

Morris Goding Access Consulting

# **Stephen Horrell - Pavilions**

171 Forest Way Belrose,NSW – Seniors Living(Belrose Pavilions)

# Access Review Final v2

# 29 June 2022

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## 1. Executive Summary

The Access Review Report is a key element in the design of the SEPP Seniors Living development located at 171 Forest Way Belrose NSW 2085, and an appropriate response to the SEPP Seniors Living Policy, AS1428 series, Building Code of Australia (BCA), and DDA Access to Premises Standards (including DDA Access Code).

The review will ensure that ingress and egress, paths of travel, circulation areas, and sanitary facilities, dwellings comply with relevant statutory guidelines at Part 5 submission.



#### Introduction 2

#### 2.1 Background

Stephen Horrell/Pavilions has engaged Morris-Goding Accessibility Consulting, to provide a design review of the SEPP Seniors Housing Development located at 171 Forest Way Belrose NSW 2085.

The development consists of,

- The demolition of existing structures.
- 6 blocks (A, B, C, D, E, and F) this includes 35 Residential Apartments. -
- Basement and on-grade car parking \_
- Residential communal facilities and associated landscape works. \_



Figure 1. Development proposed Site Analysis Plan.

The proposed development falls under a number of BCA classifications:

- Class 2 (residential) \_
- Class 7a (carpark) -
- Class 9b (common room) \_

Areas of the development classified under the above BCA building classifications will need to consider the following key issues;

Access to and within principal entrances to the premises from the allotment boundary



- Access up to entrance doorways of residential sole occupancy units
- Access to and within common use areas
- Access to and within all areas normally used by the occupants
- Accessible car parking spaces
- Signage for persons with disabilities
- Sanitary facilities for persons with disabilities

The requirements of the investigation are to:

- Review supplied drawings of the proposed development;
- Provide a report that will analyse the provisions of disability design of the development, and
- Recommend solutions that will ensure the design complies with the Disability Discrimination Act (DDA), Building Code of Australia (BCA), State Environmental Planning Policy (SEPP), relevant Australian Standards, and enhanced benchmark requirements set by the project.

#### 2.2 Objectives

The Report seeks to ensure compliance with statutory requirements and enhanced benchmark requirements set by the project. The Report considers user groups, who include residents, and visitors. The Report attempts to deliver equality, independence and functionality to people with a disability inclusive of:

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

The Report seeks to provide compliance with the State Environmental Planning Policy (SEPP) and the Disability Discrimination Act 1992. In doing so, the report attempts to eliminate, as far as possible, discrimination against persons on the ground of disability.

#### 2.3 Accessibility of Design

The proposed design will utilise the Federal Disability Discrimination Act (DDA), Disability (Access to Premises – Buildings) Standards 2010, BCA/DDA Access Code, Universal Design principles, SEPP Seniors Living Policy, AS1428 Series, and other design guidelines, to develop appropriate design documentation, to provide reasonable access provisions for people with disabilities.

The design will be developed to ensure the principles of the DDA are upheld. Under the DDA, it is unlawful to discriminate against people with disabilities in the provision of appropriate access, where the approach or access to and within a premise, makes it impossible or unreasonably difficult for people with disabilities to make use of a particular service or amenity.



#### 2.4 Statutory Requirements

The statutory and regulatory guidelines to be encompassed in the developed design to ensure effective, appropriate and safe use by all people, including those with disabilities, will be in accordance with:

- Federal Disability Discrimination Act (DDA);
- Disability (Access to Premises Buildings) Standards 2010;
- Building Code of Australia (BCA) Part D3, E3, F2;
- AS 1428.1:2009 (General Requirement of Access);
- AS 1428.4.1:2009 (Tactile Ground Surface Indicators);
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004
- AS 2890.6:2009 (Parking for people with disabilities)
- Northern Beaches Council (Warringah) LEP 2000

#### 2.5 Limitations

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



#### Proposed Scheme and Regulatory Background 3

#### 3.1 General

The project objectives, BCA building classifications, and applicable development controls, bring into relevance the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, the Building Code of Australia 2019 and the Disability (Access to Premises – Buildings) Standards 2010.

