

From:

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Date:

Attachments:

█ [Mailbox](#)
Objection letter to DA2024/0044 - Lot 10 and 11 25 and 27 Kevin Avenue

Tuesday, 27 February 2024 8:13:55 PM

[Report - Accessibility.pdf](#)
[kevin_pathway_profile.pdf](#)

To Whom It may concern

This email is to object to DA2024/0044 - Lot 10 and 11 25 and 27 Kevin Avenue, Avalon Beach

Following review of the Accessibility report it appears there are inaccuracies in what has been reported (apologies only just had time to review this)

These are as followed

1. The footpath used for access to the bus services will not comply with the SEPP requirements provided in the accessibility report (page 11) .. an extract of which is provided here

“the overall average gradient must be not more than 1:14 and the gradients along the pathway must be not more than—

1. (i) 1:12 for a maximum length of 15m at a time, or
2. (ii) 1:10 for a maximum length of 5m at a time, or
3. (iii) 1:8 for a maximum length of 1.5m at a time.

Objection: Analysis of the grades from Kevin down to Barrenjoey road .. which are very steep in places shows there are grades are up to approximately 1:5 for 4.6 metres. Approximately 11 metres of the pathway does not comply with the steepest allowed gradient of 1:8 (which is only allowed for 1.5 metres). Please refer to attachment of a profile of this (Kevin Pathway profile)

2. There is a requirement that the facilities and services are, or the transport service is, located at a distance of not more than 400m from the site

Objection: The 400m is exceeded as in order to get to a bus stop to take you to shops and medical centres you need to take a bus from the eastern side of Barrenjoey road.

Objection: The option 'B' for access to a bus stop will not work as the grade from Kevin to Wollstonecraft is a 1:10 grade (A distance from kerb to kerb of 129 metres with a fall of 12.8 metres).

3. One other item of objection is that excess rain will cause issues to the street drainage system and properties on the northern side of Kevin Avenue, even with on-site

retention systems. The properties opposite the site are within flood-affected precincts. The increase in hard surfaces will only increase the run off flow.

Kindest regards

Geoff and Kylie Bell

39 Kevin avenue



ACCESS REPORT
DEVELOPMENT APPLICATION

25-27 KEVIN AVENUE
AVALON

HOUSING FOR SENIORS OR
PEOPLE WITH A DISABILITY 2021

Prepared by Mark Relf

7th December 2023

Accessibility Report for a Development Application 25-27 KEVIN AVENUE, AVALON

Introduction

The following report has been prepared to review the “accessibility” of a development application to develop a site at 25-27 Kevin Avenue, Avalon for the purposes of a new seniors housing consisting of ten (10) independent living units (ILUs).

The development proposes the following building elements.

- **Dwelling Mix** - The development proposes 2 X 2 bedroom apartments and 8 X 3 bedroom single level designs in two storey development with outdoor parking.
- **Communal Amenities** - Ground level pedestrian accessways, waste storage and.
- **Parking** – The plans indicate; twenty (20) resident parking spaces and one [1] visitor/car washbay.

Assessment Criteria

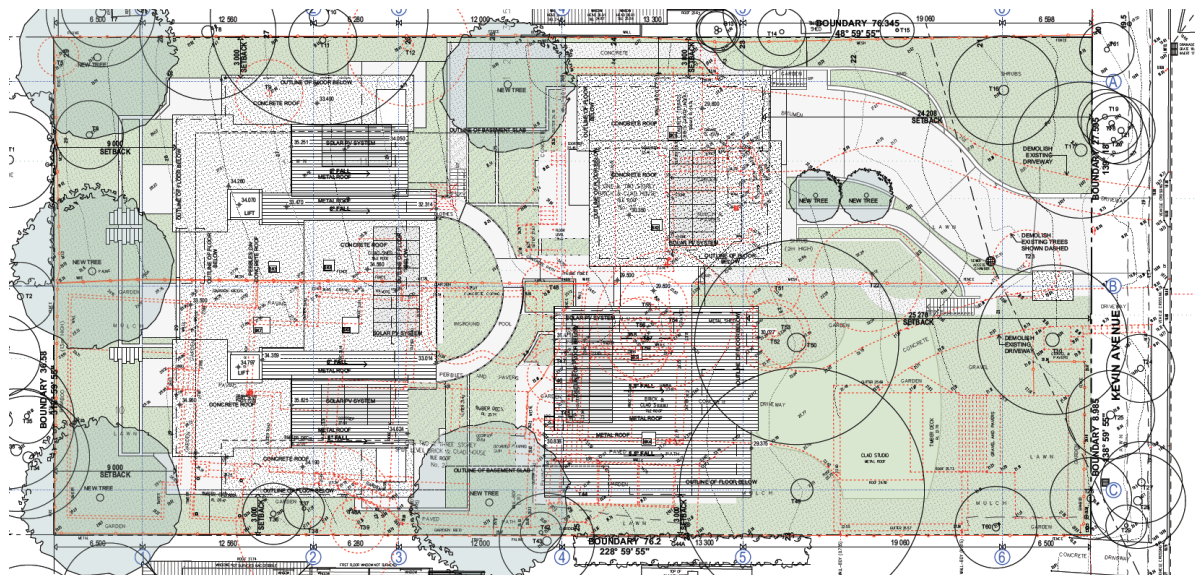
The assessment has considered the technical design standards of the State Environment Planning Policy (Housing) 2021 – Part 5 Housing for Seniors or People with a Disability (hereinafter *Seniors Housing*) and the relevant provisions of the Australian Standards.

In particular, this report considers whether the proposed development will provide appropriate housing accessibility and adaptability in accordance with the following requirements.

- Clause 93 concerning access to public transport, shops, facilities and services.
- Clause 85 and Schedule 4 concerning the independent living units and common amenities on the ground floor and clauses 104, 108(h) and (j) for, pedestrian links to transport, parking and private open spaces.
- Common Areas within the development as required by Table D3.1 of the Building Code of Australia 2022 and related clauses D4, E3D7 and E3D8 for BCA class 2 development.
- Relevant aspects Australian Standard AS1428.1 (2009) – Design for Access and Mobility, AS4299 (1995) – Adaptable Housing AS2890.6 (2009) – Off Street Parking for People with Disabilities as referenced by Schedule 4 of the Seniors Housing policy.

DA Documentation - The appraised documents and plans relied upon for this report include: Issue DA architectural plans prepared by architects GARTNER TROVATO.

Drawing No	Revision	Title
A01	A	Cover page
A02	A	Site Analysis Plan
A03	A	Site Plan
A04	A	Basement
A05	A	Ground Floor Plan
A06	A	Level 01 Floor Plan
A07	A	Level 02 Floor Plan
A08	A	Sections
A09	A	Elevations 01
A10	A	Elevations 02
A11	A	Elevations 03
A12	A	Shadow Diagrams
A13	A	Solar Access Plans
A14	A	Area Calculations
A15	A	3D Views



Site / Roof Plan

Access Assessment

Section 2 - Development Standards - Self-Contained Dwellings

This section provides an accessibility review of the self-contained dwellings and common amenities in accordance with the requirements of;

- Sections D4, E3D7, E3D8 of the Building Code of Australia 2022 (BCA) regarding accessibility of common areas.
- Housing for Seniors Policy 2021, Clause 85 and Schedule 4 concerning the self-contained dwellings and common amenities on the ground floor and clauses 104, 108(h) and (j) for pedestrian links to transport, parking and private open spaces.
- Relevant aspects Australian Standard AS1428.1 (2009) – Design for Access and Mobility, AS4299 (1995) – Adaptable Housing and AS2890.6 (2009) – Off Street Parking for People with Disabilities as referenced by Schedule 4 and clause 108(j) of the Housing for Seniors Policy.

