



**BUILDING  
INNOVATIONS  
AUSTRALIA**

# **ACCESS 2022 A1 & SENIORS HOUSING INDICATIVE COMPLIANCE REPORT FOR DA LODGEMENT**

**82 Avalon Parade,  
Avalon Beach NSW 2107**



**Prepared for:** Element Environment Pty Ltd  
**Project No.:** PRO-09932-Q7H1  
**Date:** 24/07/2025  
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## **Document History**

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18.07.2025	Report Issue v1.0	Report issued to client	Jennifer Lee	Mardiros Tatian	Mardiros Tatian
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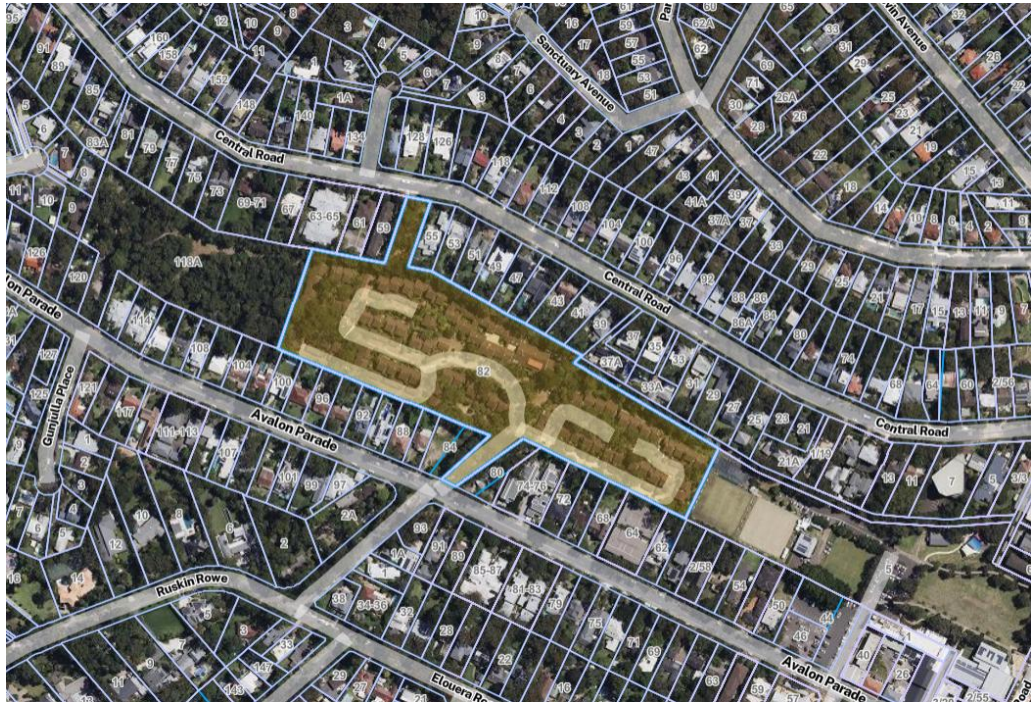


## **1.0. INTRODUCTION**

### **1.1. Location and Description**

This report is prepared in preparation of a Development Application (DA) lodgement and is for assessment purposes, it comprises a National Building Code of Australia 2022 Amendment 1 (NBCA) assessment of the proposed seniors housing development as required under Section 19 of the Environmental Planning and Assessment Regulations.

The development incorporates the alterations and additions of the existing seniors housing development including site entrance works and new signage.



**Figure 2**     *Figure 1 Site location and topography*

### **1.2. Report Purpose**

The purpose of this report is to provide an indicative compliance assessment of the DA design documentation for the proposal, against the current requirements of the BCA, related to people with disabilities.

Furthermore, this report provides a seniors housing assessment of the design documentation for the proposal, against the current requirements of Part 5 Housing for seniors and people with a disability of the State Environmental Planning Policy (Housing) 2021 (referred to as SEPP Seniors & PWD or The Policy).

Part 5 Division 3 of the Policy outlines the site and regulatory requirements of implementation of this Policy, including compliance with Schedule 4 of the Policy. This report reviews compliance with the clauses of Schedule 4 of the Policy in detail to assist determination by the relevant consent or certifying authority.

To pre-empt the Certifying Authority's role under Section 19 of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021, we have undertaken a preliminary assessment of the development against the provisions of the BCA applicable to the lodged Development Application.



### **1.3. Basis of Report**

This report is based upon and limited to:

- An assessment of design documentation referenced in Appendix A of this report;
- The Deemed-to-Satisfy provisions of the National Building Code of Australia 2022 Amendment 1 including the NSW variations where applicable.
- Part 5 of State Environmental Planning Policy (Housing) 2021, referred to as 'SEPP Seniors & PWD or The Policy'.

### **1.4. Referenced Documents**

The following documentation was relied upon when preparing this report:

- Assessment of design documentation referenced in Appendix A of this report.
- The performance and deemed-to-satisfy provisions of the National Building Code of Australia 2022 Amendment 1 incorporating the NSW Appendices where applicable.
- Guide to the National Building Code of Australia.
- Australian Standard AS1428.1-2009, Design for Access and Mobility.
- Australian Standard AS1428.2-1992, Design for Access and Mobility.
- Disability (Access to Premises — Buildings) Standards 2010.
- Environmental Planning & Assessment Act 1979.
- Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021.

### **1.5. Limitations and Exclusions**

The limitations and exclusions of this report are as follows:

- The plans are assessed indicatively to the extent necessary to proceed to construction certificate stage whereby assessment will be undertaken pursuant to Part 4A of the Environmental Planning and Assessment Act 1979. This means that the design has been assessed to be able to comply with the BCA (i.e. the submitted plans are consistent with the BCA but certain design details may not be specified at this stage due to the plans and specifications being at pre DA stage).
- This Report does not address issues in relation to the following:
  - a) The structural adequacy of the building including the Fire Resistance Levels (FRL's) of any building elements (unless specifically referred to).
  - b) The design, maintenance or operation electrical, mechanical, hydraulic or fire protection services.
  - c) Environmental Planning and Assessment Act and Regulations (unless specifically referred to).
  - d) Local Government Act and Regulations.
  - e) Occupational Health and Safety Act and Regulations.
  - f) WorkCover Authority requirements.
  - g) Requirements of other Regulatory Authorities including, but not limited to, Telstra, Sydney Water, Electricity Supply Authority, RTA, Council and the like.
  - h) Disability Discrimination Act (DDA) other than minimum requirements under the Disability (Access to Premises — Buildings) Standards 2010. DDA is a Case by Case Assessment, this building will comply with the set items under the Premises Standards.





