



Access Report Development Application (DA)



Long Reef Golf Club (LRGC) – Club House
2 Anzac Avenue, Collaroy NSW 2097

Prepared for: Long Reef Golf Club
Our Ref: 24000850 | Issue date: 17 April 2025

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1 Executive Summary

Modern Building Consultants (MBC Group) as the appointed Access Consultant for the proposed development, have reviewed architectural design documents prepared by i2c (refer Appendix A) for compliance with the National Construction Code - Building Code of Australia Volume One 2022.

This Access Report has been prepared by Dennisse Bonanno to accompany a Development Application (DA) submission, comprising alterations and additions to the existing facility located at 2 Anzac Avenue, Collaroy, NSW.

The recommendations in this report are to be developed with the ongoing design development and should be audited and confirmed prior to construction certificate stage. As the design progresses, further review of documentation shall be undertaken to ensure that compliance with the accessibility provisions of the BCA and relevant standards are achieved.

1.1 Performance Solutions - (Accessibility)

The assessment of the design documentation has revealed that the following areas are required to be assessed against the relevant Performance Requirements of the BCA Access provisions. The submission for a Construction Certificate will need to include verification from an Accredited Access Consultant, where determined permissible under A2G1 of the BCA, for the following aspects:

DTS Clause	Description of Non-Compliance	Performance Requirement
D4D4	Ground Floor outdoor Link to L1- is via stairs only. This deviation from the NCC/BCA must be addressed through a Performance-Based Solution (via management plan) to be detailed at a later stage.	D1P1
F4D5	Ground Floor – The unisex accessible facility with a shower lacks the required 1900mm clear pan circulation space, as the shower seat, when in the open position, encroaches into this space. This deviation from the NCC/BCA must be addressed through a Performance-Based Solution to be detailed at a later stage.	F4P1
D4D4	L1 – 2m or over corridor length lacks 1540mm x 2070mm clear circulation space. This deviation from the NCC/BCA must be addressed through a Performance-Based Solution (via management plan) to be detailed at a later stage.	D1P1

The above Performance Based Solutions will be subject to consultation and approval by relevant stakeholders as part of the Construction Certificate process.

1.2 Exemption Area(s)/Room(s) Under NCC BCA D4D5

The assessment of the documentation has revealed that the following area(s) or room(s), in accordance with BCA D4D5, do not comply with the Deemed-to-Satisfy provisions of the BCA.

DTS Clause	Exempt Areas	
D4D5	Ground Floor 2 x Storage, Dry Store, Freezer, Cool Room, Kitchen, Keg Room, 2 x Bars, Back-of-House (BOH,) Kiosk, x2 Bin Stores, Liquor Store and switchboard.	Level 1 Bar, Store, back of house, and plant room.

This generally applies to:

- The designated areas are not suitable for wheelchair users due to their specific operational purposes.
- These areas may pose health and safety hazards for individuals with disabilities.
- Paths of travel that solely provide access to areas exempted under conditions a) or b) above are also exempt from accessibility requirements.

Where the above is applicable the client must provide a letter detailing why this is applicable (e.g. storage of heavy equipment, furniture, hazardous substances, etc.) to this building and clearly note locations/areas. The letter is to be assessed as part of this Construction Certification (CC).

Note that any exemption will be subject to consultation and approval by relevant stakeholders as part of the Construction Certificate process.



Dennisse Bonanno
Access Team Leader
MBC Group

2 Introduction

Modern Building Consultants (MBC Group) are the appointed Access Consultant for the proposed development subject of this report by Dennisse Bonanno. This report is based upon a desktop review of architectural details (as listed in Appendix A), presently at Development Application (DA) stage, against the applicable provisions of the National Construction Code - Building Code of Australia Volume One 2022.

2.1 Purpose

The purpose of this report is to assess the current architectural design documentation at Development Application (DA) stage with respect to the accessibility provisions of the National Construction Code – Building Code of Australia Volume 1, Edition 2022, as are principally contained within Parts D4, F4, E3 and DDA (Access to premises- Buildings) 2010 Standards and the Australian Standards suite (AS) as this prescribes the minimum requirement for access to a building. The report is therefore to assess the current design proposal against the above provisions and to outline those areas, if any, where:

- Compliance is not achieved.
- Areas that may warrant redesign to achieve compliance.

2.2 Methodology

The methodology applied in undertaking this assessment has included:

- A desktop review of architectural plans, as listed in Appendix A
- NCC BCA 2022. Detailed assessment of Parts D4, E3, F4 of the BCA Access provisions.
- Discussions with the design development team to gain an understanding of the development proposed.

2.3 Limitations

This statement **does not include** or imply any detailed assessment for design, compliance or upgrading for:

- Work Health & Safety Act 2011 and Regulations: Compliance with these is not covered.
- Workcover Authority Requirements: These are outside the scope of this report.
- Structural and Services Design Documentation: No assessment of these elements is included.
- BCA and Standards: Only the sections directly referenced in this report are assessed; all other parts are excluded.

- Fittings and Fixtures: Any fittings and fixtures not provided in the architectural documentation are excluded. Loose furniture shown on the plan is considered indicative only. Those responsible for furnishing should ensure their layout does not cause circulation deficiencies per AS 1428.1-2009.
- Crossfalls and Floor Levels: These are excluded if not provided in the documentation.
- Regulatory Authorities: Requirements from other authorities, such as Telstra, Telecommunications Supply Authority, Water Supply Authority, Electricity Supply Authority, Workcover, and Roads and Maritime Services, are not included.
- BCA 2019 (Amendment 1) Sections: Sections B, C, G, H, I, J, and Parts D1 and D2 are excluded and covered in a separate BCA Report.
- Australian Standards: Unless specifically referred to, these are not assessed.
- Services and Equipment: Any operating services or equipment within the design are not covered.
- Federal, State, and Local Policies/Legislation: Only those directly referenced in this report are included.
- Disability Discrimination Act 1992 (DDA): Although this report covers the Disability (Access to Premises – Buildings) Standards 2010 according to BCA accessibility requirements, adhering to the DDA does not ensure protection from complaints. The DDA is outcome-focused and does not provide specific compliance measures.
- The recommendations in this report represent the professional opinion and interpretation of MBC DDA and Access division and may differ from those of other consultants
- Any drawings not included in Appendix A are not reviewed.

This report has been prepared by MBC in the capacity as the appointed Access consultant for the proposed development. This report is an assessment of the proposed development against the Deemed-to-Satisfy (DTS) provisions of the applicable BCA Access provisions.

