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Disability Access Report

To accompany the Section 4.56 Modification Application

Prepared for

MLP Co Pty Ltd
for Cap One Developments Pty Ltd

Project

Seniors Housing

Location

1955 Pittwater Road Bayview NSW

Date

25 June 2024

Project No.

P000737



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Prepared by:

Christine Cheung
Director | Access Consultant
Accredited ACA Member No. 158

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1 Introduction

1.1 Report Background

This Access Report has been prepared by Inclusive Places to accompany the Section 4.56 (S4.56) application for the construction of a SEPP Seniors Housing residential development at 1955 Pittwater Rd, Bayview (the site).

This report seeks consent for the following modifications:

- **Unit 1:** Layout re-configuration to improve amenity by relocating the Laundry area
- **Unit 4:** Relocation of the Laundry Room adjacent to the entry lift.

Additionally, the following items are part of the S4.56 modification but do not need to be assessed for disability access provisions:

- New window to provide ventilation
- Glazing adjustment for better alignment

Refer to Figures 1 and 2 below for areas within Unit 1 and Unit 4 assessed for compliance with SEPP Seniors Housing access requirements.

The site consists of a single apartment building with a total of 4 apartments and on-site basement car parking.

This report supports the S4.56 application by addressing the access requirements and highlighting measures to reduce the risk of disability discrimination.

Our engagement also involved a desktop assessment of the architectural design documentation against:

- Part D3 of the National Construction Code Series (Volume 1) Building Code of Australia 2019 Amendment 1 (BCA)
- Disability (Access to Premises - Buildings) Standards 2010
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 [NSW] Schedule 3 Standards concerning accessibility and useability for hostels and self-contained dwellings.



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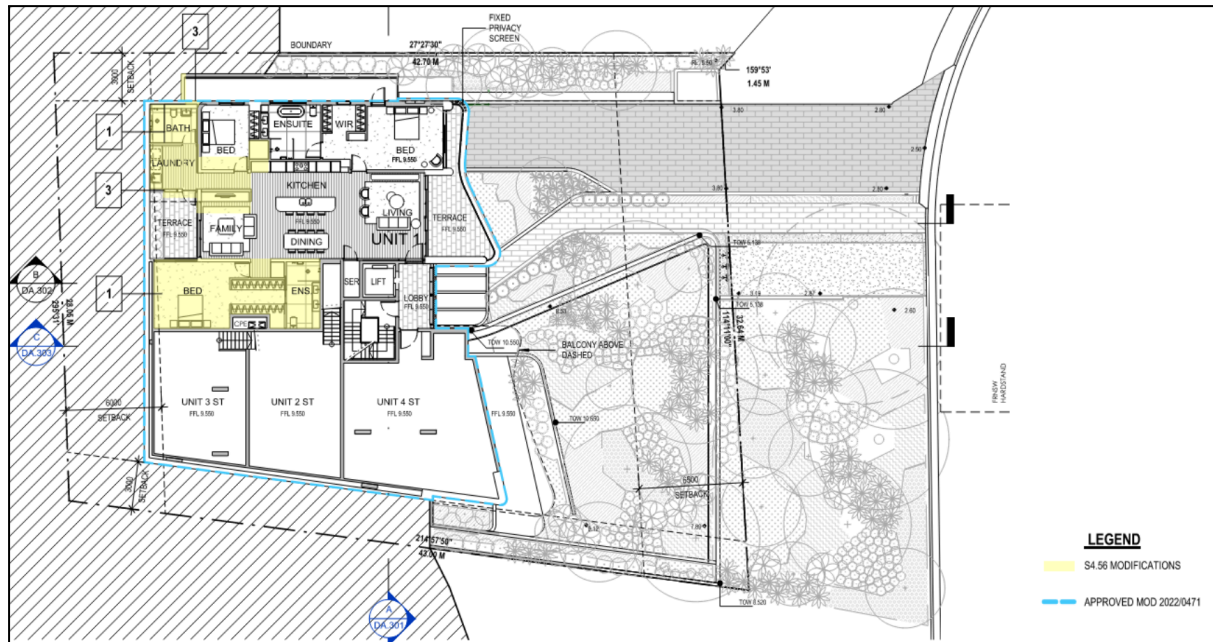


