



Accessibility Design Review – DA Review

Project Title: Proposed SEPP Seniors Living – Self Contained Dwellings
27 Bellevue Avenue, Avalon

Job Number: 9135

Date: 24 June 2020

Prepared For: Shed Design

Report Version: 9135_ADR_v1.0

1.0	INTRODUCTION	3
1.1	Project Information & Classification	3
1.2	Purpose of the Report.....	3
1.3	Report Scope.....	3
1.4	Limitations of the Report	4
1.5	The Disability (Access to Premises – Building) Standards 2010	5
2.0	ACCESSIBILITY DESIGN REVIEW	6
	BCA Part D3 – ACCESS FOR PEOPLE WITH DISABILITIES.....	7
	<i>Cl. D3.1: General building access requirements</i>	7
	<i>Cl. D3.2: Access to Buildings</i>	8
	<i>Cl. D3.3: Parts of buildings to be accessible</i>	8
	<i>Cl. D3.4: Exemptions</i>	11
	<i>Cl. D3.5: Accessible carparking</i>	11
	<i>Cl. D3.6: Signage</i>	11
	<i>Cl. D3.7: Hearing augmentation</i>	12
	<i>Cl. D3.8: Tactile indicators</i>	12
	<i>Cl. D3.9: Wheelchair seating spaces in Class 9b assembly buildings</i>	12
	<i>Cl. D3.10: Swimming pools</i>	12
	<i>Cl. D3.11: Ramps</i>	13
	<i>Cl. D3.12: Glazing on an accessway</i>	13
	BCA Part E3 – LIFT INSTALLATIONS	13
	<i>Cl. E3.6: Passenger lifts</i>	13
	BCA Part F2 – SANITARY AND OTHER FACILITIES	15
	<i>Cl. F2.4: Accessible sanitary facilities</i>	15
3.0	SEPP SENIOR 2004 REQUIREMENTS.....	16
4.0	ACCESSIBILITY COMPLIANCE STATEMENT.....	27
5.0	REVIEW PROVIDED BY	27

Report Status	Revision	Date	Details
Draft	1.0	24 June 2020	For Review & Comment

ACCESSIBILITY DESIGN REVIEW

PROJECT: Proposed SEPP Seniors Living – Self Contained Dwellings

LOCATION: 27 Bellevue Ave, Avalon

1.0 INTRODUCTION

This report provides an Accessibility Design Review of the proposed SEPP Seniors Living residential development at 27 Bellevue Ave, Avalon.

1.1 Project Information & Classification

The proposed development consists of 3x self-contained dwellings and two carparking areas located at the subject site.

It is understood the following Building Code of Australia 2019 building classification(s) apply to the subject tenancy (to be confirmed by the BCA Consultant / PCA) –

Building Part	Building Classification	Use
Lower Ground Floor	Class 7a and Class 2	Parking and residential apartment.
Ground Floor	Class 7a and Class 2	Parking and residential apartment.
First Floor	Class 2	Residential apartment.

1.2 Purpose of the Report

Shed Architects engaged the services of ABE Consulting as Accessibility Consultants for this project to undertake an assessment of the proposed design documentation in relation to the accessibility related requirements as identified in Part 1.3 of this report for submission to the Local Council as part of the Development Application documentation.

1.3 Report Scope

This report provides an Accessibility Design Review of the relevant project architectural documentation in the context of the following –

- Part D3, Clause F2.4 and Clause E3.6 ‘deemed-to-satisfy’ (DtS) requirements of the Building Code of Australia 2019 (BCA)
- The Disability (Access to Premises - Buildings) Standards 2010;
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 Schedule 3 Standards concerning accessibility and usability for hostels and self-contained dwellings;

This Accessibility Design Review is based on –

- Architectural design documentation prepared by Shed Architects, Project No. 1901, as follows:

Dwg#	Title	Date – Issue
1901 – DA100	LOWER LEVEL PARKING PLAN	Undated
1901 – DA110	LOWER GROUND FLOOR PLAN	06/09/2019 - A
1901 – DA120	GROUND FLOOR PLAN	Undated
1901 – DA130	FIRST FLOOR PLAN	Undated

1901 – DA200	LONGITUDINAL SECTION	Undated
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- The Building Code of Australia 2019 (BCA) prepared by the Australian Building Codes Board.
- The Guide to the BCA 2019, prepared by the Australian Building Codes Board.
- The Disability (Access to Premises – Building) Standards 2010.
- Australian Standards AS 1428.1-2009 - Design for Access and Mobility - Part 1: General requirements for access - New building work.
- Australian Standards AS/NZS 2890.6-2009 – Off-street parking for people with disabilities.
- Australian Standards AS/NZS 1428.4.1-2009 - Design for Access and Mobility - Part 4.1: Means to assist the orientation of people with vision impairment – Tactile ground surface indicators.
- Australian Standards AS4299-1995 - Adaptable housing.
- Australian Standards AS 2890.1-1993 Parking facilities, Part 1: Off street parking.
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 - Schedule 3

1.4 Limitations of the Report

The Disability Discrimination Act (DDA - 1992) is a Federal Government legislation enacted in 1993 that seeks to ensure all new building infrastructure, refurbishments, services and transport projects provide functional, equitable and independent accessibility. The DDA is a complaints based legislation, which is administered by the Australian Human Rights Commission (AHRC). For any built environment the key requirement of the DDA is to ensure functionality, equity and independence of movement by people with disabilities, their companions, family and carer givers.