2.4 Current Legislation

National Legislation

- Disability Discrimination Act, 1992, Government of Australia, <http://www.legislation.gov.au>
- Disability (Access to Premises – Buildings) Standards, 2010, Government of Australia, <https://www.legislation.gov.au/Details/F2010L00668>
- Disability (Access to Premises – Buildings) Amendment Standards 2020 Government of Australia, <https://www.legislation.gov.au/Details/F2020L01245>
- Disability (Access to Premises – Buildings) Amendment Standards 2020, Government of Australia.

Disability Discrimination Act 1992 (Cth) (DDA)

The accessibility assessment process covers all aspects of the infrastructure (premises), to the extent required to meet the objectives of the Disability Discrimination Act 1992 (Cth), including, however not limited to, Section 23 which relates to access to premises and facilities which the public may enter or use.

The act is enforced primarily through a complaints mechanism, which allows individuals who have directly or indirectly experienced unlawful discrimination to seek a conciliated outcome through the Australian Human Rights Commission and in the instance of unsuccessful conciliation, to bring an action in the Federal Magistrates Court or the Federal Court of Australia.

The Disability Discrimination Act (DDA) ensures consistent protection against unjust and unfavorable treatment for individuals with disabilities in Australia. It also makes it illegal to discriminate against an "associate" of a disabled person, such as a friend, carer, or family member.

The DDA's broad definition of disability encompasses various conditions, including physical, intellectual, psychiatric, neurological, cognitive, sensory (such as low vision, deafness, or hearing reduction), learning difficulties, physical disfigurement, and the presence of disease-causing organisms in the body. This inclusive definition ensures that all individuals with disabilities are safeguarded by the Act, promoting the principle of equal fundamental rights for people with disabilities, just like any other member of the community.

The Act applies to a wide range of life activities, spanning access to premises, education, provision of goods and services, employment, and administration of Commonwealth laws and programs.

Whenever a person with a disability wishes to utilize premises, including buildings, outdoor spaces, car parking areas, pathways, and facilities, it is essential to provide equitable and dignified access. The DDA mandates appropriate adjustments to be made to ensure accessibility. If adequate access is not provided, a complaint can be filed under the DDA.

Notably, the DDA takes precedence over State legislation, Standards, and Guidelines concerning disability access matters, reinforcing its pivotal role in upholding accessibility rights for people with disabilities across Australia.

Applicable Building Code of Australia (BCA)

The Environmental Planning and Assessment Act states that the BCA that is applicable to the project is the one in force at the time of the application for a construction certificate. It is presumed at this stage that the CC date will be after 01/05/19 the BCA that is applicable to the project is BCA Volume 1,2022.

National Construction Code (NCC) specifically the Building Code of Australia. Current Version, Australian Building Codes Board, www.abcb.gov.au

Australian Standards for Access and Mobility

- Australian Standards for Access and Mobility,
- AS 1428.1:2009 - Part 1 General requirements for access – New building work,
- AS 1428.2:1992 - Enhanced and additional requirements – Part 2 Buildings and facilities,
- AS1428.4: 1:2009 - Part 4.1 – Means to assist the orientation of people with vision impairment – TGSI,
- AS 1735.12:1999 - Lifts, escalators and moving walks,
- AS/NZS 2890.6:2009 - Off- street parking for people with disabilities and
- Northern Beaches Council - Development Control Plan.

Disability (Access to Premises- Buildings) Standards 2010 – General**Part 1, Clause 1.3 Objects**

- a. “To ensure that dignified, equitable, cost effective and reasonably achievable access to buildings, and facilities and services within buildings, is provided with a disability; and
- b. to give certainty to building certifiers, building developers and building managers that, if access to 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 Act.”

In contrast to building regulations, the DDA is not prescriptive. The implementation of the Premises Standards in 2010, and corresponding changes to the BCA, is a significant step towards achieving equal access to premises and is crucial to justice and social inclusion for people with disabilities.

It is noted that the Premises Standards are limited in scope, covering aspects of building compliance applicable under the BCA. It is acknowledged that the Premises Standards could address a broader range of accessibility issues including considerations to accessibility of parkland, playgrounds, transport vehicles, interior fit-out of buildings, and fixtures and fittings. As such, there are features which fall beyond the scope of the standards which may be subject to the general complaint’s provisions of the DDA.

According to the Guidelines on the Application of the Premises Standards (produced by the Australian Human Rights Commission, 2011), the Premises Standards serve two primary purposes:

- To ensure equitable and dignified access for new buildings and areas of existing buildings that undergo renovation or upgrade requiring building approval.
- To provide clarity to those involved in the design, construction, certification, and management of buildings, outlining the required level of access for buildings falling under the scope of the Premises Standards.

The Premises Standards, outlined in the Access Code within Schedule 1, establish a set of nationally applicable Performance Requirements to enable non-discriminatory access and use of

the buildings and areas they cover. They also provide technical Deemed-to-Satisfy Provisions to meet these Performance Requirements.

While the Premises Standards largely align with the BCA and reference various Australian Standards related to access and other relevant matters, they aim to offer certainty to the building industry in fulfilling access requirements for new and upgraded buildings, specifically concerning elements covered by the Premises Standards. However, it's important to note that not all elements and components within buildings and premises fall within the scope of the Premises Standards. The DDA has a broader scope, encompassing more aspects related to accessibility beyond what is covered by the Premises Standards or the BCA.

The Disability Discrimination Act (DDA) includes specific provisions related to access requirements for buildings under Section 23, which pertains to access to premises and facilities that the public can enter or use. Additionally, the DDA provides a framework for creating specific Disability Standards that offer more detailed guidance on compliance.

These Disability Standards include:

- Disability Standards for Accessible Public Transport 2002 (No applicable)
- Disability Standards for Education 2005 (No applicable)
- Disability (Access to Premises – Buildings) Standards 2010 (Applicable)

Enforcement of the DDA primarily occurs through a complaints process. Individuals who have experienced unlawful discrimination, either directly or indirectly, can seek resolution through the Australian Human Rights Commission. If conciliation efforts are unsuccessful, they have the option to take the matter to the Federal Magistrates Court or the Federal Court of Australia.

2.5 Affected Part

Definitions under the Premises Standards

The Premises Standards states:

(3) A building is a **new building if:**

(a) it is not a part of a building; and

(b) either:

(i) an application for approval for its construction is submitted, on or after 1 May 2011, to the competent authority in the State or Territory where the building is located; or

(ii) all of the following apply:

(A) it is constructed for or on behalf of the Crown;

(B) the construction commences on or after 1 May 2011;

(C) no application for approval for the construction is submitted, before 1 May 2011, to the competent authority in the State or Territory where the building is located.

