design features that create attractive, high-quality facilities/spaces
Space Management	<ul style="list-style-type: none"> Provide appropriate cleaning and service to facilities to maintain them in good condition Use materials that reduce opportunities for vandalism and are easy to clean/maintain

Note: The principles of CPTED aim to minimise the opportunity for crime, but it is recognised that environmental design cannot definitively eliminate opportunities for crime or prevent a determined perpetrator from committing such crimes. We note that Ethos Urban are not specialist security consultants and therefore cannot comment on specific security measures or systems requirements. Therefore it is recommended that a security consultant with a Class 2A licence under a Security Industry Act 1997 is engaged to provide specific advice on the placement, installation, monitoring, and maintenance of the CCTV network and other Security measures such as bollard/barriers.

The subject facilities vary in terms of their typology. Apparent and perceived safety and privacy characteristics, particularly within The Rocks, also differ significantly, where facilities were noted as being generally more unsafe. This is largely due to the lack of foot traffic; narrow and difficult wayfinding; the locational isolation of some facilities; and entrapment potential - as many facilities are not directly accessible from the street.

In Darling Harbour, the majority of the facilities are attached to or within another building structure, improving safety due to additional activation in proximity. Foot traffic levels were identified as being much higher than The Rocks within the Darling Harbour vicinity particularly at night-time, but also during the day.

A brief CPTED assessment was undertaken in accordance with an assessment of lighting and wayfinding, with the following key points identified.

- In The Rocks, some facilities demonstrated a lack of lighting, entrapment potential, and minimal foot traffic in the vicinity, particularly at night, contributing to a sense of safety. Poor wayfinding was identified at almost half of the facilities, which would contribute to lack of foot traffic, additionally increased amount of time spent off the public road/footpath, potential anti-social behaviour is likely to arise.
- In particular, poor CPTED compliance was identified at:
 - Metcalfe Bond Stores
 - Unwin's Store Courtyard
 - Cleland Bond
 - Well Courtyard.

Additional signage and lighting would activate some of the public toilets to ensure CPTED principles are met.

As with all structures, the elements of a public toilet will deteriorate over time. This may be exacerbated by the type of construction materials and frequency of maintenance. Facilities that appear old and poorly maintained may be perceived as less safe or hygienic than their newer counterparts. Cleanliness schedules are unknown for the purposes of this report however seasonal demand fluctuations, particularly around peak tourist periods put cleaning and maintenance pressures on existing toilet infrastructure.



Figure 24 Feedback survey example in Darling Harbour bathroom

Source: Ethos Urban

Ensure accessibility and inclusion

Public toilets play an important role in providing access to public spaces for special user groups, and wherever possible, must be planned around the needs of people with diverse needs. Accessibility and inclusion are not just about catering for people with additional mobility requirements, it must also consider different social, cultural and demographic user groups, as well as children, parents with young children, culturally diverse people, the elderly and members of the LGBTIQ+ community. In this context, it is appropriate to consider universal design principles that cater for the needs of all users, rather than just those with physical mobility requirements. Using public toilets can be a confronting experience for different user groups and in order to reduce barriers and achieve equity it is important to ensure that future upgrades and installations of new toilets adopt the key principles of universal design, which are:

- **Equitable in Use** - the design is useful and marketable to people with diverse abilities
- **Flexibility in Use** - the design accommodates a wide range of individual preferences and abilities
- **Simple and Intuitive Use** – the design is easy to understand, regardless of the users’ experience, knowledge, language skills or current concentration level
- **Perceptible Information** – the design communicates necessary information effectively to the user, regardless of ambient conditions or the user’s sensory abilities
- **Tolerance for Error** – the design minimises hazards and adverse consequences of accidental or unintended actions
- **Low Physical Effort** – the design can be used efficiently and comfortably with a minimum of fatigue
- **Size and Space for Approach and Use** – appropriate size and space is provided for approach, reach, manipulation and use regardless of users’ body size, posture or mobility.

New facilities are required to comply with Australian Standards for accessibility under the *Disability Discrimination Act* (DDA), however, accommodating all these requirements can be challenging when seeking to retrofit older buildings, particularly if a facility is spatially constrained, or within The Rocks precinct, where many of the buildings are heritage-listed.

From a visual assessment the precincts have a number of accessible bathrooms as well as ambulant facilities in the newer bathrooms. It is not known specifically if the facilities are DDA-compliant. There are areas where accessibility would be limited in terms of wheelchair access (i.e. stairs to the male facilities of Unwin's Courtyard in The Rocks).

Culture, identity and social preferences are also important. For example, in addition to driving up wait times for women, the absence of all-gender facilities can also cause issues for single parents with a child of the opposite sex. Most facilities currently do not provide at least one all-gender cubicle and instead, only provide all-gender toilets in the form of a combined 'unisex'/accessible cubicle. Whilst this meets minimum regulatory standards, this approach may not be inclusive, appropriate and/or comfortable for people who may not identify as a specific gender.

All-gender toilets ensure access and equity is provided for all members of society and broadens the scope from disability access to universal access, paving the way toward a more inclusive society.⁴³

Full-height partitions and doors are generally required for all-gender facility design, and, whilst not a strict requirement of the current version of the BCA, separate male, female and all-gender facilities represent best-practice in modern public amenities provision and will meet the diverse needs of the community.

Replacement of outdated, non-inclusive signage will also enable confidence and comfort for all community members.

To meet community accessibility needs and preferences, including those of vulnerable and minority groups, it will be important to review the following:

- Upgrade facilities to align with best-practice Universal Design principles and DDA Compliance. Unwin's Courtyard signage to be updated with inclusive terminology (remove reference to 'ladies' for example and replace with best-practice inclusive signage).
- At least one Family (Parents') Room should be centrally located in The Rocks
- At least one 'Changing Places' facility should be provided in each of the precincts, with signage and digital wayfinding coordinated. Delivery in busy areas as part of high-use facilities should be prioritised.

Opportunities include:

- Near Darling Quarter Playground (as an area with a high volume of children)
- Near Nurses Walk (as identified as a key connection link in The Rocks, experiencing a high volume of visitors)
- Near The Rocks Square (A family room could also be provided here, as a popular tourist location).

Help buttons adjacent to high-use amenities, when possible, should be considered. New and upgraded facilities should provide at least one all-gender toilet to accommodate diverse user groups and achieve 'potty parity'. Signage should give preference to "all-gender" rather than unisex terminology and symbols.

⁴³Cowell, T, 1 February 2017 'Why Can't I Have a Unisex Ambulant Toilet?' Available at: <https://www.disabilityaccessconsultants.com.au/cant-unisex-ambulant-toilet/> . Accessed 30 October 2023.



Figure 25 Example of inclusive bathroom signage at Museum of Contemporary Art

Source: Ethos Urban

11.0 Action plan

The Action Plan sets out a comprehensive list of physical and operational actions for public toilets in each precinct to assist with planning and decision-making regarding toilet facilities and associated infrastructure. It is recommended that this action plan is reviewed regularly to monitor performance of the Strategy and evolving demand for facilities.

Principles for Amenities Provision:

Based on the recommendations of this Strategy, this section outlines a series of recommended actions which have been determined following a comprehensive assessment against the principles described below, and in **Section 3.0**.

1. Distribute equitably for walkability
2. Focus delivery on activity nodes
3. Deliver wayfinding and signage to support ongoing use
4. Support cities' economic success
5. Ensure amenities are environmentally sustainable for the long term
6. Integrated with heritage and character of the area
7. Improve safety and privacy
8. Ensure accessibility and inclusion

This Strategy has identified the key issues and opportunities facing the public toilet network within The Rocks and Darling Harbour in Sydney, with recommendations across a number of themes for each principle. The Strategy's recommendations have been translated into an **Action Plan**, categorised by theme and each assigned an indicative timing.

To determine the most appropriate phasing of implementation in accordance with budget and expenditure, timing has not been included. Priority will be the guiding factor.

Prioritisation of actions are categorised as:

- **High:** Expedite delivery/works to support aspirations of this strategy
- **Medium:** Undertake as part of ongoing program of public works
- **Low:** Minor works to be included as part of other works/upgrades where possible.

ACTION PLAN										
Action	Principles for Amenities Provision								Priority	Status
	1	2	3	4	5	6	7	8		
Overarching considerations										
When undertaking design and feasibility studies for new works and upgrades to existing facilities:										
<ul style="list-style-type: none">Incorporate a best-practice safety and CPTED review									High	Ongoing
<ul style="list-style-type: none">Audit surrounding signage and wayfinding to understand ease of navigating to and from amenities, particularly for those with specific access requirements										
<ul style="list-style-type: none">Undertake an environmental sustainability design (ESD) review to understand how delivery and operation can occur in a more sustainable manner										
<ul style="list-style-type: none">Consider feelings of safety and comfort for minority groups including those with specific amenity needs, the elderly, different cultures, women, girls, the LGBTQI+ community, and gender diverse people										
<ul style="list-style-type: none">Preference low maintenance, low waste fittings, fixtures and materials										
<ul style="list-style-type: none">Consider character and heritage (where appropriate) of the surrounding area										
Strategic										
When undertaking stakeholder engagement as part of upgrades, include discussions about amenities and whether they are meeting identified community accessibility needs and preferences, including those of vulnerable and minority groups									Medium	In progress
When revising existing or as part of future wayfinding strategies, ensure they address:									High	-

ACTION PLAN										
Action	Principles for Amenities Provision								Priority	Status
	1	2	3	4	5	6	7	8		
<ul style="list-style-type: none"> — Analysis of key streets, transit stops and places which would benefit from enhanced wayfinding — Consistent, multi-lingual, inclusive and directional signage (with distance) for amenities that includes the specific facilities within (i.e. accessible, all-gender, changing facilities). These should be visible from the street and public domain at all times. 										
Update digital online tools and maps (National Public Toilet Map, Darling Harbour and The Rocks individual PMNSW websites, City of Sydney Access and Inclusion Map, Google Maps) to include all of the available public toilets and their features, opening hours etc									High	-
Review impact of development and construction on the provision of public amenities and consider the need for temporary facilities to replace offline facilities e.g. Darling Harbour									High	-
Update existing precinct lighting strategies to integrate upgrades and activation to enhance safety and legibility around amenities. Prioritise interventions in the following locations: <ul style="list-style-type: none"> — Metcalfe Bond — Cleland Bond — Well Courtyard — Unwin's Courtyard 									Medium	-
Advocate for inclusive, diverse and accessible new public toilet provision within new public and private developments (The Ribbon, Harbourside, Cockle Bay, Harbour Park, and Circular Quay Renewal)									High	In progress
Finalise The Rocks Heritage Access Strategy (draft), to complement the delivery of amenities through The Rocks									High	In progress