A key component of compliance to the DDA is the use of the Disability (Access to Premises - Buildings) Standards 2010, Part D3, Clause F2.4 and Clause E3.6 of the Building Code of Australia 2019 (BCA) and the relevant referenced standards primarily being Australian Standards Suite AS1428 and Australian Standards AS2890.6 – Off-street parking for people with disabilities. The AS 1428 series details technical requirements related to design for access and mobility.

The Building Code of Australia has adopted key accessibility and DDA legislation into the 2011 BCA. In particular adherence to the Access to Premises Standard (2010); AS1428.1 2009; AS1428.4.1 2009 and AS2890.6 2009 has become mandatory. However, compliance with these elements does not necessarily result in compliance with the Disability Discrimination Act if the elements of equality, independence and functionality remain compromised within an environment.

This report does not include or assess the following –

- The provisions of the BCA not directly referenced in Part 1.3 of this report;
- Standards not directly referenced in this report; including AS4299-1995 (Adaptable Housing) unless otherwise explicitly specified in Part 1.3 of this report;
- Disability Discrimination Act 1992 (as explored earlier);
- Federal / State / Local planning policies and/or guidelines unless otherwise explicitly specified in Part 1.3 of this report;
- Work Health & Safety considerations or Work Cover Authority requirements;
- This report does not provide any performance based assessments (Performance Solutions) of the BCA;
- This report does not provide any exemptions from the requirements of the BCA.

- This report is not a Part 4A compliance certificate under the Environmental Planning & Assessment Act 1979 or Regulation 2000;
- Review or specification of slip-resistance classification(s) for floor surface finishes / materials. We recommend surface finish advice be sought from an independent specialist slip safety consultant.

1.5 The Disability (Access to Premises – Building) Standards 2010

The Disability (Access to Premises - Buildings) Standards 2010 provides the prescriptive requirements set out regarding the upgrade of an existing building where works are being undertaken.

The Premises Standards apply to:

- a new building
- a new part of an existing building
- the *affected part* of an existing building.

The new parts of a building and any subsequent affected part are outlined as per the below extracts of The Disability (Access to Premises - Buildings) Standards 2010 –

New Part:

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:

- *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*
- *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.*

Affected Part:

- *the principal pedestrian entrance of an existing building that contains a new part and*
- *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.*

Furthermore, Part 4 of The Disability (Access to Premises - Buildings) Standards 2010 sets out applicable exceptions and concessions. In this instance the following lessee concession is provided –

Lessees:

If the lessee of a *new part* of a building submits an application for approval for the building work, the following people do not have to ensure that the *affected part* of the building complies with these Standards:

- The building Certifier;
- The building developer;
- The building manager.

2.0 ACCESSIBILITY DESIGN REVIEW

The following tables provide an assessment of the architectural design documentation in relation to the DtS provisions of the BCA / Premises Standards in the context as outlined in Part 1 of this report.

The tables identify each of the relevant assessment outcomes into six (6) main categories, as follows –

Capable of Complying (CoC) – Spatial allowance has been made to accommodate compliance where the specification provided has been satisfied.

Compliance Departure (CD) – A compliance departure with the DtS provisions of the BCA.

Design Detail (DD) – A detail commentary/specification is offered within the report.

Performance Solution (PSR) – A Performance Solution Report is being pursued to justify the compliance departures

Not Applicable (N/A) – Not applicable or not relevant to the project. Commentary provided.

Informational (Info) – Provided for informational purposes

Interpretation Note(s) –

- Readily moveable furniture has been treated as indicative only unless otherwise noted within the report as it is not considered to form part of the building as addressed by the BCA.

Cl. D3.1: General building access requirements

A diagram of a garbage room layout. The room is rectangular and contains six garbage bins arranged in two columns of three. The bins are colored green, red, and yellow from top to bottom. The text "GARBAGE ROOM" is centered in the room. A dimension line at the bottom indicates a width of 897 mm between the two columns of bins.

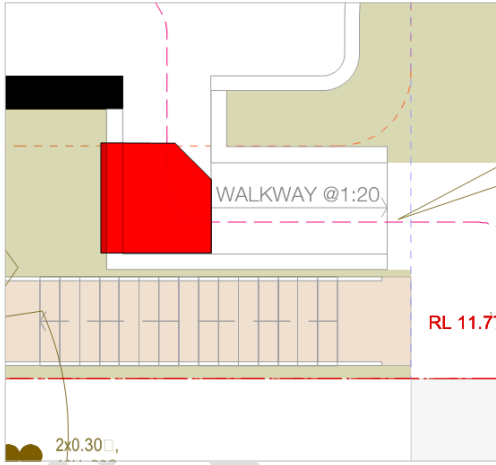
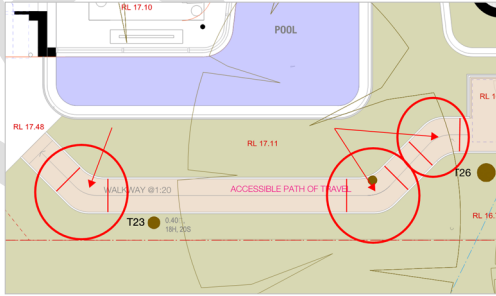
	<p>Resolution:</p> <p>Either provide a compliance doorway or increase the pinch point width to 1000mm.</p> <p>Compliance is otherwise readily achievable with specification to be provided at detailed design stage.</p>	
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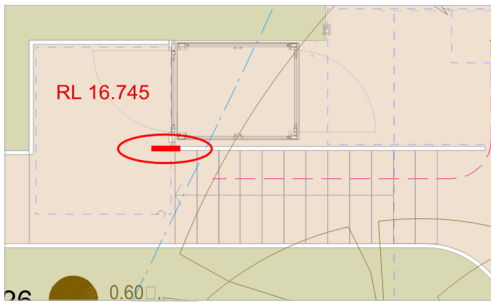
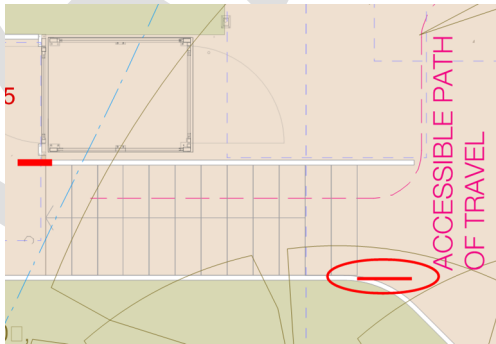
Cl. D3.2: Access to Buildings