- i) Construction Safety Act.
- j) Conditions of Development Consent issued by the relevant Local Council.
- This assessment does not incorporate the detailed requirements of the Australian Standards.
- Building Innovations Australia Pty Ltd cannot guarantee acceptance of this report by the Local Council, NSW Fire Brigades or other approval authorities.
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## **1.6. Legislative Framework**

Section 4.15 (formally Section 79C) of the Environmental Planning and Assessment Act provides the matters of consideration that the consent authority must take into account in the determination of a development application.

Once development consent is granted, and pursuant to Section 19 of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021, a certifying authority must not issue a construction certificate for building work unless:

- (a) *the relevant building work plans and specifications include the matters required by a relevant BASIX certificate, if any, and*
- (b) *the design and construction of the building, as described in the relevant building work plans and specifications and in other information given to the certifier under section 12, is consistent with the development consent, and*
- (c) *the building will comply with the relevant requirements of the Building Code of Australia as in force at the time the application for the construction certificate was made.*

### **Compliance with the National Building Code of Australia**

The BCA is a performance based document whereby compliance can be achieved by satisfying the deemed to satisfy requirements or by formulating an alternative solution to address the relevant performance requirements.

As indicated above, the requirements of the Environmental Planning and Assessment Regulations requires all new building works to comply with the relevant requirements of the BCA (as in force at the time the application for the construction certificate was made).

This means that the plans and documentation submitted with the *construction certificate* (CC) application must demonstrate full compliance with the relevant provisions of the Building Code of Australia.



### *Fulfilment of BASIX Commitments (Residential only)*

Section 43 of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021 requires a certifying authority to monitor fulfilment of any commitments listed on the BASIX certificate, where the BASIX requires the certifying authority to monitor those commitments.

A certifying authority must not issue an occupation certificate (whether interim or final) for any building resulting from, or any building that becomes a BASIX affected building because of, BASIX affected development or BASIX optional development to which this clause applies, or for any part of such a building, unless each of the commitments whose fulfilment it is required to monitor in relation to the building or part has been fulfilled.

For the purpose of satisfying itself as to the fulfilment of any such commitment, a certifying authority may rely on the advice of any properly qualified person (i.e. Energy Efficiency Consultant).

### *Special Requirements for Residential Flat Developments*

Section 15 (formally Cl. 143A) of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021 requires a qualified designer to provide a statement that verifies that the plans and specifications that form part of construction certificate application achieve or improve the design quality of the development having regard to the design quality principles set out in Part 2 of the State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Development prior to the issue of a Construction Certificate.

Section 43 (formally Cl. 154A) of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021 requires a qualified designer to provide a statement that verifies that the residential flat development achieves the design quality of the development as shown in the plans and specifications having regard to the design quality principles set out in Part 2 of the State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Development prior to the issue of an Occupation Certificate.

### *Disability (Access to Premises — Buildings) Standards 2010*

Disability (Access to Premises — Buildings) Standards 2010 has been introduced and is applicable to this building. It is noted that unless Part D4, Clauses E3D7, E3D8, F4D5, F4D6 & F4D7 are included in the below assessment, an access consultant may need to be engaged to provide specific comments as to compliance with this standard. Note that except for slight variations, particularly for Class 1b buildings, available verification methods and adult change facilities, as this is a new building to BCA 2022 A1, compliance with the Disability (Access to Premises — Buildings) Standards 2010 would inherently comply.



## **1.7. Terminology**

- **Accessible** - complying with the floor space requirements described in AS 1428.1 and able to be approached, entered and used by people with a disability, including those who rely upon a wheelchair.
- **Accessible housing unit** - Housing unit with features already in place to facilitate use by a person with a disability or progressive frailty.
  - NOTE: Accessible housing would typically incorporate features such as grabrails and fittings adequate for people with limited mobility. Some of these features which enhance independent living are described in AS 1428.1 and AS 1428.2.
- **Adaptable housing unit** - housing unit which is designed and constructed to meet the performance requirements stated in Clause 2.2 and to include the essential features listed in Appendix A. An adaptable housing unit is designed in such a way that it can be modified easily in the future to become accessible to both occupants and visitors with disabilities or progressive frailties.
- **Building Code of Australia** - Document published on behalf of the Australian Building Codes Board. The BCA is a uniform set of technical provisions for the design and construction of buildings and other structures throughout Australia and is adopted in NSW under the provisions of the Environmental Planning & Assessment Act & Regulation.
- **Circulation space** - contains the net unobstructed area for a minimum height of 2000 mm above the finished floor or ground surface (unless otherwise specified in this Standard), which is that space surrounding built elements, landscape elements, and fixtures and fittings required for movement into and within buildings.
- **Fire Resistance Level (FRL)** - means the grading periods in minutes tested in accordance with AS 1530.4-2005 for the following criteria -
  - (a) structural adequacy; and
  - (b) integrity; and
  - (c) insulation,and expressed in that order.
- **Fire Source Feature (FSF)** - the far boundary of a road adjoining the allotment; or a side or rear boundary of the allotment; or an external wall of another building on the allotment which is not a Class 10 building.
- **General Purpose Outlet (GPO)** - electrical socket for general use.
- **Housing unit** - a single residence or a part of a residence, containing living area and sleeping space, kitchen, toilet and bath or shower room. The term includes bed-sitter flats, detached and semi-detached houses, villa homes, townhouses and apartments in multi-storey blocks.
- **Open space** - means a space on the allotment, or a roof or other part of the building suitably protected from fire, open to the sky and connected directly with a public road.
- **Performance Requirements of the BCA** - A Building Solution will comply with the BCA if it satisfies the Performance Requirements. A Performance requirement states the level of performance that a Building Solution must achieve.

Compliance with the Performance Requirements can only be achieved by-

  - (a) complying with the Deemed-to-Satisfy Provisions; or
  - (b) formulating a Performance Solution which-
    - (i) complies with the Performance Requirements; or
    - (ii) is shown to be at least equivalent to the Deemed-to-Satisfy Provisions; or
  - (c) a combination of (a) and (b).