Figure 1 - Screenshot of S4.56 Modifications to Unit 1 Lower Ground

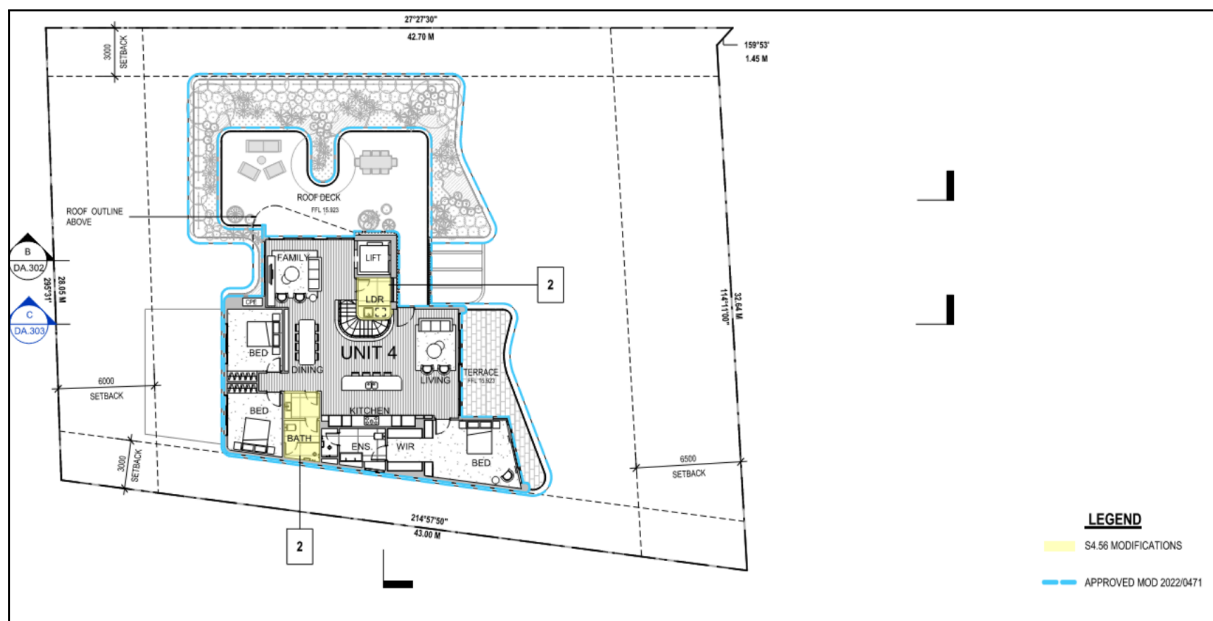


Figure 2 - Screenshot of S4.56 Modifications to Unit 2 First Floor

1.2 Report Purpose

The key objectives of the report are as follows:

- ❑ Undertake an assessment of the proposed development against:
 - ❑ Parts D3 and E3.6 Deemed to satisfy provisions of the National Construction Code Series – Volume 1- Building Code of Australia.

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Disability Access Report to accompany S4.56 modification

- ❑ The Disability (Access to Premises—Buildings) Standards 2010 (the Premises Standards)
- ❑ Pittwater 21 DCP
- ❑ Identify any compliance departures that require resolution/attention for the proposed development by way of design change or Performance Solutions
- ❑ Verify that the referenced documentation has been reviewed by an appropriately qualified Accredited Access Consultant and demonstrate that compliance with the BCA / Access to Premises – Building Standard 2010 / Northern Beaches Council DCP is readily achievable.
- ❑ Enable the principal certifier to satisfy its statutory obligations under the Environmental Planning and Assessment Regulation, 2000 and its statutory obligations under the Building and Development Certifiers Regulation 2020.
- ❑ Accompany the submission of the S4.56 to the Consent Authority to enable them to be satisfied that the building design is capable of complying with the NCC/BCA and that subsequent compliance with the access requirements of the BCA, will not give rise to design changes, which may necessitate the submission of additional Section 4.56 applications under the Environmental Planning and Assessment Act, 1979.

Inclusive Places has reviewed drawings for the site to assess for consistency with the following disability design criteria contained within:

1. The intent and objects of the Disability (Access to Premises- Buildings) Standards (2010).
2. Parts D3 and E3.6 of the Building Code of Australia (BCA) 2019 – Amendment 1
3. Relevant Australian Standards listed in the BCA2019 – Amendment 1, as follows:
 - a. AS1428.1 Design for Access and Mobility: General requirements for Access – New Building Work (2009) (incorporating Amendments 1 and 2)
 - b. AS1428.4.1 Design for Access and Mobility: Means to assist the orientation of people with vision impairment – Tactile ground surface indicators (2009)
 - c. AS1735.12 Lifts, escalators and moving walks Part 12: Facilities for persons with disabilities
 - d. AS2890 (Part 6) (2009) – Parking Facilities – Off-street parking for people with disabilities
 - e. AS4586 (2013) Slip resistance classification of new pedestrian surface materials
4. The following design standards
 - a. State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 [NSW] Schedule 3 Standards concerning accessibility and useability for hostels and self-contained dwellings

5. Relevant Australian Standards listed in the design criteria of unit design types based on Schedule 3 Standards concerning accessibility and useability for hostels and self-contained dwellings the following design standards referenced are:
 - a. AS4299 Adaptable Housing (1995)
 - b. AS1428.1 Design for Access and Mobility: General requirements for Access – New Building Work (2009)
 - c. AS2890.1 (1993) - Parking Facilities – Off-street parking for people with disabilities

In the preparation of this report, documentation relied upon for the S4.56 is referenced in Appendix A.

1.3 Report Limitations & Exclusions

The limitations and exclusions of this report are as follows:

- ❑ This report is based on a review of the referenced documentation in the Appendix A.
- ❑ This Report does not address issues in relation to the design, maintenance or operation electrical, mechanical, hydraulic or fire protection services, Utility Services Provider Requirements (Water, Gas, Telecommunications and Electricity supply authorities), Local Government Act and Regulations, Occupational Health and Safety Act and Regulations or the like.
- ❑ This assessment does not incorporate the detailed requirements of the BCA Referenced Australian Standards and it's the responsibility of design and installation contractors to demonstrate and achieve compliance for all new works.
- ❑ The commentary within this Access Assessment Report does not relieve the Principal Designer, Principal Building Contractor or the Principal Certifier from their statutory obligations under the EP&A Act, Work Health Safety Act, BDC Regulation and the like and they are to be satisfied that the proposal meets their requirements prior to approval.
- ❑ It is important to note that without the written permission from Inclusive Places (trading as Cheung Access Pty Ltd), no part of this report may be reproduced in any form or by any means. This report is based solely on client instructions and therefore should not be relied upon or used by any third party without prior knowledge and instructions from Inclusive Places (trading as Cheung Access Pty Ltd).
- ❑ All reasonable attempts have been made to identify key compliance matters pursuant to the BCA and additional issues which have been deemed an impediment to access provision and may increase Client risk of attracting a complaint under the DDA.