ACTION PLAN										
Action	Principles for Amenities Provision								Priority	Status
	1	2	3	4	5	6	7	8		
Continue works to upgrade and refurbish Well Courtyard including the new Amenities block									Medium	In progress
Page 2 of 4 design study for Unwin's Courtyard amenities to understand upgraded facilities and improved access									Medium	(Note; other landscaping works in progress)
Projects										
Provide at least one 'all-gender' facility in new and upgraded facilities. This should optimally be separate to the accessible facility. Rename existing 'unisex' facilities as all-gender.									Medium	-
Provide at least one permanent Changing Places facility in each precinct. Delivery in busy areas as part of high-use facilities should be prioritised including: <ul style="list-style-type: none"> Near Darling Quarter Playground Near Nurses Walk Near The Rocks Square 									Medium	-
Provide Family (Parents') Room in The Rocks Square, complemented by wayfinding and signage internally, in the public domain and at ground level in close proximity to the entrance, to ensure accessibility.									High	-
Ensure all facilities have the following signage adjacent to/within amenities: <ul style="list-style-type: none"> Maintenance and cleaning schedule Contact details for maintenance Map of internal layout of amenities Opening hours 									Medium	-
Provide help buttons adjacent to high-use amenities, when possible									Medium	-

ACTION PLAN										
Action	Principles for Amenities Provision								Priority	Status
	1	2	3	4	5	6	7	8		
Identify a secure, publicly accessible location in each precinct for at least one 24hr bathroom to support the night time economy including workers										
Review sharps disposals provision and provide bins for sharps disposal in cubicles without existing provision.									Low	-
Operations and maintenance										
Establish Shared Service Agreements (SSAs) amongst public toilet providers to clarify ownership and responsibilities and promote a higher quality of service and maintenance of existing facilities.									High	Ongoing
Align opening hours of facilities to the level and times of activation in the surrounding area (at least until 10pm). 24-hour opening hours in conjunction with implementation of CPTED recommendations is preferred.									Medium	-
Standardise provision of 'snap, send and solve' or community surveys within amenities and integrate into the overall design of amenities									Low	-

12.0 Next steps

Accessible, clean and inclusive facilities are necessary public infrastructure for both individual health and wellbeing, as well as public health and sanitation systems.

A comprehensive review of public toilets within The Rocks and Darling Harbour, located in the City of Sydney Local Government Area (LGA), has been undertaken. A spatial analysis shows that amenities are generally located no further than 400m from another, which meets best-practice toilet provision and the City of Sydney's recommendations. However, further analysis, through a comprehensive audit of facility opening hours, changing facilities, provision of all-gender facilities, review of signage and wayfinding, surrounding public realm and activation, safety, cleanliness and condition, and lighting concludes that:

- The number and spatial distribution of facilities within both precincts is generally acceptable, to be improved with the future Darling Harbour developments at Harbourside, Cockle Bay, the Ribbon, and the Darling Quarter Playground, as well as an Automatic Public Toilet at the corner of George St and Alfred St in The Rocks and the Circular Quay Renewal.
- Key issues identified in both precincts relate to accessibility and wayfinding, safety and signage, and a lack of diversity in the types of facilities, including no provision of a Changing Places facility in either precinct and few Family (Parents') Rooms.
- There are also few specifically labelled 'all-gender' or 'gender-neutral' facilities. Many facilities only provide all-gender toilets in the form of a combined 'unisex'/accessible cubicle, and whilst this meets minimum regulatory standards, this approach may not be inclusive, appropriate and/or comfortable for people who may not identify as a specific gender.
- Some facilities do not have accessible bathrooms or baby change tables, whilst some only provide these in gendered facilities, restricting the usability for various groups in the community.

The audit has culminated in an Action Plan to identify the key ways to improve access to facilities across both Precincts. Through an improvement of amenities typologies, wayfinding signage around the two key tourism precincts, and ongoing monitoring and feedback mechanisms, the location and amenity of existing facilities can be better understood by the diverse range of members of the public, increasing the utilisation of existing facilities and ensuring they are inclusive, safe, and accessible.

Appendices

Appendix 1 Visual audit

The Rocks | Tallawoladah

The following pages identify photos from site visits to inform the Audit Matrix.

(1) Dawes Point/George Street (23/15 George St, Dawes Point)



Figure 26 Female Ambulant bathroom during daytime

Source/Notes: Ethos Urban

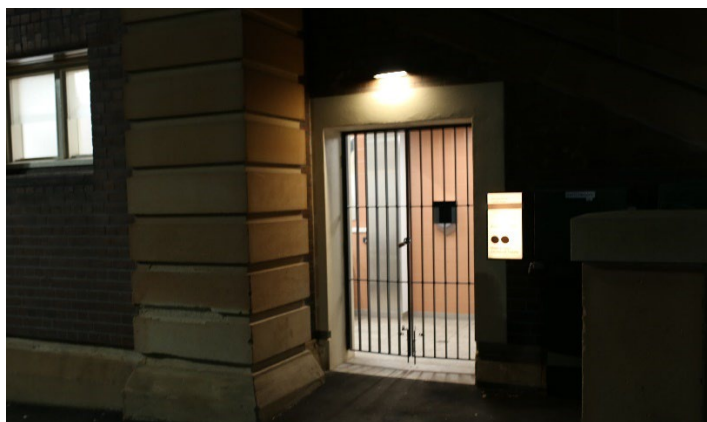


Figure 27 Locked entrance at approximately 10pm

Source/Notes: Ethos Urban



Figure 28 Female bathroom in daytime

Source/Notes: Ethos Urban

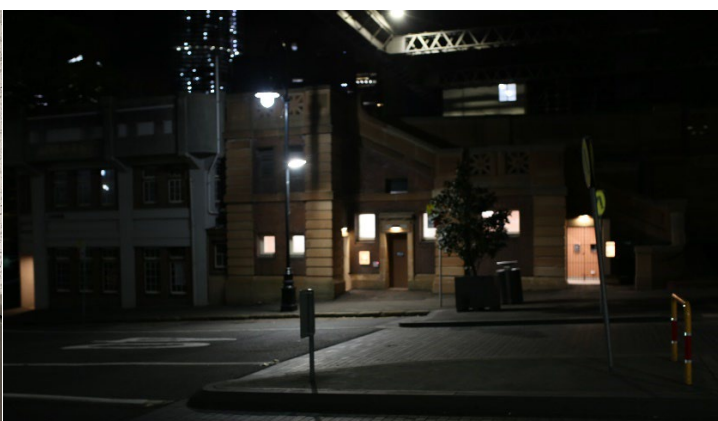


Figure 29 Night audit entrance from George Street

Source/Notes: Ethos Urban

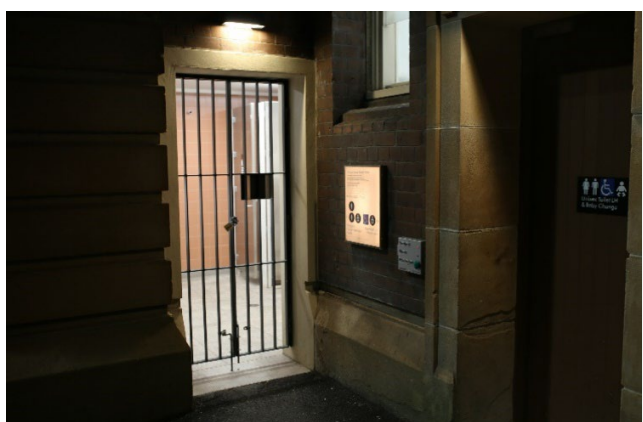


Figure 30 Locked entrance during night audit

Source/Notes: Ethos Urban

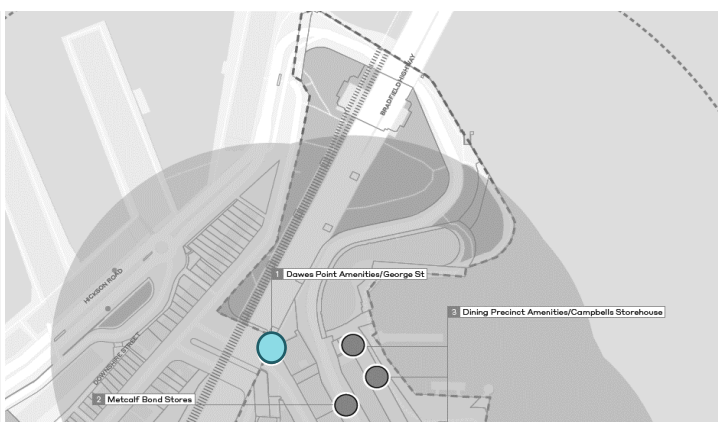


Figure 31 Locational map

Source/Notes: Ethos Urban

(2) Metcalfe Bond Stores (66 George St, The Rocks)



Figure 32 Signage to Metcalfe Bond Stores public toilet

Source/Notes: Ethos Urban



Figure 33 Entrance to public toilets

Source/Notes: Ethos Urban



Figure 34 Minimal activation

Source/Notes: Ethos Urban

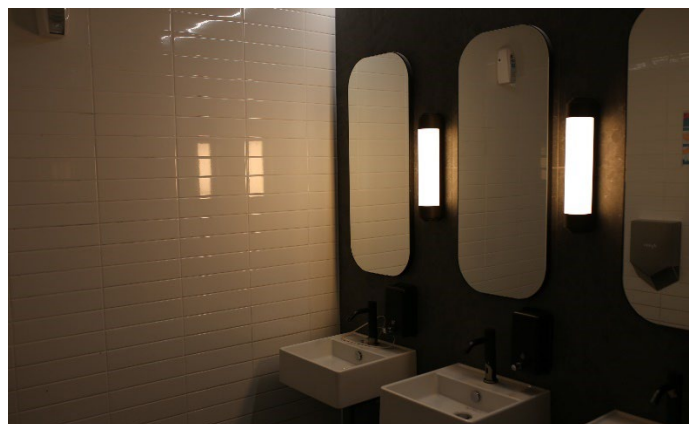


Figure 35 Internal facilities of high quality

Source/Notes:

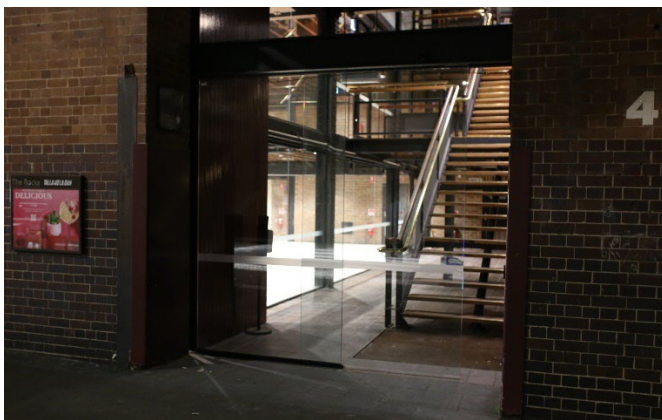


Figure 36 Entrance from Hickson Road

Source/Notes: Ethos Urban

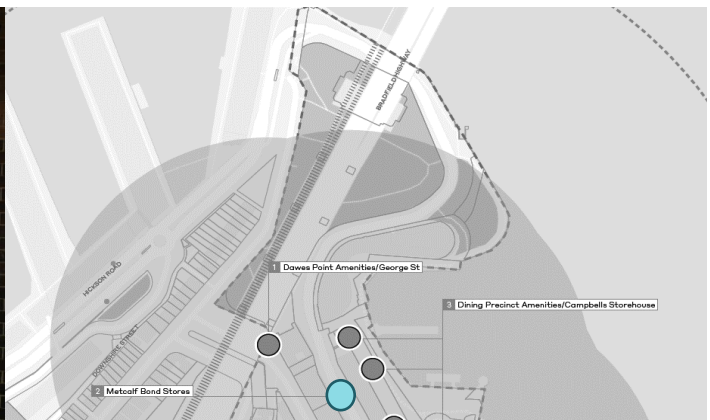


Figure 37 Locational map

Source/Notes: Ethos Urban

(3) Dining Precinct Amenities – Campbell’s Storehouse (Central)