- *Ramp* - an inclined accessway with a gradient steeper than 1 in 20 but not steeper than 1 in 14.
- *Shall* - refers to an essential requirement.
- *Should* - refers to a desirable requirement.
- *Sole occupancy unit* - means a room or other part of a building for occupation by one or joint owner, lessee, tenant, or other occupier to the exclusion of any other owner, lessee, tenant, or other occupier.
- *The Act* – refers to NSW Environmental Planning and Assessment Act 1979.
- *The Regulation* – refers to NSW Environmental Planning and Assessment Regulation 2000.
- *The Standard* – refers to Australian Standard AS 4299-1995.
- *Threshold* - the sill of a doorway at the entrance to a house gradient not steeper than 1 in 8, located in, or instead of, a step other than a kerb.
- *Visitable housing unit* - housing unit which has at least one wheelchair accessible entry with an accessible path of travel to the living area and to a toilet that is either accessible or visitable.
- *Visitable toilet* - a toilet which has a space of minimum 1250 mm in front of the toilet 900 mm wide clear of door swings and fixtures.
- *Walkway* - any accessway with a gradient not steeper than 1





## **2.0. BUILDING DESCRIPTION – PROPOSED DEVELOPMENT**

### **2.1. Building Code of Australia Description**

For the purposes of the Building Code of Australia 2022 A1 (BCA) the proposed development may be described as follows.

**Note:** *The scope of this report is limited to the new works only, which involves the alterations and additions of the site entrance and installation of signage, and only assesses the deemed-to-satisfy variations created by the subject new works. This report does not include an assessment of the remainder of the development.*

### **2.2. Rise in Storeys (RIS) & Effective Height**

*Sections or elevations for the full building have not been provided for assessment purposes. Building properties such as number of storeys and effective height cannot be confirmed until sections/elevations reviewed, including for the internal parts of the building. However, based on the design of the building and information provided by the client, this is not expected to significantly impact the following assessment.*

### **2.3. Building Classifications (Part A6)**

The proposed building has been classified as follows.

<b>BUILDING LEVELS</b>	<b>PLAN LEVELS</b>	<b>CLASSIFICATION</b>	<b>USE</b>
-	Entry Wall Concept	-	-



### **3.0. BCA ACCESSIBILITY REQUIREMENTS**

Noting that the level of documentation at this stage is for a Development Application (DA) assessment purposes, an indicative compliance assessment of the referenced documents identified in Appendix A of this report has been undertaken against the Deemed-to-Satisfy Provisions of the National Building Code of Australia 2022 Amendment 1 (BCA).

Outlined below is a summary of the Deemed-to-Satisfy Provisions of the BCA. All Deemed-to-Satisfy clauses that are applicable to the subject building have been referred to below, including a comment adjacent to each clause of the proposal's ability to satisfy each respective clause.

The abbreviations outlined below have been used in the following tables:

N / A	The Deemed-to-Satisfy clause does not apply to the subject Building.
Complies	The relevant provisions of the Deemed-to-Satisfy clause have been demonstrated by the proposed design and existing building features, notwithstanding it is at consent stage.
CRA	'Compliance Readily Achievable'. It is considered that the level of detail included in the consent-level documentation will not determine strict compliance with the individual BCA clause requirements. However, subject to noting the requirements of each clause, it is considered BCA compliance can be readily demonstrated without significant implication to the approved design. This will occur through progression of documentation to the Construction Certificate stage of the development.
FI	Further information is necessary to determine the compliance potential of the building design.
PS	Performance Solution with respect to this Deemed-to-Satisfy Provision is possible to satisfy the relevant BCA Performance Requirements.
DNC	Does Not Comply.
DTS	Deemed-To-Satisfy provisions as defined by the National Building Code of Australia 2022 A1.

### 3.1. BCA 2022 A1 Clause by Clause Assessment

## SECTION D – ACCESS AND EGRESS

### Part D4 – Access for People with Disabilities

Clause	Description	Status	Comments
D4D1	Deemed-to-Satisfy Provisions	Note	<p>Disability (Access to Premises — Buildings) Standards 2010 is to be read in conjunction with the BCA.</p> <p>Compliance with the Access Codes appears to be achieved.</p> <p>Note: Disability (Access to Premises - Buildings) Standards 2010 requires all new and affected part of a building and a Continuous Accessible Path of Travel from the Principal Pedestrian Entrance (PPE) to the new/affected parts to comply with the Access Code.</p>
D4D2	General Building Access Requirements	CRA	<p>Buildings and parts of buildings must be accessible as required by D4D2, unless exempted by D4D5.</p> <p>Compliance with Part D4 of the BCA is applicable to this building.</p> <p>All common areas are also to facilitate access in accordance with AS1428.1.</p> <p>Ensure all surfaces and abutment of surfaces comply with Clause 7 of AS1428.1.</p> <p>Ensure not less than 1m clearance is provided in a continuous accessible path of travel.</p> <p>Final design details of wheelchair access to this part are to be provided at the final Construction Certificate stage.</p>

*Architects/Designers Note: AS1428.1 is very detailed, please ensure that your design has been checked and rechecked as to full compliance .i.e.:*

- All doors are to be a minimum of a clear opening width of not less than 850 mm and the required circulation spaces around doors to be accessible in accordance with AS 1428.1
- Door hardware is to a 'D' grasping style, 20N force to open and close all doors.
- Walkways, corridors also must be compliant for dead areas, wheelchair passing and splayed corners.
- Doors and doorways need to have 30% luminance contrasting to distinguish door locations,
- All Glazing other than windows needs 30% luminance contrasting, The contrasting line shall be not less than 75 mm wide and shall extend across the full width of the glazing panel. The lower edge of the contrasting line shall be located between 900 mm and 1000 mm above the plane of the finished floor level. Any contrasting line on the glazing shall provide a minimum of 30% luminance contrast when viewed against the floor surface or surfaces within 2 m of the glazing on the opposite side.
- All stairs excluding the fire isolated stair are to incorporate the required double handrail, downturns, solid treads, colour contrast nosing strips and TGSIs.