DtS Provision	Comment(s)/Recommendation(s)	Status
<p>An accessway must be provided to a building required to be accessible –</p> <ul style="list-style-type: none"> • from the main points of pedestrian entry at the allotment boundary; and • from another accessible building connected by a pedestrian link; and • from any required accessible carparking space on the allotment. <p>In a building required to be accessible, an accessway must be provided through the principal pedestrian entrance, and –</p> <ul style="list-style-type: none"> • through not less than 50% of all pedestrian entrances including the principal pedestrian entrance; and • in a building with a floor area more than 500m², a pedestrian entrance which is not accessible must not be located more than 50m from an accessible pedestrian entrance. <p>except for pedestrian entrances serving only areas exempted by D3.4.</p>	<p>2x accessways appear to be provided from the allotment boundary, 1 on Wickham Ln and the other from Sanders Ln.</p> <p>A pedestrian link is provided between all 3 units and the onsite parking. Refer to section D3.3 for associated comments.</p> <p>Design Detail:</p> <p>The gradient of the accessway from the Sanders Lane site boundary to Apartments 2 and 3 has been calculated at approximately 1:8 which is not compliant for an accessway of that length. Please confirm that this is for vehicles only.</p>	DD

Cl. D3.3: Parts of buildings to be accessible

DtS Provision	Comment(s)/Recommendation(s)	Status
<p>In a building required to be accessible every ramp and stairway, except for ramps and stairways in areas exempted by D3.4, must comply with –</p> <ul style="list-style-type: none"> • for a ramp, except a fire-isolated ramp, clause 10 of AS 1428.1; and 	<p>All non-fire-isolated ramps are required to comply with AS1428.1-2009.</p> <p>Compliance Departure:</p> <p>Insufficient lower landing space for a 90° turn is provided to the 1:20 walkway at off Wickham Ln</p>	CD

	 <p>Resolution:</p> <p>Provide a minimum 1500mm x 1500mm lower landing in accordance with AS1428.1-2009.</p> <p>Compliance Departure:</p> <p>Landings are not provided at the change of directions along the 1:20 ramp between Apartments 2 and 3, refer below.</p>  <p>Resolution:</p> <p>Provide landings at each change in direction along the 1:20 ramp or re-design it as a curved ramp with a consistent curve in accordance with AS1428.1-2009. Curved ramps must be minimum 1500mm wide.</p>	
<ul style="list-style-type: none"> for a stairway, except a fire-isolated stairway, clause 11 of AS 1428.1; and 	<p>All non-fire-isolated stairways are required to comply with AS1428.1-2009.</p> <p>Compliance Departure:</p> <p>The stairway between apartment 3 & 2 has not been set back sufficiently to allow</p>	CD

	<p>for a horizontal handrail extension that does not affect the platform lift.</p>  <p>Resolution:</p> <p>Amend the area to allow for the required stairway handrail extensions without affecting the circulation space of other elements.</p> <p>Compliance Departure:</p> <p>The stairway between apartment 3 & 2 has not been indicated with an outer handrail extension at the lower landing that is perpendicular to the stair.</p>  <p>Resolution:</p> <p>Ensure compliant handrails and extensions are provided to all common area stairways in accordance with AS1428.1-2009.</p> <p>Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage.</p>	
<ul style="list-style-type: none"> for a fire-isolated stairway, clause 11.1(f) and (g) of AS 1428.1; and 	<p>N/A – no fire-isolated stairways are proposed</p>	N/A

<p>Accessways must have—</p> <ul style="list-style-type: none"> • passing spaces complying with AS 1428.1 at maximum 20 m intervals where a direct line of sight is not available • turning spaces complying with AS 1428.1 at 20m intervals or within 2m of the termination of an accessway. 	<p>Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage.</p>	CoC
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Cl. D3.4: Exemptions

DtS Provision	Comment(s)/Recommendation(s)	Status
<p>The following areas are not required to be accessible –</p> <ul style="list-style-type: none"> • An area where access would be inappropriate because of the particular purpose for which the area is used. • An area that would pose a health or safety risk for people with a disability. • Any path of travel providing access only to an area exempted by (a) or (b). 	<p>Exemptions are to be reviewed on a case by case basis. We highlight that no parts of the building have been offered an access exemption (not exhaustive).</p>	Info