#### 3.2 **SEPP Seniors Living Policy**

The SEPP (Housing for Seniors or People with a Disability) 2004, hereinafter cited as 'the SEPP', is intended to promote a balance between the need for greater housing choice and the need to safeguard the character of residential neighbourhoods.

The development proposes 100% of the accommodation to qualify as SEPP Seniors Living.

Compliance issues associated within the SEPP can be summarised as follows;

- Appropriate pedestrian linkages to essential services external to the development site.
- Appropriate paths of travel to public transport which connects with local centres containing all essential services.
- Wheelchair accessible paths of travel to a minimum percentage of dwellings (determined by site gradients).
- Wheelchair accessible paths of travel to common areas and common facilities, including letterbox areas and garbage areas.
- Private car accommodation for SEPP Seniors Living dwellings designed in accordance with AS2890.
- Accessible entry and passage through the dwelling, including through all internal doorways, in compliance with AS1428.1.
- Main bedroom suitably sized to accommodate a queen size bed (1530mm x 2100mm L) and circulation around all edges including an area for wheelchair turning in accordance with AS1428.1.
- Main bathroom suitably sized and fit out as a compliant AS1428.1 layout with a visitable toilet compliant with AS4299.

Visitable - toilet has a space of minimum 1250mm in front of the toilet x 900mm wide clear of the swing and fixtures.

- Slip resistant floor surfaces.
- Door hardware and ancillary items in compliance with AS4299. -
- Suitable living area circulation in compliance with AS4299. -
- Kitchen circulation, joinery, and appliance layout in compliance with AS4299.



- Suitable circulation space forward of laundry appliances.
- Linen storage in accordance with AS4299.



### 4 Ingress & Egress

#### 4.1 External Linkages

The BCA and DDA Premises Standards contain requirements for site approaches for the use of persons with disabilities. These requirements are applicable to the Class 2 residential buildings of the development and can be summarised as follows:

- An accessible path of travel from main pedestrian entry points at the site allotment boundary to all building entrances compliant with AS1428.1:2009. Currently requirement appears capable of being achieved as level access is provided at level 7 from the allotment boundary. Note cross falls are to be 1:40 max gradient.
- An accessible path of travel between buildings (or parts of buildings) that are connected by a pedestrian linkage, within the site allotment boundary, compliant with AS1428.1:2009 is also required. Currently requirement appears capable of being achieved as lift access is provided (x3) as shown below in yellow.



Figure 2. Proposed Vertical and Horizontal Pedestrian Links Shown in Yellow (all 6 blocks)

- An accessible path of travel to building entrances (required to be accessible) from associated accessible car-parking bays, compliant with AS1428.1:2009 is required. Currently requirement appears capable of being achieved as all carparking is connected via lift.

#### Assessment

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

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.



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

#### 4.2 Entrances

The BCA and DDA Premises Standards contain requirements for building entry for the use of persons with disabilities. These requirements are applicable to the Class 2 residential buildings of the development and can be summarised as follows:

- Access through at least 50% of entrances, including the principal pedestrian entrance/s \_ to all buildings or parts of buildings (i.e. when they have a separate function and/or use e.g. external retail tenancy). Note it is preferred that all entrances are accessible.
- A non-accessible entry located no more than 50m distance from an accessible entry (for buildings greater than 500m2).
- All accessible doors with 850mm min. clear width opening and suitable door circulation area, compliant with AS1428.1:2009.
- An accessible path of travel e.g. ramp or lift provided adjacent (or in reasonable proximity) to any stair access. Note: providing choice of access route directly adjacent so that people can start and finish in the same location/travel similar route promotes inclusion and UD principles.

#### Assessment

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

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

#### 4.3 **Emergency Egress**

BCA 2019 Part D2.17 has requirements for all fire-isolated egress stairs from areas required to be accessible (not communication stairs) to include at least one continuous handrail designed to be compliant with AS1428.1 Clause 12. Provision of an off-set tread at the base of stair flights or an extended mid-landing that will allow a 300mm extension clear of egress route is considered appropriate for achieving a consistent height handrail (without vertical or raked sections). Currently, this requirement has not been achieved as majority of egress stairs do not provide off-set tread at middle landings. Stairs are to be adjusted for compliance.