*Floor surfaces and junction points are all smooth and comply with slip resistant levels.*

#### Door Circulation Spaces

Doorways and gates are not within the scope of this Development Application.

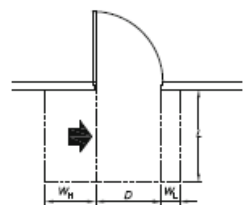


## Part D4 – Access for People with Disabilities

Clause	Description	Status	Comments
D4D3	Access to Buildings	CRA	<p>An accessway/s has been provided from Principal Pedestrian Entry (PPE) areas.</p> <p>The use of a platform lift in accordance with AS 1735.14 Low-rise platform lift is allowed for this building and is limited to 1m.</p> <p>The residential parts of the building are deemed to have only one entry, the fire isolated exits are for egress purposes only.</p> <p>All doors are to be a minimum of a clear opening width of not less than 850 mm and the required circulation spaces around doors to be accessible in accordance with AS 1428.1 including SOU doors to storey serviced via a lift.</p> <p>All stairs excluding fire isolated stair are to incorporate the required double handrail, downturns, colour contrast nosing strips and TGSi's.</p> <p>Nosing to stairs within the fire isolated passage are to have a colour contrasting strip.</p> <p>Final design details of wheelchair access to this part are to be provided at the final Construction Certificate stage.</p>
D4D4	Parts of Buildings to be accessible	CRA	Final details to be provided detailing floor services and materials are to be provided at the Construction Certificate stage or noted on the plans.

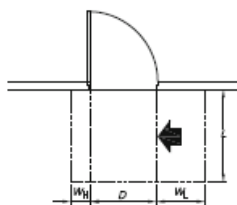
AS 1428.1—2009

58



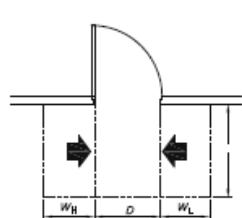
Dimension D	Dimension L	Dimension WH	Dimension WL
850	1220	560	340
900	1185	510	340
950	1160	460	340
1000	1140	410	340

(a) Hinge-side approach, door opens away from user



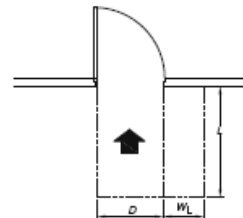
Dimension D	Dimension L	Dimension WH	Dimension WL
850	1240	240	660
900	1210	190	660
950	1175	140	660
1000	1155	90	660

(b) Latch-side approach, door opens away from user



Dimension D	Dimension L	Dimension WH	Dimension WL
850	1240	560	660
900	1210	510	660
950	1175	460	660
1000	1155	410	660

(c) Either side approach, door opens away from user



Dimension D	Dimension L	Dimension WH	Dimension WL
850	1450	0	510
900	1450	0	510
950	1450	0	510
1000	1450	0	510

(d) Front approach, door opens away from user

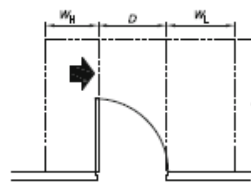
LEGEND:  
D = Clear opening of width of doorway  
L = Length  
WH = Width—hinge side  
WL = Width—latch side  
→ = Direction of approach  
↻ = Circulation space

DIMENSIONS IN MILLIMETRES

FIGURE 31 (in part) CIRCULATION SPACES AT DOORWAYS WITH SWINGING DOORS

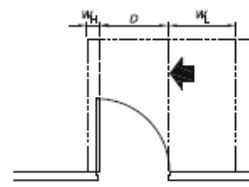
59

AS 1428.1—2009



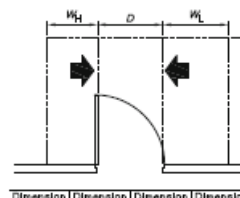
Dimension D	Dimension L	Dimension WH	Dimension WL
850	1670	650	900
900	1670	510	900
950	1670	560	900
1000	1670	510	900

(e) Hinge-side approach, door opens towards user



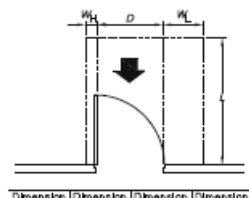
Dimension D	Dimension L	Dimension WH	Dimension WL
850	1670	110	900
900	1670	110	900
950	1670	110	900
1000	1670	110	900

(f) Latch-side approach, door opens towards user



Dimension D	Dimension L	Dimension WH	Dimension WL
850	1670	650	900
900	1670	510	900
950	1670	560	900
1000	1670	510	900

(g) Either side approach, door opens towards user



Dimension D	Dimension L	Dimension WH	Dimension WL
850	1450	110	530
900	1450	110	530
950	1450	110	530
1000	1450	110	530

(h) Front approach, door opens towards user

LEGEND:  
D = Clear opening of width of doorway  
L = Length  
WH = Width—hinge side  
WL = Width—latch side  
→ = Direction of approach  
↻ = Circulation space

DIMENSIONS IN MILLIMETRES

FIGURE 31 (in part) CIRCULATION SPACES AT DOORWAYS WITH SWINGING DOORS



**Part D4 – Access for People with Disabilities**

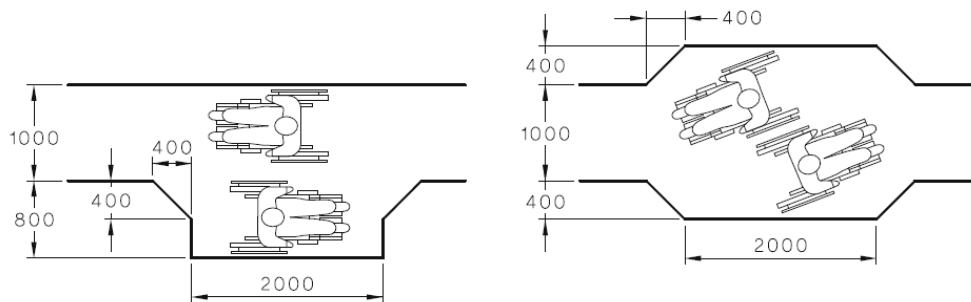
Clause	Description	Status	Comments
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**Passing Spaces**

Ensure passing and turning space are provided every 20m at max 1 in 40 gradient (2.5%).

Design verification to be provided prior to the issue of the Construction Certificate.