Cl. D3.5: Accessible carparking

DtS Provision	Comment(s)/Recommendation(s)	Status
<p>Accessible carparking spaces are to be provided in accordance with Table D3.5 of the BCA in a Class 7a building and a carparking area on the same allotment as a building required to be accessible.</p> <p>The BCA does not prescribe the provision of accessible carparking spaces for Class 2 buildings.</p>	<p>Refer to the SEPP Seniors Living Schedule 3 requirements outlined in Part 3.0 of this report for details.</p>	Info

Cl. D3.6: Signage

DtS Provision	Status
<p>In a building required to be accessible signage complying with Spec. D3.6, AS1428.1-2009 and incorporating the appropriate recognised symbol (as appropriate) for persons with disability must be provided as follows –</p> <ul style="list-style-type: none"> • braille and tactile signage must identify each sanitary facility and space with hearing augmentation; • braille and tactile signage must identify each door required by E4.5 to be provided with an exit sign and state “Exit” and “Level” followed by the floor level number; • signage must be provided within a room containing a hearing augmentation system identifying; the type of system, the area covered within the room and if receivers are being used and where the receivers can be obtained; 	DD

- A design compliance certificate should be obtained from the signage designer/contractor to confirm compliance with the relevant provisions of the BCA and Australian Standards.**

N/A – No areas requiring the provision of a hearing augmentation system have been indicated.

DtS Provision	Comment(s)/Recommendation(s)	Status
<p>Tactile ground surface indicators complying with sections 1 and 2 of AS/NZS 1428.4.1:2009 must be provided to warn people who are blind or have a vision impairment that they are approaching –</p> <ul style="list-style-type: none"> a stairway, other than a fire-isolated stairway; an escalator/moving walk; a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp; in the absence of a suitable barrier an overhead obstruction less than 2 m and where an accessway meeting a vehicular way adjacent to any pedestrian entrance to a building. 	<p><u>Compliance Departure:</u></p> <p>TGSIs are not shown to the top and bottom landings of the stairs located in the south-east corner of the site.</p> <p><u>Resolution:</u></p> <p>Provide TGSIs to the top and bottom landings of the stairs in accordance with AS/NZS 1428.4.1:2009.</p>	CD

N/A – Not a Class 9b building.

N/A – No common area swimming pool is proposed.

Cl. D3.11: Ramps

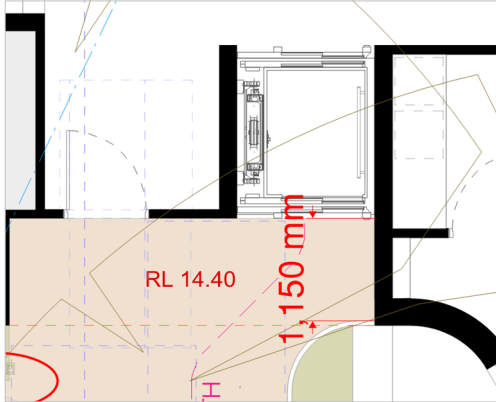
DtS Provision	Comment(s)/Recommendation(s)	Status
On an accessway, a series of connected ramps must not have a combined vertical rise of more than 3.6 m; and a landing for a step ramp must not overlap a landing for another step ramp or ramp.	Compliance is readily achievable.	CoC

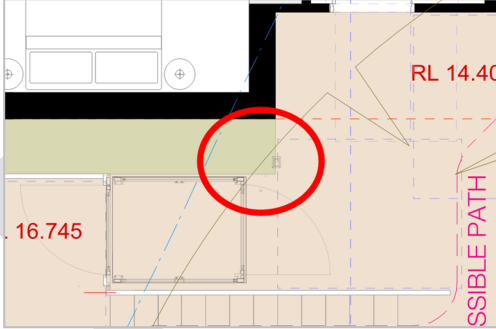
Cl. D3.12: Glazing on an accessway

DtS Provision	Comment(s)/Recommendation(s)	Status
Where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening, must be clearly marked in accordance with AS 1428.1.		DD

BCA Part E3 – LIFT INSTALLATIONS

Cl. E3.6: Passenger lifts

DtS Provision	Comment(s)/Recommendation(s)	Status
<p>Every passenger lift must –</p> <ul style="list-style-type: none"> • be one of the types identified in Table E3.6a, subject to the limitations on use specified in the Table; and • have accessible features in accordance with Table E3.6b; and • not rely on a constant pressure device for its operation if the lift car is fully enclosed. 	<p>Passenger lifts are installed in Apartments 1 and 3 of the development, commentary on these lifts is provided in Section 3.0 of this report.</p> <p>One passenger lift and one platform lift are proposed in the south-east part of the site to allow access from the corner of Sanders Lane and Wickham Lane further into the site, refer below.</p> <p><u>Compliance Departure:</u></p> <p>The doorway circulation space in front of the passenger lift on the lower ground floor is reduced to 1150mm in lieu of 1280mm (for a side on approach).</p> 	CoC