- ❑ Inclusive Places accepts no responsibility for any loss suffered as a result of any reliance upon such assessment or report other than providing guidance to alleviate access barriers in the built environment and reduce Client risk of attracting a complaint under the DDA.
- ❑ If the layouts or specified fixtures and fittings of the accessible building elements are modified by the Client from the date of issue of this access report, then Inclusive Places accepts no responsibility for any variations to required access design specifications.

Exclusions and limitation to the access report:

- ❑ No assessment of universal housing as set out in the SEPP 65- Apartment Design Guide (ADG) 2015 - Part 4Q-1 Universal Design.
- ❑ No assessment of any Silver livable units as outlined in the Livable Housing Design Guidelines (LHDG)

1.4 Disability Discrimination Act 1992 (DDA)

The Federal Disability Discrimination Act 1992 (DDA) provides protection for everyone in Australia against discrimination based on disability. Section 32 of the DDA focuses on the provision of equitable and dignified access to services and facilities for people with mobility, sensory and cognitive disabilities.

Disability discrimination happens when people with a disability and their relatives, friends, carers, co-workers or associates are treated less fairly than people without a disability. Compliance with Access to Premises Standards give certainty to building certifiers, building developers and building managers that, if access to (new parts) of buildings is provided in accordance with these Standards, the provision of that access, to the extent covered by these Standards, will not be unlawful under the DDA. This however applies only to the new building or new parts of an existing building and its affected part. All areas outside the scope of these areas are still subject to the DDA. We cannot guarantee or certify for DDA compliance because DDA compliance can only be assessed by the Courts. Scope of DDA extends beyond the building fabric and also includes furniture and fittings.

From 1 May 2011, the Commonwealth's Disability (Access to Premises - Buildings) Standards made under the Disability Discrimination Act 1992 (DDA) applies to all new building work. The Premises Standards, established requirements for access to buildings, that are incorporated into the BCA 2019 – Amendment 1.

The Premises Standards contain an Access Code of construction that is mirrored in the disability access provisions of the BCA 2019 – Amendment 1. New building work must comply with the Access Code in the same manner as complying with the BCA 2019 – Amendment 1 by meeting deemed-to-satisfy provisions or by adopting a performance solution that achieves the relevant performance requirements.

This means if access is provided in accordance with the Premises Standards then it is not unlawful under the DDA. It also ensures that Object 1.3 (a) of the Premises Standards is met which is to:

‘Ensure that dignified, equitable, cost-effective and reasonably achievable access to buildings and facilities and services within buildings is provided for people with a disability.’

1.5 Proposed Development

The proposed SEPP Seniors living development will consist of 4 units which are connected by an accessible pathway from the ground level street entrance on Pittwater Road. Vehicle entry into the car parking is via a new driveway from Pittwater Road.

BCA Classification:

Class	Description
2	Residential Sole Occupancy Units (SOU's) with associated on-site parking

Areas of new work required to be accessible:

Area	BCA Table D3.1 Requirements	Description of works
All levels	<p>To and within all areas normally used by the occupants</p> <p>From Accessible car parking spaces</p> <p>Common areas - such as Bin Store</p> <p>Entries to sole occupancy units (SOU's)</p>	<p>Common Areas - pathways to entry lobbies.</p> <p>To and within all areas normally used by the occupants.</p>

Building overview:

Level	Building Features
Entry Floor Level	<p>Carpark Entry on eastern side of site</p> <p>Pedestrian access from the allotment boundary adjacent to the</p>

	vehicular access. Mail Boxes
Carpark Floor Level	Car parking Garbage room
Lower Ground Level	1 SOU Lift Stairs (fire-isolated)
Ground Level	2 SOUs Lift Stairs (fire-isolated)
First Floor	1 SOU Lift Stairs (non-fire-isolated)
Total Units	4 Units

1.6 Report Structure

The report consists of further review during ongoing construction provided in the table under Section 2 below, which is for the reader's ease of reference and most urgent attention. Notwithstanding the summary of issues within Section 2 must also be read in conjunction with the body of the assessment provided under Section 3 of the report which further details compliance matters needing consideration in design development and during construction.

It is also the responsibility of all design consultants to ensure compliance with relevant BCA access requirements, DCP controls, Australian Standards and Manufacturers Specifications. This report does not in any way relieve design consultants from their obligations in designing to achieve compliance with the BCA. Furthermore, this report does not relieve the PCA from their statutory obligations required to assess the drawings in detail prior to the issue of a Complying Development Certificate.

A summary of all the clauses foreseen as relevant from the SEPP Seniors (Housing for Seniors or People with a Disability), Chapter 3 Part 2 Clause 26 Location and access to facilities are included within Section 3.1.2 of this report.

Section 3.1.3 of this report provides a review and comments on Schedule 3 Standards concerning accessibility and useability for hostels and self-contained dwellings, SEPP (Housing for Seniors or People with a Disability) 2004 and (Clause 41 (1)) Part 1 Standards applying to hostels and self-contained dwellings. The standards set out in this Part apply to any seniors housing that are self-contained dwellings.

2 Summary of Key Access elements to check

The following comprises a summary of the key access elements identified under the Disability Access Assessment in Section 3 and is to be read in conjunction with the aforementioned Sections and the Building Code of Australia Volume 1. .

The following elements are to be provided and confirmed prior to the issue of the relevant Occupation Certificate.