(4) A part of a building is a new part of the building if it is an extension to the building or a modified part of the building about which:

- (a) an application for approval for the building work is submitted, on or after 1 May 2011, to the competent authority in the State or Territory where the building is located; or
- (b) all of the following apply:
 - (i) the building work is carried out for or on behalf of the Crown;
 - (ii) the building work commences on or after 1 May 2011
 - (iii) no application for approval for the building work is submitted, before 1 May 2011, to the competent authority in the State or Territory where the building is located.

(5) An affected part is:

- (a) the principal pedestrian entrance of an existing building that contains a new part; and
- (b) any part of an existing building, that contains a new part, that is necessary to provide a continuous accessible path of travel from the entrance to the new part. If a building owner or the only lessee of a building applies for a building or construction approval, the new part and affected part must comply with the Premises Standards. However, if one, of a number of lessees in a building applies for a building or construction approval, the new part must comply with the Premises Standards. There is no onus on the lessee applying for the approval to upgrade the affected part. Refer to the Premises Standards and the Guidelines on the Application of the Premises Standards for more details.

Reference and Guidelines

- Guide to the BCA, Current Version, Australian Building Codes Board,
www.abcb.gov.au
- Guideline on the Application of The Premises Standards, 2013, Australian Human Rights Commission, <https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards>
- Guide to the BCA, Current Version, Australian Building Codes Board,
www.abcb.gov.au
- Guideline on the Application of The Premises Standards, 2013, Australian Human Rights Commission,
<https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards>
- AS1428.2:1992 Enhanced and Additional requirements
<https://www.saiglobal.com/PDFTemp/Previews/OSH/as/as1000/1400/14282.pdf>
- AS1428.4.1 Draft Way-finding Standard
<https://store.standards.org.au/reader/as-1428-4-2-2018?preview=1>
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture, <https://humanrights.gov.au/our-work/disability-rights/publications/advisory-note-streetscape-public-outdoor-areas-fixtures>
- Advisory Note on the streetscape, public outdoor areas, fixtures, fittings, and furniture (2013).

- AS1428.1: 2021 - Part 1 General requirements for access – New building work.
- AS 1735.12:2020 - Lifts, escalators and moving walks and
- AS/NZS 2890.6:2022 - Off- street parking for people with disabilities and

The purpose of this statement is to evaluate the current design proposal against the Deemed-to-Satisfy (DtS) provisions of the National Construction Code Series 2022 - Building Code of Australia (BCA), DDA Premises Standards 2010, and AS1428.1 Suite, and to assure the Consent Authority that the design can comply without requiring significant amendments.

Universal Design (UD)

Access is paramount in providing an inclusive environment for all users within the community. The Access Code is focused on ensuring that all users are equally catered for in society.

It is recommended to use the Universal Design principles in all projects as this will ensure a holistic approach in the provision of access for all members of society.

There are 7 Principles and their subsequent Guidelines to be considered when undertaking the design of a new project:

No.	Principle	Guidelines
1	Equitable use	<p>The design is useful and marketable to people with diverse abilities.</p> <ul style="list-style-type: none"> - Provide the same means of use for all users: identical whenever possible; equivalent when not. - Avoid segregating or stigmatizing any users. - Provisions for privacy, security, and safety should be equally available to all users. - Make the design appealing to all users. <p>Example: Online content that is designed so that it is accessible to everyone, including students who are blind and using text-to-speech software.</p>
2	Flexibility in use	<p>The design accommodates a wide range of individual preferences and abilities.</p> <ul style="list-style-type: none"> - Provides choice in methods of use. - Accommodate right- or left-handed access and use. - Facilitate the user's accuracy and precision. - Provide adaptability to the user's pace. <p>Example: A civic facility that allows a visitor to choose to read or listen to a description of the contents of a display case employs this principle.</p>
3	Simple and intuitive use	<p>Use of the design is easy to understand regardless of the user's experience, knowledge, language skills, or current concentration level.</p> <ul style="list-style-type: none"> - Eliminate unnecessary complexity. - Be consistent with user expectations and intuition. - Accommodate a wide range of literacy and language skills. - Arrange information consistent with its importance. - Provide effective prompting and feedback during and after task completion. <p>Example: Control buttons on specific equipment for common use (staff and visitors) are labelled with text and symbols that are simple and intuitive to understand.</p>
4	Perceptible information	<p>The design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities.</p> <ul style="list-style-type: none"> - Use different modes (pictorial, verbal, tactile) for redundant presentation of essential information. - Provide adequate contrast between essential information and its surroundings.

No.	Principle	Guidelines
		<ul style="list-style-type: none"> - Maximise "legibility" of essential information. - Differentiate elements in ways that can be described (i.e., make it easy to give instructions or directions). - Provide compatibility with a variety of techniques or devices used by people with sensory limitations. <p>Example: Broadcasting television closed captions for users (staff and visitors) with hearing loss.</p>
5	Tolerance for error	<p>The design minimizes hazards and the adverse consequences of accidental or unintended actions.</p> <ul style="list-style-type: none"> - Arrange elements to minimize hazards and errors: most used elements, most accessible; hazardous elements eliminated, isolated, or shielded. - Provide warnings of hazards and errors. - Provide fail safe features. - Discourage unconscious action in tasks that require vigilance. <p>Example: Online content that is designed to be accessible to everyone, including students/teachers who are blind or partially blind or visitors/users using text-to-speech software.</p>
6	Low physical effort	<p>The design can be used efficiently and comfortably and with minimal fatigue.</p> <ul style="list-style-type: none"> - Allow user to maintain a neutral body position. - Use reasonable operating forces. - Minimize repetitive actions. - Minimize sustained physical effort. <p>Example: Automated doors, windows, lighting, air-conditioning, etc. Sensor doors and basin and sink taps/water mixers.</p>
7	Size and space for approach and use	<p>Appropriate size and space are provided for approach, reach, manipulation and use regardless of user's body size, posture or mobility.</p> <ul style="list-style-type: none"> - Provide a clear line of sight to important elements for any seated or standing user. - Make reach to all components comfortable for any seated or standing user. - Accommodate variations in hand and grip size. - Provide adequate space for the use of assistive devices or personal assistance. <p>Example: Adjustable workbenches for visitors, users and adjustable desks for</p>

Base Extracted from [Universal Design Principles | RL Mace Universal Design Institute \(udinstitute.org\)](https://www.udinstitute.org/)

3 Development Description & Assessment Information

3.1 Proposed Development

The proposed development involves the refurbishment of the existing Long Reef Golf Club clubhouse, spanning across two storeys to enhance both member and community facilities.