	<p><u>Resolution:</u></p> <p>Provide the required 1280mm circulation space clear of obstruction as per AS1428.1-2009.</p> <p><u>Compliance Departure:</u></p> <p>The doorway latch-side clearance to the platform lift on the lower ground floor is obstructed by landscaping.</p>  <p><u>Resolution:</u></p> <p>Provide the required 530mm latch-side clearance free of obstruction as per AS1428.1-2009.</p> <p>The proposed passenger & platform lift shall have the following features:</p> <ul style="list-style-type: none"> • Handrail complying with the mandatory handrail provisions of AS1735.12, • Lift floor dimensions not less than 1,100mm x 1,400mm (as the lift vertical travel is less than 12m), • Minimum clear door opening complying with AS1735.12, • Passenger protection system complying with AS1735.12, • Lift landing doors at the upper landing, • Lift car and landing control buttons complying with AS1735.12, • Lighting in accordance with AS1735.12, • Automatic audible/visual information within the lift car and at the landings as prescribed, • Emergency hands-free communication, including a button that alerts a call centre of a problem and a light to signal that the call has been received. 	
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	<p>A design compliance certificate is be obtained from the lift designer to confirm compliance with the relevant provisions of the BCA and Australian Standards.</p> <p><u>Design Detail –</u></p> <ul style="list-style-type: none"> • Ensure lift landing controls are provided no less than 500mm from an internal corner (platform lift door openings may dictate where the call button(s) can be located). 	
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BCA Part F2 – SANITARY AND OTHER FACILITIES

Cl. F2.4: Accessible sanitary facilities

DtS Provision	Comment(s)/Recommendation(s)	Status
<p>In a building required to be accessible:</p> <ul style="list-style-type: none"> • Accessible unisex sanitary compartments must be provided as in accordance with Table F2.4(a), • Accessible unisex showers must be provided in accordance with Table F2.4(b), • At each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, a sanitary compartment suitable for a person with an ambulant disability in accordance with AS 1428.1 must be provided for use by males and females. • An accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate disposal of sanitary towels. • Circulation spaces, fixtures and fittings of all accessible sanitary facilities must comply with AS1428.1. • An accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and • Where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right handed mirror image facilities must be provided as evenly as possible. 	<p>No common area sanitary compartments are proposed.</p>	<p>Info.</p>

3.0 SEPP SENIOR 2004 REQUIREMENTS

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

The following is a summary and check list of the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, specifically assessing the development against the requirements of Chapter 3, Part 2 and Schedule 3

Chapter 3, Part 2 – Site-related requirements - Clause 26 Location and access to facilities		
Provisions	Comment	Status
<p>“(1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the proposed development will have access that complies with subclause (2) to:</p> <p>(a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and</p> <p>(b) community services and recreation facilities, and</p> <p>(c) the practice of a general medical practitioner.”</p>	<p>The development relies upon the provisions of clause 26(2) (a) & (b) regarding access to services either within walking distance or via a public transport service that can convey residents to an appropriate range of services and shops.</p> <p>A local medical and dental centre and other prescribed services are also within walking distance of the proposed development.</p> <p>There are several bus stops provided in the vicinity, all within 400m of the proposed development.</p>	CoC
<p>(2) Access complies with this clause if:</p> <p>“(a) the facilities and services referred to in subclause (1) are located at a distance of not more than 400 metres from the site of the proposed development that is a distance accessible by means of a suitable access pathway and the overall average gradient for the pathway is no more than 1:14, although the following gradients along the pathway are also acceptable:</p> <p>(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,</p> <p>(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,</p> <p>(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time, or</p> <p>(b) in the case of a proposed development on land in a local government area that is within the Sydney Statistical Division—there is a transport service available to the</p>	<p>It is assumed that the required services are provided along these bus routes and should be confirmed by the design/ planning team.</p> <p>The design team has proposed some alterations to the council footpath near the site along Sanders Ln to ensure the average gradient of the pathway to Old Barrenjoey Rd is 1:14 or better.</p> <p>Safe passage is readily achievable via council footpaths and crossings.</p>	

<p>residents who will occupy the proposed development:</p> <p>(i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and</p> <p>(ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and</p> <p>(iii) that is available both to and from the proposed development during daylight hours at least once each day between 12pm and 6pm each day from Monday to Friday (both days inclusive),</p> <p>and the gradient along the pathway from the site to the public transport services (and from the transport services to the facilities and services referred to in subclause (1)) complies with subclause (3).</p>		
<p>“(3) For the purposes of subclause (2) (b) and (c), the overall average gradient along a pathway from the site of the proposed development to the public transport services (and from the transport services to the facilities and services referred to in subclause (1)) is to be no more than 1:14, although the following gradients along the pathway are also acceptable:</p> <p>(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,</p> <p>(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,</p> <p>(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time.”</p>		

38 Accessibility The proposed development should: <ul style="list-style-type: none"> (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. 	Compliance is readily achievable with minor alterations to Sander Ln.	CoC
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Schedule 3 - Standards concerning accessibility and use-ability for hostels and self-contained dwellings.

Part 1 Standards applying to hostels and self-contained dwellings

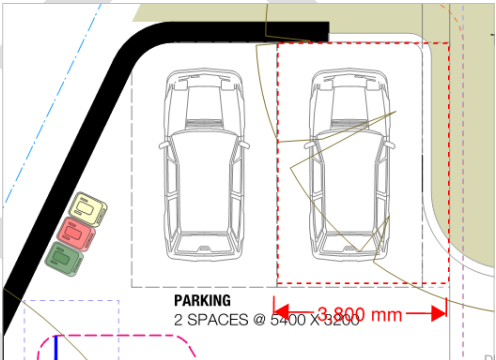
1 Application of standards in this Part

The standards set out in this Part apply to any seniors housing that consists of hostels or self-contained dwellings.