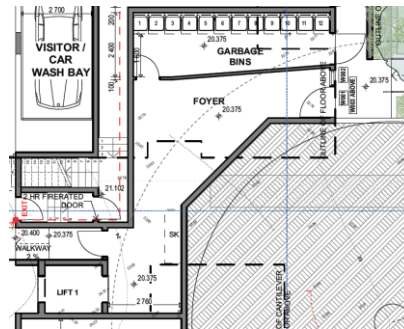
Clause	Item Assessment	Complies
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Clauses
D4D2, D4D3
of the BCA

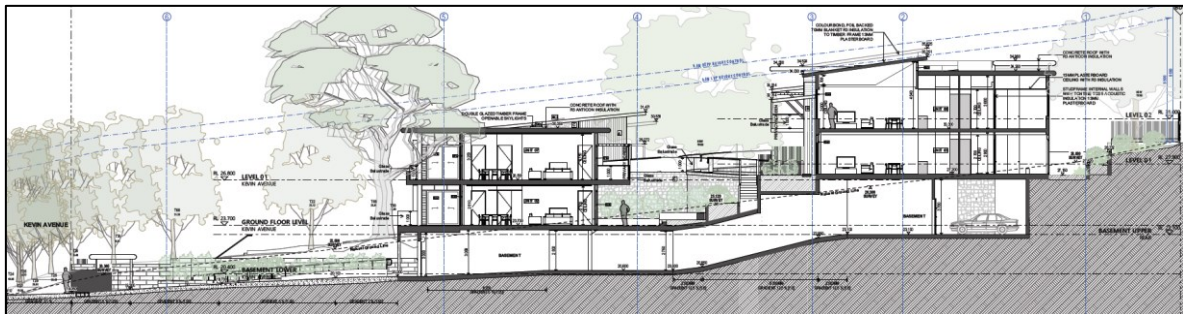
Site Entry Access

The development occupies a sloping which proposes two buildings over a basement carpark with three [3] lifts enabling equitable access to all apartments and common areas.

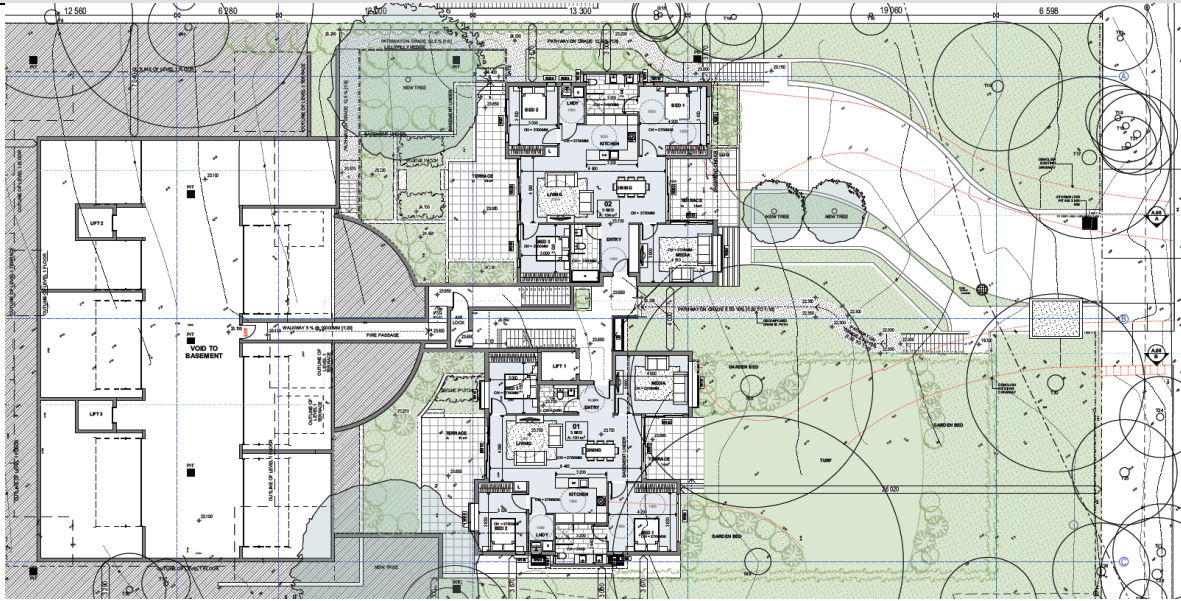
The principal site entrance provides a 1:40 gateway at the front boundary which continues at a 1:14 to 1:20 slope long common accessways to the entry foyer and lift 1 lobby in accordance with AS1428.1 to satisfy clauses D4D2 and D4D3 of the BCA and clause 2 of the Seniors Housing Policy.



YES



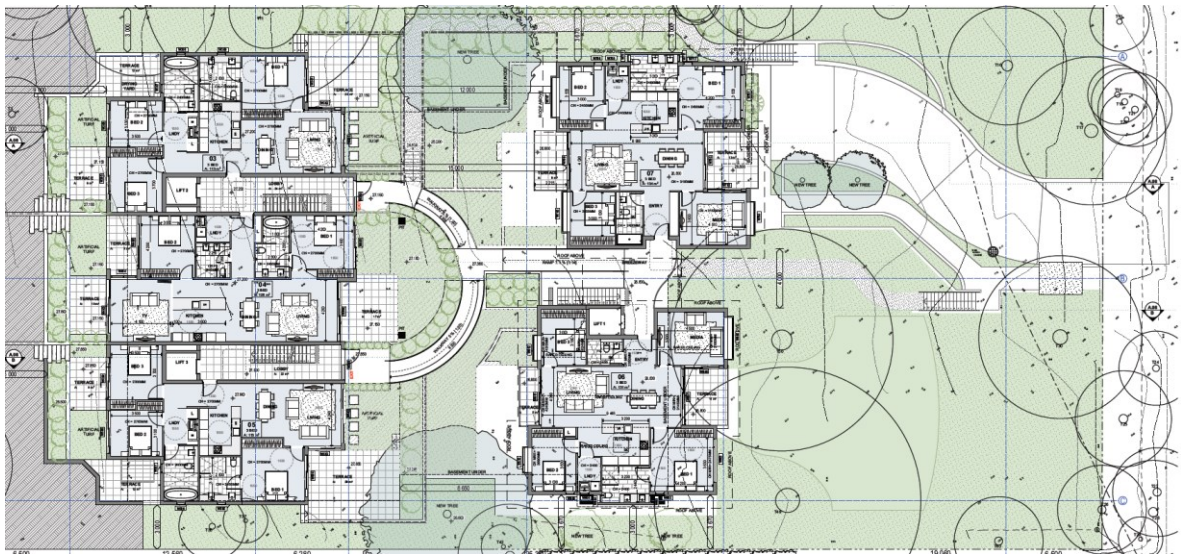
Clause	Item Assessment	Complies
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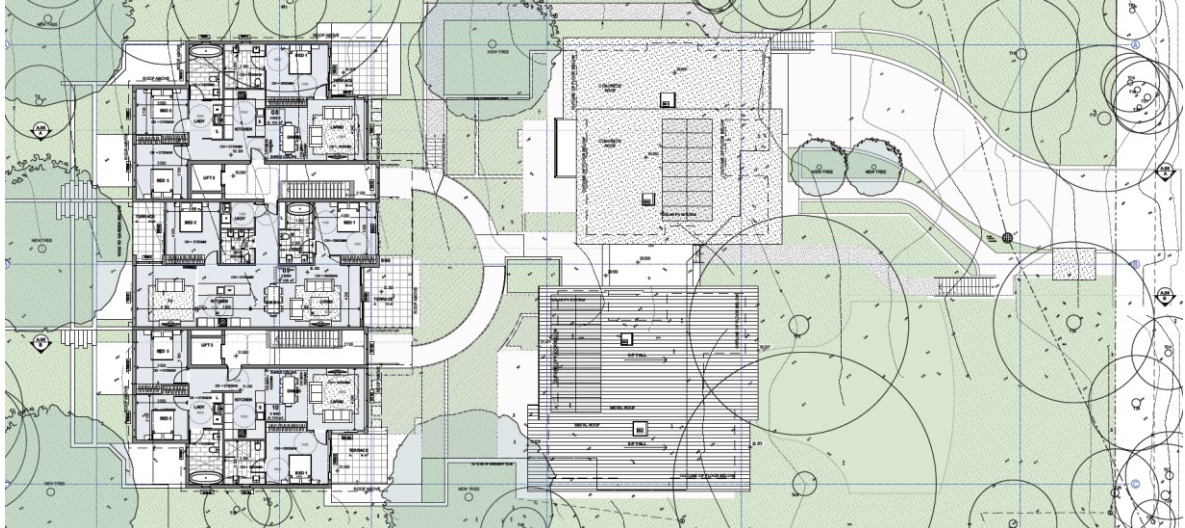
Ground Floor