Figure 38 Internal view of toilet access – unisex

Source/Notes: Ethos Urban



Figure 39 Entrance from restaurant promenade

Source/Notes: Ethos Urban

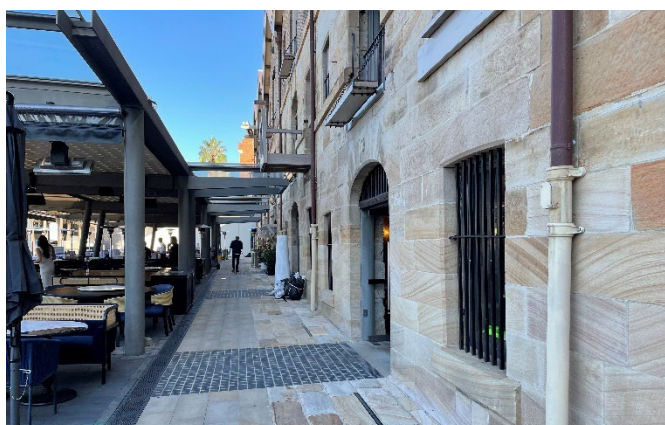


Figure 40 View of bathroom entrance

Source/Notes: Ethos Urban

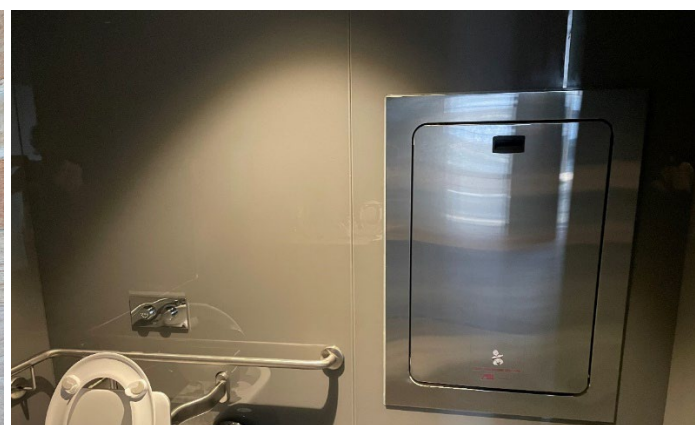


Figure 41 Internal facilities

Source/Notes: Ethos Urban

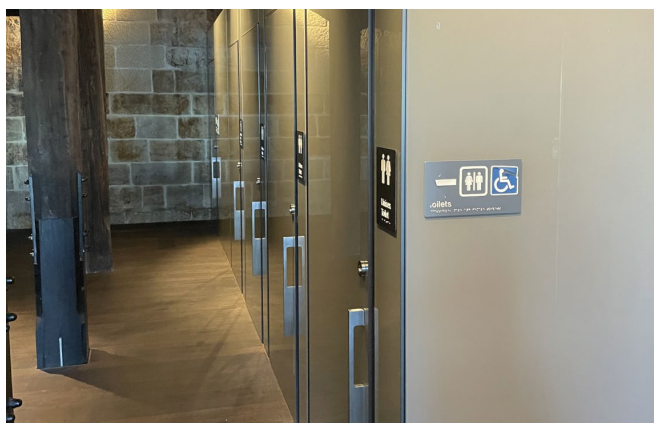


Figure 42 Internal signage

Source/Notes: Ethos Urban

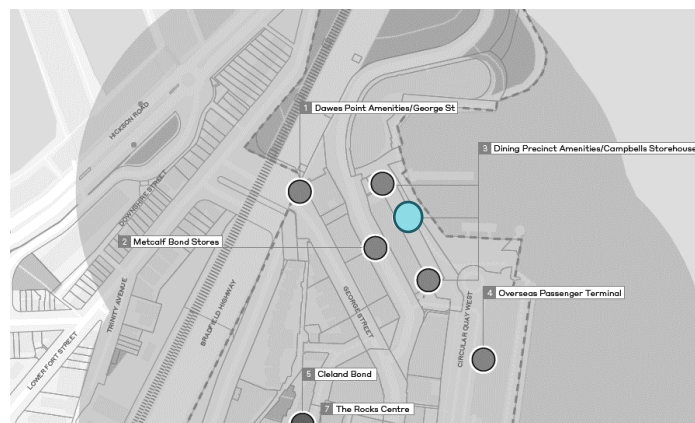


Figure 43 Locational map

Source/Notes: Ethos Urban

(3a) Dining Precinct Amenities/Campbell’s Storehouse (Northern)



Figure 44 Site visit – September 2023

Source/Notes: Ethos Urban



Figure 45 Site visit – September 2023

Source/Notes: Ethos Urban



Figure 46 Site visit – September 2023

Source/Notes: Ethos Urban



Figure 47 Night audit – May 2022

Source/Notes: Ethos Urban



Figure 48 Night audit – May 2022

Source/Notes: Ethos Urban

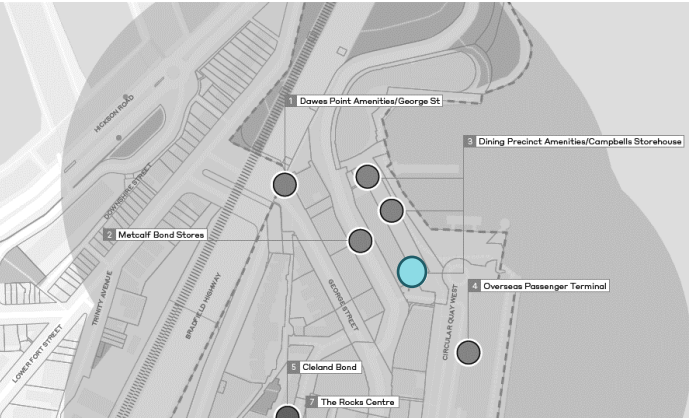


Figure 49 Locational map

Source/Notes: Ethos Urban

(3b) Dining Precinct Amenities/Campbell's Storehouse (Southern)

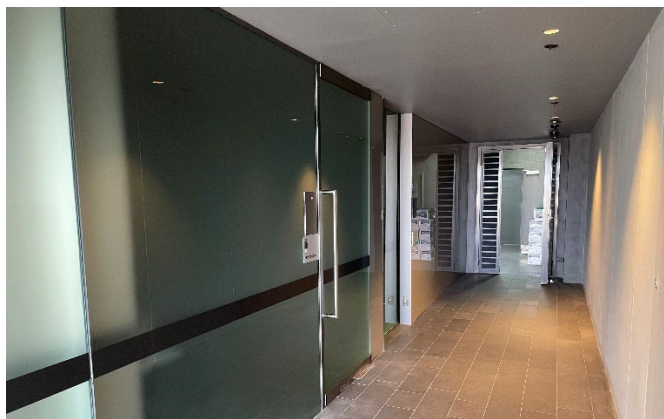


Figure 50 Internal condition

Source/Notes: Ethos Urban



Figure 51 Baby change table

Source/Notes: Ethos Urban

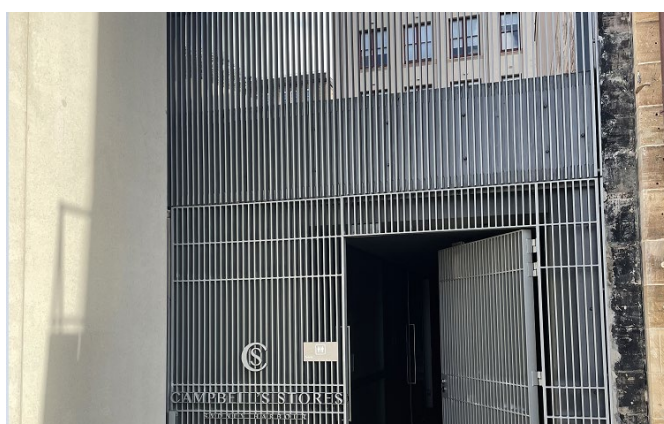


Figure 52 Entrance to facilities

Source/Notes: Ethos Urban



Figure 53 Signage externally and entrance

Source/Notes: Ethos Urban

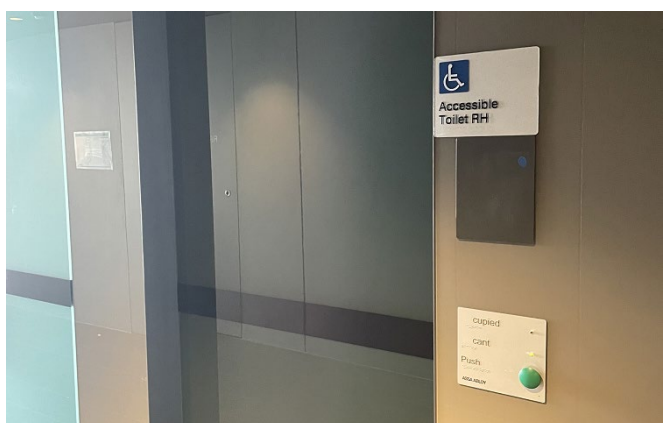


Figure 54 Condition of toilet

Source/Notes: Ethos Urban

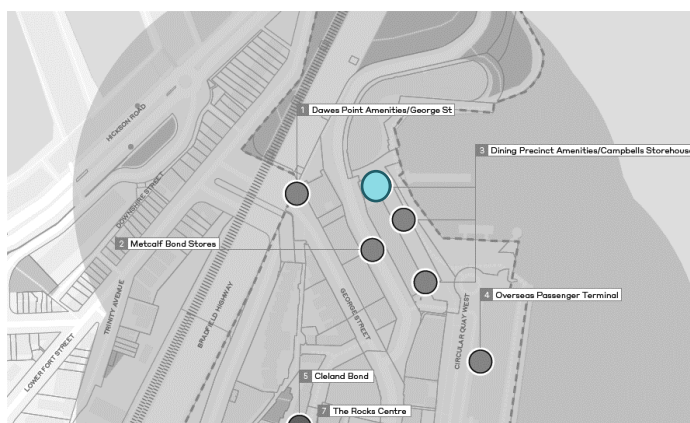


Figure 55 Locational map

Source/Notes: Ethos Urban

(4) Overseas Passenger Terminal



Figure 56 June 2022 visit

Source/Notes: Ethos Urban



Figure 57 Site visit June 2022 (signage since updated)

Source/Notes: Ethos Urban



Figure 58 Night audit image

Source/Notes: Ethos Urban



Figure 59 Site visit September 2023 (new signage)