N.B. Despite the provisions of clauses 2, 7, 8, 9, 10, 11, 12, 13 and 15–20 of Schedule 3, a self-contained dwelling, or part of such a dwelling, that is located above the ground floor in a multi-storey building does not have to comply with the requirements of those provisions if the development application is made by, or by a person jointly with, a social housing provider.

Provisions	Comment	Status
2 Siting standards (1) Wheelchair access 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. (2) If the whole of the site does not have a gradient of less than 1:10: <ul style="list-style-type: none"> (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 (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. 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%	Compliance is readily achievable	CoC

<p>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.</p> <p>(3) Common areas 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.</p>		
<p>3 Security Pathway lighting: (a) must be designed and located so as to avoid glare for pedestrians and adjacent dwellings, and (b) must provide at least 20 lux at ground level.</p>	<p>Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage</p>	<p>DD</p>
<p>4 Letterboxes Letterboxes: (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 (b) must be lockable, and (c) must be located together in a central location adjacent to the street entry or, in the case of self-contained dwellings, must be located together in one or more central locations adjacent to the street entry.</p>	<p>Please indicate to location of the letterboxes.</p>	<p>DD</p>
<p>5 Private car accommodation If car parking (not being car parking for employees) is provided: (a) car parking spaces must comply with the requirements for parking for persons with a disability set out in AS 2890, and (b) 5% of the total number of car parking spaces (or at least one space if there are fewer than 20 spaces) must be designed to enable the width of the spaces to be increased to 3.8 metres, and (c) any garage must have a power-operated door, or there must be a power point and an area for motor or control rods to enable a</p>	<p>Compliance is readily achievable.</p> <p>This clause refers to AS 2890, <i>Parking facilities, Part 1: Off street parking</i>.</p> <p>The minimum clear width of car parking spaces is required to be 3.2m. The minimum length of carparking spaces is to be 5.4m.</p> <p>Additionally, at least 5% (or at least one space if there are fewer than 20 spaces) of the total number of carparking spaces is to be increasable to 3.8m wide.</p> <p>Part 7, Division 4 (h) of the SEPP states that a consent authority must not refuse consent to a development application</p>	<p>CoC</p>

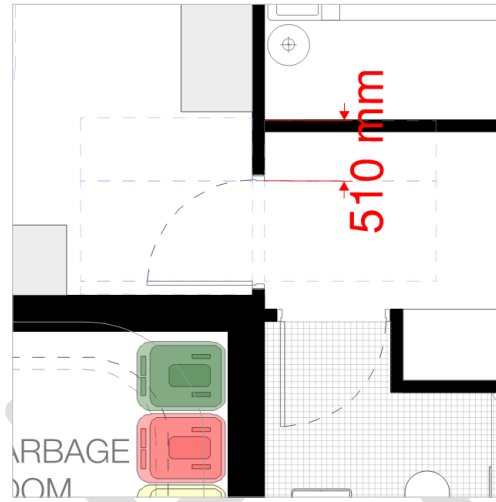
<p>power-operated door to be installed at a later date.</p>	<p>made pursuant to the chapter if 0.5 car spaces for each bedroom is provided.</p> <p>The three apartments each contain 3 bedrooms totalling 9 bedrooms for the proposal, requiring at total of 4.5 carparking spaces.</p> <p>6 carparking spaces are provided, 4 of which are measured as 3.8m wide.</p> <p>It is suggested that one of the two carparking spaces in the lower carparking area be designed for possible extension to 3.8m.</p> 	
<p>6 Accessible entry</p> <p>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>	<p>Compliance is readily achievable. Details to be provided at detailed design stage.</p> <ul style="list-style-type: none"> • An 850mm clear opening with appropriate latch side clearance. • Lighting complying with AS1680.2 and achieving a minimum 150 lux. • Call buttons at entrances shall be located between 900-1100mm from the floor and not less than 500mm from internal corners. • D shaped lever latch set located between 900-1100mm from the floor. 	<p>CoC</p>

7 Interior: general

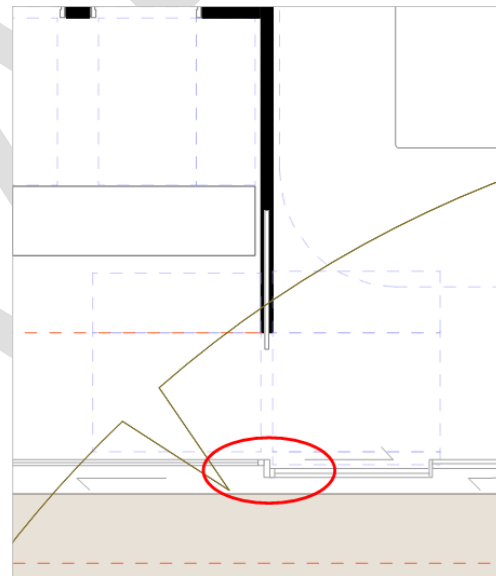
- (1) Internal doorways must have a minimum clear opening that complies with AS 1428.1.
- (2) Internal corridors must have a minimum unobstructed width of 1,000 millimetres.
- (3) Circulation space at approaches to internal doorways must comply with AS 1428.1.

Compliance Departure:

The following doorways have reduced or no latch-side clearance.