<p>Clauses D4D2, D4D3, D4D4 of the BCA</p>	<p>Ground Floor Access</p> <p>Lift 1 provides direct access to the basement carpark and to apartments 01 and 02 on the ground floor and apartments 06 and 07 of level 01.</p> <p>Level 01 plan proposes 1:20 gradient walkways from lift 1 to the common lift lobbies 2 and 3.</p>	<p>YES</p> <p>YES</p>
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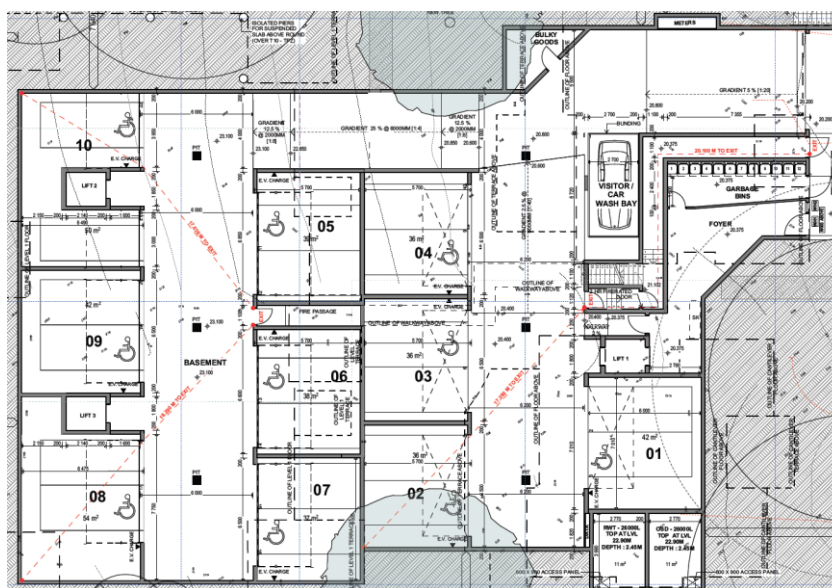
<p>Clauses D4D2, D4D3, D4D4 of the BCA</p>	<p>Level 01 Floor Access</p> <p>Level 01 plan proposes 5 apartments with apartments 06 and 07 in the front building and apartments 03, 04 and 05 in the back building which also incorporate lifts 2 and 3 for direct access to basement parking.</p>	<p>YES</p>
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Level 01

Clause	Item Assessment	Complies
Clauses D4D2, D4D3, D4D4 of the BCA	<p>Level 02 Floor Access</p> <p>Level 02 plan proposes 3 apartments 08., 09 and 10 in the back building which also incorporates lifts 2 and 3 for direct access to basement parking for these apartments.</p>	<p>YES</p>
		
<p>Level 02</p>		
Clauses D4D2, D4D3, D4D4, E3D7, E3D8 of the BCA	<p>Site Access – Wheelchair Access</p> <p>The combination of outdoor accessways and the three [3] facilitate equitable access to all apartments and relevant parking while doorway landings propose appropriate circulation spaces and accessible thresholds that comply with ASI428.1 to enter the dwellings and satisfy clauses D4D2, D4D3, D4D4 of the BCA and the SEPP HS.</p>	<p>YES</p>
Schedule 4, Clause 2(1)(2)	<p>Lifts</p> <p>The three [3] lifts will be detailed in accordance with ASI735.12 to satisfy clauses E3D7, E3D8 of the BCA and SEPP HS.</p>	<p>YES at CC stage</p>
Clauses D4D4, D4D9 D3D15 of the BCA	<p>Common Stairways</p> <p>The plans show three common lobby stairways and several external that provide handrails on both sides and with extensions at landings for safer access and luminance contrasting stair nosings in accordance with ASI428.1 to satisfy of the BCA.</p> <p>Details concerning step nosings, tactiles, slip resistance and luminance contrast shall be confirmed during construction documentation phase in accordance with ASI428.1, ASI428.4.1 as required by clauses D3D15, D4D3 and D4D9 of the BCA.</p>	<p>YES</p> <p>YES at CC stage</p>
Schedule 4 Clause 3	<p>Security – Low level lighting along the entry pathways can be a condition of consent which can be confirmed at construction certificate stage.</p>	<p>YES at CC stage</p>

Clause	Item Assessment	Complies
Schedule 4 Clause 4	Letterboxes – The plans indicate that letterboxes will be installed adjacent to the front site entrance, which will include a generally level 1550 X 1550 area adjacent to the letterboxes to comply with this requirement.	YES
Schedule 4 Clause 5	<p>Private Car Accommodation – The development proposes a total of ten (10) garages within a basement car park.</p> <ul style="list-style-type: none"> • Garage 01 proposes 7000mm width X 6000mm length • Garage 02 proposes 6500mm width X 5500mm length. • Garage 03 proposes 6500mm width X 5500mm length. • Garage 04 proposes 6500mm width X 5500mm length. • Garage 05 proposes 6850mm width X 5500mm length. • Garage 06 proposes 6600mm width X 5500mm length. • Garage 07 proposes 6500mm width X 5500mm length. • Garage 08 proposes 7750mm width X 6300mm length. • Garage 09 proposes 6500mm width X 6300mm length. • Garage 10 proposes two spaces of 3000mm and 3950mm width X 6300mm length. 	



In accordance with the SEPP HS the development proposes:

- 10 accessible spaces of 2400mm with adjoining a 2400mm width shared area X 5400mm length accessible parking bay space, which satisfies the accessibility requirements of AS2890.6, clause 108(j) and schedule 4, clause 5(a) of the Housing for Seniors Policy. YES
- 13 spaces provide 3800mm width to comply with schedule 4, clause 5(b) of the Housing for Seniors Policy. YES

Clause	Item Assessment	Complies
	<ul style="list-style-type: none"> The carpark is designed to provide 2200mm minimum entry height and 2500mm within the car spaces to satisfy the accessibility requirements of AS2890.6 and schedule 4, clause 5(a) of the Housing for Seniors Policy. 	YES
	<ul style="list-style-type: none"> The carpark will provide power operated doors as specified by schedule 4 clause 5(c) of the Housing for Seniors Policy. 	YES
Clause 104(b)	<p>Parking Accessibility</p> <p>With respect to the requirements of clause 104(b) to provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitor it is my opinion that the undercover sure carpark with three [3] lifts achieves the required objectives.</p>	YES
Schedule 4 Clause 6	<p>Accessible entry – The plans confirm that the entry doorway landings for each dwelling provide 1550mm X 1550mm minimum circulation space with 530mm minimum latch side clearance in accordance with AS4299.</p> <p>The internal unit foyer areas also provide at least 1650mm X 1550mm circulation space with the required 530mm latch side clearance in accordance with AS4299 and the Housing for Seniors Policy.</p> <p>Details of 920mm entry doors and lever door handles can be confirmed at construction documentation stage.</p>	YES Can Comply
Schedule 4 Clause 7	<p>Interior: general – The plans show that all internal corridors on the accessible ground floor areas shall be 1240mm minimum width to facilitate side-on doorway circulation spaces in accordance with Figure 31(a)(b) of AS1428.1 to satisfy clause 7 of schedule 4.</p> <p>Where front-on approaches to doorways is provided then the doorway circulation space shall provide at least 1550mm width with 530mm minimum latch side clearance in accordance with Figure 31(d)(h) of AS1428.1 to satisfy clause 7 of schedule 4.</p>	YES YES
Schedule 4 Clause 8	<p>Main bedroom – The plans show a main bedroom on the accessible entry level that provides an area large enough to accommodate a queen sized bed with the required circulation spaces to enter/exit the room or access the ensuite in accordance with AS1428.1.</p> <p>The main bedrooms provide 1200mm minimum clearance at the foot of a queen bed and 1000mm minimum on each side or 1250mm minimum for doorway access to the ensuite and exit from the room that comply with AS1428.1.</p>	YES YES
Schedule 4 Clause 9	<p>Bathroom – The plans show a bathroom on the accessible entry level for the apartments that will provide at least 3200mm X 2400mm</p>	YES