This development consists of:

Entrances

- A main entrance with a verandah and lobby on the west end of the building.
- A dedicated members' entrance on the south end.
- A gate entrance on the east end.

Community & Staff Facilities

- Three meeting/community rooms.
- An administration office and three staff offices.
- A staff breakout room connected to Back-of-House (BOH) staff amenities.

R

Amenities

- Accessible and ambulant amenities.
- BOH staff amenities with a toilet and shower.

BOH Kitchen Facilities

- A kitchen area with a dry storeroom, freezer room, cool room, keg room, and additional storage areas.

Food & Beverage Services

- An internal bar area located between the communal area and member's lounge.
- A second bar area opening to a garden seating area.
- A kiosk opening to an outdoor area.
- A bar servicing members presentation space.
- Multiple communal areas including a dining area, communal lounge area, covered terrace dining, and outdoor garden seating area.

Event/ Members Spaces

- Members presentation space/meeting rooms with two connected terrace areas.
- Two members lounges and two members terrace areas.

Vertical Circulation

- Three sets of stairs.
- A passenger lift.

3.2 Location and Description

The subject site is located at 2 Anzac Avenue, Collaroy NSW 2097 and legally described as Lot 1 of Deposited Plan (DP) 1144187. The site is in the suburbs of Collaroy, within the Northern Beaches Local Government Area (LGA).

The site is located at 2 Anzac Avenue, Collaroy, within the Long Reef Golf Club grounds, which is bounded by Anzac Avenue to the west and Seaview Parade to the north. Griffith Park is situated directly to the west, while Fisherman's Beach lies to the east, providing coastal views and access to the beach.

The site is approximately 300 meters east of Pittwater Road, a major arterial route offering connectivity to surrounding suburbs and transport links. The area is serviced by several bus routes along Pittwater Road, providing access to key locations such as Dee Why and Manly to the south, as well as Mona Vale and Palm Beach to the north.

Development surrounding the site includes:

- To the north: Griffith Park and additional public recreational facilities, along with residential properties along Anzac Avenue.
- To the east: The coastline of Fisherman's Beach and Long Reef Aquatic Reserve, offering natural coastal views and amenities for beachgoers.
- To the south: Continued sections of the Long Reef Golf Course and additional beachfront areas.
- To the west: Residential and commercial developments along Pittwater Road, including local restaurants and cafes that service the nearby community.

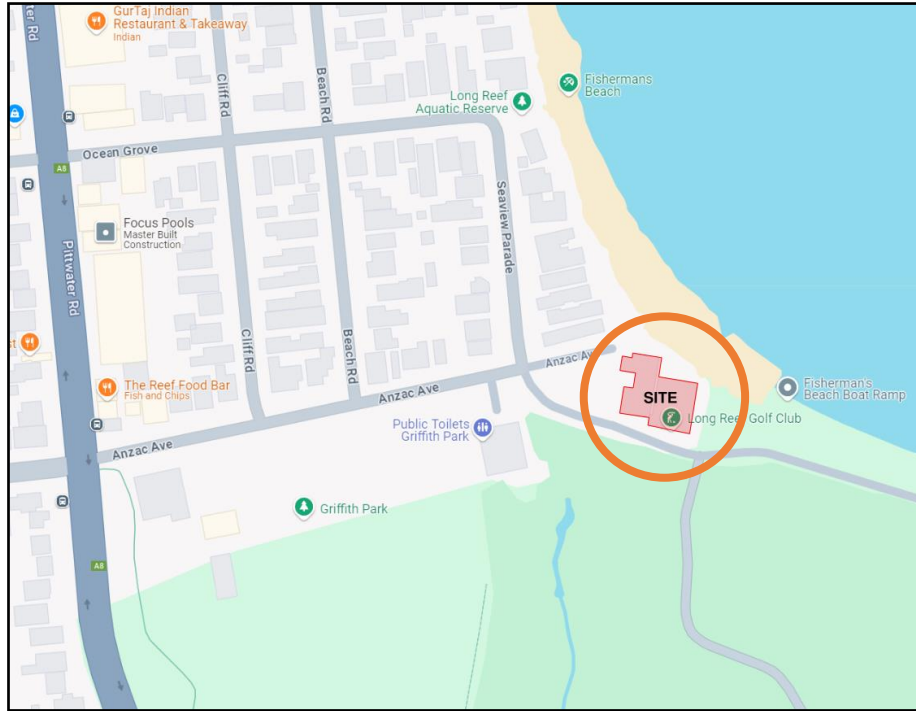


Figure 1: Site Location (Source: Google Maps, 2024)

3.3 BCA Classification (Access Requirements)

The table below outlines the uses and classifications of the proposed new building, along with the associated access requirements:

Use	Class	Access Requirements
General Assembly	9b	Access is required - to and within all areas normally used by the occupants.

4 Mandatory Requirements Accessibility Assessment & Recommendations for Access for People with Disability

The following details the accessibility compliance of the proposed development. The assessment is limited to the significant issues ascertainable from the current level of design detail. Further detailed assessment will be required at the Detailed Design Stage/construction Certificate Stage to demonstrate full compliance with the relevant access provisions.

4.1 Accessibility Compliance (Affected Part)

Premises Standards 2010 - Part 2.1 Clause 5 mandates:

Access for People with Disabilities –Affected Part Upgrade

Commonwealth Disability (Access to Premises- Buildings) Standards 2010 (DAPS)

Clause 2.1 (a) and (b) of the Access to Premises Standard states that the following must comply with the Access Standards:

- Any new building (an application after 1 May 2011)
- Any new part (new works) and
- Any affected part of an (existing) building.

An affected part (as defined in the Premises Standards) is:

- a) The principal pedestrian entrance of an existing building that contains a new part; and
- b) Any part of an existing building that contains a new part, that is necessary to provide a continuous accessible path of travel from the entrance to the new part including ramps and lifts as necessary.
- c) Compliance with the affected part upgrade should be assessed to the satisfaction of the Certifying Authority at CC stage.
- d) Should the applicant for the works be the lessee in a multi-leased building, the affected part upgrade requirements are not applicable to the subject development under concession 4.3 of the Premises Standard.