Apartment 2

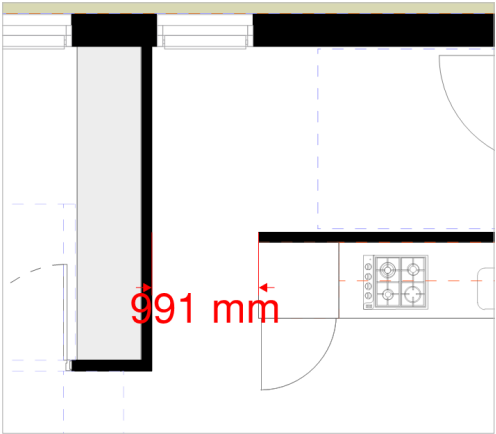
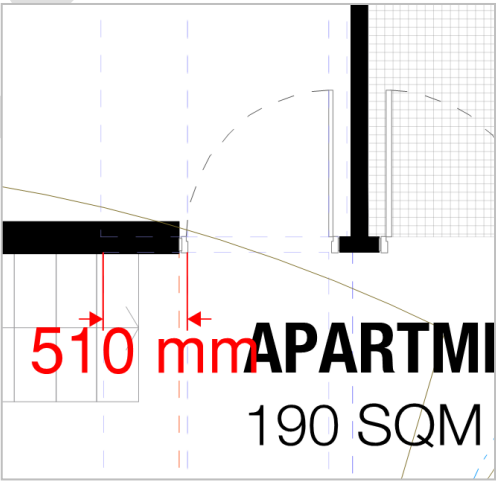


Apartment 1

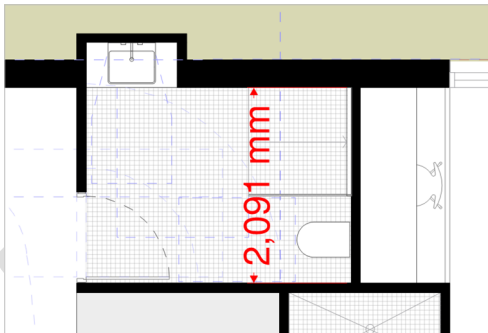
Compliance Departure –

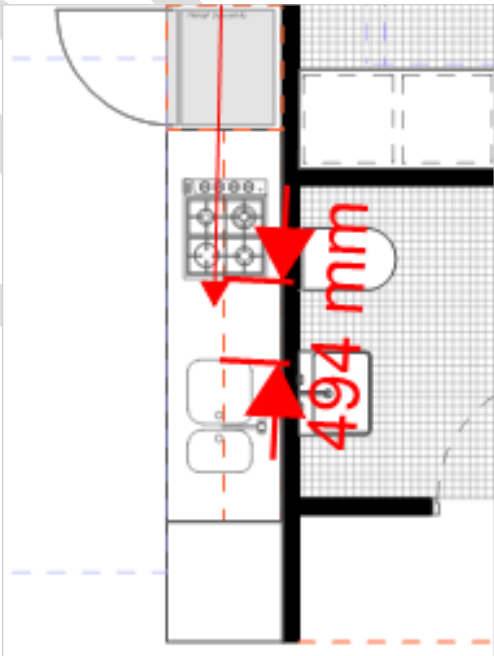
A 1m clear corridor width is not provided at the end of the kitchen bench in Apartment 2.

CD

	 <p>Resolution – Provide the prescribed 1m clear corridor width throughout the units.</p> <p>Design Detail: Please ensure compliant access is provided to balcony areas etc.</p> <p>Design Detail: Please confirm if the head height under the stairway is 2m or better for the entire doorway circulation space (apartment 3).</p>  <p>APARTMENT 3 190 SQM</p>	
<p>8 Bedroom</p> <p>At least one bedroom within each dwelling must have:</p> <p>(a) an area sufficient to accommodate a wardrobe and a bed sized as follows:</p> <p>(i) in the case of a dwelling in a hostel—a single-size bed,</p>	<p>Compliance is readily achievable.</p> <p>Location of GPOs etc to be determined at detailed design stage.</p>	<p>CoC</p>

<ul style="list-style-type: none"> (ii) in the case of a self-contained dwelling— a queen-size bed, and (b) a clear area for the bed of at least: <ul style="list-style-type: none"> (i) 1,200 millimetres wide at the foot of the bed, and (ii) 1,000 millimetres wide beside the bed between it and the wall, wardrobe or any other obstruction, and (c) 2 double general power outlets on the wall where the head of the bed is likely to be, and (d) at least one general power outlet on the wall opposite the wall where the head of the bed is likely to be, and (e) a telephone outlet next to the bed on the side closest to the door and a general power outlet beside the telephone outlet, and (f) wiring to allow a potential illumination level of at least 300 lux. 		
<p>9 Bathroom</p> <p>(1) At least one bathroom within a dwelling must be on the ground (or main) floor and have the following facilities arranged within an area that provides for circulation space for sanitary facilities in accordance with AS 1428.1:</p> <ul style="list-style-type: none"> (a) a slip-resistant floor surface, (b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS 1428.1, (c) a shower that complies with AS 1428.1, except that the following must be accommodated either immediately or in the future: <ul style="list-style-type: none"> (i) a grab rail, (ii) portable shower head, (iii) folding seat, (d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it, (e) a double general power outlet beside the mirror. <p>(2) Subclause (1) (c) does not prevent the installation of a shower screen that can</p>	<p>Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage</p>	<p>CoC</p>