Where fire-isolated egress stairs will also be used for communication stair purposes between levels, they should be designed to meet AS1428.1:2009. Confirmation is required on the likely use of certain stairs for this purpose.

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



Consideration of management systems and fire wardens for emergency egress for people with disabilities.

#### Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Non-compliance regarding the lack of stairs off-set tread in middle landings noted above is required to be addressed for compliance.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).



### 5 Paths of Travel

#### 5.1 Circulation Areas

The BCA and DDA Premises Standards contain requirements for circulation areas for the use of persons with disabilities. These requirements are applicable to the Class 2 residential buildings of the development and can be summarised as follows:

- Wheelchair passing bays (1800mm width x 2000 length) when a direct line of sight is not available and are to be provided at 20m max. intervals along access-ways. Currently, this requirement has not been achieved as there is a lack of a passing bay at the entry junction of bin recycle area and pedestrian pathways leading to the residential blocks. This is to be adjust for compliance. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.
- Turning spaces (at least 1540mm W x 2070mm L) within 2m of every corridor end and at 20m.max intervals along all access-ways. This is needed for wheelchairs to make a 180 degree turn, compliant with AS1428.1:2009. Currently the requirement appears capable of being achieved.
- All common-use doors (i.e. not excluded under Part D3.4) with 850mm min. clear width opening (each active door leaf) and suitable door circulation area, compliant with AS1428.1:2009. Currently the requirement appears capable of being achieved.
- All common-use corridors and accessible paths of travel with at least 1000mm min. width when travelling in linear direction Note: Increased clear width paths of travel required for doorway circulation, turning areas etc. Currently the requirement appears capable of being achieved.
- Continuous accessible path of travel (CAPT) is to be step free. Currently the requirement appears capable of being achieved as it is noted in the documentation what may appears to be steps in the continuous accessible path of travel. MGAC understands that there is a drawing issue and all continuous accessible paths of travel are on-grade (step-free).

#### Assessment

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

Landscape facing Forrest Way and passage between blocks E and C and perimetral pathway around lawn (oval) - Clarification is required on whether area is of common use. If this is the case, pathways are to provide 1-meter minimum clear width, 1800mm x 2000mm passing bays are to be provided where there is a lack line of sight, 1500mm minimum clear width curved pathway to be provided and 1540mm 2070mm to dead-end to achieve 'U' turn. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.



Provide further information regarding location of accessible path of travel or confirm the proposed observation deck and roof decks (x3). These areas are required to be accessible under SEPP and WLEP.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

#### 5.2 **Passenger Lifts**

The BCA and DDA Premises Standards contain requirements for passenger lifts and circulation areas for the use of persons with disabilities. These requirements are applicable to the Class 2 residential buildings of the development and can be summarised as follows:

- Passenger lifts with min. internal size at floor of 1400mm width x 1600mm depth, \_ compliant with BCA/DDA Access Code Part E3.6 and AS1735.12. Currently requirement appears capable of being achieved.
- All lift lobbies and main corridors on each level with 1800mm min. clear width to allow two wheelchairs ability to space pass each other. There are three (3) lifts provided at 1 lift for every 2 blocks. These connect all level 3 levels of each block with suitable circulation spaces at lift lobby.

#### Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. It is understood level six has two lifts (L1 and L2), carpark 2 is not directly connected to units on this level and connection occurs via lift (L1) to L5 or L7 (L2). Consider direct connection from carparking on level six to units on level six. This is a DDA issue that needs to be address for compliance.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

#### 5.3 Stairs and Ramps

The BCA and DDA Premises Standards contain requirements for stairs and ramps for the use of persons with disabilities. These requirements are applicable to the 2 residential buildings of the development (and stairs and ramps within the landscaped areas) and can be summarised as follows:

- Stairs with handrails on both sides with minimum 1 metre clearance in accordance with AS1428.1.
- Landings 1200mm length with 1500mm length at 90 degree turns.
- Stairs handrails on both sides in accordance with AS1428.1
- Stairs with offset to ensure no encroachment of handrail extensions into from transverse path of travel at top and bottom of stair/ramp. Communication stairs



connecting levels 8 and 9 are to ensure space for handrail extensions and TGSI's. These to be provided during further stage.