Source/Notes: Ethos Urban



Figure 60 Internal condition

Source/Notes: Ethos Urban

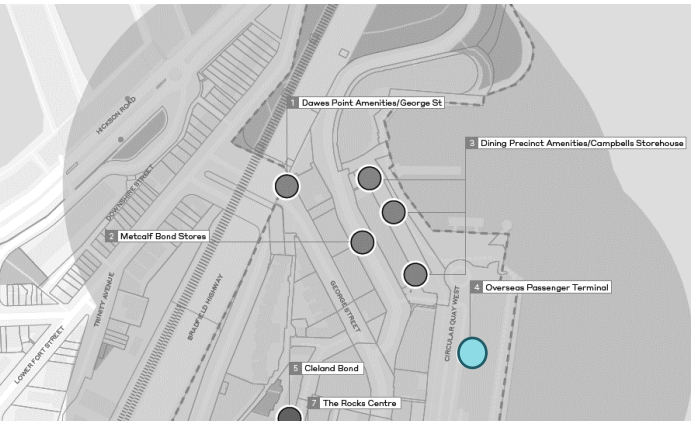


Figure 61 Locational map

Source/Notes: Ethos Urban

(5) Cleland Bond (29 Playfair St, The Rocks)

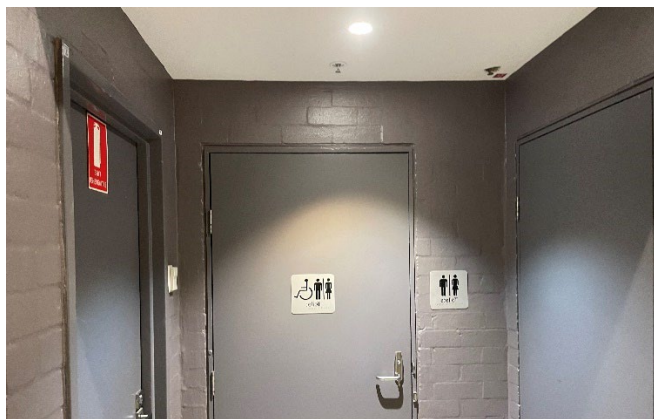


Figure 62 Internal access – Cleland Bond

Source/Notes: Ethos Urban



Figure 63 Inconsistent signage

Source/Notes: Ethos Urban



Figure 64 External view

Source/Notes: Ethos Urban



Figure 65 Signage

Source/Notes: Ethos Urban

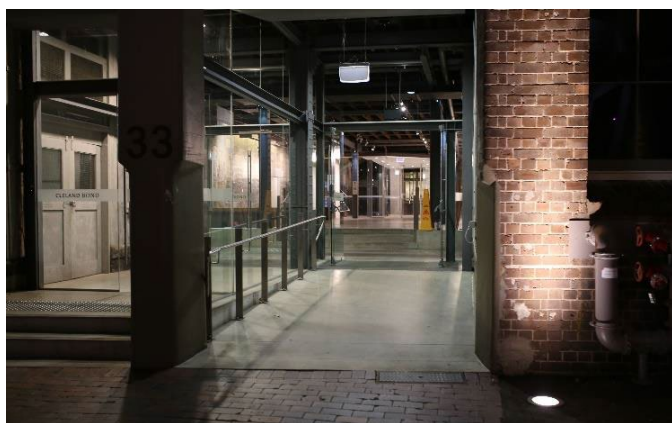


Figure 66 Night audit image

Source/Notes: Ethos Urban



Figure 67 Locational map

Source/Notes: Ethos Urban

(6) Unwin's Courtyard (Unwin's Stores – 75A George St)



Figure 68 Stairs to male facilities

Source/Notes: Ethos Urban



Figure 69 Entrance from Kendall Lane

Source/Notes: Ethos Urban

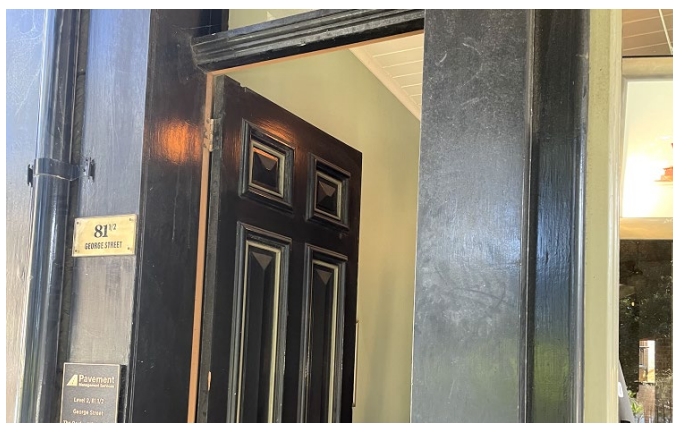


Figure 70 George St Entry

Source/Notes: Ethos Urban

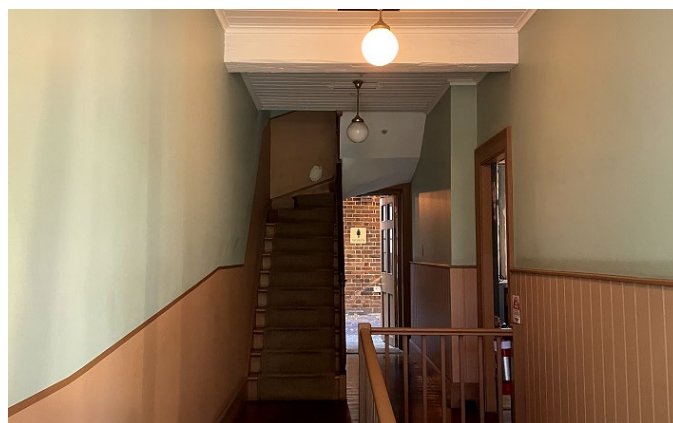


Figure 71 Entry to facilities

Source/Notes: Ethos Urban



Figure 72 Signage to female bathroom

Source/Notes: Ethos Urban



Figure 73 Locational map

Source/Notes: Ethos Urban

(7) The Rocks Centre (Visitor Centre)



Figure 74 Entrance to facilities

Source/Notes: Ethos Urban



Figure 75 Signage to toilets

Source/Notes: Ethos Urban



Figure 76 Signage internally

Source/Notes: Ethos Urban



Figure 77 Internal access to toilets

Source/Notes: Ethos Urban

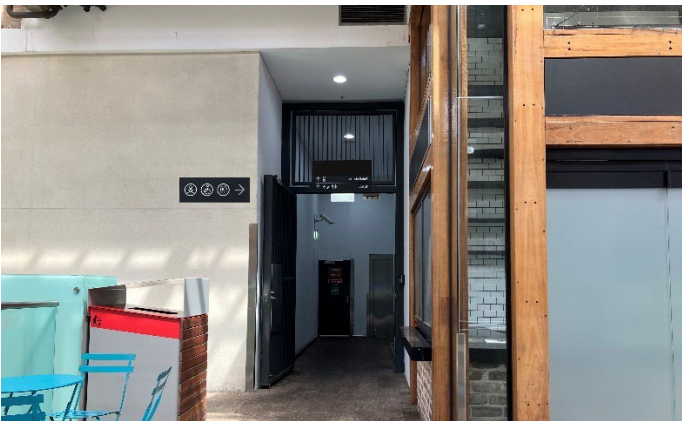


Figure 78 View internally

Source/Notes: Ethos Urban



Figure 79 Locational map

Source/Notes: Ethos Urban

(7A) The Rocks Square



Figure 80 Internal signage

Source/Notes: Ethos Urban

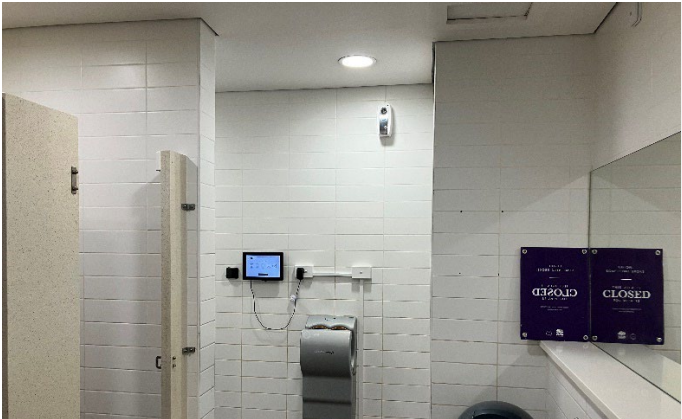


Figure 81 Hand dryer and internal condition

Source/Notes: Ethos Urban



Figure 82 Signage

Source/Notes: Ethos Urban



Figure 83 Internal condition

Source/Notes: Ethos Urban



Figure 84 Feedback form

Source/Notes: Ethos Urban



Figure 85 Locational map

Source/Notes: Ethos Urban

(8) Well Courtyard



Figure 86 Female bathroom

Source/Notes: Ethos Urban



Figure 87 External view of Well Courtyard

Source/Notes: Ethos Urban



Figure 88 View facing east

Source/Notes: Ethos Urban



Figure 89 External view of Well Courtyard

Source/Notes: Ethos Urban

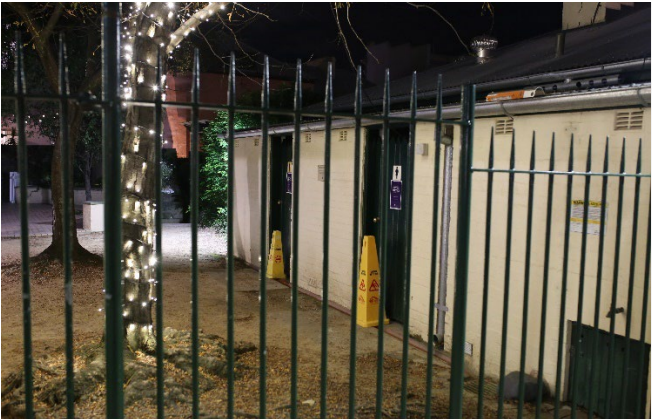


Figure 90 Night audit – May 2022

Source/Notes: Ethos Urban



Figure 91 Locational map

Source/Notes: Ethos Urban

(9) Museum of Contemporary Art (MCA)



Figure 92 Signage

Source/Notes: Ethos Urban



Figure 93 Internal access

Source/Notes: Ethos Urban



Figure 94 Parents Room

Source/Notes: Ethos Urban



Figure 95 View from Circular Quay

Source/Notes: Ethos Urban



Figure 96 'All Gender' signage at MCA

Source/Notes: Ethos Urban



Figure 97 Locational map

Source/Notes: Ethos Urban

(10) Nurses Walk (Gloucester and Harrington)