easily be removed to facilitate future accessibility.		
<p>10 Toilet</p> <p>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.</p>	<p><u>Compliance Departure:</u></p> <p>The internal compartment width of the applicable bathrooms is 2090mm in lieu of 2300mm (to allow for WC and shower circulation space).</p>  <p><u>Resolution:</u></p> <p>Increase the width of the 3x visitable bathrooms to 2300mm or reconfigure the internals to achieve compliant circulation space for all fixtures.</p>	CD
<p>11 Surface finishes</p> <p>Balconies and external paved areas must have slip-resistant surfaces.</p> <p>Note. Advise regarding finishes may be obtained from AS 1428.1.</p>	<p>Compliance is readily achievable.</p> <p>Slip resistivity to be nominated at detailed design stage.</p>	CoC
<p>12 Door hardware</p> <p>Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS 4299.</p>	<p>Compliance is readily achievable.</p> <p>Door hardware to be nominated at detailed design stage.</p>	CoC
<p>13 Ancillary items</p> <p>Switches and power points must be provided in accordance with AS 4299.</p>	<p>Compliance is readily achievable.</p> <p>Location of GPOs to be nominated at detailed design stage.</p>	CoC
<p>14 Application of standards in this Part</p> <p>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.</p>		
<p>15 Living room and dining room</p> <p>(1) A living room in a self-contained dwelling must have:</p>	<p>Compliance is readily achievable.</p> <p>Location of telephone and illumination level to be nominated at detailed design stage.</p>	CoC

<p>(a) a circulation space in accordance with clause 4.7.1 of AS 4299, and</p> <p>(b) a telephone adjacent to a general power outlet.</p> <p>(2) A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux.</p>		
<p>16 Kitchen</p> <p>A kitchen in a self-contained dwelling must have:</p> <p>(a) a circulation space in accordance with clause 4.5.2 of AS 4299, and</p> <p>(b) a circulation space at door approaches that complies with AS 1428.1, and</p> <p>(c) the following fittings in accordance with the relevant subclauses of clause 4.5 of AS 4299:</p> <p>(i) benches that include at least one work surface at least 800 millimetres in length that comply with clause 4.5.5 (a),</p> <p>(ii) a tap set (see clause 4.5.6),</p> <p>(iii) cooktops (see clause 4.5.7), except that an isolating switch must be included,</p> <p>(iv) an oven (see clause 4.5.8), and</p> <p>(d) “D” pull cupboard handles that are located towards the top of below-bench cupboards and towards the bottom of overhead cupboards, and</p> <p>(e) general power outlets:</p> <p>(i) at least one of which is a double general power outlet within 300 millimetres of the front of a work surface, and</p> <p>(ii) one of which is provided for a refrigerator in such a position as to be easily accessible after the refrigerator is installed.</p>	<p>Compliance is readily achievable.</p> <p>Configuration of kitchen to be determined at detailed design stage.</p> <p><u>Design Detail:</u></p> <p>Cooktops in all three apartments do not have a minimum 800mm adjacent work surface.</p> <p>The ovens shown in all three apartments are not located adjacent to an 800mm work surface.</p> 	CoC
<p>17 Access to kitchen, main bedroom, bathroom and toilet</p> <p>In a multi-storey self-contained dwelling, the kitchen, main bedroom, bathroom and toilet must be located on the entry level.</p>	Compliance is readily achievable.	CoC

<p>18 Lifts in multi-storey buildings</p> <p>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 <i>Building Code of Australia</i>.</p>	<p>Compliance is readily achievable</p>	<p>N/A</p>
<p>19 Laundry</p> <p>A self-contained dwelling must have a laundry that has:</p> <ul style="list-style-type: none"> (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 (e) an accessible path of travel to any clothes line provided in relation to the dwelling. 	<p>Please confirm the location of the laundry in all 3 apartments.</p> <p>A clear space of 1300mm must be achievable in front of the appliances.</p> <p>Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage</p>	<p>DD</p>
<p>20 Storage for linen</p> <p>A self-contained dwelling must be provided with a linen storage in accordance with clause 4.11.5 of AS 4299.</p>	<p>Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage</p>	<p>CoC</p>
<p>21 Garbage</p> <p>A garbage storage area must be provided in an accessible location.</p>	<p>Compliance is readily achievable.</p>	<p>CoC</p>

4.0 ACCESSIBILITY COMPLIANCE STATEMENT

This report has provided a review of the relevant project design documentation to determine the compliance status of the proposed development against Part D3, Part E3.6 and Part F2.4 'deemed-to-satisfy' (DtS) provisions of the Building Code of Australia 2019 (BCA).

A review has also been provided to identify the compliance statues of the design with SEPP (Housing for Seniors or People with a Disability) 2004, Schedule 3 – Standards concerning accessibility and useability for hostels and self-contained dwellings.

Following this review and the adaptation of the recommendations proposed, ABE Consulting are able to confirm that at the Development Application Phase of design, the development can readily achieve compliance with SEPP (Housing for Seniors or People with a Disability) 2004, Schedule 3 – Standards concerning accessibility and useability for hostels and self-contained dwellings.

5.0 REVIEW PROVIDED BY

Prepared by:

Draft

Sam Freeman

Accessibility Consultant

Reviewed by:

Draft

Abe Strbik

Director

Member - Association of Consultants in Access Australia # 405

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