Clause	Item Assessment	Complies
	or 3000mm X 2800mm with a layout that complies with AS4299/1428.1 and the provisions of the SEPP HS in the following manner:	
	<ul style="list-style-type: none"> ▪ Toilet in a recessed corner to enable retrofitting of grabrails and provide 1250mm clearance in front of the pan, 	YES at CC stage
	<ul style="list-style-type: none"> ▪ Vanity washbasin that will have plumbing that can be adapted to comply with A1428.1. 	YES at CC stage
	<ul style="list-style-type: none"> ▪ 1160mm X 1100mm minimum shower area with 1250mm X 1600mm minimum circulation area and a removable screen that can accommodate a grabrail, folding seat and portable shower head to comply with AS1428.1. 	YES at CC stage
	<ul style="list-style-type: none"> ▪ Wall cabinet and mirror with an adjoining power outlet 600-1100mm height above the floor in accordance with AS4299. 	YES at CC stage
Schedule 4 Clause 10	Toilet – The plans show a toilet on the accessible entry level of every apartment that provides a toilet pan in the corner of a room to enable future grabrails and facilitates internal access and adaptability to provide at least 1250mm X 900mm clearance in front of the pan with that complies with AS4299 to satisfy the SEPP HS.	YES
Schedule 4 Clause 11	Surface finishes – Details regarding paving finishes in accordance with the Housing for Seniors Policy, can be provided at construction certificate stage to comply with this requirement.	Can Comply
Schedule 4 Clause 12	Doors – Details regarding doors and door handles complying with the Housing for Seniors Policy and AS1428.1 can be provided at construction certificate stage to comply with this requirement.	Can Comply
Schedule 4 Clause 13	Ancillary items – Details regarding installation of switches, power points complying with the Housing for Seniors Policy can be provided at construction certificate stage.	Can Comply
Schedule 4 Clause 14	Clause 14 is satisfied by the achievement of compliance with the following “additional standards” as set out below.	YES
Schedule 4 Clause 15	Living and Dining rooms – The combined living and dining areas indicate that the circulation spaces comply with this clause. See Private Open Space Cls 50(f) regarding doorway thresholds.	YES
Schedule 4 Clause 16	Kitchen – The plans indicate the floor area and general kitchen layout will comply with this clause by providing 1550mm minimum width circulation space between kitchen cupboards. The plans also show an area to accommodate a wall oven, hotplate, sink and fridge in accessible positions as required by sub paragraphs (a), (c) and (g).	YES
	Details regarding other aspects of adjustable cupboards and fitments as per the requirements of sub-paragraphs (d) to (j) which will be	At CC stage

Clause	Item Assessment	Complies
	provided at construction certificate stage to satisfy the Housing for Seniors Policy.	
Schedule 4 Clause 17	Access to kitchen, main bedroom, bathroom and toilet – This development is made by the NSW Land and Housing Corporation being a social housing provider, which proposes single level apartments on the ground floor incorporating all of the above features that comply with the SEPP HS and inherently satisfy clause 17.	YES
Clause 85(2) and Schedule 4 Clause 18	Lifts in Multi-Storey Buildings – This development is made by the NSW Land and Housing Corporation being a social housing provider, which proposes single level apartments on the ground floor that inherently comply with the SEPP HS.	YES
Schedule 4 Clause 19	Laundry – The laundry facilities are provided within rooms which have appropriate 1550mm diameter circulation spaces that comply with the SEPP HS including an area for a washing machine, basin and drier. Details regarding slip resistant floors, level thresholds to the clotheslines and door sizes and handles can be provided at construction certificate stage to comply with this clause.	YES Can Comply
Schedule 4 Clause 20	Storage – The plans indicate that all units shall have a storage / linen cupboard adjoining the hallway.	YES
Schedule 4 Clause 21	Garbage – With respect to waste management the development proposes the outdoor bin store area in an accessible area with 1550 X 1550 circulation space adjacent to all bins to enable wheelchair access to satisfy the SEPP HS.	YES
Cls 108 (h)	Private Open Space - The plans indicate that there are terraces/courtyards for all self-contained dwellings providing private open space to meet the requirements of at least 15M ² with one area adjoining the living room that is at least 3.0 X 3.0 metres to readily comply with the SEPP HS. Details the doors and doorway thresholds can be confirmed at a later date in accordance with ASI428.1 to satisfy clause 108(h) of the SEPP HS.	YES YES at CC stage

Section 2

Access to Facilities and Services [Clause 93 & Clause 108(a)]

With respect to the location of the development site and provision of access to shops and services the following assessment is provided having regard to clauses 93 and 104(a) of the SEPP HS.

Clauses 93 and 104(a) sets out the following criteria for determining site suitability with respect to access to shops and services for ILU development.

Site Related requirements

2.0 93 Location and access to facilities and services—*independent living units*

- (1) Development consent must not be granted for development for the purposes of an independent living unit unless the consent authority has considered whether residents will have adequate access to facilities and services —
 - (a) by a transport service that complies with subsection (2), or
 - (b) on-site.
- (2) The transport service must—
 - (a) take the residents to a place that has adequate access to facilities and services, and
 - (b) for development on land within the Greater Sydney region—
 - (i) not be an on-demand booking service for the transport of passengers for a fare, and
 - (ii) be available both to and from the site at least once between 8am and 12pm each day and at least once between 12pm and 6pm each day, and
 - (c) for development on land that is not within the Greater Sydney region—be available both to and from the site during daylight hours at least once each weekday.
- (3) For the purposes of subsections (1) and (2), access is adequate if—
 - (a) the facilities and services are, or the transport service is, located at a distance of not more than 400m from the site, and
 - (b) the distance is accessible by means of a suitable access pathway, and
 - (c) the gradient along the pathway complies with subsection (4)(c).
- (4) In subsection (3)—
 - (a) a suitable access pathway is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and
 - (b) the distance is to be measured by reference to the length of the pathway, and
 - (c) the overall average gradient must be not more than 1:14 and the gradients along the pathway must be not more than—
 - (i) 1:12 for a maximum length of 15m at a time, or
 - (ii) 1:10 for a maximum length of 5m at a time, or
 - (iii) 1:8 for a maximum length of 1.5m at a time.

Site Related requirements

(5) In this section — **facilities and services** means —

- (a) shops and other retail and commercial services that residents may reasonably require, and
- (b) community services and recreation facilities, and (c) the practice of a general medical practitioner.

Provide a booking service has the same meaning as in the Point to Point Transport (Taxis and Hire Vehicles) Act 2016, section 7.

Note — *Provide a booking service is defined as carrying on a business taking bookings for taxis or hire vehicles to provide passenger services, whether immediately or at a later time, and communicating the bookings to drivers for passenger services or providers of passenger services.*

Clause 104 – Accessibility:

The proposed development should:

- (a) have obvious and safe pedestrian links from the site that provide access to public transport services and local facilities,

The following assessment has considered the above criteria and provides evidence regarding suitability of the location and surrounding environment.

Distance to facilities, shops and services

2.1 The site is located approximately 750 metres to the centre of the Avalon Shopping precinct which provides a wide variety of shops and services.

Therefore, the development relies upon the use of public transport to access shops and services as specified by Clause 93 (2) of the SEPP HS, which requires a 400 metre maximum distance from the site to a bus stop and upon arriving at a destination a further 400 metres maximum distance to reach the specified services that incorporate pedestrian accessways which are suitable for motorised wheelchair access.

2.2 With respect to distance to bus service the site analysis has examined two sets of bus stops on Barrenjoey Road serviced by bus routes 192, 199 and 190X, which are described option A and Option B. Both options require footpath alterations and additions.

- Option A bus stops are located south of the Kevin Avenue intersection where the southbound departure bus stop is 426 metres from the site while the return trip bus stop is 394 metres from the site.
- Option B bus stops are located north of the Kevin Avenue intersection where the southbound departure bus stop is 349 metres from the site while the return trip bus stop is 367 metres from the site.