#	Relevant BCA Clause	Element	Recommendation
1	D2.14	Slip resistance	<p>Provide in-situ Slip resistance testing certificates for paving and floor surfaces which are on an accessible path of travel or in areas required to be accessible - Using the guidance of Table 3B, HB198:2014 - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC/BCA does not require slip resistance, as detailed below.</p> <ul style="list-style-type: none"> External footpaths and walkways no steeper than 1:14 Wet Pendulum P4 or Oil-wet platform test R11 Entries to lift lobby (Transitional areas) Wet Pendulum P2 or Oil-wet platform test R9 Food service areas:



			<p>Wet Pendulum P3 or Oil-wet platform test R10</p> <ul style="list-style-type: none"> • Toilet facilities <p>Wet Pendulum P3 or Oil-wet platform test R10</p> <ul style="list-style-type: none"> • Kitchen areas <p>Wet Pendulum P3 or Oil-wet platform test R10</p> <ul style="list-style-type: none"> • Step nosings <p>(NCC/BCA requirement Table D2.14)</p> <p>Wet Pendulum P4</p> <p>Slip resistance Testing Authority - Testing to be conducted by an independent NATA accredited and NCC/BCA Registered Testing Authority for slip resistance testing.</p>
2	D3.1	External paths of travel	<p>Any external accessible paths of travel associated with this project to comply with AS1428.1 (2009) for:</p> <ul style="list-style-type: none"> • minimum widths, • gradient, • crossfall, • hand and kerb rails as required on ramps and stairs required to be accessible, • Tactile indicators on the top and bottom of external 1:14 gradient ramp • Turning spaces; and • Door circulation and landings • slip resistant; confirm by providing slip resistance ratings as per Table 3B, HB198:2014 - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC does not require slip resistance • accessible surface traversable by people with disabilities
3	D3.1	Internal paths of travel	<p>All internal accessible paths of travel associated with this scope of works to comply with AS1428.1 (2009) for:</p> <ul style="list-style-type: none"> • minimum widths, • gradient,



			<ul style="list-style-type: none"> • crossfall • turning spaces and • slip resistant; confirm by providing slip resistance ratings as per Table 3B, HB198:2014 - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC does not require slip resistance • accessible surface traversable by people with disabilities
4	D3.2	Doors	<p>All doors to common areas required to be accessible and SOU entry doors to have compliance with AS1428.1 (2009) with respect to:</p> <ol style="list-style-type: none"> 1. 850mm clear openings 2. Door circulation space on both sides of door 3. 30% luminance contrast on doorways 4. Door operation and hardware 5. Door force is 20N where a door closer is fitted. 6. Distances between successive door leaves
5	D3.3	Stairs	<p>Stairs to comply with AS1428.1(2009) Cl 11 Stairs with regards to</p> <ul style="list-style-type: none"> • Minimum width of 1000mm • Handrail diameter • Handrail heights to be 865mm to 1000mm above step nosing • Handrail extensions at top and base • Contrast strips to edge of stair nosings 50 - 75mm deep (30% contrast) • Handrail on one side where fire-isolated • Handrail on both sides where non-fire-isolated • Tactile indicators on top and bottom landing of steps where non-fire-isolated
6	D3.3	Ramps	<p>Ramps where part of the new works to comply with AS1428.1 (2009) Cl 10 Walkways, ramps and landings</p>
7	D3.3	Flooring	<p>All areas required to be accessible to comply with AS1428.1(2009) Clause 7</p>



8	D3.5	Accessible carparking	Accessible parking bays to be provided in accordance with AS4299 Adaptable Housing Residential parking bays to be provided in accordance with SEPP Seniors requirements Connecting path to principal pedestrian entrance to be provided
9	D3.6	Accessible signage	Accessible signage to be provided in accordance with BCA2019 Amdt 1 and AS1428.1-2009 for: <ul style="list-style-type: none"> Required exit doors stating 'Exit' and 'Level' followed by floor number.
10	D3.8	Tactile indicators	Tactile indicators to be provided as required in accordance with AS1428.4.1(2009)
11	D3.11	Ramps	On an accessway— (a) a series of connected ramps must not have a combined vertical rise of more than 3.6 m
12	D3.12	Glazing	Confirm compliance at time of Occupation Certificate noting that there are no glazed panels or doors proposed in CDC design package

3 Disability Access Assessment

Section of Report	Design Criteria
3.1	Overview of Accessible building features 3.1.1 Compliance with BCA Part D3 3.1.2 Compliance with SEPP Seniors Living - Overall 3.1.3 Compliance with SEPP Seniors Living - accessibility and useability of self-contained dwellings
3.2	BCA Part D3 – Access For People with Disabilities

3.1 Overview of Seniors Housing building features

3.1.1 Compliance with BCA Part D3

The proposed development, will satisfy the prescriptive deemed to satisfy provisions of Part D3 of the BCA 2019 Amdt 1 as follows:

1. Accessible pathways from Pittwater Road on the ground level to the principal entrance of the residential building.
2. Access to and within common areas for the residents.
3. Access to the entrance doorway of sole occupancy units

3.1.2 Compliance with SEPP Seniors Living - Overall summary

The development is shown to have one (1) building that has four (4) storeys. Lift access is provided to all levels. An accessible entry path and communal areas including bin storage and parking are provided.

All units have been designed to comply with the SEPP Seniors.

It is my professional opinion the units within the development has the capacity to satisfy the SEPP Seniors Living housing design requirements, as follows:

1. Drawings - all units are shown to be in accordance with the requirements of SEPP Seniors (2004 Schedule 3)
2. Siting - the site has slope but has pedestrian access from the single street frontage and car parking areas to the entry of each unit as well as access to common use facilities is provided.
3. Security - potential for pathway lighting to be 50lx and safe vehicle drop off point.
4. Provision of letterboxes in a central position near street entrance
5. Private Car Accommodation - Basement level car parking is provided
6. Accessible 850mm clear entry to the units.
7. Interior General - Minimum door width 820mm, internal corridors 1000mm.
8. Living room and dining room circulation space, GPO's and telephone outlets.
9. Adaptable Kitchen
10. Main Bedroom circulation space and GPO's
11. Bathroom
12. Toilet
13. Laundry
14. Door Locks 900 - 1100mm height
15. Non-slip floor coverings to outside paved areas.