Compliance Comments
<p>Access to -Any new part (new works)</p> <p>The proposed refurbishment is considered a major intervention to be carried out on an existing building, the "affected part" provisions is applicable. According to the National Construction Code (NCC) and the Building Code of Australia (BCA), the following generally applies:</p> <ul style="list-style-type: none"> - Affected Part Requirements: When major works or significant renovations are performed, the affected part of the building must be upgraded to comply with current accessibility standards. The affected part refers to the areas of the building that are

Compliance Comments
<p>impacted by the new work and any necessary pathways to provide continuous accessibility between the new and existing portions.</p> <ul style="list-style-type: none"> - Extent of Compliance: Routes, entrances, and any facilities connected to or impacted by the renovation must be made accessible. Most of the work will involve upgrades, triggering BCA D4 compliance for all areas except those exempted under D4D5 <p><i>Clarify the location of cosmetic upgrades, including areas where there will be only change of floor finishes or paint, if any.</i></p>

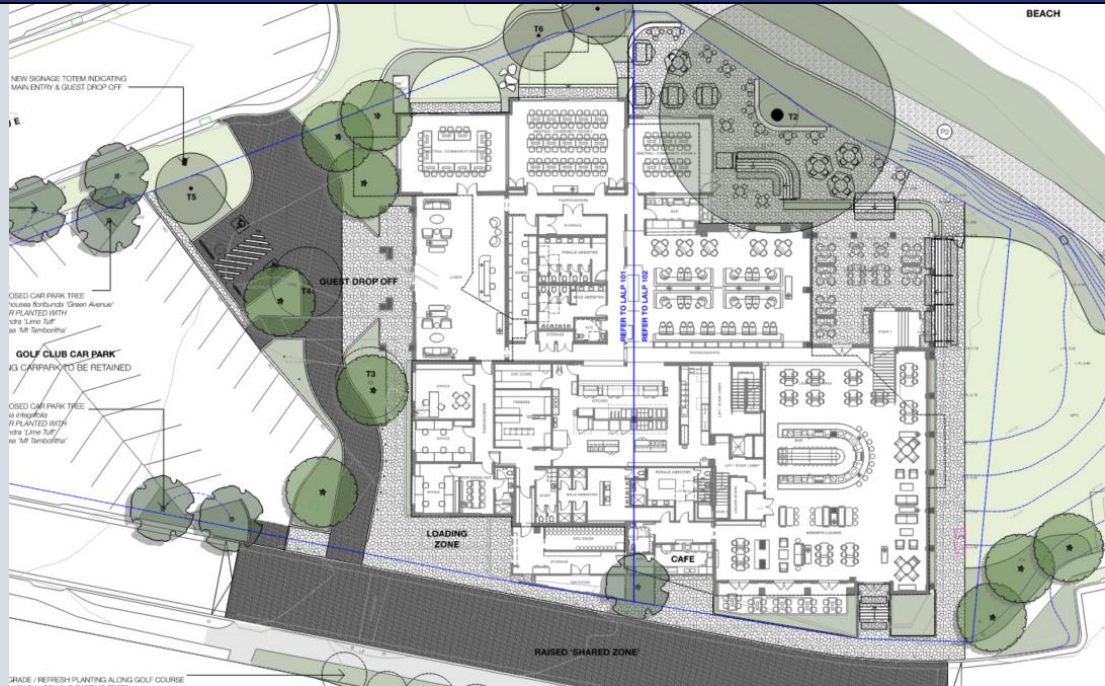
4.2 Access to Buildings (Site Connections) - BCA Part D4D2

An accessway to the building must be provided with a continuous accessible path of travel (CAPT) compliant with AS1428.1. Specific components are as follows:

- from the main points of a principal pedestrian entry (PPE) to the allotment boundary; and
- from another accessible building (new or existing) connected by a pedestrian link; and
- from any required accessible carparking space (new or existing) on the allotment.

Compliance Comments
<p>Access from the allotment boundary</p> <ul style="list-style-type: none"> - Access to the site via Anzac Avenue is through driveway. This crosses the site. - Access from the golf course is via a new raised shared zone pedestrian road, which will improve the safety when going to or coming from the golf course.

Compliance Comments



- Access from the golf course/council carparking adjacent pedestrian footpath is via stairs, which does not provide indication of ramp access for a compliant continuous accessible path of travel.

Carparking Access

- Two new accessible car parks identified in external area immediately in front of guest drop off area/main entry. Accessible parking is to be provided in accordance with AS/NZS 2890.6:2009.

Ensure a continuous accessible path of travel is provided in accordance with AS1428.1. If there are level changes exceeding 5mm a ramp is to be provided to address the level change.

Further information is to be provided regarding the location of the accessible car parking bay and compliant path of travel is to be provided.

4.3 Access to Buildings (Entrances) - BCA Part D4D3

In a building required to be accessible, an accessway compliant with AS1428.1 must be provided through the principal pedestrian entrance (PPE), and:

- through no less than 50% of all pedestrian entrances including the principal pedestrian entrance; and
- in a building with a total floor area more than 500 m², a pedestrian entrance which is not accessible must not be located more than 50 m from an accessible pedestrian

entrance, except for pedestrian entrances serving only areas exempted by (service maintenance areas D4D5 Clause).

Where a pedestrian entrance required to be accessible has multiple doorways, these are to be accessible and:

- if the pedestrian entrance consists of no more than 3 doorways – no less than 1 of those doorways must be accessible; and
- if a pedestrian entrance consists of more than 3 doorways – no less than 50% of those doorways must be accessible.

For the purposes of (3); an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where:

- all doorways serve the same part or parts of the building must comply with AS1428.1; and
- the distance between each doorway is not more than the width of the widest doorway at that pedestrian entrance; and

A doorway is the clear, unobstructed opening created by the opening of one or more door leaves.