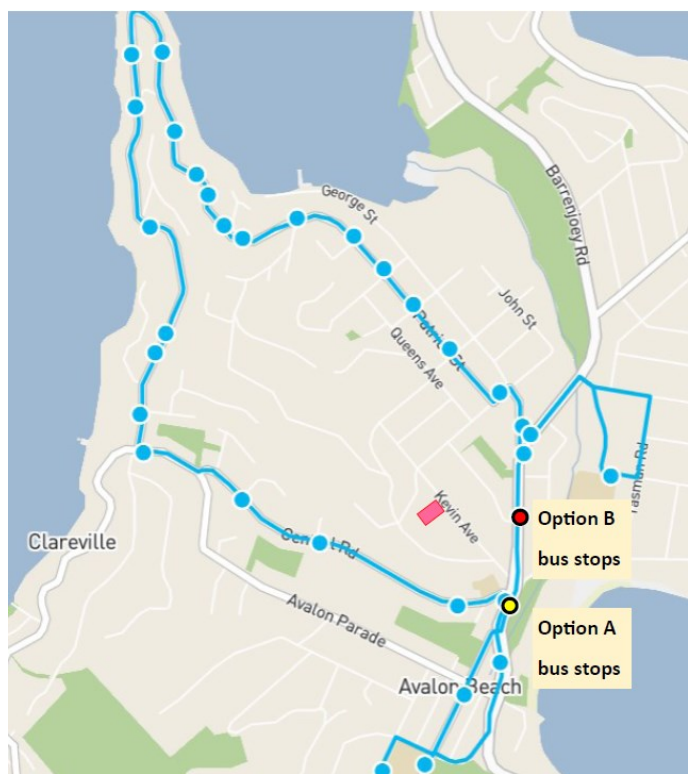
There are signalised pedestrian crossings at both locations for safe access to bus stops.

Please refer to Footpath Access concerning the two options.

2.3 The site is located at 25-27 Kevin Avenue, Avalon in a region serviced by several bus routes as follows.

Site Related requirements

- 192 bus route operates a loop service from Avalon shopping centre on Old Barrenjoey Road turning into Central Road to Cabarita Road/ Patrick Street then returning to Barrenjoey Road passing the intersection of Kevin Avenue. There are up to 35 trips per day Monday to Friday and 18 trips per day Saturday and Sunday.
- 199 bus route operates from Palm Beach to Manly via Avalon, Newport, Mona Vale, Warriewood, Narrabeen, Dee Why and Brookvale. There are more than 100 trips per day Monday to Sunday.



Bus Route 192 provides a 20 min loop service every 20-35 min from Avalon library via Barrenjoey Rd to Stokes Point 35 times daily Mon-Fri.

- 2.4
- 199 bus route operates from Palm Beach to Manly via Avalon, Newport, Mona Vale, Warriewood, Narrabeen, Dee Why and Brookvale. There are more than 100 trips per day Monday to Sunday.
 - 190X bus route operates from North Avalon to Sydney City via Avalon, Newport, Mona Vale, Warriewood, Narrabeen, Dee Why and Brookvale. This is a more limited morning 6.00am to 8.30am and evening service 5.30pm to 8.00pm.

Bus stops within the area are also located with 400 metres of the required range facilities and services to comply with Clause 93(3) of the SEPP HS in terms of “distances”, albeit one bus stop is marginally more than 400 metres at 426 metres.

- 2.5
- The destination retail/commercial precincts at Avalon, Newport, Mona Vale, Warriewood, Narrabeen, Dee Why, Brookvale and Manly provide a comprehensive range of facilities and services to readily satisfy Clauses 93(1), 93(2) and 93(5) of the SEPP HS.

Bus stops within these retail/commercial precincts are also located with 400 metres of the required range facilities and services to comply with Clause 93(3) and (4) of the SEPP HS in terms of “distances”.

Site Related requirements**2.7 Option A Kevin Avenue to Barrenjoey Road;**

A review of the footpath along Kevin Avenue confirms very gradual 1:20 to 1:25 gradients along an existing footpath for 128 metres to a speed hump which comply with Clause 93(3) and (4) of the SEPP HS.

To bypass the intersection of Park Street and Kevin Avenue the development proposes minor works to add drainage grates to bridge the gutter to enable wheelchair access and construct a new footpath for approximately 107 metres to connect with an existing footpath adjacent to a recently completed seniors housing development.

The footpath gradients adjacent to the new seniors housing development fall within the 1:14 overall average from the site to the bus stops previously approved by Council. The new footpath provides adequate access for people using motorised wheelchairs.



Kevin Avenue footpath and kerb ramps at Barrenjoey Road

Site Related requirements

2.8 At the intersection of Kevin Avenue and Barrenjoey Road there are kerb ramps at the signalised crossing followed by a footpath at an average of 1:14 slope to the Central Rod crossing which also provides kerb ramp to cross into two directions to both bus stops, north and south bound.

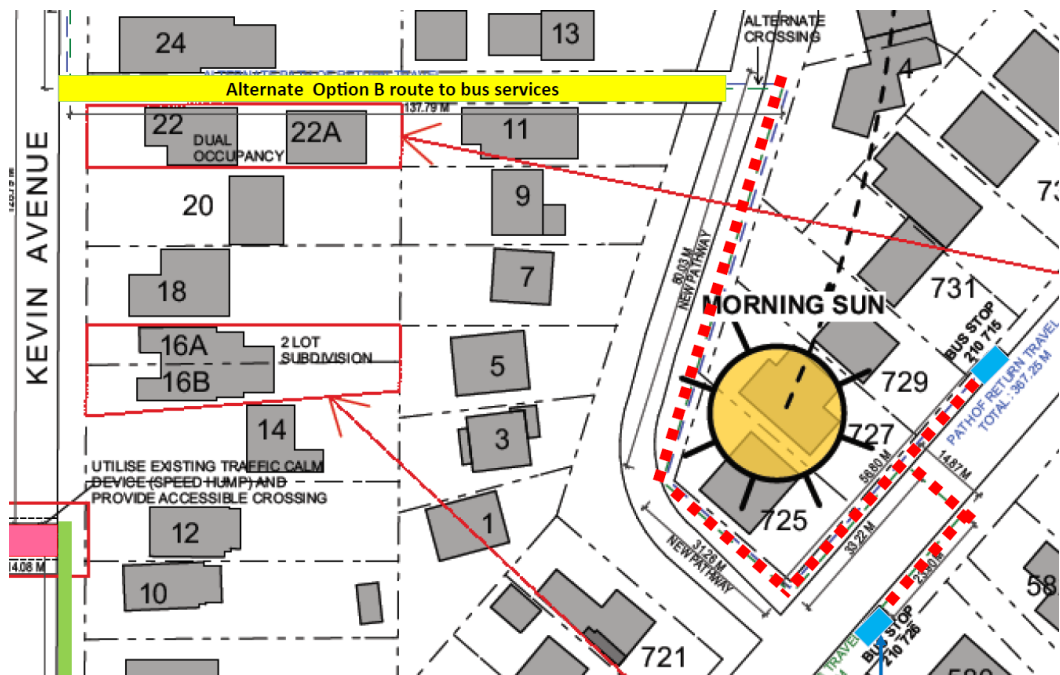
The existing bus shelter and boarding point comply with ASI428.1 and the DDA Transport Standard to satisfy the SEPP HS.

Overall, subject to the installation of the footpath link and crossing of the speed hump the comply with Clause 93(3) and (4) of the SEPP HS.



2.9 **Option B public right of way to Wollstencraft Avenue to Barrenjoey Road;**

This option has the potential to provide access to both and southbound bus services within 400 metres from the subject site by utilizing a public right of way between 22 and 24 Kevin Avenue through to Wollstencraft Avenue. However, the grassed treelined portion of land has no footpath.



Site Related requirements

2.10 Destination Bus Stops

With respect to the accessibility of the destination bus stops at the Avalon shopping centre it is evident that the 192 bus route facilitates appropriate access to footpath infrastructure consistent with clauses 93(4) and (5) of the SEPP HS.