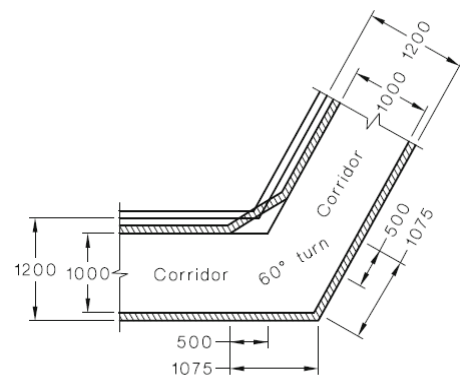
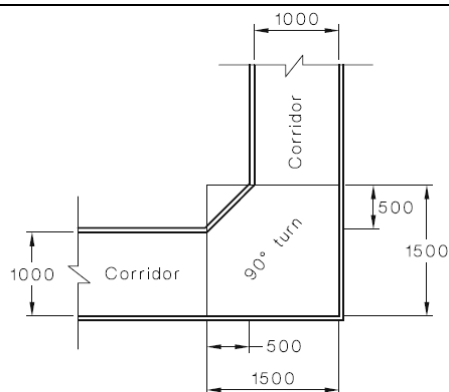
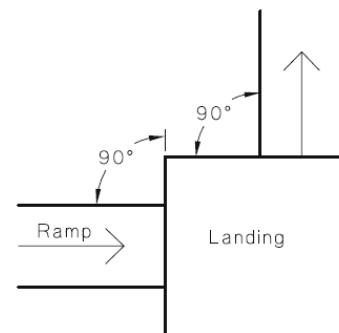
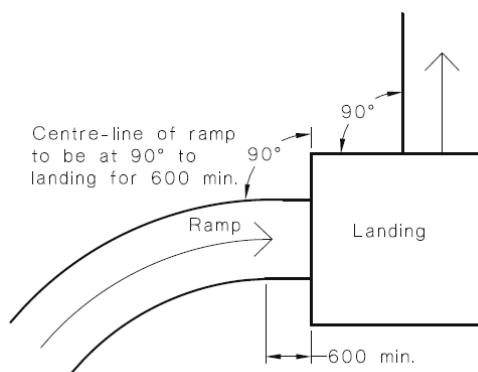
Passing Spaces for Wheelchairs are to be provided in corridors longer than 20m.



**Turning Spaces & Dead End Zones**

Sufficient turning spaces and dead end zones appear to have been provided within accessways required to be accessible in accordance with AS1428.1-2009.

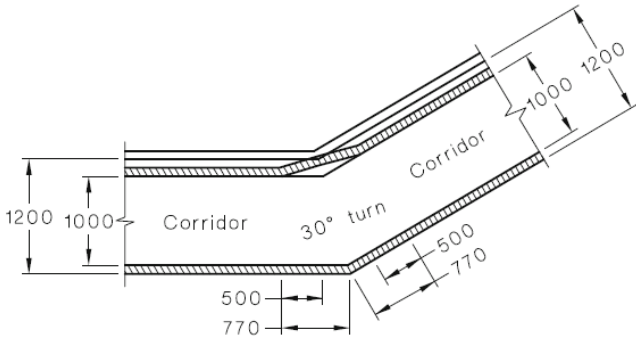
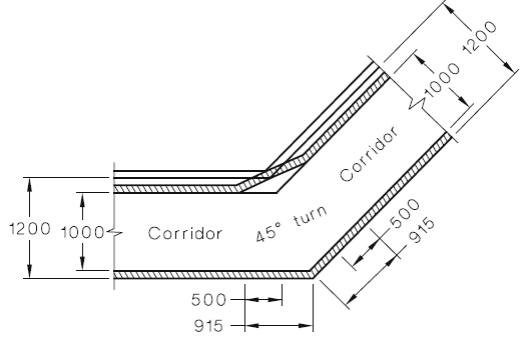
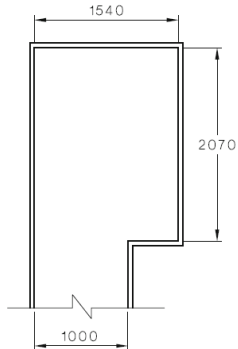
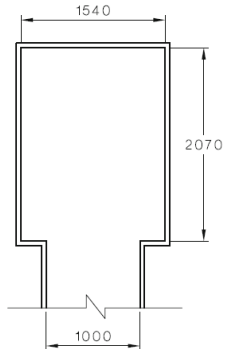
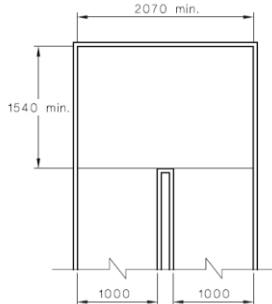
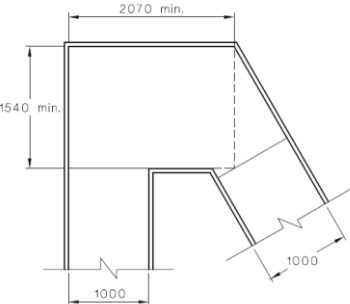
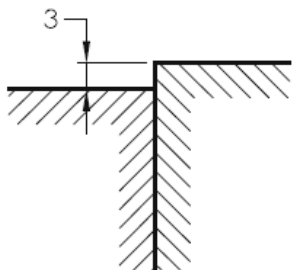
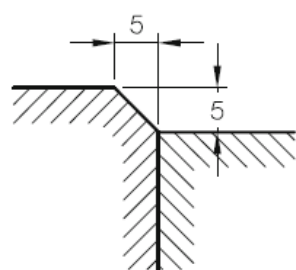
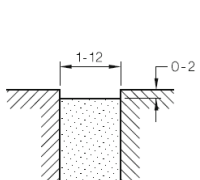
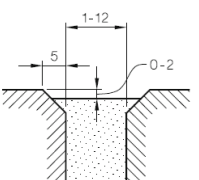
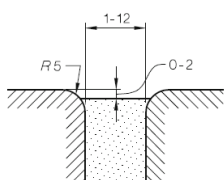
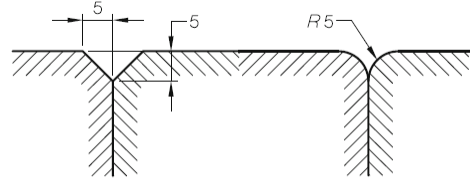
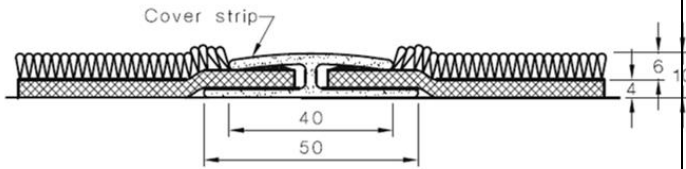
Design verification to be provided prior to the issue of the Construction Certificate.