- Doorway threshold ramp is to have 1:8 gradient, 35mm max. height and 280mm max. length, compliant with AS1428.1. Currently, this requirement has not been achieved as carparking on level 1 has a 20mm level difference (internal/external) without door threshold ramp. Provide threshold ramps at the junction between the accessible parking bay and pathway, and at the doorway leading to the lift lobby. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

#### Assessment

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

Stairs facing north is not an egress stair and requires compliance with AS1428.1. Clarification is required on whether this is a common use or maintenance stair.

If stairs are maintenance only, gates are to be incorporated at the top and bottom, to ensure restricted access.

If stairs are for common use, clarify the location of continuous accessible path of travel to be adjacent to the stair.

Ensure stairs are 1200mm min. overall width.



### 6. Site Topography & Linkages

6.1 Location and access to facilities – (SEPP 2004 Part 2, Sub-clauses 26(1) and (2))

(1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the proposed development will have access that complies with subclause (2) to:

(a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and

- (b) community services and recreation facilities, and
- (c) the practice of a general medical practitioner.

(2) Access complies with this clause if:

(c) in the case of a proposed development on land in a local government area is not within the Sydney Statistical Division – there is a public transport service available to the residents who will occupy the proposed development:

(i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and

(ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and

(iii) that is available both to and from the proposed development at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday (both days inclusive),

and the gradient along the pathway from the site to the public transport services and from the public transport services to the facilities and services referred to in subclause (1)) complies with subclause (3).

#### Assessment

A local shopping centre exists at 56-58 Glen Street Belrose which is approximately 2km from the site. A larger shopping centre (Belrose Supa Centre) is approximately 4km away. All required services are likely to be provided by either facility. The distances to these localities exceed the maximum 400m walking distance prescribed by both SEPP and WLEP.

Where the services are not available within the walking distances prescribed, a public transport system can be used. Currently public transport services are available to both Shopping Centres.

A bus service operated by Forest Coach Lines provides a service to both Shopping Centres:

From the front entrance to the site it is approx. 60m walk to bus stop ID: 208541



to catch Terry Hills service 283 to bus stop 208545.

Upon crossing the road to bus stop 208587 it is possible to catch either:

- service 283 (Belrose to Chatswood operated by Forest Coach Lines) to the Glen Street Belrose shopping centre; or
- catch service 270 (City QVB to Terrey Hills) to the Belrose Supa Centre.

Both of these routes are available within the prescribed walking distance of 400m from the proposed residential aged care facility. Both of these routes provide opportunities for the residents to travel at least once between 8am and 12 noon and at least once between 12 noon and 6pm.



Figure 1. Pedestrian Pathway from 171 Forrest Way to Bus Stop (283/270 Bus Route Inc. Stop 20857)

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. It is noted that the accessible footpath to bus stop plan provided shows that the pathway has suitable width with over 1200mm.

On the basis of the current level of detail all access requirements achieve compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

#### 6.2 Housing Siting (Schedule 3 Part 1 Clause 2 (1) & (2))

(1) If the whole of the site has a gradient of less than 1:10, 100% of the dwellings must have wheelchair access by a continuous accessible path of travel (within the meaning of AS 1428) to an adjoining public road.

(2) If the whole of the site does not have a gradient of less than 1:10:

- a percentage of dwellings that must have wheelchair access must equal the proportion of the site that has a gradient of less than 1:10. or 50%, whichever is the greater, and
- the wheelchair access provided must use by a continuous accessible path of travel (within the meaning of AS1428.1.) to an adjoining public road or an internal road or a driveway that is accessible to all residents.

#### Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements achieve



compliance via from Forrest Way allotment boundary to 6 blocks, linkage occurs on level 7 via lifts 1 and 2.



Figure 2. Level 7 Principal Pedestrian Entrance linkage from boundary to Lift lobbies 1 and 2.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

#### 6.3. Accessibility – (Part 3 Clause 38)

The proposed development should:

(a) Have obvious and safe pedestrian links from the site that provides access to the public transport services or local facilities

(b) Provide attractive, yet safe, environment for pedestrian and motorist with convenient access and parking for residential and visitors.