The proposed changes detailed in the S4.56 drawings for Units 1 and 4 have been designed to comply with the Schedule 3 requirements for access to the laundry area. Specifically:

- **7 Interior: general**
 - (3) Circulation space at approaches to internal doorways for rooms required to be accessible must comply with AS 1428.1.
- **19 Laundry**
 - A self-contained dwelling must have a laundry that has:
 - (a) a circulation space at door approaches that complies with AS 1428.1, 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

It is assumed that the proposed development meets the intent of Clause 26, as this would have been checked at the time of lodgement of the original Development Application.

3.1.3 Compliance with SEPP Seniors Living - Accessibility and useability of self-contained dwellings

Schedule 3 Standards concerning accessibility and useability for hostels and self-contained dwellings, SEPP Seniors (Housing for Seniors or People with a Disability) 2004.

Clause 38 Accessibility

The proposed development should:

- (a) have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities, and*
- (b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.*

The design complies with the requirements of Clause 38 where private car accommodation for the houses and apartments have safe pedestrian links from the parking for residents and visitors.

(Clause 41 (1)) Part 1 Standards applying to hostels and self-contained dwellings 1 Application of standards in this Part. The standards set out in this Part apply to any seniors housing that consists of hostels or self-contained dwellings.

#	SEPP Housing for Seniors or People with a Disability (HSPD) (2004)	Comments
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	2 Siting standards	
	(1) Wheelchair access	
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 1428.1) to an adjoining public road.	Complies
2.	(2) If the whole of the site does not have a gradient of less than 1:10:	N/A
3.	(a) the 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	Complies All SOUs have lift access to the entry door
4.	(b) the wheelchair access provided must be by a continuous accessible path of travel (within the meaning of AS 1428.1) to an adjoining public road or an internal road or a driveway that is accessible to all residents.	Complies An AS1428.1-2009 compliant pathway from the street entry point on Pittwater Road is shown on the plans
	Note. For example, if 70% of the site has a gradient of less than 1:10, then 70% of the dwellings must have wheelchair access as required by this subclause. If more than 50% of the site has a gradient greater than 1:10, development for the purposes of seniors housing is likely to be unable to meet these requirements.	
	(3) Common areas	
5.	Access must be provided in accordance with AS 1428.1 so that a person using a wheelchair can use common areas and common facilities associated with the development.	Capacity to comply
	3 Security	
	Pathway lighting:	
6.	(a) must be designed and located so as to avoid glare for pedestrians and adjacent dwellings, and	No external lighting reviewed



7.	(b) must provide at least 20 lux at ground level.	Details to be provided
	4 Letterboxes	
	Letterboxes:	
8.	(a) must be situated on a hard standing area and have wheelchair access and circulation by a continuous accessible path of travel (within the meaning of AS 1428.1), and	Capacity to comply Letterboxes are shown on the plans to be located near the Pittwater Road pedestrian entrance. The area needs to include a level 1540mm x 2070mm turning area at the letter boxes
9.	(b) must be lockable, and	Capacity to comply Locks to be noted on drawings
10.	(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.	Capacity to comply The units have a centralised letterbox location integrated into the Pittwater Rd pedestrian entrance.
	5 Private car accommodation	
11.	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	Capacity to comply A total of eight (8) parking bays for the apartment complex are provided in the basement or car parking level which is compliant with the requirements as set out in the SEPP. Parking for all units includes one (1) parking bay that is shown to have dimensions to provide a 3.8 metre wide parking bay, which is



		<p>compliant with the requirements for AS4299.</p> <p>It is noted that all units have an additional single parking space.</p> <p>All car parking spaces have the ability to achieve an overall length of 5.4 metres.</p> <p>This arrangement is suitable for a car park and complies with the current SEPP Seniors parking requirements.</p>
12.	(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	Each unit is shown to have a car parking spaces with an overall width of 3.8 metres (as noted above)
13.	(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.	<p>Not applicable</p> <p>The parking area has a single roller vehicle entry door to the shared parking area.</p>
	6 Accessible entry	
14.	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 AS 4299.	<p>Units 1 and 4 have direct access into the unit via the lift.</p> <p>Units 2 and 3 have a shared foyer with AS1428.1-2009 compliant door circulation</p>
	7 Interior: general	
15.	(1) Internal doorways must have a minimum clear opening that complies with AS 1428.1.	All internal doors into areas required to be accessible by Seniors Housing provide



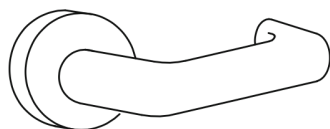
		820mm clear opening width for each unit layout. 870mm door leaf widths shown on internal door schedule
16.	(2) Internal corridors must have a minimum unobstructed width of 1,000 millimetres.	Plans for all of the units include 1000mm minimum width internal corridors.
17.	(3) Circulation space at approaches to internal doorways for rooms required to be accessible must comply with AS 1428.1.	All the units have circulation space to all rooms required by SEPP Seniors to be accessible to comply with AS1428.1 (2009). The S4.56 drawings show that approaches to the relocated laundry areas within Unit 1 and Unit 4 comply with AS1428.1.
	8 Bedroom	
	At least one bedroom within each dwelling must have:	
18.	(a) an area sufficient to accommodate a wardrobe and a bed sized as follows:	Complies
19.	(i) in the case of a dwelling in a hostel—a single-size bed,	N/A
20.	(ii) in the case of a self-contained dwelling—a queen-size bed, and	Complies
21.	(b) a clear area for the bed of at least:	
22.	(i) 1,200 millimetres wide at the foot of the bed, and	Capacity to comply Ensure detailed drawings are provided at time of CC
23.	(ii) 1,000 millimetres wide beside the bed between it and the wall, wardrobe or any other obstruction, and	