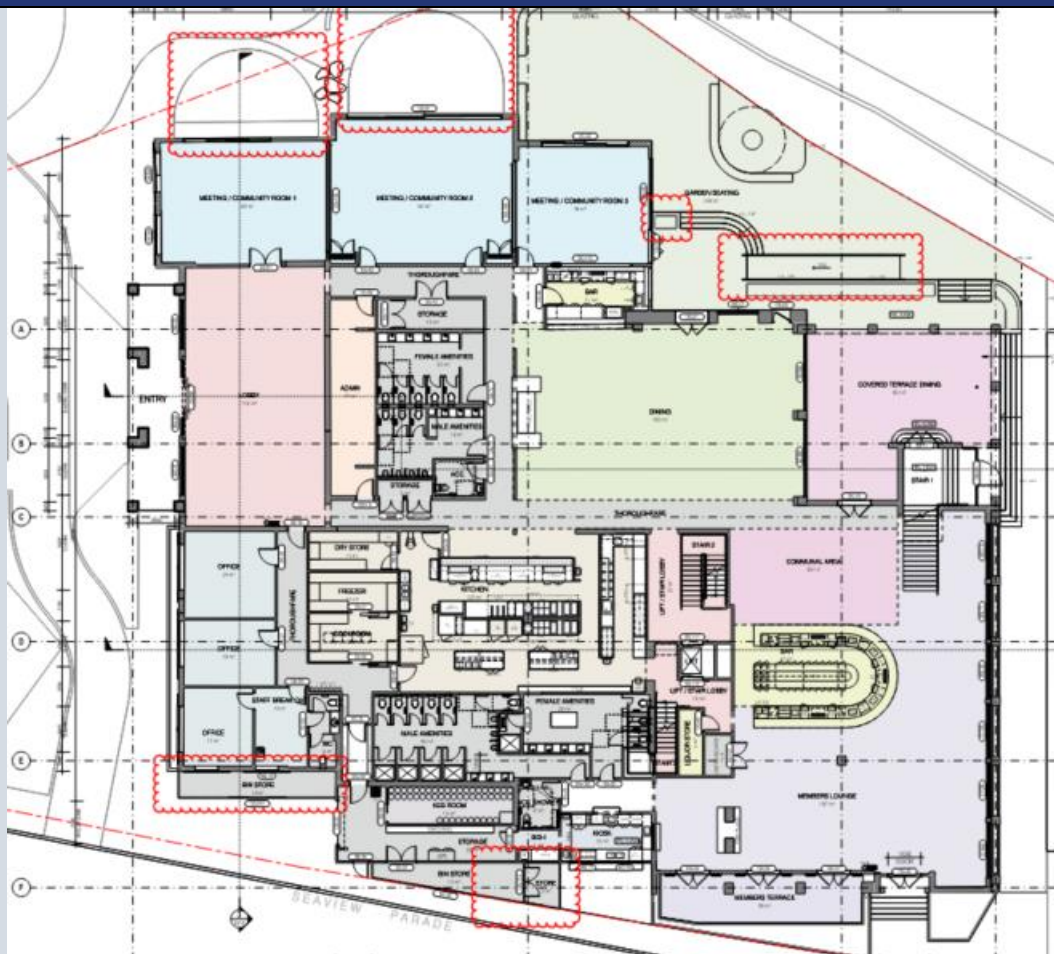
- Where a doorway on an accessway has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- A single door is to ensure a clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.

A ramp complying with AS 1428.1 or a passenger lift need not be provided to serve a storey or level other than the entrance storey in accordance with NCC BCA D4.

Where there are level differences between internal and external areas. The threshold ramp is to be provided in accordance with AS1428.1.

Compliance Comments
<p>Main Entrance (West), Members Entrance (South) and Gate Entrance (East)</p> <ul style="list-style-type: none"> - External doors entrances appear to meet compliance under the BCA D4D3, 50% of entrances are capable of meeting compliance. <p>Please note: Members stair entry from south is estimated to be within 50m of an accessible entry (via ramp within garden seating). Path connecting to ramp will be required in accordance with AS1429.1:2009.</p>

Compliance Comments



Where steps are located along the continuous accessible path of travel (CAPT), provide a step ramp, ramp or walkways in accordance with AS1428.1 Clause 10.7.

- All doors in the continuous accessible path of travel are to ensure a level threshold is provided at the building entrance. Changes in levels are to be a max. of 3mm or 5mm where edges are rounded or bevelled. Where changes in level exceed 3-5mm, provide a threshold ramp as per AS1428.1 Clause 10.5.

Further information is to be provided regarding the location of the accessible continuous accessible path of travel adjacent to proposed stairs as required under AS1428.1.

4.4 Emergency Egress Provisions for People with Disabilities

Currently there are no provisions for emergency egress for people with disabilities in the NCC BCA or DDA Premises Standards. However, the following is recommended to be considered:

- Evacuation strategy development to be put in place for this facility (DDA)
- Areas of refuge to allow people with disabilities to protect themselves in case of fire.

- This is to provide a clear circulation space (excluding the 1-metre clear circulation space of footprint for an occupied wheelchair) in accordance with AS1428.1 Figure 1.
- Wider doors, recommended to provide clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- Relocation of extinguishers operable parts at 900-1250mm above FFL.

Where stairs are also used for common use (staff and students), it is to ensure compliance with AS1428.1 and TGSi are to be incorporated in accordance with AS1428.4.1, where the handrail breaks or is not continuous throughout the stair.

- Stairs middle landings are to ensure provision of one off-set tread in accordance with AS1428.1.

Compliance Comments

All internal stairs are communication stairs, therefore are to comply with AS1428.1. There are no fire isolated stairs in this project.

4.5 (D4D4) Continuous Accessible Path of Travel (CAPT)

A continuous accessible path of travel is defined as an uninterrupted pathway to and from within a premises or building environment which provides linkage to all programs, goods and services within a premises or building. Therefore, the following items are located via this pathway.

- All continuous accessible paths of travel are to ensure compliance with AS1428.1. Clause 7 with 1-metre minimum clear circulation and 2.1-metres above FFL.
- Where a manual doorway on an continuous accessible path of travel (CAPT) has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- Where manual door latch side cannot be achieved, the door is to be automated.
- A single manual door on an continuous accessible path of travel (CAPT) is to ensure a clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- Doorway threshold ramp is to have a 1:8 gradient, 35mm max. height and 280mm max. length, compliant with AS1428.1. (Note: No threshold ramps are allowed inside of the building under the BCA unless open to a road, open space or are in a building class 9a)
- The distance between successive doorways in a vestibule serving an area required to be accessible is to be 1450mm (excluding the swing doors)
- 2000mm L x 1800mm W (passing bay) is to be provided where there is no line of sight (2-way corner/ L shape)
- 1500mm x 1500mm (+splay) clear circulation space is to be provided to achieve 90-degree turn.

- 2-metre length or over corridors are to provide 1540mm x 2070mm minimum clear circulation space to achieve 180-degrees.

Compliance Comments

Covered Terrace Dining

- The path of travel clearances differ between landscape plan and floor plan. The landscape plan provides a DTS provision of 1800mm clear circulation space however the floor plan indicates a 1200mm clearance. Further information is required to clarify the clearances in this area.

Lobby/Stair Lobbies – Ground Level & Level 1

- Currently all lift lobbies lack a suitable space for passing bay with 1800x2000mm clear circulation space, required to allow two wheelchair users to pass each other and where there is a lack of line of sight. Passing bay is to be provided for compliance.
- Stair handrails are not to intrude into this clearance zone. Provide a 1540x2070mm turning space at the end of accessways more than 2m in length.
- There is lack of suitable circulation space around the lift lobby (from member's lounge). Ensure a 1500x1500mm turning space is to be provided to perform 90 degree turns.

Meeting/Community Room 1

- There is a lack 850mm door clear width opening (active leaf) Provide a minimum 850mm clear opening width through the active leaf of the double doors. There is enough space for changes to be made and meet compliance at a later stage.