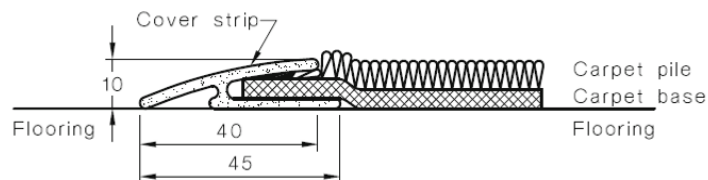
**Part D4 – Access for People with Disabilities**

Clause	Description	Status	Comments
	 		
	 		
	 		
	<p>All finished floor surfaces are to be trip free, the following details demonstrate the tolerance level for floor finishes.</p> <div>   </div> <p>(a) Change in level</p> <div>    </div> <p>(a) Continuous paving units—Level surface</p> <div>  </div> <p>(b) Continuous paving units—flush-jointed with level surfaces</p> <div>  </div>		
	<p>Note: BCA Clause D4D4 changes the above to 11mm, 4mm and 15mm respectively.</p>		



## Part D4 – Access for People with Disabilities

Clause	Description	Status	Comments
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Note: BCA Clause D4D4 changes the above to 11mm, 4mm and 15mm respectively.

### Handrail Extensions

Any non-fire isolated stairways or ramps are required to include double handrails which extend 300mm from the top of the stairway or ramp and 600mm from the base of stairways in accordance with AS 1428.1-2009.

Stairways and ramps are not within the scope of this Development Application.

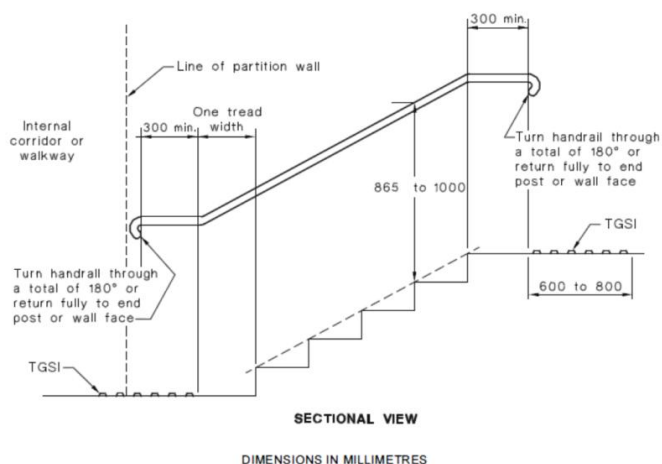


FIGURE 26(B) STAIRWAY LOCATION AND HANDRAIL EXTENSIONS AT END OF STAIRWAY OTHER THAN AT LINE OF BOUNDARY

As Occupants may pass under these stairs, they must be obstructed or have TGS's installed to warn of over head obstructions.

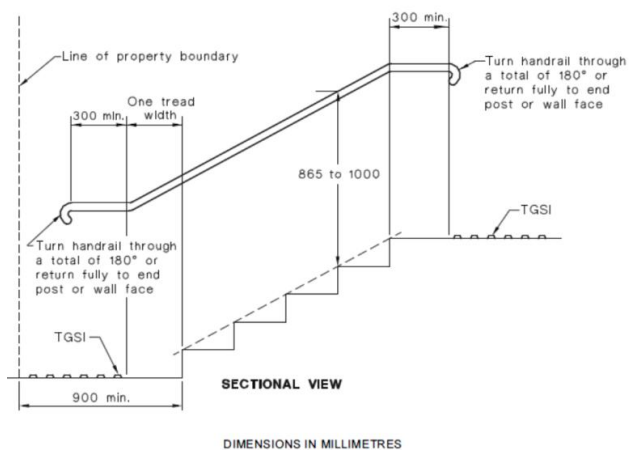
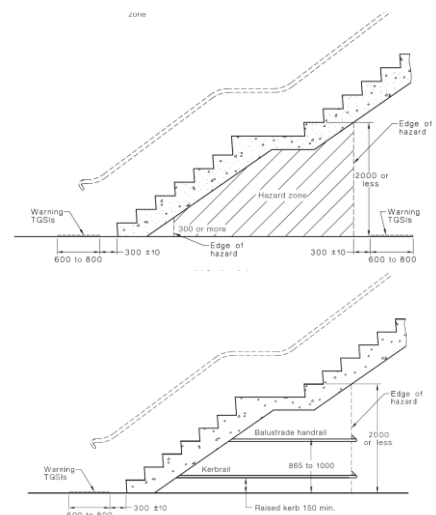


