

19/02/2025

Our Ref: GDL250014

Northern Beaches Council
Att: Assessing Officer
PO Box 82
Manly NSW 1655 Australia

Dear Assessing Officer,

ACCESSIBILITY CAPABILITY STATEMENT FOR DEVELOPMENT APPLICATION – CHANGE OF USE – REV A

PROJECT: Lifeline Northern Beaches, 14 Cross Street, Brookvale NSW 2100

The purpose of this submission is to advise that Group DLA Access has undertaken a preliminary accessibility assessment of the design documentation for the above project as listed in **Appendix A – Documentation Reviewed** to this statement.

The assessment has been undertaken against the relevant access provisions of the Federal Disability (Access to Premises – Buildings) Standards 2010, the Building Code of Australia (BCA) 2022 and referenced accessibility design standards, to the extent necessary for submission of a Development Application under the requirements of the Environmental Planning and Assessment Act 1979 (NSW).

The current site consists of a ground floor factory / workshop and level 1 office space. The present submission seeks approval for the use of the premises for the purposes of goods repair and reuse premises. The total floor area of the proposed retail sales / op-shop is approximately 251m². There is no proposed change of use to part of Ground Floor which will remain for processing goods, and level 1 which will remain as office space. It is understood that any further internal fitout alterations will have an area of works at not more than 457m².

The table below sets out the building classifications under BCA 2022 of the corresponding elements of the new works:

Building (or Part)	BCA Use Description	BCA Classification
Ground Level	Current <ul style="list-style-type: none">Factory / Workshop Proposed <ul style="list-style-type: none">Retail ShopFactory / Workshop	Current <ul style="list-style-type: none">Class 8 Proposed <ul style="list-style-type: none">Class 6Class 8
Level 1	Current <ul style="list-style-type: none">Office Proposed <ul style="list-style-type: none">Office (No Change)	Current <ul style="list-style-type: none">Class 5 Proposed <ul style="list-style-type: none">Class 5 (No Change)

Table 1 – Building Class

Following our review and assessment:

The proposed change of works are to occur on partial area of the ground floor only, within an existing building. This will mean that any expected building approval for the new works will trigger the application of the 'Affected Part' provisions of the Federal Disability (Access to Premises – Buildings) Standards 2010.

The 'Affected Part' of a building is defined as the principal pedestrian entrance of the existing building and the required continuous accessible path of travel from this building entrance to the new works area. The Affected Part is required to comply with AS1428.1.

The preliminary assessment of the design has identified that Performance Solution(s) could be feasible for the purposes of compliance with the BCA with respect to each of the following items that are associated with the principle pedestrian entrance (Affected Part) of the building that may not meet the DtS provisions of the BCA:

- Main entry doorway with at least 850mm min. clear width door opening (active leaf), with 530mm min. latch door circulation space across 1450mm min. length that is level on both sides (generally at least 1500mm x 1500mm area no steeper than 1:40 gradient/crossfall), compliant door hardware, luminance contrast around doorway to meet AS1428.1:2009.
- Threshold ramps that are no steeper than 1:8 gradient and comply with AS1428.1 are to be provided for height variations of 35mm.
- If the height variation is more than 35mm and less than 190mm, step ramps no steeper than 1:10 gradient would be required with an appropriate size level landing on both sides for door circulation area to meet AS1428.1:2009.

It would be plausible for the above Performance Solution(s) to be further developed in conjunction with the appropriate project stakeholders as part of the detailed design phase prior to **Complying Development Certificate** Stage.

For reference, an Access Assessment Summary has been included in **Appendix B** to this statement.

GROUP DLA

Upon review of the supplied documentation, it is the opinion of Group DLA Access that, with ongoing design development and detailing in accordance with the supplied advice of Group DLA Access, the design of the proposed new works including the applicable Affected Part principle pedestrian entrance of the building will be capable of compliance with the relevant design requirements for the provision of access for people with a disability.

This will be achieved through a combination of compliance with the Deemed-to-Satisfy (DtS) Provisions of BCA 2022 and Performance Solutions that will be developed, as required, in conjunction with the appropriate project stakeholders.

Should you require further information or clarification regarding the above matters, please do not hesitate to contact the undersigned.

Yours sincerely,



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APPENDIX A – DOCUMENTATION REVIEWED

This access capability statement has been prepared with reference to the documentation outlined in the table below.