#### Assessment

Proposed on-grade crossing will require appropriate features to indicate the nature of the ongrade crossing and allowed safe crossing. The proposed on-grade crossing appears to be compliant gradients under the SEPP.

There is no indication of a safe path of travel from entry to stairs facing Forrest Way. Ensure this pathway is a safe pedestrian crossing leading to level 8. This adjustment can be resolved at later design stages.

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



This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior to occupation stages.

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



### 7 Common Areas within Site

### 7.1. Common Areas (Schedule 3 Part 1 Cl 2(3))

# Access must be provided in accordance with AS1428.1 so that a person using a wheelchair can use common areas and common facilities associated with the development.

#### Assessment

Refer to item 5 above for comments regarding L7 (common room), Landscape facing Forrest Way, passage between blocks E and C and perimetral pathway around lawn (oval).

Shed 1 and 2 adjacent to lawn (oval) - Client is to confirm if these rooms are to be for maintenance use only. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

Outdoor gym and picnic area – It is not clear the location of the accessible path of travel to these facilities. Further information is to be provided for compliance.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

### 7.2. Lifts in Multi-storey buildings – (Schedule 3 Part 2 Cl 18)

# In a multi-storey building containing separate self-contained dwellings on different storeys, lift access must be provided to dwellings above the ground level of the building by way of a lift complying with Clause E3.6 of the BCA.

#### Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Refer to item 5.2 for additional comments. On the basis of the current level of detail all access requirements appear capable of achieving compliance.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

#### 7.3. Security – (Schedule 3 Part 1 Cl 3)

#### Pathway lighting

# (a) must be designed and located so as to avoid glare for pedestrians and adjacent dwellings, and

#### (b) must provide at least 20 lux at ground level.

Assessment



MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Pathway lighting will be required to be designed and located so as to avoid glare for pedestrians and adjacent dwellings, and must provide the appropriate lux level at all levels. These details will be provided during the design development stage of the project.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

#### 7.4. Letterboxes – (Schedule 3 Part 1 Cl 4)

(a) must be situated on a hard standing area and have wheelchair access by a continuous accessible path of travel (within the meaning of AS 1428).

#### (b) must be lockable, and

(c) must be located together in a central location adjacent to the street entry or, in the case of self-contained dwellings, must be located together in one or more central locations adjacent to the street entry.

#### Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Letterbox is located at the principal pedestrian entrance on Forrest Way, and provides suitable circulation in accordance with AS1428.1.

Additional details will be provided during the design development stage of the project.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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



## 8. Independent Living Unit Design

### 8.1. Accessible Entry – (Schedule 3 Part 1 Cl 6)

# Every entry (whether a front entry or not) to a dwelling, not being an entry for employees must comply with clauses 4.3.1 and 4.3.2 of AS4299.

#### Assessment

There are 35 units provided on the 6 blocks (A, B, C, D, E and F). All 35 units front entry comply with AS1428.1.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

### 8.2. Interior: general – (Schedule 3 Part 1 Cl 7)

# Widths of internal corridors and circulation at internal doorways must comply with AS1428.1.

#### Assessment

Currently, the requirement has not been achieved as various doors do not provide suitable circulations in accordance with AS1428.1 Fig31 and 32. This is required to be adjusted for compliance.

Decks do not provide RL's. Ensure internal decks/terraces provide threshold level. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

#### 8.3. Living room and Dining room – (Schedule 3 Part 2 Cl 15)

#### (1) A living room in a self-contained dwelling must have:

- (a) a circulation space in accordance with Clause 4.7.1 of AS4299, and
- (b) a telephone adjacent to a general power outlet.

# (2) A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux.

#### Assessment

Additional details will be provided during the design development stage of the project.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.



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

### 8.4. Kitchen – (Schedule 3 Part 2 Cl 16)

A kitchen in a self-contained dwelling must have:

(a) a circulation space in accordance with clause 4.5.2 of AS 4299, and

(b) a width at door approaches complying with clause 7 of this Schedule, and

(c) the following fittings in accordance with the relevant subclauses of clause 4.5 of AS 4299:

(*i*) benches that include at least one work surface at least 800 millimetres in length that comply with clause 4.5.5 (a),

(ii) a tap set (see clause 4.5.6),

(iii) cooktops (see clause 4.5.7), except that an isolating switch must be included,

(iv) an oven (see clause 4.5.8), and

(d) "D" pull cupboard handles that are located towards the top of below-bench cupboards and towards the bottom of overhead cupboards, and

#### (e) general power outlets:

(*i*) at least one of which is a double general power outlet within 300 millimetres of the front of a work surface, and

(ii) one of which is provided for a refrigerator in such a position as to be easily accessible after the refrigerator is installed.