24.	(c) 2 double general power outlets on the wall where the head of the bed is likely to be, and	detailing required dimensions and elements
25.	(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	
26.	(f) wiring to allow a potential illumination level of at least 300 lux.	Complies
9 Bathroom		
27.	(1) At least one bathroom within a dwelling must be on the ground (or main) floor and have the following facilities in accordance with AS 1428.1:	Capacity to comply Ensure detailed drawings are provided at time of CC
28.	(a) a slip-resistant floor surface,	Capacity to comply Ensure detailed drawings are provided at time of CC
29.	(b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS 1428.1	Complies - future adaption
30.	(c) a shower that complies with AS 1428.1, except that the following must be accommodated either immediately or in the future:	Complies - future adaption
31.	(i) a grab rail,	Complies - future adaption
32.	(ii) portable shower head,	Complies - future adaption
33.	(iii) folding seat,	Complies - future adaption
34.	(d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it,	Complies - future adaption
35.	(e) a double general power outlet beside the mirror.	Complies - future adaption



36.	(2) Subclause (1) (c) does not prevent the installation of a shower screen that can easily be removed to facilitate future accessibility.	Complies - future adaption
	10 Toilet	
37.	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.	Complies
	11 Surface finishes	
38.	Balconies and external paved areas must have slip-resistant surfaces. Note. Advice regarding finishes may be obtained from AS 1428.1.	Capacity to comply Slip resistance details to be provided at time of CC Note 1. The texture to be traversable by people who use a wheelchair and those and those with an ambulant or sensory disability. 2. A vertical change of not more than 5mm (bevelled edges) occurs between the abutment of two surfaces.
	12 Door hardware	
39.	Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS 4299.	Door hardware has capacity to comply with AS1428.1-2009. Ensure during ongoing design and construction



		 <p>1. Lever door handles are provided for swing doors. 2. D-type handles are provided on sliding doors.</p> <p>Consider using same hardware as entry door ie with return as shown above for Interior door hardware</p>
	13 Ancillary items	
40.	Switches and power points must be provided in accordance with AS 4299.	<p>Capacity to comply</p> <p>Ensure during ongoing design and construction</p> <p>1. General power outlets are to be located 600mm-1100mm, not less than 500mm from the corner.</p> <p>2. Rocker action or toggle switches are provided 900mm-1100mm, not less than 500mm from corner.</p>
	Part 2 Additional standards for self-contained dwellings	
	14 Application of standards in this Part	
	The standards set out in this Part apply in addition to the standards set out in Part 1 to any seniors housing consisting of self-contained dwellings.	
	15 Living room and dining room	



	(1) A living room in a self-contained dwelling must have:	
41.	(a) a circulation space in accordance with clause 4.7.1 of AS 4299, and	Requirement Area of 2250mm minimum diameter after furniture has been provided
42.	(b) a telephone adjacent to a general power outlet.	Capacity to comply
43.	(2) A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux.	Complies
	16 Kitchen	
	A kitchen in a self-contained dwelling must have:	
44.	(a) a circulation space in accordance with clause 4.5.2 of AS 4299, and	All pre-adaptation kitchens complies for all units.
45.	(b) a circulation space at door approaches that complies with AS 1428.1, and	Kitchens are shown to be open plan and there is sufficient circulation space to access the kitchen area.
	(c) the following fittings in accordance with the relevant subclauses of clause 4.5 of AS 4299:	
46.	(i) benches that include at least one work surface at least 800 millimetres in length that comply with clause 4.5.5 (a),	Capacity to comply Ensure during ongoing design and construction Bench top areas are provided beside cooktop, oven, sink, fridge; 1 area to be 800mm min width
47.	(ii) a tap set (see clause 4.5.6),	Drawings to show location of tap relative to sink



48.	(iii) cooktops (see clause 4.5.7), except that an isolating switch must be included,	Complies
49.	(iv) an oven (see clause 4.5.8), and	Capacity to comply
50.	(d) “D” pull cupboard handles that are located towards the top of below-bench cupboards and towards the bottom of overhead cupboards, and	Capacity to comply
51.	(e) general power outlets:	
52.	(i) at least one of which is a double general power outlet within 300 millimetres of the front of a work surface, and	Capacity to comply
53.	(ii) one of which is provided for a refrigerator in such a position as to be easily accessible after the refrigerator is installed.	Capacity to comply
54.		
	17 Access to kitchen, main bedroom, bathroom and toilet	
55.	In a multi-storey self-contained dwelling, the kitchen, main bedroom, bathroom and toilet must be located on the entry level.	Complies
	18 Lifts in multi-storey buildings	
56.	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 Building Code of Australia.	A lift providing access to all floors is shown on the plans
	19 Laundry	
	A self-contained dwelling must have a laundry that has:	
57.	(a) a circulation space at door approaches that complies with AS 1428.1, and	Revised S4.56 drawings for Unit 1 and Unit 4 show compliance with AS1428.1 door circulation approaches. Complies

58.	(b) provision for the installation of an automatic washing machine and a clothes dryer, and	Complies Drawings space is provided for front loader washing machine and wall mounted dryer
59.	(c) a clear space in front of appliances of at least 1,300 millimetres, and	Complies for all of the units. S4.56 drawings indicate that 1300mm clearance is provided to laundry spaces within Unit 1 and Unit 4.
60.	(d) a slip-resistant floor surface, and	Capacity to comply
61.	(e) an accessible path of travel to any clothes line provided in relation to the dwelling.	No communal external clotheslines is being provided. Clotheslines will be provided to each unit on the balcony or terrace.
20 Storage for linen		
62.	A self-contained dwelling must be provided with a linen storage in accordance with clause 4.11.5 of AS 4299.	Capacity to comply
21 Garbage		
63.	A garbage storage area must be provided in an accessible location	A communal bin room is located on the car park level.