Figure 98 Night audit view

Source/Notes: Ethos Urban



Figure 99 Baby change table

Source/Notes: Ethos Urban

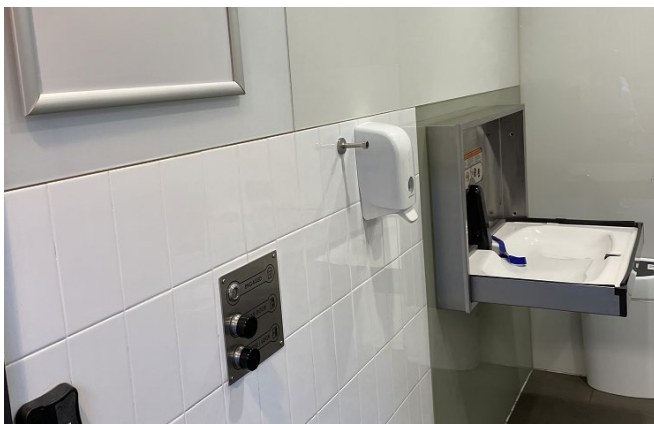


Figure 100 Baby change table

Source/Notes: Ethos Urban

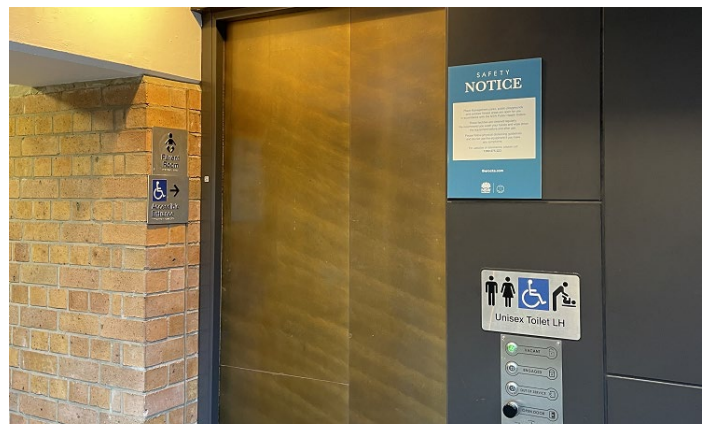


Figure 101 External access

Source/Notes: Ethos Urban



Figure 102 Signage

Source/Notes: Ethos Urban

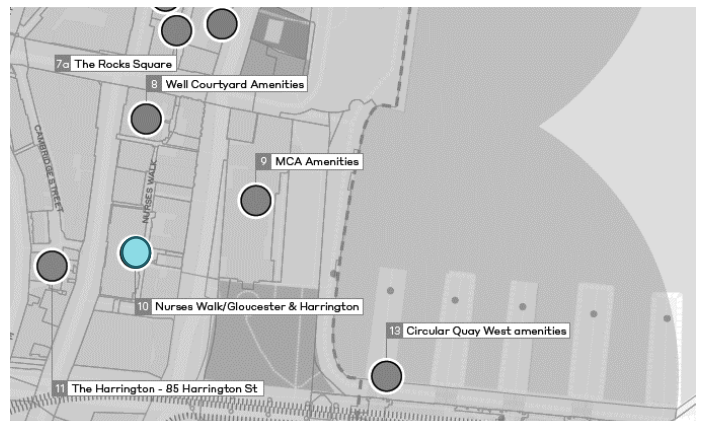


Figure 103 Locational map

Source/Notes: Ethos Urban

(11) The Harrington (85 Harrington St aka The Harrington Collective)



Figure 104 Signage is not consistent

Source/Notes: Ethos Urban



Figure 105 Lift access required

Source/Notes: Ethos Urban



Figure 106 Night activation Nurses Walk

Source/Notes: Ethos Urban

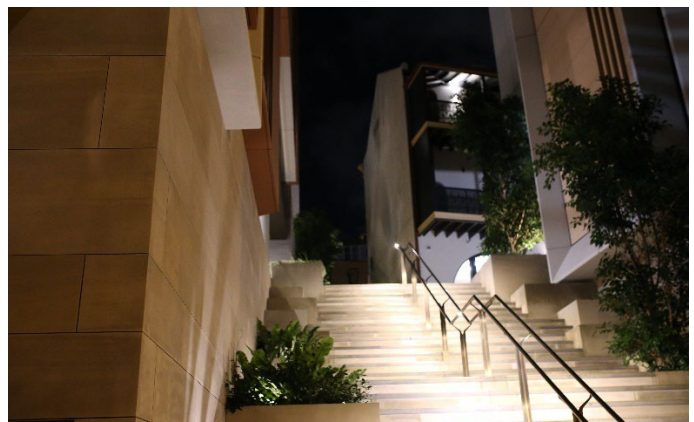


Figure 107 Night activation

Source/Notes: Ethos Urban

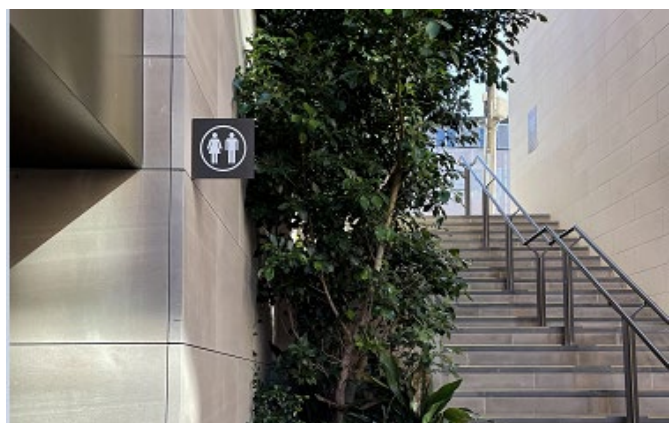


Figure 108 Access is via stairs or lift

Source/Notes: Ethos Urban

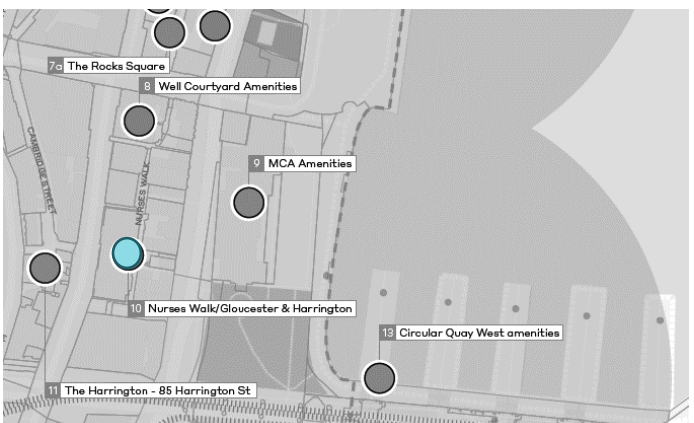


Figure 109 Locational map

Source/Notes: Ethos Urban

(13) Circular Quay West Train Station



Figure 110 Facing east towards facilities

Source/Notes: Ethos Urban



Figure 111 Internal entrance

Source/Notes: Ethos Urban



Figure 112 Internal condition

Source/Notes: Ethos Urban

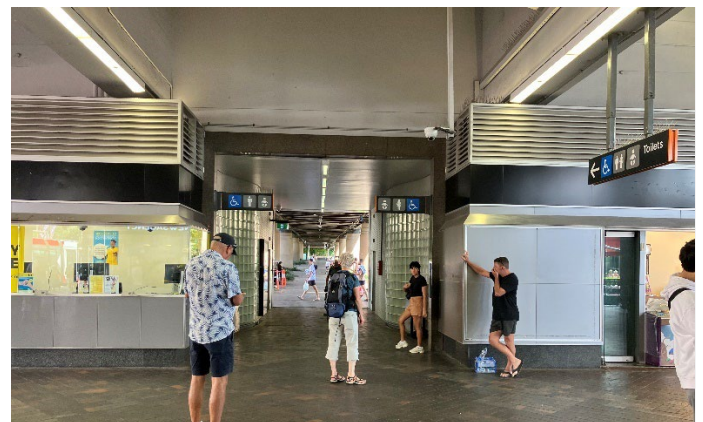


Figure 113 Signage is generally clear

Source/Notes: Ethos Urban



Figure 114 Entrance to facilities

Source/Notes: Ethos Urban

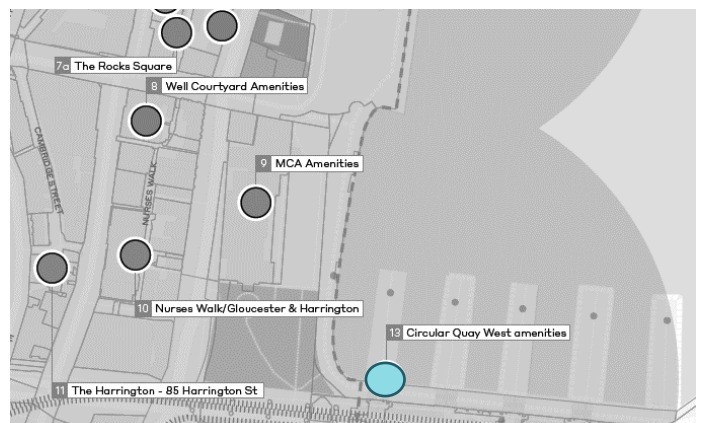


Figure 115 Locational map

Source/Notes: Ethos Urban

Darling Harbour | Tumbalong

The following pages identify photos from site visits to inform the Audit Matrix.

(1) Darling Square Dining Precinct



Figure 116 Internal condition

Source/Notes: Ethos Urban



Figure 117 External signage

Source/Notes: Ethos Urban



Figure 118 Signage to baby change/unisex/acc

Source/Notes: Ethos Urban

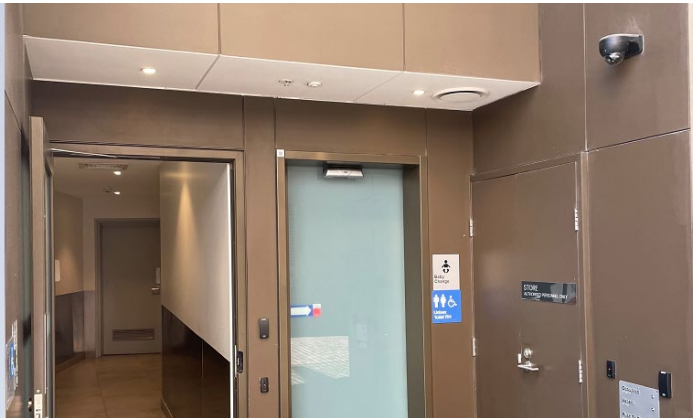


Figure 119 Baby change and unisex /accessible toilet

Source/Notes: Ethos Urban

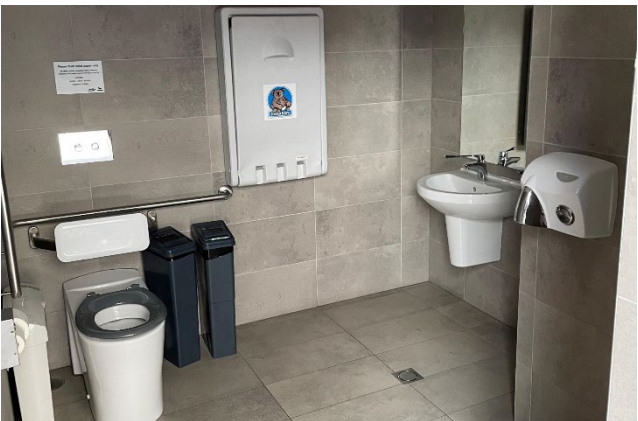


Figure 120 Internal condition

Source/Notes: Ethos Urban



Figure 121 Locational map

Source/Notes:

(1a) Darling Square Library



Figure 122 Signage to facilities

Source/Notes: Ethos Urban

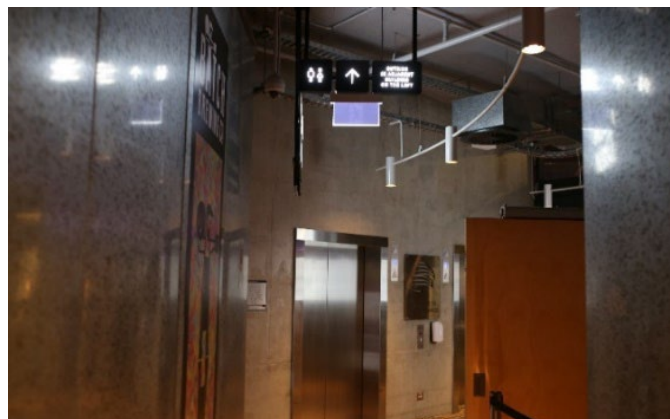


Figure 123 Internal access to bathrooms

Source/Notes: Ethos Urban



Figure 124 Signage internally

Source/Notes: Ethos Urban

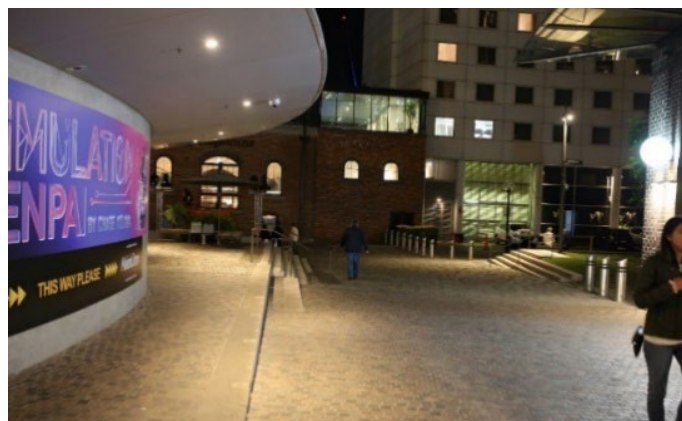


Figure 125 Night audit external access

Source/Notes: Ethos Urban

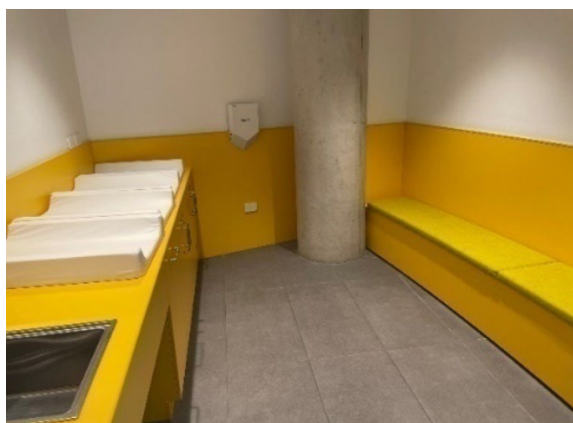


Figure 126 Parents' room

Source/Notes: Ethos Urban



Figure 127 Locational Map

Source/Notes: Ethos Urban

(2) Pier Street Amenities



Figure 128 Signage

Source/Notes: Ethos Urban



Figure 129 External artwork

Source/Notes: Ethos Urban



Figure 130 Internal artwork activation

Source/Notes: Ethos Urban



Figure 131 Entrance to Pier St facilities

Source/Notes: Ethos Urban



Figure 132 Internal condition

Source/Notes: Ethos Urban



Figure 133 Locational Map

Source/Notes: Ethos Urban

(3) Liverpool Street Amenities



Figure 134 Internal condition

Source/Notes: Ethos Urban



Figure 135 Baby change facilities

Source/Notes: Ethos Urban



Figure 136 Combined female/accessible

Source/Notes: Ethos Urban



Figure 137 Entry to the female facilities

Source/Notes: Ethos Urban



Figure 138 Baby change facilities in Female facilities

Source/Notes: Ethos Urban



Figure 139 Locational map

Source/Notes: Ethos Urban

4) ICC DQ Amenities



Figure 140 Entrance signage

Source/Notes: Ethos Urban



Figure 141 Entrance to bathrooms

Source/Notes: Ethos Urban

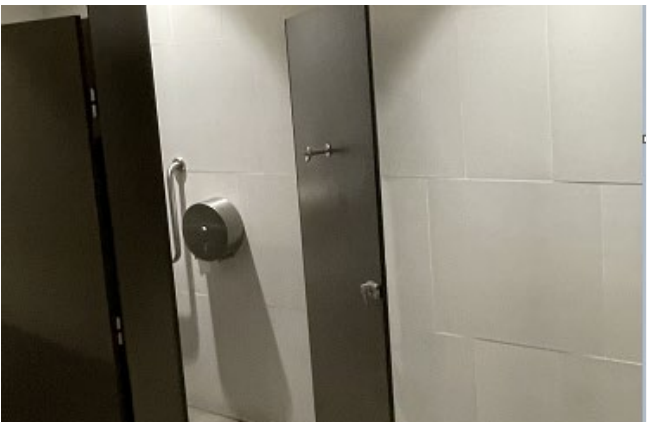


Figure 142 Internal condition

Source/Notes: Ethos Urban

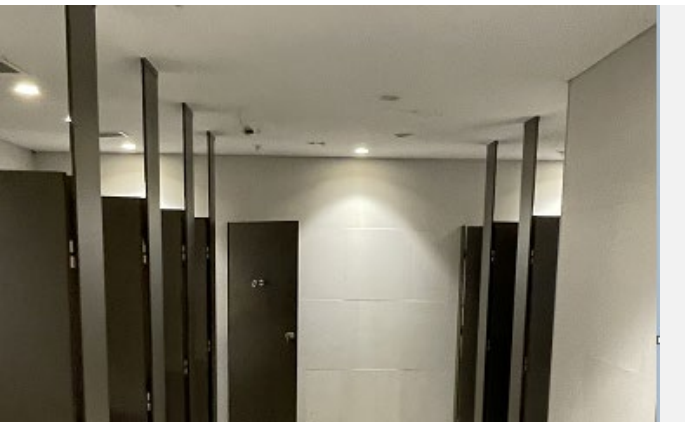


Figure 143 Internal condition

Source/Notes: Ethos Urban



Figure 144 Signage to accessible bathroom

Source/Notes: Ethos Urban

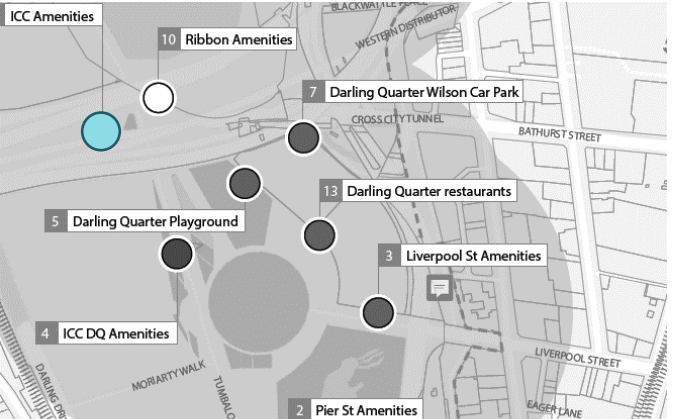


Figure 145 Locational map

Source/Notes: Ethos Urban

(5) Darling Quarter Playground

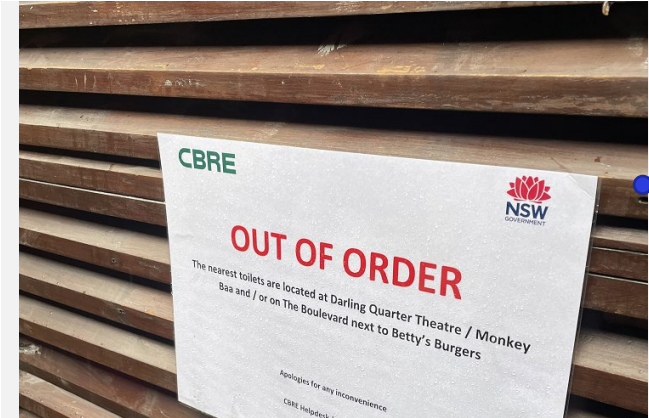


Figure 146 Signage at time of site visit (2022)