#### Assessment

Typical units F, G, H, I, J and K kitchens have deficient circulation space between benches with 1500mm or less in lieu 1550mm minimum. All these benches are to be adjusted for compliance. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

Typical units A2, B and I do not provide 800mm workspace bench. Provide 800mm workspace bench for compliance. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

Additional details will be provided during the design development stage of the project.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

#### 8.5. Main bedroom – (Schedule 3 Part 1 Cl 8)

#### At least one bedroom within each dwelling must have:



(a) an area sufficient to accommodate a wardrobe and a bed sized as follows:

- (i) in the case of a dwelling in a hostel—a single-size bed,
- (ii) in the case of a self-contained dwelling-a queen-size bed, and

#### (b) a clear area for the bed of at least:

(i) 1,200 millimetres wide at the foot of the bed, and

(ii) 1,000 millimetres wide beside the bed between it and the wall, wardrobe or any other obstruction, and

(c) 2 double general power outlets on the wall where the head of the bed is likely to be, and

(d) at least one general power outlet on the wall opposite the wall where the head of the bed is likely to be, and

(e) a telephone outlet next to the bed on the side closest to the door and a general power outlet beside the telephone outlet, and

#### (f) wiring to allow a potential illumination level of at least 300 lux.

#### Assessment

Various proposed main bedrooms do not provide 1meter circulation space at each side of the bed. These room will be required to be adjusted and

Allow for a gueen size bed 1530mm W x 2100mm L minimum.

The proposed design is capable of achieving compliance, subject to detail noted in the above clause being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

#### 8.6. Bathroom – (Schedule 3 Part 1 Cl 9)

(1) At least one bathroom within a dwelling must be on the ground (or main) floor and have the following facilities arranged within an area that provides for circulation space for sanitary facilities in accordance with AS 1428.1:

(a) a slip-resistant floor surface,

(b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS 1428.1,

(c) a shower that complies with AS 1428.1, except that the following must be accommodated either immediately or in the future:

- (i) a grab rail,
- (ii) portable shower head,
- (iii) folding seat,



(d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it,

(e) a double general power outlet beside the mirror.

# (2) Subclause (1) (c) does not prevent the installation of a shower screen that can easily be removed to facilitate future accessibility.

#### Assessment

Type A1 3 bed – Main bathroom does not provide shower, only bath. A shower compliant with AS1428.1 circulation spaces and fixtures is to be provided for compliance.

Various units main bathrooms have a shower with deficient circulation space. Provide 1160mm W x 1100mm L shower and 1400mm x 1600mm clear Infront of shower for compliance. No encroachments are allowed.

Typical unit H and J provides the toilet pan peninsula location, which is not in accordance with AS1428.1. This pan location is to be adjusted; pan is to be at the corner for grabrails provision when required.

Note the basin is the only fixture to be relocated, however, proposed scheme must prove relocation of basin can be done easily. In some cases, bath will have to be removed to relocate the basin. There is not enough space for basin relocation.

Non-compliances above noted are to be addressed for compliance.

#### 8.7. Toilet - (Schedule 3 Part 1 Cl 10)

# A dwelling must have at least one toilet on the ground (or main) floor and be a visitable toilet that complies with the requirements for sanitary facilities of AS 4299.

#### Assessment

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

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

# 8.8. Access to kitchen, main bedroom, bathroom and toilet – - (Schedule 3 Part 2 CI 17)

# In a multi-storey self-contained dwelling, the kitchen, main bedroom, bathroom and toilet must be located on the entry level.