NB: Further Technical details regarding the following fixtures and finishes may be obtained from AS 1428.1 (Design for Access and Mobility) (2009) and AS4299 (Adaptable Housing) (1995).

3.2 BCA Part D3 – Access For People with Disabilities

The following is a clause-by-clause assessment of the architectural drawings against BCA Part D3 – Access For People with a Disability as well as other parts of the BCA that includes access

for people with disabilities. For more detail on each requirement, please refer to *Appendix B: BCA Part D3 – Access For People with a Disability*.

Deemed to Satisfy Provision	Capacity to comply	Comments
D3.1 General building access requirements Class 2 (residential)	✓	<p>The drawings demonstrate access will be provided to the maximum extent possible to all areas required to be accessible within the development.</p> <p>Access pathways including circulation spaces at end of corridors and common doorways have been provided to comply with AS1428.1 (2009).</p> <p>Compliant access pathways are proposed to all areas that will be normally used by the occupants such as:</p> <ul style="list-style-type: none"> • Car park • Garbage room on car park level • Unit 2 and 3 foyer • Ground level pedestrian access path including mailboxes <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction:</p> <ol style="list-style-type: none"> 1. External and internal pathways comply with AS1428.1 (2009). 2. Doors have compliance with AS1428.1 (2009) with respect to clear openings, circulation space and luminance contrast on doorways, door operating force is 20N including where a door closer is fitted. 3. In-situ slip resistance testing certification for all surfaces in areas required to be accessible is provided at time of OC. Test results to show testing under wet surface conditions in accordance with AS4586 – 2013 <p>Ensure pedestrian links complying with AS1428.1 (2009) are provided to all areas required to be accessible.</p>



D3.2 Access to buildings	✓	<p>An accessible pathway from the street frontage on Pittwater Road is provided to and through the principal pedestrian entrance.</p> <p>The gradient of the accessible pathways from the allotment boundary have capacity to comply with AS1428.1 (2009).</p> <p>The principal pedestrian entry door leaf widths have capacity to provide the minimum clear door opening width of 850mm as required by both the NCC and AS1428.1(2009).</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction</p> <ol style="list-style-type: none">1. External pathways comply with AS1428.1 (2009) including<ol style="list-style-type: none">a. Gradients and cross falls2. In-situ slip resistance testing certification for all surfaces in areas required to be accessible is provided at time of OC. Test results to show testing under wet surface conditions in accordance with AS4586 – 20133. Entry doors to be accessible and have compliance with AS1428.1 (2009) with respect to:<ol style="list-style-type: none">a. Level thresholdb. Level landings with same dimensions as door circulationc. 850mm minimum clear opening widthsd. Door circulation spacee. 30% luminance contrast on doorwaysf. Door operation and hardwareg. Door force is 20N where a door closer is fitted.
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D3.3 Parts of building to be accessible	<p>✓</p> <p>✓</p> <p>Capacity to comply</p>	<p>Accessible walkways - external</p> <p>An accessible walkway is proposed to be provided to and within the areas of the building required to be accessible.</p> <p>Turning spaces are provided within the areas required to be accessible.</p> <p>Internal accessways</p> <p>Continuous accessible paths of travel have been provided to all areas normally used by the occupants.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction external and internal walkways are in accordance with AS1428.1-2009</p> <p>Stairs</p> <p>There are currently no common area non-fire-isolated stairs shown on the plans.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction where provided all non-fire-isolated stairs comply with:</p> <ol style="list-style-type: none"> 1. AS1428.1 Cl 11 Stairs (2009) including <ol style="list-style-type: none"> a. handrails on both sides except pool side tiered seating area b. handrail extensions on landings c. tactile indicators on top and bottom landing of steps, where handrail is continuous on both sides d. All stairs require contrast strips to edge on stair nosings 50 - 75mm deep (30% contrast) to comply with AS1428.1 (f) and (g). e. No vertical handrail sections 2. BCA <ol style="list-style-type: none"> a. Non-slip nosings (Part D2.14)
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	<p>Capacity to comply</p> <p>✓</p>	<p>Stairs - fire-isolated</p> <p>Stairs providing egress are located within the central building core on the plans. The stairs are shown with 90 degree turns on landings.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction fire isolated stairs comply with AS1428.1-2009 including</p> <ul style="list-style-type: none"> <input type="checkbox"/> contrast strip to edge on stair nosings 50-75mm deep (30% contrast) <input type="checkbox"/> handrail at 865mm to 1000mm above step nosing on at least one side of the stairs <input type="checkbox"/> Opaque risers <input type="checkbox"/> No vertical sections of handrails <p>Lift</p> <p>There is one (1) lift proposed within the building. See Part E3.6 of this table for detailed commentary.</p> <p>Flooring</p> <p>Flooring detailed within the Lobby finishes schedule is shown to be tiles.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction any new works in areas required to be accessible is in accordance with the requirements of AS1428.1(2009) including but not limited to:</p> <ol style="list-style-type: none"> 1. Flooring joints or abutments to have vertical rise no longer greater than 3mm or 5mm if rounded 2. Flooring to have compliant slip resistance as
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	Capacity to comply	<p>per Table 3B, SA HB 198:2014 Guide to the specification and testing of slip resistance of pedestrian surfaces - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC does not require slip resistance</p> <p>Turning spaces</p> <p>At the end of corridors, plans show that there is a turning space of at least 1540mm x 2070mm to comply with AS1428.1 (2009) in all areas required to be accessible.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction: Turning spaces in accordance with AS1428.1-2009 Clause 6.5.3 (1540mm x 2070mm) are provided in the following locations:</p> <ol style="list-style-type: none"> 1. Within 2 metres of end of corridors
	Capacity to comply	<p>Internal Doors - common areas</p> <p>Details of the door paint colours are proposed to be provided to assess that there will be luminance contrast between the various elements detailed in AS1428.1(2009) for door luminance contrast.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction all doorways are constructed in accordance with AS1428.1-2009 including:</p> <ol style="list-style-type: none"> 1. Clear opening widths, 2. approaches 3. door operating force 4. door hardware 5. Luminance contrast 6. Distance between successive doors on accessible paths of travel