- 2.11 With respect to the accessibility of the destination bus stops at the Avalon, Newport, Warriewood, Narrabeen, Collaroy, Dee Why, Brookvale and Manly shopping centres it is evident that the 199 bus route facilitates appropriate access to footpath infrastructure consistent with clauses 93(4) and (5) of the SEPP HS.

Bus Route Timetable

2.12 Bus Route Frequency

192 Bus Route - With respect to requirements of clause 93(2) of the SEPP HS the timetable for the **192 route** confirms a total of 35 services daily, Monday to Friday that travel to the Avalon shopping precinct with;

- a) 9 services depart from the Barrenjoey Road stops daily between 8.00am and noon Mon–Fri travelling to Avalon; and
- b) 8 return services to the Barrenjoey Road bus stops between noon and 6.00pm.

- 2.13 The timetable also confirms that the abovementioned bus route provides 20 services on Saturday and 18 on Sunday to ensure a comprehensive array of public transport.

A sample of the timetable is attached at Appendix A of this report to illustrate the above frequencies.

Overall, the abovementioned services provide an appropriate range of services and choice of destinations to access a wide range of shops and services to satisfy clause 93 (2) and (5) of the SEPP HS.

- 2.14 **199 Bus Route** - With respect to requirements of clause 93(2) of the SEPP HS the timetable for the **199 route** confirms a total of 110 services daily, Monday to Friday that travel to the Avalon, Newport, Mona Vale, Warriewood, Narrabeen, Collaroy, Dee Why, Brookvale and Manly shopping precincts with;

- a) 25 services depart from the Barrenjoey Road stops daily between 8.00am and noon Mon–Fri; and
- b) 36 return services to the Barrenjoey Road bus stops between noon and 6.00pm.

- 2.15 The timetable also confirms that the abovementioned bus route provides 105 services on Saturday and 50 on Sunday to ensure a comprehensive array of public transport.

A sample of the timetable is attached at Appendix A of this report to illustrate the above frequencies.

Overall, the abovementioned services provide an appropriate range of services and choice of destinations to access a wide range of shops and services to satisfy clause 93 (2) and (5) of the SEPP HS.

Site Related requirements

Scope and adequacy of facilities and services
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- 2.16 **Destination Accessibility** - With respect to the accessibility of destination bus stops and access to shops and services this assessment confirms appropriate access in accordance with Clauses 93(2)(3)(4) and 104(a) of the SEPP HS at .
- 2.17 **Newport, Mona Vale, Warriewood, Narrabeen, Collaroy, Dee Why, Brookvale and Manly Shopping Centres** provide a large range of retail, commercial and recreational services.
- Route 199 buses operate from the numerous bus stops Barrenjeoy Road, Pittwater Road, Sydney Road and Belgrave Street where there are footpaths, kerb ramps and signalized crossings throughout that facilitate appropriate access to access shops and services in accordance with Clauses 93(1)(3)(4)(5) of the SEPP HS.
- 2.18 **Avalon Shops** are located on Avalon Parade and Old Barrenjeoy Road approximately 50-350 metres from the bus stops and there are pedestrian crossing, footpaths and kerb ramps which provide appropriate access to access shops and services, including a medical practice, supermarket, cafes, bakery, liquor shop, etc in accordance with Clauses 93(1)(3)(4)(5) and 104(a) of the SEPP HS.

Summary of Access to Services, Bus Stops and Bus Services
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- 2.19 In summary it is evident that;
- That the development site is well located to facilitate appropriate pedestrian access to the public transport in accordance with clauses 93(2)(3)(4) and 104 of the SEPP HS in terms of distance to a transport service with infrastructure, subject the footpath installation on Kevin Avenue and destinations;
 - The available bus services provided by bus Route 192 and 199 as listed above, in conjunction with the abovementioned pedestrian infrastructure, will provide appropriate access to facility and services in a manner consistent with clause 93(2) of the SEPP HS.
 - The 192/199 bus routes and destination shopping centres and services at Avalon, Newport, Mona Vale, Warriewood, Narrabeen, Collaroy, Dee Why, Brookvale and Manly provide a comprehensive range of services to readily satisfy Clause 93(1) and 93(5) of the SEPP HS.

Conclusion

Following a review of the plans and documentation it is my opinion that the proposed development complies with the accessibility and adaptability requirements of the State Environment Planning Policy - Housing for Seniors or People with a Disability 2021 and related standards in the following manner;

- The development demonstrates compliance with the minimum requirements of visitability by virtue of 100% of the independent living units that will have wheelchair accessible pathways from an adjoining road or internal road as required by schedule 4 clause 2(2), clause 85 of the SEPP HS, section D4 of the BCA; and
- Accessibility of the independent living units and compliance with the design standards of schedule 4 to satisfy clause 85 of the SEPP HS; and
- Provision of communal amenities that will be accessible and benefit the lifestyle of future residents which also demonstrate compliance with AS1428, section D4 of the BCA and clauses 104(b), schedule 4 clause 2(3); and
- Provision of well designed parking for residents and visitors in accordance with schedule 4 clause 5, clauses 104(b) and 108(j) of the SEPP HS.
- The development will facilitate access to shops and services through the provision of **transport services** (as detailed in Appendix A) with minor modification to a speed hump and footpath installation on Kevin Avenue that will enable access to the subject bus stops on Barrenjoey Road that travel to Avalon, Newport, Mona Vale, Warriewood, Narrabeen, Collaroy, Dee Why, Brookvale and Manly shopping precincts and recreational services at least sixty (60) times a day Monday to Friday during daylight hours in accordance with clauses 93(1), (2), (3), (4) and 104 of the SEPP HS; and
- A review of various services directories indicates that the Avalon, Newport, Mona Vale, Warriewood, Narrabeen, Collaroy, Dee Why, Brookvale and Manly shopping precincts and surrounds do provide an appropriate range of **retail, commercial, facilities and recreational services** that includes banking, medical centres and Home Nursing/Personal Care Services, supermarkets and numerous variety stores to comply with clause 93(1) and 93(5) suitable for this type of development.



Mark Relf
Access Consultant (ACAA)

Appendix A – Bus Services examples

199 Palm Beach to Manly via Mona Vale & Dee Why



Monday to Friday	♿	♿	♿	♿	♿	♿	♿	♿	♿
Ocean Pl at Ocean Rd, Palm Beach	07:42	07:52	08:02	08:12	08:23	08:33	08:44	08:54	09:04
Barrenjoey Rd near Careel Head Rd, Avalon	07:51	08:01	08:11	08:21	08:32	08:42	08:53	09:03	09:13
Avalon Beach SLSC, Barrenjoey Rd, Avalon	07:54	08:04	08:14	08:24	08:36	08:46	08:57	09:07	09:17
Barrenjoey Rd after Bramley Ave, Newport	08:01	08:11	08:21	08:31	08:43	08:53	09:04	09:14	09:24
Kalina St after Queens Pde, Newport	08:05	08:15	08:25	08:35	08:47	08:57	09:08	09:18	09:28
Barrenjoey Rd before Darley St, Mona Vale	08:13	08:23	08:33	08:43	08:55	09:05	09:16	09:26	09:36
Barrenjoey Rd opp Village Park, Mona Vale	08:15	08:25	08:35	08:45	08:57	09:07	09:18	09:28	09:38
Warriewood B-Line, Warriewood	08:20	08:30	08:40	08:50	09:02	09:12	09:23	09:33	09:43
Narrabeen Shops, Pittwater Rd, Narrabeen	08:25	08:35	08:45	08:55	09:07	09:17	09:28	09:38	09:48
Collaroy B-Line, Collaroy	08:31	08:41	08:51	09:01	09:13	09:23	09:33	09:43	09:53
Dee Why Shops, Pittwater Rd, Dee Why	08:40	08:50	09:00	09:10	09:22	09:32	09:42	09:52	10:02
Pittwater Rd after Chard Rd, Brookvale	08:47	08:57	09:07	09:17	09:29	09:39	09:49	09:59	10:09
Warringah Mall, Pittwater Rd, Brookvale	08:50	09:00	09:10	09:20	09:32	09:42	09:52	10:02	10:12
Manly Wharf, West Esplanade, Manly	09:02	09:12	09:22	09:32	09:42	09:52	10:02	10:12	10:22