#### Assessment

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



This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

#### 8.9. Laundry – - (Schedule 3 Part 2 Cl 19)

A self-contained dwelling must have a laundry that has:

(a) a width at door approaches that complies with clause 7 of this Schedule, and

(b) provision for the installation of an automatic washing machine and a clothes dryer, and

(c) a clear space in front of appliances of at least 1,300 millimetres, and

#### (d) a slip-resistant floor surface, and

#### (e) an accessible path of travel to any clothes line provided in relation to the dwelling.

#### Assessment

Vast majority of laundry rooms provide deficient circulation in front of appliances. Provide 1300mm min. clear for compliances.

There are no clothes lines documented. Provide location of clothesline to al SOU's

Non-compliances above noted are to be addressed for compliance.

#### 8.10. Storage – (Schedule 3 Part 2 Cl 20)

#### A self-contained dwelling must be provided with a linen storage in accordance with clause 4.11.5 of AS 4299.

#### Assessment

Typical unit A1, A2 and H do not provide linen storage. Provide 600mm min cupboard for compliance. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

#### 8.11. Doors – (Schedule 3 Part 1 Cl 12)

#### Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS 4299.

#### Assessment

Various units doorways provide deficient latch side clearances. This is to be address for compliance. Ensure 530mm min. (internal) is provided and 510mm min (external)latch side are provided.



The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

### 8.12. Surface Finishes – (Schedule 3 Part 1 Cl 11)

#### Balconies and external paved areas must have slip-resistant surfaces.

#### Assessment

Additional details will be provided during the design development stage of the project. It is understood all balconies will provide threshold level, therefore this proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

#### 8.13. Ancillary items - (Schedule 3 Part 1 Cl 13)

#### Switches and power points must be provided in accordance with AS 4299.

#### Assessment

Additional details will be provided during the design development stage of the project.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

#### 8.14. Garbage - (Schedule 3 Part 2 Cl 21)

#### A garbage storage area must be provided in an accessible location.

#### Assessment

Bin recycle area sliding door does not provide latch side clearance. It is recommended to relocate door to achieve 530mm min. (internal) latch side clearance for compliance. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).

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

#### 8.15. Private Car Accommodation (Division 4 CI 50 (h) and Schedule 3 Part 1 CI 5)



#### Schedule 3 Part 1 Cl 5

*If car parking (not being car parking for employees) is provided:* 

(a) car parking spaces must comply with the requirements for parking for persons with a disability set out in AS 2890, and

(b) 5% of the total number of car parking spaces (or at least one space if there are fewer than 20 spaces) must be designed to enable the width of the spaces to be increased to 3.8 metres, and

(c) any garage must have a power-operated door, or there must be a power point and an area for motor or control rods to enable a power-operated door to be installed at a later date.

#### Assessment

This clause is universally confusing and there are many different interpretations due to the Government not amending this clause to suit the recent version of Standards.

In 2004, when the SEPP was introduced, AS2890.1 (which was adopted in the BCA at the time) required accessible car bays to have 3.2 metre width, this was to satisfy as per above: (a). The criteria to satisfy (b) was to have 5% of dwellings with an increased width of 3.8 metres. It can be argued that for (b) to be achieved, the width of the car bays must be less than 3.8 metres, ergo 3.2 metres as required under (a).

In 2009, AS2890 was revised to form AS2890.6, which required accessible car bays to have 2.4 metre with 2.4 metre additional 'shared area'. AS2890.6 was adopted by the BCA in 2011 and is still in force. This would mean that a garage would need to have an outsized 4.8 metre width. This is an onerous requirement for a single garage especially as the additional 2.4 metre width is not shared with another vehicle as shown in AS2890.6.

If client wishes to propose a blend of 3.2 metre and 3.8 metre width parking space design throughout the project, meeting the original intent of SEPP, the provision of 3.2 metre width parking spaces is a technical departure from AS2890.6, however as far as the degree of functionality, a 3.2-metre-wide car bay is suitable for people with many different types of mobility aids including walking frames, canes, crutches and some wheelchairs. It is noted that Livable Housing (LHA) Guidelines Silver Level adopts 3.2 metres as a suitable width. It is also noted that a large number of parking space offer an effective width much greater than 3.8 metres due to additional borrowed space at aisle ends, on access paths, and to the structural grid.

Carparking at level 2:

- Provides 9 residential garages with double parking. Each provides at least one parking bay with 3.8mm x 5.1meter,
- There are 5 single garages provided and
- 2 accessible parking bays with shared area for residents.