FIGURE 26(A) STAIRWAY LOCATION AND HANDRAIL EXTENSIONS AT BOUNDARY





## Part D4 – Access for People with Disabilities

Clause	Description	Status	Comments
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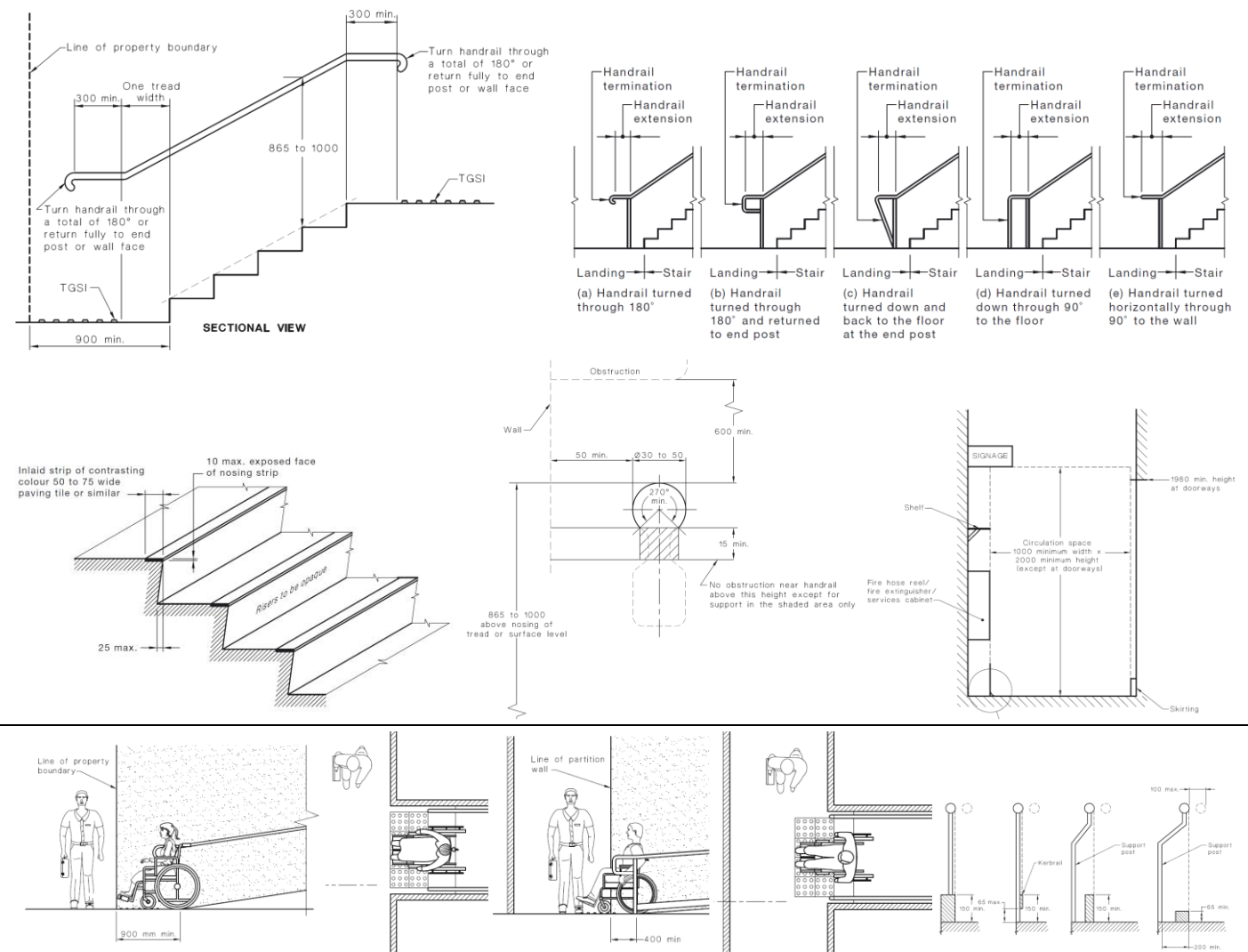
Tactile or TGSI's are to be installed correctly to all stairs and ramps. These TGSI's are to be re-installed to the correct distance from the nosing and the height from the FFL.

The floor surface is to be cut to allow the TGSI mat to be fixed to the slab and provide the correct height.

### Stairways & Ramps

Any non-fire isolated stairways or ramps are required to include double handrails and tactiles in accordance with AS 1428.1-2009.

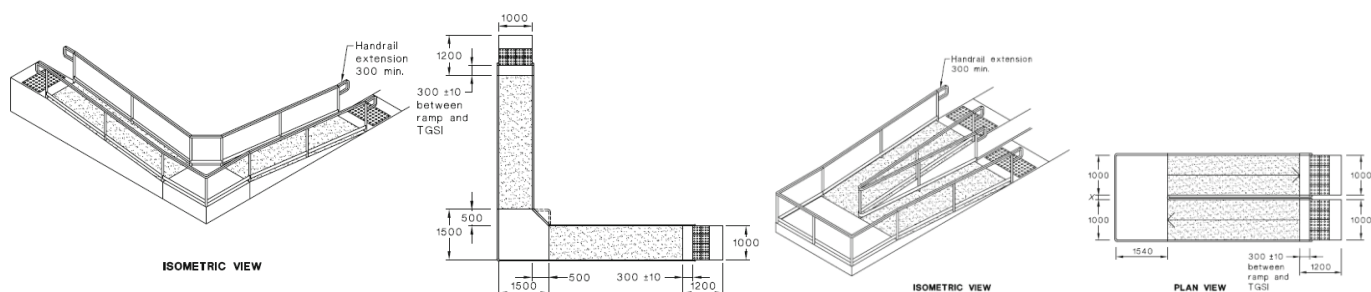
Stairways and ramps are not within the scope of this Development Application.





**Part D4 – Access for People with Disabilities**

Clause	Description	Status	Comments
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Extraction from Standards Australia Handbook 197:1999