Monday to Friday	♿	♿	♿	♿	♿	♿	♿	♿	♿
Ocean Pl at Ocean Rd, Palm Beach	09:15	09:26	09:37	09:47	09:58	10:08	10:18	10:28	10:38
Barrenjoey Rd near Careel Head Rd, Avalon	09:24	09:35	09:46	09:56	10:07	10:17	10:27	10:37	10:47
Avalon Beach SLSC, Barrenjoey Rd, Avalon	09:28	09:38	09:49	09:59	10:10	10:20	10:30	10:40	10:50
Barrenjoey Rd after Bramley Ave, Newport	09:35	09:45	09:56	10:06	10:16	10:26	10:36	10:46	10:56
Kalina St after Queens Pde, Newport	09:38	09:48	09:59	10:09	10:19	10:29	10:39	10:49	10:59
Barrenjoey Rd before Darley St, Mona Vale	09:46	09:56	10:06	10:16	10:26	10:36	10:46	10:56	11:06
Barrenjoey Rd opp Village Park, Mona Vale	09:48	09:58	10:08	10:18	10:28	10:38	10:48	10:58	11:08
Warriewood B-Line, Warriewood	09:53	10:03	10:13	10:23	10:33	10:43	10:53	11:03	11:13
Narrabeen Shops, Pittwater Rd, Narrabeen	09:58	10:08	10:18	10:28	10:38	10:48	10:58	11:08	11:18
Collaroy B-Line, Collaroy	10:03	10:13	10:23	10:33	10:43	10:53	11:03	11:13	11:23
Dee Why Shops, Pittwater Rd, Dee Why	10:12	10:22	10:32	10:42	10:52	11:02	11:12	11:22	11:32
Pittwater Rd after Chard Rd, Brookvale	10:19	10:29	10:39	10:49	10:59	11:09	11:19	11:29	11:39
Warringah Mall, Pittwater Rd, Brookvale	10:22	10:32	10:42	10:52	11:02	11:12	11:22	11:32	11:42
Manly Wharf, West Esplanade, Manly	10:32	10:42	10:52	11:02	11:12	11:22	11:32	11:42	11:52

Monday to Friday	♿	♿	♿	♿	♿	♿	♿	♿	♿
Ocean Pl at Ocean Rd, Palm Beach	10:48	10:58	11:08	11:18	11:28	11:39	11:49	11:59	12:09
Barrenjoey Rd near Careel Head Rd, Avalon	10:57	11:07	11:17	11:27	11:37	11:48	11:58	12:08	12:18
Avalon Beach SLSC, Barrenjoey Rd, Avalon	11:00	11:10	11:20	11:30	11:40	11:51	12:01	12:11	12:21
Barrenjoey Rd after Bramley Ave, Newport	11:06	11:16	11:26	11:36	11:46	11:57	12:07	12:17	12:27
Kalina St after Queens Pde, Newport	11:09	11:19	11:29	11:39	11:49	12:00	12:10	12:20	12:30
Barrenjoey Rd before Darley St, Mona Vale	11:16	11:26	11:36	11:46	11:56	12:06	12:16	12:26	12:36
Barrenjoey Rd opp Village Park, Mona Vale	11:18	11:28	11:38	11:48	11:58	12:08	12:18	12:28	12:38
Warriewood B-Line, Warriewood	11:23	11:33	11:43	11:53	12:03	12:13	12:23	12:33	12:43
Narrabeen Shops, Pittwater Rd, Narrabeen	11:28	11:38	11:48	11:58	12:08	12:18	12:28	12:38	12:48
Collaroy B-Line, Collaroy	11:33	11:43	11:53	12:03	12:13	12:23	12:33	12:43	12:53
Dee Why Shops, Pittwater Rd, Dee Why	11:42	11:52	12:02	12:12	12:22	12:32	12:42	12:52	13:02
Pittwater Rd after Chard Rd, Brookvale	11:49	11:59	12:09	12:19	12:29	12:39	12:49	12:59	13:09
Warringah Mall, Pittwater Rd, Brookvale	11:52	12:02	12:12	12:22	12:32	12:42	12:52	13:02	13:12
Manly Wharf, West Esplanade, Manly	12:02	12:12	12:22	12:32	12:42	12:52	13:02	13:12	13:22

Monday to Friday	♿	♿	♿	♿	♿	♿	♿	♿	♿
Ocean Pl at Ocean Rd, Palm Beach	12:19	12:29	12:39	12:49	12:59	13:09	13:19	13:29	13:39
Barrenjoey Rd near Careel Head Rd, Avalon	12:28	12:38	12:48	12:58	13:08	13:18	13:28	13:38	13:48
Avalon Beach SLSC, Barrenjoey Rd, Avalon	12:31	12:41	12:51	13:01	13:11	13:21	13:31	13:41	13:51
Barrenjoey Rd after Bramley Ave, Newport	12:37	12:47	12:57	13:07	13:17	13:27	13:37	13:47	13:57
Kalina St after Queens Pde, Newport	12:40	12:50	13:00	13:10	13:20	13:30	13:40	13:50	14:00
Barrenjoey Rd before Darley St, Mona Vale	12:46	12:56	13:06	13:16	13:26	13:36	13:46	13:56	14:06
Barrenjoey Rd opp Village Park, Mona Vale	12:48	12:58	13:08	13:18	13:28	13:38	13:48	13:58	14:08
Warriewood B-Line, Warriewood	12:53	13:03	13:13	13:23	13:33	13:43	13:53	14:03	14:13
Narrabeen Shops, Pittwater Rd, Narrabeen	12:58	13:08	13:18	13:28	13:38	13:48	13:58	14:08	14:18
Collaroy B-Line, Collaroy	13:03	13:13	13:23	13:33	13:43	13:53	14:03	14:13	14:23
Dee Why Shops, Pittwater Rd, Dee Why	13:12	13:22	13:32	13:42	13:52	14:02	14:12	14:22	14:32
Pittwater Rd after Chard Rd, Brookvale	13:19	13:29	13:39	13:49	13:59	14:09	14:19	14:29	14:39
Warringah Mall, Pittwater Rd, Brookvale	13:22	13:32	13:42	13:52	14:02	14:12	14:22	14:32	14:42
Manly Wharf, West Esplanade, Manly	13:32	13:42	13:52	14:02	14:12	14:22	14:32	14:42	14:52

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Manly to Palm Beach via Dee Why & Mona Vale



Monday to Friday	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ
Manly Wharf, West Esplanade, Manly	10:20	10:30	10:40	10:50	11:00	11:10	11:20	11:30	11:40
Warringah Mall, Pittwater Rd, Brookvale	10:31	10:42	10:52	11:02	11:12	11:22	11:32	11:42	11:52
Pittwater Rd at Old Pittwater Rd, Brookvale	10:33	10:44	10:54	11:04	11:14	11:24	11:34	11:44	11:54
Dee Why B-Line, Dee Why	10:40	10:51	11:01	11:11	11:21	11:31	11:41	11:51	12:01
Collaroy B-Line, Collaroy	10:47	10:58	11:08	11:18	11:28	11:38	11:48	11:58	12:08
Narrabeen B-Line, Narrabeen	10:52	11:03	11:13	11:23	11:33	11:43	11:53	12:03	12:13
Warriewood B-Line, Warriewood	10:58	11:09	11:19	11:29	11:39	11:49	11:59	12:09	12:19
Mona Vale B-Line, Mona Vale	11:04	11:15	11:25	11:35	11:45	11:55	12:05	12:15	12:25
Barrenjoey Rd after Darley St, Mona Vale	11:06	11:17	11:27	11:37	11:47	11:57	12:07	12:17	12:27
Kalinya St before Queens Pde, Newport	11:11	11:22	11:32	11:42	11:52	12:02	12:12	12:22	12:32
Barrenjoey Rd before Robertson Rd, Newport	11:16	11:27	11:37	11:47	11:57	12:07	12:17	12:27	12:37
Barrenjoey Rd after Avalon Pde, Avalon	11:22	11:33	11:43	11:53	12:03	12:13	12:23	12:33	12:43
Barrenjoey Rd near Careel Head Rd, Avalon	11:26	11:37	11:47	11:57	12:07	12:17	12:27	12:37	12:47
Ocean Pl at Ocean Rd, Palm Beach	11:36	11:47	11:57	12:07	12:17	12:27	12:37	12:47	12:57