Dining

- DG06 & DG07 door reveal is more than 300mm. Ensure the door is located at the centreline of the door reveal. Or doors are to be automated. There is enough space for changes to be made and meet compliance at a later stage.

Admin

- Entry doors lack suitable circulation space. Provide 1670mm landing depth at the doors for a side approach. Refer to AS1428.1 Fig 31(f).

Amenities Corridor – Level 1

- There is a lack of 1540x2070mm at the end of accessways more than 2m in length. If this cannot be provided, a Performance Based Solution is required to be endorsed by MBC for departure from NCC/BCA.

Members Lounge – Level 1

- Door lacks 850mm clear opening width. This is to be addressed for compliance. Since the door needs to be enlarged to meet the 850mm minimum clear opening width, there

Compliance Comments
will not be sufficient clearance for the 510mm latch side clearance for a depth of 1450mm (clear of adjacent walls).
Members presentation space/meeting rooms – Level 1
<ul style="list-style-type: none"> - DG133 & DG134 door reveal is more than 300mm. Ensure the door is located at the centreline of the door reveal. Or doors are to be automated. There is enough space for changes to be made and meet compliance at a later stage. -
<i>Non-compliances flagged above are to be addressed for compliance and re-issue rectified plans for review. Refer to markups for departure locations.</i>

4.6 Stairs (D4D4), Ramps and Walkways (D4D12)

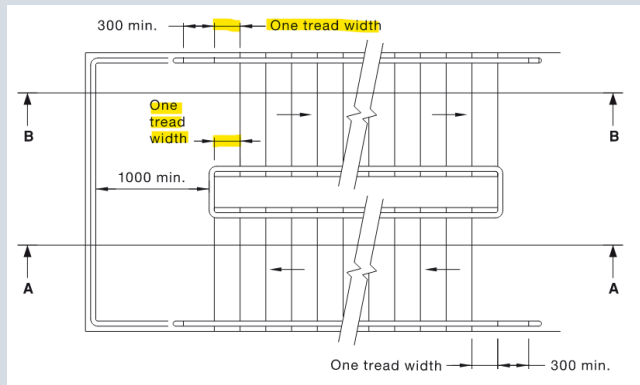
Every ramp and stairway, except for ramps and stairways in areas exempted by (service maintenance areas D3.4 Clause, must comply with –

- for a ramp, except , Clause 10 of AS 1428.1 ; and
- for a stairway, except a fire-isolated stairway, Clause 11 of AS 1428.1 ; and
- for a fire-isolated stairway, Clause 11.1(f) and (g) of AS 1428.1 ; and
- All stairs and ramps are to be 900mm offset from the allotment boundary in accordance with AS1428.1.
- All stairs and ramps are to allow suitable space for handrail extensions to be provided during a later stage. (No protrusion will be allowed at detail design stage).
- All stairs and ramps adjacent to doors are to ensure 1450mm front approach level landings.
- All walkways, ramps and stairways are to ensure a minimum 1200mm overall width and 1-metre minimum clear circulation in accordance with AS1428.1.
- Step and kerb ramps are to ensure compliance with AS1428.1.
- Curved ramps and walkways are to ensure 1500mm minimum clear width
- Stairs middle landings are to ensure an off-set tread is provided
- When turning 90-degree or 180-degrees on 1:14 ramp, walkways are to ensure 1450mm x 2070mm landings. When there is a lack of sight a passing bay of 1800mm x 2000mm is required.
- Ramps 1:14 and walkways landings are to be 1200mm (only one direction of travel)
- Ramps 1:14 and walkways landings are to be 1500mm x 1500mm (+splay) when turning 90-degrees
- A series of connected ramps must not have a combined vertical rise of more than 3.6m
- A landing for a step ramp must not overlap a landing for another step ramp or ramp

Compliance Comments

General Recommendations:

- There is lack of middle landing off-set tread, required under AS1428.1. All stairs are to provide setback, one tread width at mid-landings to allow consistent height throughout the stair as required under AS1428.1 Fig 28.



- Handrails are required to be provided to both sides of the stairs.
- Suitable space is to be allowed for handrail extensions and TGSI provision at top and bottom to be incorporated at later stage. Note, protrusion into transversal circulation is not allowed.

Stair 2

- Stairs are required to be setback a minimum of 300mm at the top to allow compliant handrails to be fixed as per AS1428.1 Fig 26(B).
- The stair handrail extension must extend parallel to line the of the nosing.
- Stairs are required to be setback one tread width at mid-landings to allow compliance handrail to be fixed.
- Stairs are required to be setback a minimum of 600mm at the base to allow compliant handrails to be fixed as per AS1428.1 Fig 26(B).

Stair 3

- The stair is to be setback to ensure the riser does not protrude into the transverse path of travel.
- The stair handrail extension must extend parallel to line the of the nosing.
- Stairs are required to be setback a minimum of 600mm at the base to allow compliant handrails to be fixed as per AS1428.1 Fig 26(B).

Non-compliances flagged above are to be addressed for compliance and re-issue rectified plans for review. Refer to markups for departure locations.

New lifts required to be accessible must comply with BCA E3 and relevant parts of AS1735.12.

Lift is to have floor minimum dimensions as follows:

- Passenger lifts which travel less than 12m requires floor size of 1100mm by 1400mm.
- Lift lobbies are to ensure 2000mm x 1800mm minimum clear circulation space (to achieve passing bay that allows two users to pass each other, E.q Wheelchairs, prams, large goods, etc.

Compliance Comments
<ul style="list-style-type: none"> - There is a lack of line of sight without a passing bay measuring 1800mm x 2000mm, as required under AS1428.1, to allow two wheelchair users to pass each other. - Gf – lack 1540mm x2070mm leading to liquor store. This is to be address for compliance.
<p><i>Non-compliances flagged above are to be addressed for compliance and re-issue rectified plans for review. Refer to markups for departure locations.</i></p>

4.8 Sanitary and other Facilities - BCA Part F4

- Class 9b: Provide at least 1 unisex accessible toilet, adjacent to every bank of toilets on each storey, compliant with AS1428.1 under NCC BCA and DDA Premises Standards Part F4. If there is more than 1 toilet bank of toilets on each level, an accessible toilet is required at 50% min. of toilet banks on each level.
- An accessible unisex sanitary compartment must contain a closet pan washbasin, shelf or bench top and adequate disposal of sanitary towels.
- A minimum size of a combined unisex accessible toilet (USAT) and shower facility room is to be 2300mm X 2630mm, to accommodate circulation to the pan (1900mm x 2300mm) and the shower facility.
- Circulation spaces, fixtures and fittings of all accessible sanitary facilities must comply with AS1428.1
- Door circulation is to ensure compliance with AS1428.1 Fig.31 or 32 or door is to be automated.
- An accessible unisex facility must be located so that it can be entered without crossing an area reserved for one gender.
- Left-hand (LH) and right-handed (RH) mirror image facilities to be even where two or more accessible unisex facilities provided. Balance is to be provided between consecutive floor with the same user.