Source/Notes: Ethos Urban



Figure 147 External condition

Source/Notes: Ethos Urban



Figure 148 Night audit photo

Source/Notes: Ethos Urban

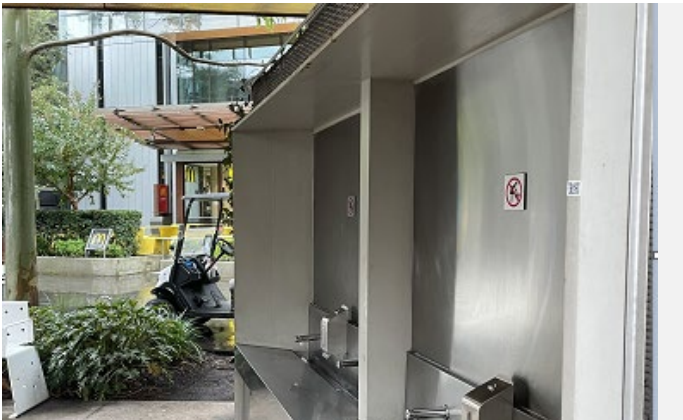


Figure 149 Handwash facilities

Source/Notes: Ethos Urban



Figure 150 Baby change table in accessible

Source/Notes: Ethos Urban

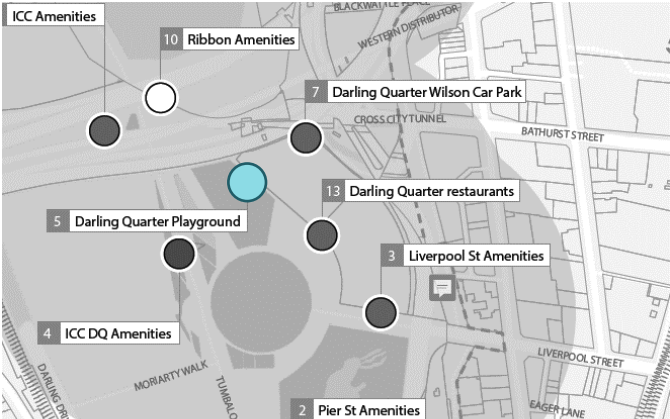


Figure 151 Locational map

Source/Notes: Ethos Urban

(6) ICC Carpark Amenities



Figure 152 Carpark entrance/exit

Source/Notes: Ethos Urban

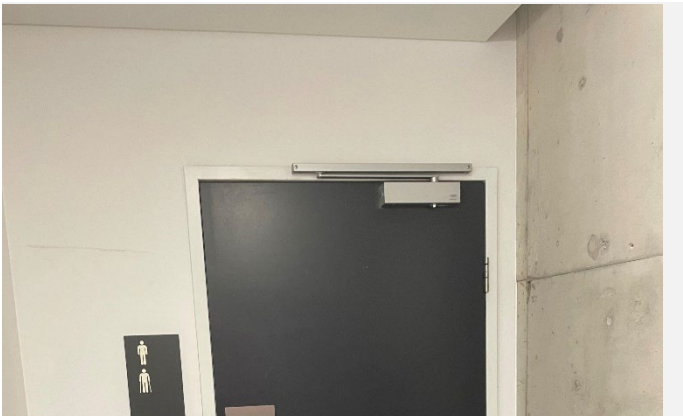


Figure 153 Signage to facilities

Source/Notes: Ethos Urban

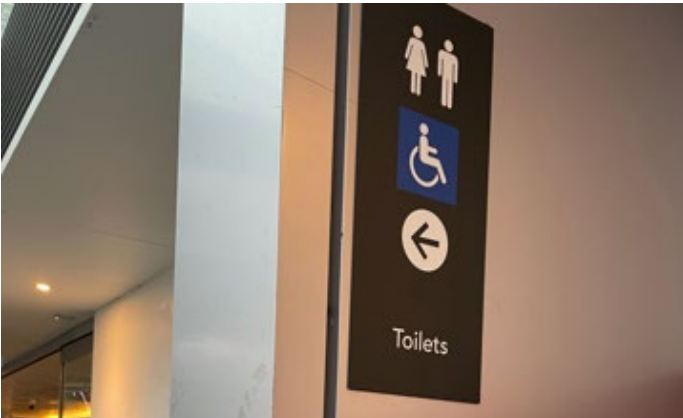


Figure 154 Signage to bathroom

Source/Notes: Ethos Urban



Figure 155 Internal access

Source/Notes: Ethos Urban



Figure 156 Ambulant facilities available

Source/Notes: Ethos Urban



Figure 157 Locational Map

Source/Notes: Ethos Urban

(7) Darling Quarter Wilson Car Park



Figure 158 Entrance via lifts to carpark

Source/Notes: Ethos Urban



Figure 159 Night Audit photos

Source/Notes: Ethos Urban



Figure 160 Internal condition

Source/Notes: Ethos Urban



Figure 161 Entrance to facilities

Source/Notes: Ethos Urban



Figure 162 Internal condition

Source/Notes: Ethos Urban

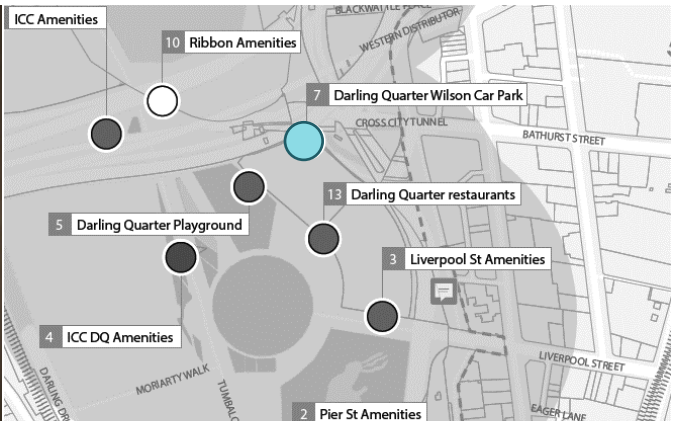


Figure 163 Locational Map

Source/Notes: Ethos Urban

(9) Cockle Bay Wharf (Existing -to be redeveloped)