Monday to Friday	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ
Manly Wharf, West Esplanade, Manly	11:50	12:00	12:10	12:20	12:30	12:40	12:50	13:00	13:10
Warringah Mall, Pittwater Rd, Brookvale	12:02	12:12	12:22	12:32	12:42	12:52	13:02	13:12	13:22
Pittwater Rd at Old Pittwater Rd, Brookvale	12:04	12:14	12:24	12:34	12:44	12:54	13:04	13:14	13:24
Dee Why B-Line, Dee Why	12:11	12:21	12:31	12:41	12:51	13:01	13:11	13:21	13:31
Collaroy B-Line, Collaroy	12:18	12:28	12:38	12:48	12:58	13:08	13:18	13:28	13:38
Narrabeen B-Line, Narrabeen	12:23	12:33	12:43	12:53	13:03	13:13	13:23	13:33	13:43
Warriewood B-Line, Warriewood	12:29	12:38	12:48	12:58	13:08	13:18	13:28	13:38	13:48
Mona Vale B-Line, Mona Vale	12:35	12:44	12:54	13:04	13:14	13:24	13:34	13:44	13:54
Barrenjoey Rd after Darley St, Mona Vale	12:37	12:46	12:56	13:06	13:16	13:26	13:36	13:46	13:56
Kalinya St before Queens Pde, Newport	12:42	12:51	13:01	13:11	13:21	13:31	13:41	13:51	14:01
Barrenjoey Rd before Robertson Rd, Newport	12:47	12:56	13:06	13:16	13:26	13:36	13:46	13:56	14:06
Barrenjoey Rd after Avalon Pde, Avalon	12:53	13:02	13:12	13:22	13:32	13:42	13:52	14:02	14:12
Barrenjoey Rd near Careel Head Rd, Avalon	12:57	13:06	13:16	13:26	13:36	13:46	13:56	14:06	14:16
Ocean Pl at Ocean Rd, Palm Beach	13:07	13:16	13:26	13:36	13:46	13:56	14:06	14:16	14:26

Monday to Friday	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ
Manly Wharf, West Esplanade, Manly	13:20	13:30	13:40	13:50	14:00	14:10	14:20	14:30	14:40
Warringah Mall, Pittwater Rd, Brookvale	13:32	13:42	13:52	14:02	14:12	14:22	14:32	14:42	14:53
Pittwater Rd at Old Pittwater Rd, Brookvale	13:34	13:44	13:54	14:04	14:14	14:24	14:35	14:45	14:56
Dee Why B-Line, Dee Why	13:41	13:51	14:01	14:11	14:21	14:31	14:42	14:52	15:03
Collaroy B-Line, Collaroy	13:48	13:58	14:08	14:18	14:28	14:38	14:51	15:01	15:12
Narrabeen B-Line, Narrabeen	13:53	14:03	14:13	14:23	14:33	14:43	14:55	15:05	15:16
Warriewood B-Line, Warriewood	13:58	14:08	14:18	14:28	14:38	14:49	15:01	15:11	15:22
Mona Vale B-Line, Mona Vale	14:04	14:14	14:24	14:34	14:44	14:55	15:07	15:17	15:28
Barrenjoey Rd after Darley St, Mona Vale	14:06	14:16	14:26	14:36	14:46	14:57	15:09	15:19	15:30
Kalinya St before Queens Pde, Newport	14:11	14:21	14:31	14:41	14:51	15:02	15:14	15:24	15:35
Barrenjoey Rd before Robertson Rd, Newport	14:16	14:26	14:36	14:46	14:56	15:08	15:20	15:30	15:41
Barrenjoey Rd after Avalon Pde, Avalon	14:22	14:32	14:42	14:52	15:02	15:14	15:26	15:36	15:47
Barrenjoey Rd near Careel Head Rd, Avalon	14:26	14:36	14:46	14:56	15:06	15:18	15:30	15:40	15:51
Ocean Pl at Ocean Rd, Palm Beach	14:36	14:46	14:56	15:06	15:16	15:28	15:40	15:50	16:01

Monday to Friday	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ	Ⓐ
Service Information						C			
St Pauls College, Darley Rd, Manly	-	-	-	-	-	15:36	-	-	-
Manly Wharf, West Esplanade, Manly	14:50	15:00	15:10	15:20	15:30	15:40	15:50	16:00	16:10
Warringah Mall, Pittwater Rd, Brookvale	15:03	15:13	15:23	15:33	15:44	15:54	16:04	16:14	16:23
Pittwater Rd at Old Pittwater Rd, Brookvale	15:06	15:16	15:26	15:36	15:47	15:57	16:07	16:17	16:26
Dee Why B-Line, Dee Why	15:13	15:23	15:33	15:44	15:55	16:05	16:14	16:24	16:33
Collaroy B-Line, Collaroy	15:22	15:32	15:42	15:53	16:04	16:14	16:23	16:33	16:41
Narrabeen B-Line, Narrabeen	15:26	15:36	15:46	15:57	16:08	16:18	16:27	16:37	16:45
Warriewood B-Line, Warriewood	15:32	15:42	15:52	16:03	16:14	16:24	16:33	16:43	16:51
Mona Vale B-Line, Mona Vale	15:38	15:48	15:58	16:09	16:20	16:30	16:39	16:49	16:57
Barrenjoey Rd after Darley St, Mona Vale	15:40	15:50	16:00	16:11	16:22	16:32	16:41	16:51	16:59
Kalinya St before Queens Pde, Newport	15:45	15:55	16:05	16:16	16:27	16:37	16:46	16:56	17:04
Barrenjoey Rd before Robertson Rd, Newport	15:51	16:01	16:11	16:22	16:33	16:43	16:52	17:02	17:10
Barrenjoey Rd after Avalon Pde, Avalon	15:57	16:08	16:18	16:29	16:40	16:50	16:59	17:09	17:17
Barrenjoey Rd near Careel Head Rd, Avalon	16:01	16:12	16:22	16:33	16:44	16:54	17:03	17:13	17:21
Ocean Pl at Ocean Rd, Palm Beach	16:11	16:22	16:32	16:43	16:54	17:04	17:13	17:23	17:31

Appendix B – Statement of Expertise

CONSULTANCY PROFILE & STATEMENT OF EXPERTISE

Accessibility Solutions consultancy offers a range of services to provide advice for clients to develop new and modify existing buildings, facilities and services to be accessible to people with disabilities to comply with legislation and regulations relevant to people with disabilities.

Relevant legislation and regulations that underpins advice includes the Disability Discrimination Act (DDA) Building Code of Australia, Australian Standards 1428, DDA Premises Standards, DDA Transport Standard, State Environment Planning Policy Housing for Seniors or People With a Disability (SEPP HS) / Seniors Living Policy, SEPP 65 – Apartment Design Guide and various local government Development Control Plans.

The scope of services provided by Accessibility Solutions includes:

- Plan Appraisals and design advice
- Access Reports for development applications and construction certificates
- Expert Reports for Court evidence
- Access Auditing of existing buildings, facilities, transport conveyances and infrastructure
- Policy and document reviews and development of Disability Action Plans
- Staff training in access auditing

The services consider issues concerning people with all types of disability including; physical; vision; hearing, intellectual and other cognitive impairments that may affect access for people with a disability consistent with the Disability Discrimination Act.

As principal consultant Mark Relf has considerable experience and expertise in a wide range of access related projects and is an accredited member of the Association of Consultants in Access Australia for the purposes of providing advice concerning access to the built environment and services for people with disabilities.

His expertise has been gained over 20 years working in management and advocacy roles within the disability sector and since 1994 providing advice to clients on access issues. Mark also participates on various key committees concerning access for people with disabilities. His qualifications and affiliations are:

- Accredited Member of the Association of Consultants in Access Australia.
- Member, Standards Australia ME/64 Committee responsible for the AS1428 suite and AS4299 – Adaptable Housing.





Horizontal Scale 1 : 100
 Vertical Scale 1 : 100

NOT TO SCALE ON A4 SHEET