D3.4 Exemptions	✓	<p>The following is a list of areas within the building which are not required to be accessible:</p> <p>(a) An area where access would be inappropriate because of the particular purpose for which the area is used.</p> <p>(b) An area that would pose a health or safety risk for people with a disability.</p> <p>(c) Any path of travel providing access only to an area exempted by (a) or (b).</p> <p>Exempt areas from access:</p> <ul style="list-style-type: none"> • Cleaner Store • Maintenance toilet
D3.5 Accessible parking	N/A	
D3.6 Signage	✓	<p>The signage schedule will be developed prior to Occupation Certificate.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction:</p> <p>Braille and tactile signage is provided as required by BCA Part D3.6 including</p> <ul style="list-style-type: none"> • Exit levels • To be in accordance with BCA2019 and AS1428.1 (2009) <p>Once developed signage schedule is recommended to be reviewed by the Access Consultants to confirm compliance and content</p>
D3.8 Tactile indicators	Capacity to comply	<p>Tactile Indicators or TGSIs are proposed to be shown on the plans at the time of CC</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction:</p> <p>Tactile indicators are installed to comply with AS1428.4.1 including on the top and bottom of non-fire isolated stairs</p>





		<p>and ramps as well as at pedestrian crossings over the internal road.</p> <p>Luminance contrast between the TGSIs and the background surface on which they are installed to be confirmed by on-site testing prior to issuing of OC.</p>
D3.12 Glazing on an accessway	Capacity to comply	<p>Details of the common area doors are proposed to be provided at the time of CC</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction all common area glazed door and glazed panels where there is no transom provide a solid contrast line 75mm width at 900 - 1000mm and 30% luminance contrast when viewed against the floor surface or surfaces within 2m of the glazing on the opposite side</p>
E3.6 Passenger lifts	Capacity to comply	<p>One (1) lift is proposed within the building, to provide access to all levels of the development.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design development and construction that the lift(s) have accessible features in accordance with E3.6b BCA 2019 – Amendment 1</p>
F2.4 Accessible sanitary facilities	N/A	<p>A single toilet provided for maintenance staff is shown on the plans for the car parking level. This is not required to be accessible</p>

4. Conclusion

On the basis of our assessment, we confirm that the S4.56 plans for the Seniors Housing development at 1955 Pittwater Road Bayview meets the Performance Requirements of the Disability (Access to Premises-Buildings) Standards 2010 and Part D3 and E3.6 of the Building Code of Australia (BCA) (2019 Amendment 1) through the deemed-to-satisfy provisions.

We note some further assessment during the construction stages is required to ensure adequate access compliance as highlighted in Sections 3.1.3 and Section 3.2 Access Assessment table above.

Statement of Qualifications

	Prepared by
Full Name	Christine Boesenberg née Cheung
Position Title	Managing Director
Company Name	Cheung Access Pty Ltd Trading as Inclusive Places
Company Address	GPO Box 1380, Sydney NSW 2001
Qualifications and Accreditations	<p>B. App Sc (Occupational Therapy), Masters of Environmental Studies Registered Occupational Therapist (Occupational Therapy Board/ AHPRA) Accredited with the Access Consultants Association</p> 
Signature	 <p>Declaration: I declare that I am an appropriately qualified and competent person practising in the relevant area of work. I have recognised relevant experience in the area of work assessing disability access compliance and hold appropriately current insurance policies.</p>
Date	25 June 2024



inclusive
places

Appendix A: Drawings Received

Sheet No.	Revision	Sheet Name
DA.100	H	Drawing List
DA.101	G	Site Plan
DA.203	H	Lower Ground Floor Plan
DA.204	D	Ground Floor Plan
DA.205	E	First Floor Plan
DA.301	F	Section AA
DA.302	F	Section BB
DA.303	B	Section CC
DA.401	F	North Elevation
DA.402	H	West Elevation
DA.403	E	South Elevation
DA.404	H	East Elevation
DA.405	A	UNIT 1 Internal Elevations/Sections
DA.701	D	GFA Diagram
DA.702	A	GFA Comparison Diagram
DA.903	B	Lower Ground Comparison Plan
DA.905	A	First Floor Comparison Plan
DA.1103	A	Lower Ground GFA Comparison Diagram
DA.1105	A	First Floor GFA Comparison Diagram