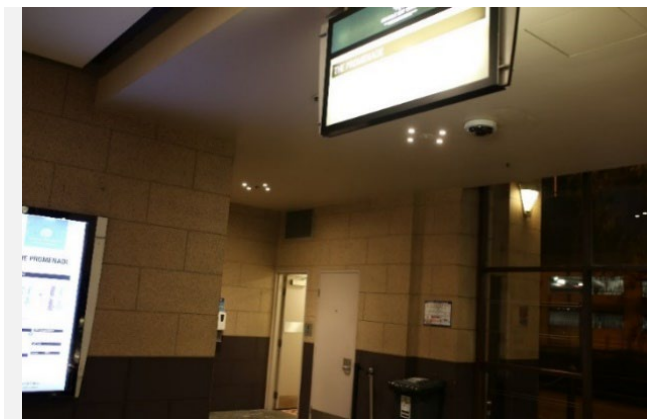


Figure 164 Internal access

Source/Notes: Ethos Urban



Figure 165 Internal sharps

Source/Notes: Ethos Urban

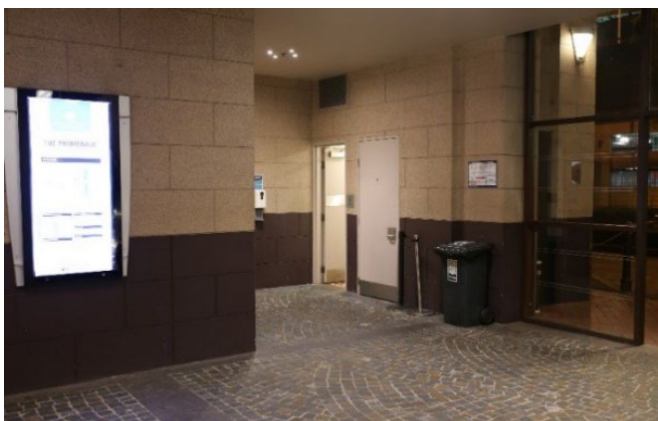


Figure 166 Internal access

Source/Notes: Ethos Urban



Figure 167 Accessible bathroom

Source/Notes: Ethos Urban

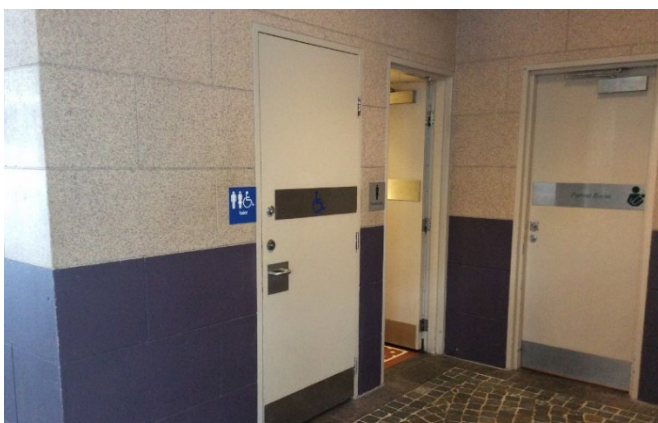


Figure 168 Internal bathrooms

Source/Notes: Public Toilet Map

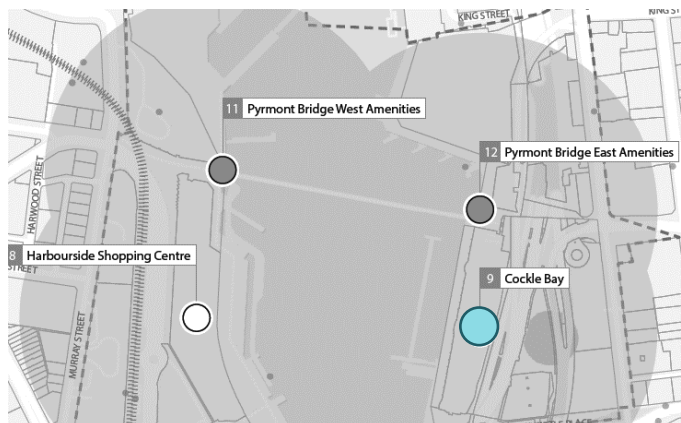


Figure 169 Locational map

Source/Notes: Ethos Urban

(11) Pyrmont Bridge West Amenities

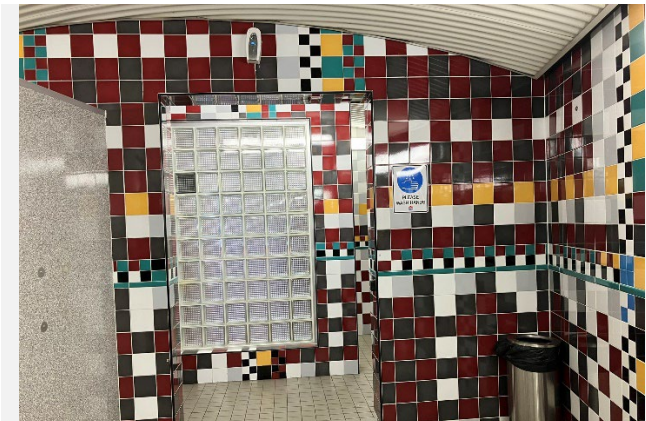


Figure 170 Inside of facilities

Source/Notes: Ethos Urban



Figure 171 Entry to facilities

Source/Notes: Ethos Urban



Figure 172 Facilities

Source/Notes: Ethos Urban



Figure 173 Internal condition

Source/Notes: Ethos Urban

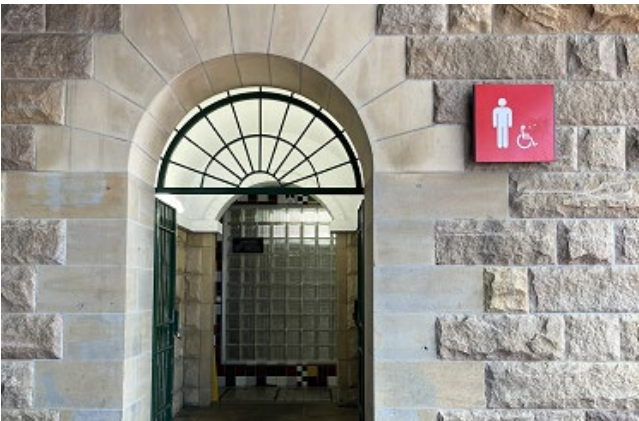


Figure 174 Entrance to men's

Source/Notes: Ethos Urban

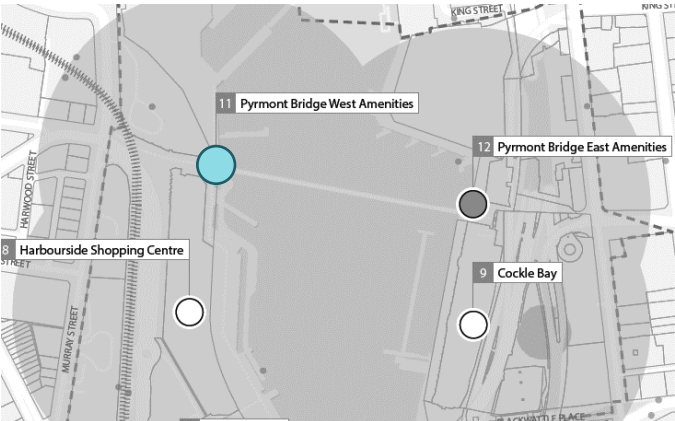


Figure 175 Locational Map

Source/Notes: Ethos Urban

(12) Pyrmont Bridge East Amenities



Figure 176 Entrance to facilities

Source/Notes: Ethos Urban

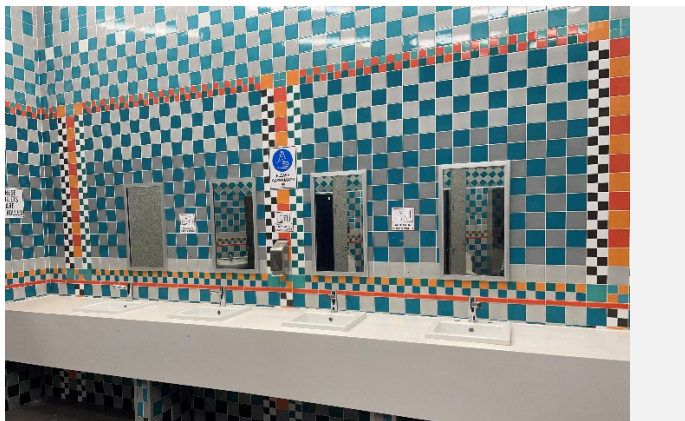


Figure 177 Inside of mens facilities

Source/Notes: Ethos Urban



Figure 178 Entrance to Pyrmont Bridge East amenities

Source/Notes: Ethos Urban



Figure 179 Women's facilities

Source/Notes: Ethos Urban



Figure 180 Men's facilities

Source/Notes: Ethos Urban

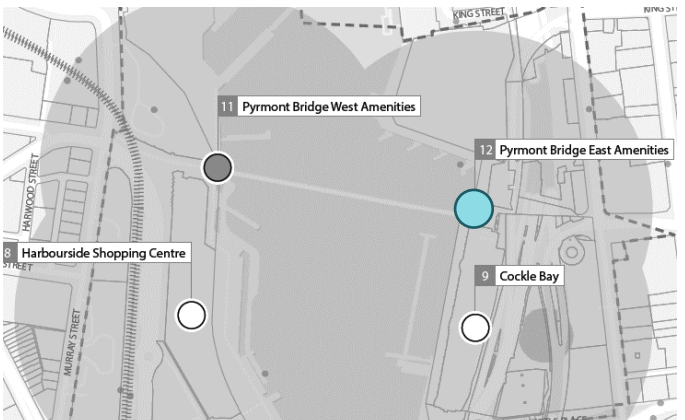


Figure 181 Locational Map

Source/Notes: Ethos Urban

(13) Darling Quarter Theatre / Restaurants



Figure 182 Entrance at night

Source/Notes: Ethos Urban



Figure 183 Entrance at night

Source/Notes: Ethos Urban

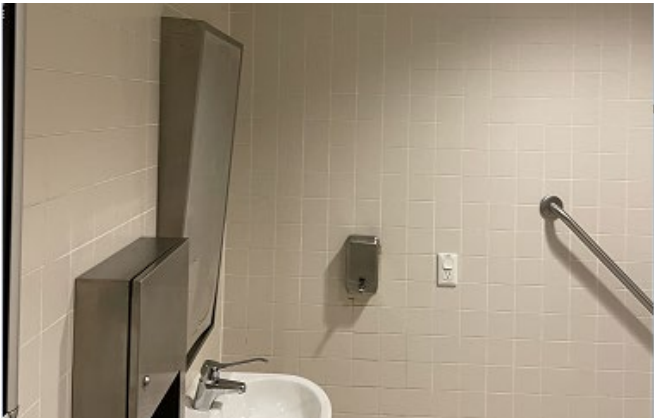


Figure 184 Internal condition

Source/Notes: Ethos Urban



Figure 185 Internal signage

Source/Notes: Ethos Urban



Figure 186 Signage internally

Source/Notes: Ethos Urban

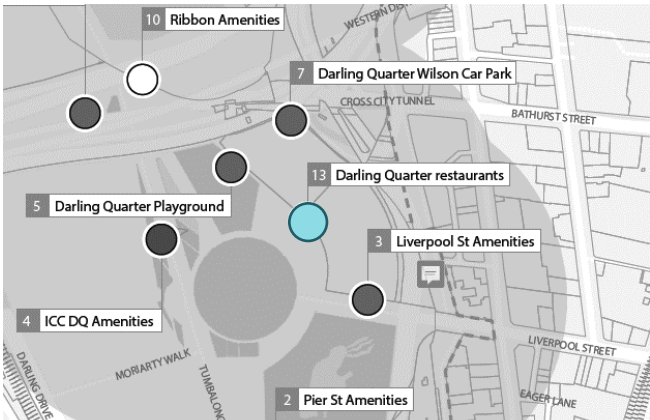


Figure 187 Locational map

Source/Notes: Ethos Urban

(14) Metcalfe Park Trouton Place



Figure 188 Street view

Source/Notes: Ethos Urban



Figure 189 External entrance

Source/Notes: Ethos Urban

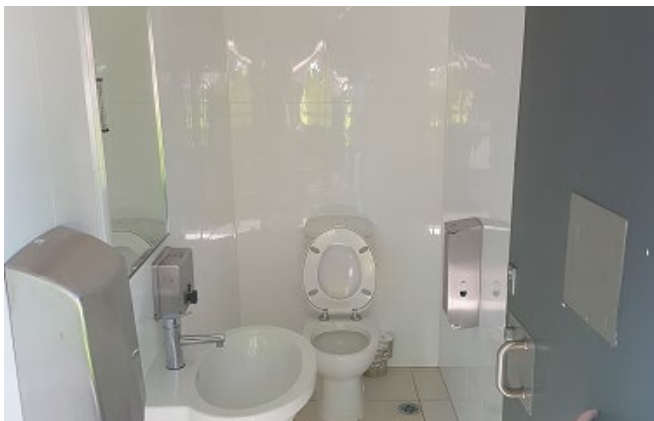


Figure 190 Internal condition

Source/Notes: Ethos Urban

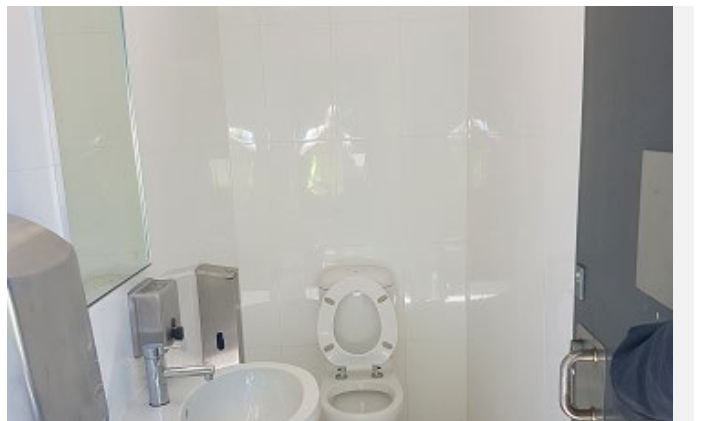


Figure 191 Internal condition

Source/Notes: Ethos Urban



Figure 192 Internal condition

Source/Notes: Ethos Urban



Figure 193 Locational map

Source/Notes: Ethos Urban

Appendix 2 Definitions

Definitions

Terms used	Definition
Ambulant Facility	A facility that is accessible to those with ambulant disabilities (e.g., sensory loss, arthritis, use of a walking frame) who are not confined to a wheelchair. Ambulant facilities do not provide the required additional space needed for wheelchair access.
Accessible Facility	A facility designed to provide space to accommodate wheelchair access and assistance when transferring from wheelchair to toilet, with features such as lower mirrors and washbasins and grab rails. These are also sometimes referred to as Disabled Facilities.
All-Gender/Gender-Neutral Facility	A facility that is accessible to all people regardless of gender, preferred over 'unisex' by the LGBTI community as it recognises that some members of the community do not identify as either male or female.
Australian Standard (AS1428)	AS1428 specifies that new buildings must be capable of providing access to people with disabilities. Particular attention is focused on continuous accessible paths of travel for wheelchair users, access for people with ambulatory disabilities and access for people with sensory disabilities.
Automated Public Toilet (APT)	A fully automated public toilet, including electronically controlled doors, fit with touchless amenities and sometimes self-cleaning and monitoring systems.
Building Code of Australia (BCA)	A uniform set of technical provisions to be incorporated into the design and construction of buildings and other structures within Australia.
Changing Places Toilet	Public toilet facilities that cater for people (including adults) who cannot use standard accessible toilets, with high support needs such as severe or profound disabilities. These facilities incorporate full sized change tables tracking hoist systems, large circulation spaces and a centrally placed toilet with room for carers.
Crime Prevention Through Environmental Design (CPTED)	An approach to the prevention of crime focusing on the relationship between physical environments and those who use them.
Co-located	A public toilet that is externally accessible and attached to, or within, an existing building structure such as a visitor centre or a library.
Disability Discrimination Act (DDA)	The Disability Discrimination Act 1992 makes discrimination against an individual because of their disability unlawful. This applies to a number of areas of public life including employment, education and the access of public places.
Ecologically Sustainable Design (ESD)	An integrated and holistic approach to design that aims to reduce negative environmental impacts and improve the health of building occupants. Principles of ESD include the promotion of renewable energy, reducing water use, inclusion of environmentally friendly building materials and optimising operational practices.
Gender-Neutral/All-Gender Facility	A facility that is accessible to all people regardless of gender, preferred over 'unisex' by the LGBTI community as it recognises that some members of the community do not identify as either male or female.
Interface Signage	The design or use of signs and symbols to communicate information to a particular or broad range of user groups, for the purpose of wayfinding and typologies.
National Public Toilet Map	<p>Developed as part of the National Continence Program, the National Public Toilet Map provides information and the location of more than 19,000 toilets across Australia.</p> <p>The map also shows listings of publicly available toilets in private businesses such as petrol stations and community centres. Information about the level of accessibility, opening hours and other facilities is provided.</p> <p>The map is also available as an app for smartphones and tablet devices.</p>
Family or Parents' Room	A safe, private place for parents and carers to feed, change and care for young children while they are out and about. They should provide easy pram access, a private place to feed, comfortable seating, clean environment, nappy changing area and sink with hand drying facilities,

Terms used	Definition
	and waste containers. May or may not include a confined play area and a special, smaller toilet for toddlers.
Public Toilet	<p>A facility containing one or more rooms/cubicles with one or more toilets or urinals which is available for use by the public without restriction during hours of operation. The facility may be mechanised or automated and consist of stand-alone, service-hosted and privately provided facilities.</p> <p>For the purposes of the strategy, a Public Toilet is further defined as <u>one which is directly accessible from the public domain</u>.</p>
Snap Send Solve	Snap Send Solve is an app that gives residents the ability to report maintenance issues to their local council. The app allows users to take a photo of the issue then send it directly to the appropriate authority/department. It currently has more than 60,000 users across Australia
Stand Alone	A free-standing toilet building, usually a toilet block, that has separate male, female, and all-gender/gender-neutral entrances.
Unisex Facility	A facility that is accessible for use by any gender, however the outdated title presumes its occupant identifies themselves according to a gender binary, as one of two distinct and opposite forms of masculine and feminine.

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