Drawing No.	Title	Prepared By	Revision	Date
367_DA_111	Site Plan	Collins and Turner	02	17/2/2025
367_DA_140	Change of Use Area Plan	Collins and Turner	02	17/2/2025
367_DA_141	Operational / Functional Area Plan	Collins and Turner	02	17/2/2025

APPENDIX B – ACCESS ASSESSMENT SUMMARY

- 1) All proposed new work areas within the existing building would require compliance with the BCA and referenced access standards.
- 2) The extent and location of any proposed new work within the partial ground level (change of use) areas of the building that may require building approval as this would trigger the Affected Part upgrade provision of the Premises Standards. This would require an Affected Part assessment and upgrade of the principal pedestrian entrance of the building, and the required accessible path of travel to the new work area to meet AS1428.1:2009 (if not already compliant).
- 3) The Premises Standards small building exemption (Clause D3.3(f) from requirement to provide an accessible lift or ramp to the upper level of small buildings of Class 5, 6, 7b and 8 buildings with two or three storeys, if size of each storey (other than entrance level) is less than 200 m². This would be applicable to this building as the Level 1 has less than 200m² (174m² based on assessment by BCA Consultant), however it is also noted that the proposed change of use area is limited to a small portion of the ground floor area of the building only.
- 4) There is currently no accessible entry and/or step free accessway into the ground floor main area of the building due to the existing steps in the door threshold/s. The principal pedestrian entrance doorway (and any doors located on the required accessible path of travel to new work) would be required to be upgraded under the Affected Part. This would require:
 - a. Main entry doorway with at least 850mm min. clear width door opening (active leaf), with 530mm min. latch door circulation space across 1450mm min. length that is level on both sides (generally at least 1500mm x 1500mm area that is no steeper than 1:40 gradient/crossfall), compliant door hardware, luminance contrast around doorway to meet AS1428.1:2009.
 - b. Threshold ramps that are no steeper than 1:8 gradient and comply with AS1428.1 are to be provided for height variations of 35mm.
 - c. If the height variation is more than 35mm and less than 190mm, step ramps no steeper than 1:10 gradient would be required with an appropriate size level landing on both sides for door circulation area to meet AS1428.1:2009.
- 5) If there is no lift provision to provide continuous access to Level 1 office space/areas for people with disability or access needs, equitable provision of facilities available on level 1 should be provided on Ground Floor, such as at least 1 x accessible office station/desk and meeting room. This will allow for general flexibility/options in use, promote access and inclusion of occupants and assist reduce risk of potential DDA complaints.
- 6) For any meetings / conference rooms that are provided with an inbuilt amplification system (not solely for emergency warning purposes), there is a requirement for a system of Hearing Augmentation under BCA D4D8 which is to be provided.
- 7) Sanitary Facilities – The BCA Consultant has assessed the existing Ground level toilets as non- required amenities for min. occupant numbers for the building class, based on the proposed change of use (Class 6) building area (Retail Op shop). On this basis, there would be no mandatory requirement under the BCA Part F4D6 for provision of a new unisex accessible toilet. However, this would still be highly recommended, as the absence of an accessible sanitary facilities within the building, at ground level is an equity and dignity issue at risk of potential DDA complaint.

On Level 1 there is an existing male and female toilet bank. The provision of at least 1 x male ambulant toilet and 1 x female ambulant toilet in these toilets to meet AS1428.1:2009 is recommended. NOTE: Providing new ambulant toilets at a bank of toilets that is not adjacent

to an accessible toilet is not technically required under BCA F4D5 (c) for minimum compliance, but is highly recommended and in our opinion, would help to future proof the building and may assist to offset the potential DDA risk of non-provision of a ground floor accessible toilet if cannot be achieved within project constraints.

- 8) Carparking – There is currently on-site carparking for up to five (5) cars. It is understood no new work is proposed to increase numbers or change the current arrangement. The BCA Part D4D6 requires a minimum of 1 per cent of the total car parking to be designated as accessible for Class 5 buildings. For Class 6 buildings a minimum of 2 per cent of the total car parking is to be designated accessible.

Any required accessible carparking spaces are required to comply with AS2890.6:2009, which would require an accessible line marked car space of at least 2.4m W x 5.4m L space with shared area at same level adjacent of same dimensions with line-marking and bollard.

However, in car parking areas with five (5) or less car parking spaces, accessible car spaces are not required to be designated with line marking and bollard so as not to restrict use to only people with disability.

- 9) All new work required accessways and upgrades and any Affected Part upgrade areas within existing building would need to ensure that finished floor surfaces are traversable and sufficiently slip resistant for compliance with AS1428.1:2009 (and AS4586:2013).