Carparking at level 6:



- Provides 8 residential garages with double parking. Each provides at least one parking bay with 3.8mm x 5.1meter and
- 2 accessible parking bays with shared area for residents.

Ensure 2.5 metres clear height is achieved in accordance with the SEPP and carparking configuration is to ensure compliance with AS2890.6.

Ensure dedicated spaces and share areas provide 1:40 max. gradient or 1:33 (bitumen).

Accessible path of travel from and to the dedicated spaces (accessible carparking bays), including share areas, are to be provided in accordance with AS1428.1.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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

# Warringah Local Environmental Plan states: Part 2 - 29 Housing for older people with disabilities (e) if, in the case of development that comprises less than 8 dwellings and is not situated on a clearway, no visitor parking is provided within the development.

#### Assessment

There are 6 visitor carparking bays provided on level 2. This includes 2 accessible parking bays for visitors.

There are 4 visitor carparking bays provided on level 6. This includes 2 accessible parking bays for visitors.

In addition, there are 4 visitor carparking bays documented in the site plan.

Ensure 2.5 metres clear height is achieved in accordance with the SEPP and carparking configuration is to ensure compliance with AS2890.6.

Ensure dedicated spaces and share areas provide 1:40 max. gradient or 1:33 (bitumen).

Accessible path of travel from and to the dedicated spaces (accessible carparking bays), including share areas, are to be provided in accordance with AS1428.1.

This proposal complies with this clause at this stage of the design and should be verified prior to construction and prior occupation stages.

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



### 9 Facilities and Amenities

#### 9.1 Sanitary Facilities

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

- For Class 9b: Provide at least 1 unisex accessible toilet, adjacent to every bank of toilets (where provided) on each storey, compliant with AS1428.1 under BCA/DDA Access Code part F2.4. If more than 1 toilet bank provided on each level, accessible toilet is required at 50% min. of toilet banks at each level.
- An even number of left hand (LH) and right hand (RH) transfer WC pans (accessible toilets) is required within the building. Alternating LH/RH layouts on each subsequent level is the most appropriate and inclusive approach.
- Accessible WC requires 2300mm x 1900mm around the pan with the basin to sit outside this area in accordance with AS1428.1. Currently this requirement has not been achieved as basins on level 7 (in the common use room) encroach into pan circulation. Ensure pan clear circulation is 1900mm x 2300mm, basin to encroach 100mm max. Basins are to be relocated for compliance. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.
- An ambulant cubicle is required within every standard toilet bank adjacent to an accessible toilet under DDA Access Code Part F2.4 compliant with AS1428.1:2009. Currently this requirement has not been achieved as there are no male and female ambulant cubicles provided.

#### Assessment

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

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

#### 9.1 Common Areas

The BCA and DDA Premises Standards contain requirements for common use areas suitable for the use of persons with disabilities. These requirements are applicable to the Class 2 residential buildings of the development and can be summarised as follows:

- For class 2 buildings, access to a unique common use facility such as common rooms, picnic area, gym, etc.
- Accessibility to common use decks within buildings.
- Mailboxes and garbage rooms within residential buildings with appropriate accessibility.



- Wheelchair access is required to any external and outdoor areas including decks compliant with AS1428.1.

#### Assessment

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

Refer to item 5 above for comments regarding L7 (common room), Landscape facing Forrest Way, passage between blocks E and C and perimetral pathway around lawn (oval).

Shed 1 and 2 adjacent to lawn (oval) - Client is to confirm if these rooms are to be for maintenance use only. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

Outdoor gym and picnic area – It is not clear the location of the accessible path of travel to these facilities. Further information is to be provided for compliance.

The proposed design is capable of achieving compliance, subject to details noted in the above clauses being addressed. It is understood this will be refined during the design development stage and prior to Construction Certification (CC).



## 10. Conclusion

MGAC has assessed the proposed scheme for the SEPP Seniors Living development located at 171 Forest Way Belrose NSW 2085. The proposed drawings indicate that accessibility requirements, pertaining to external site linkages, building access, common area access, sanitary facilities and parking can be readily achieved. However SOU's toilets and laundries are to be review for compliance.

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