- Where male and female facilities are separate, a unisex facility is only required at one location.
- Accessible unisex sanitary compartment or shower need not be provided on a storey that is not required to be provided with a lift or ramp access
- The distance between successive doorways in a vestibule serving an area required to be accessible is to be 1450mm (excluding door swing)
- Accessible facilities must meet the requirements of Section 15 of AS1428.1
- At each bank of toilets where there is one or more toilets, in addition to an accessible unisex sanitary compartment provided at that bank, a sanitary compartment suitable for a person with an ambulant disability must also be provided for use by males and females.
- The ambulant facilities must comply with the requirements of Clause 16 of AS1428.1:2009. This includes 900mm x 900mm clear circulation spaces in front of the pan, outside of the cubicle and at the entry door (this is to exclude the door swing)

Compliance Comments

Accessible WC – 5m2 – Ground level

- Basin encroaches into door circulation. This is to be address for compliance. Ensure a 300mm clear circulation is provided along the arc of the door. It is recommended door is relocated to allow for compliance.

Staff unisex Accessible WC – Ground level

- A cubicle may be considered a bank.
- This compartment is required to be a unisex accessible WC.
- Banks of toilets are required to be provided with:
 - 1 x Unisex Accessible WC
 - 1 x Male Ambulant WC
 - 1 x Female Ambulant WC

Staff Ambulant WCs – Ground Floor

- Unisex/all-gender facilities are a deviation from the NCC/BCA. A Performance Based Solution is required to be endorsed by MBC for departure from NCC/BCA.
- Ambulant cubicles are required to have a 900x900mm circulation within the cubicle, and the arc of the door is not to intrude into the circulation area.

Acc shower – Ground level

- The shower seat encroaches into the WC pan circulation. A 1900mm clearance is required when the shower seat is in an open position. A Performance Based Solution is required to be endorsed by MBC to support a 1428.1:2021 configuration.

Compliance Comments
Ambulant WCs – Level 1 <ul style="list-style-type: none"> - There are 4 x ambulant cubicles proposed. Several issues regarding circulation clearances are impacted due to the proposed layout in this area. - A 900x900mm clear circulation space is to be provided in front of the WC pan and on the outside of the cubicle (free of the door swing). - It is recommended to provide the ambulant cubicles with sliding doors to achieve the 900x900mm clearances internally and externally.
<i>Non-compliances flagged above are to be addressed for compliance and re-issue rectified plans for review. Refer to markups for departure locations.</i>

4.9 Communal and Exempted Areas - BCA Part D4D5

Under the DDA Premises Standards and BCA all common use rooms normally used by occupants of the building are to be accessible, except areas exempt under D4D5 - Services /maintenance only use areas, which are areas where access would be inappropriate because of the particular purpose for which the area is used or that would pose a health or safety risk for people with a disability.

- Accessibility is required to common use terraces, open/outdoor spaces within buildings.

Compliance Comments
Refer to section 1.2 for details of exempt areas under D4D5 and requirements to a further stage.
<i>Non-compliances flagged above are to be addressed for compliance and re-issue rectified plans for review. Refer to markups for departure locations.</i>

4.10 Carparking Spaces for People with Disabilities - BCA Part D4D6

Carparking Spaces for People with Disability are to be provided in accordance with Table D3.5 of the Disability (Access to Premises Standards) 2012 and NCC BCA, therefore:

- Class 9b – 1 space for every 100 carparking spaces

Compliant AS2890.6 Accessible car parking bays must achieve:

- 2.4-metres W x 5.4-metres L, with shared area of 2.4-metres W x 5.4-metres L and rear shared area 2.4-metres.
- The overhead clearance of 2.5metres (parking bay and shared areas) and 2.2-metres overhead path of travel.
- Accessible car parking bay and shared areas are to ensure 1:40 maximum gradient or 1:33 bitumen.
- If there is a level difference between the accessible car parking bay and linkage footpath or building, this is to be addressed with a step ramp and designed in accordance with AS1428.1.
- Accessible car parking bay and shared areas are to ensure 1:40 maximum gradient or 1:33 where bitumen surface is provided.
- Accessible car parking bay is to be close to automated doors, principal pedestrian entrances (PPE) and passenger lifts. This is to minimise travel distance and potential hazard.
- Accessible car parking bay is to ensure the provisions of compliant continuous accessible path of travel (CAPT) in accordance with AS1428.1 CL.7 to and from automated doors, principal pedestrian entrances (PPE) and passenger lifts.

Compliance Comments

- Ensure the existing accessible car park space is re-instated and complies with AS2890.6. Note that under the NCC/BCA Class 9b buildings are required to have 1 accessible car space per 100 car spaces.
- Confirm an accessible path of travel is provided between the car space and the building entrance in accordance with AS1428.1 Clause 7 & 10.

Non-compliances flagged above are to be addressed for compliance and re-issue rectified plans for review. Refer to markups for departure locations.

5 Conclusion

This access report outlines the findings of an assessment of the referenced architectural documentation provided for the proposed development

The primary purpose of the report is to assess the proposed works against the Deemed-to-Satisfy (DTS) Access provisions of the National Construction Code Series (Volume 1) Building Code of Australia 2022 and DDA Premises Standards 2010. It has been identified that access requirements can be achieved, subject to the review of the following:

- Accessibility Compliance (Affected Part),
- NCC BCA Part D4 – Access to Buildings (Site),
- Continuous Accessible Path of Travel (CAPT),
- Stairs,
- Ramps and Walkways,
- Passenger Lift,
- Sanitary,
- Communal and Exempted Areas and
- Carparking Spaces for People with Disabilities

The above items are to provide adjustments or further information for assessment.

6 Appendix A – Architectural Plans Reviewed

The following documentation, prepared by i2c was used in the assessment and preparation of this report:

Drawing No.	Title	Date	Drawn By	Rev
LA LP 002/06	Landscape Plan – MASTER PLAN OPTION 2	04.04.25	IK	06
DA12	PROPOSED SITE PLAN	02.04.25	MD	P13
DA13	GROUND FLOOR PLAN	02.04.25	BBR	P13
DA14	LEVEL 1 FLOOR PLAN	02.04.25	BBR	P11



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