**TABLE 3**

**PEDESTRIAN FLOORING SELECTION GUIDE – MINIMUM PENDULUM OR RAMP  
RECOMMENDATIONS FOR SPECIFIC LOCATIONS**

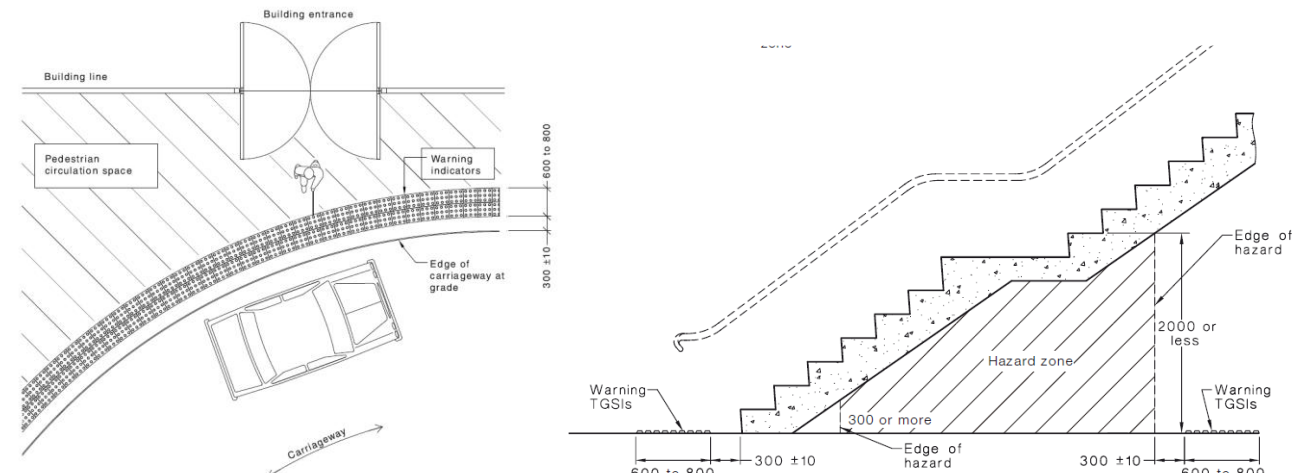
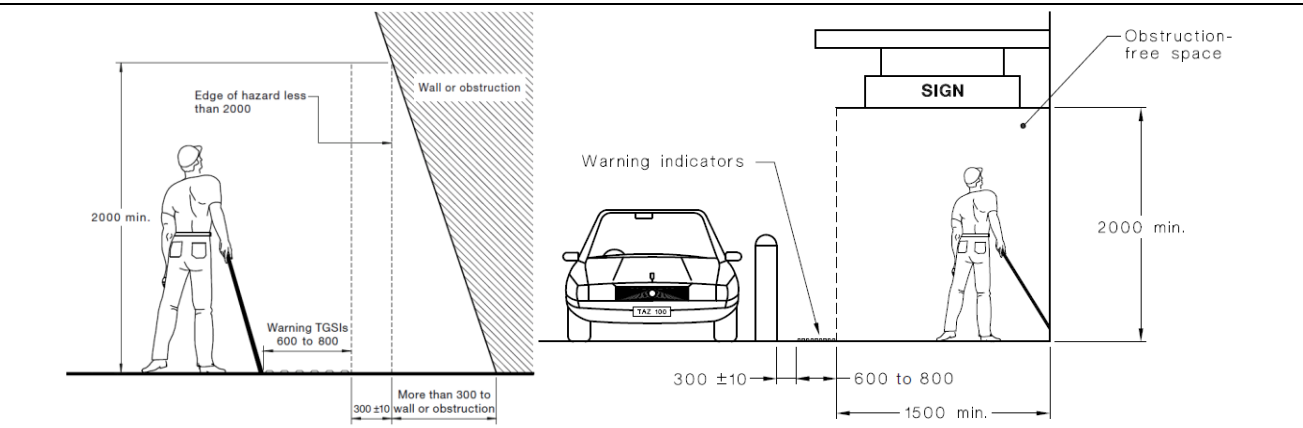
Location	Pendulum	Ramp
External colonnade, walkway and pedestrian crossings	W	R10
External ramps	V	R11
Entry foyers hotel, office, public buildings - wet	X	R10
Entry foyers hotel, office, public buildings - dry	Z	R9
Shopping centre excluding food court	Z	R9
Shopping centre – food court	X	R10
Internal ramps, slopes (greater than 2 degrees) - dry	X	R10
Lift lobbies above external entry level	Z	R9
Other separate shops inside shopping centres	Z	R9
Other shops with external entrances – entry area	X	R10
Fast food outlets, buffet food servery areas	X	R10
Hospitals and aged care facilities – dry areas	Z	R9
Hospital and aged care facilities – ensuites	X	A or R10
Supermarket aisles except fresh food areas	Z	R9
Shop and supermarket fresh fruit and vegetable areas	X	R10
Communal changing rooms	X	A
Swimming pool surrounds and communal shower rooms	W	B
Swimming pool ramps and stairs leading into water	V	C
Toilet facilities in offices, hotels, shopping centres	X	R10
Undercover concourse areas of sports stadium	X	R10
Accessible internal stair nosings (dry) – handrails present	X	R10
Accessible internal stair nosings (wet) – handrails present	W	B or R11
External stair nosings	W	R11




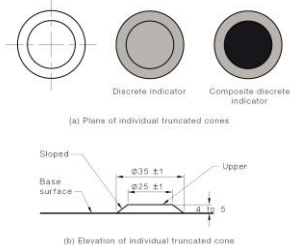
Part D4 – Access for People with Disabilities			
Clause	Description	Status	Comments
D4D5	Exemptions	Noted	<p>The following areas are not required to be accessible:</p> <ul style="list-style-type: none"> <li>(a) An area where access would be inappropriate because of the particular purpose for which the area is used,</li> <li>(b) An area that would pose a health or safety risk for people with a disability</li> <li>(c) Any path of travel providing access only to an area exempted by (a) or (b)</li> </ul>
D4D6	Accessible Carparking	N / A	No parking spaces appear to form part of the scope of this Development Application. As such, the requirements of this clause are not applicable.
D4D7	Signage	CRA	<p>In a building required to be accessible –</p> <p>Braille and tactile signage complying with Specification 15 and incorporating the international symbol of access or deafness, as appropriate, in accordance with AS1428.1 must identify each –</p> <ul style="list-style-type: none"> <li>– Sanitary facility,</li> <li>– Ambulant toilet facility,</li> <li>– Any required accessible carparking space,</li> <li>– Where needed, directional signage to any Carparking space or sanitary facility.</li> <li>– At Each 'Exit' and which 'Level' an occupant is at also needs to be in braille.</li> </ul> <p>Where a bank of sanitary facilities is not provided with an accessible unisex sanitary facility, directional signage incorporating the international symbol of access in accordance with AS 1428.1 must be placed at the location of the sanitary facilities that are not accessible, to direct a person to the location of the nearest accessible unisex sanitary facility.</p> <p>Design verification to be provided prior to the issue of the Construction Certificate.</p>







Part D4 – Access for People with Disabilities			
Clause	Description	Status	Comments
 <p>The top section contains two diagrams. The left diagram shows a building entrance with a pedestrian circulation space and a carriageway. It indicates the placement of warning TGSs (tactile ground surface indicators) at the edge of the carriageway at grade, with dimensions of 300 ±10 and 600 to 800. The right diagram shows a staircase with a hazard zone. It indicates the placement of warning TGSs at the edge of the hazard, with dimensions of 300 or more, 300 ±10, and 600 to 800. The hazard zone is defined as 2000 or less.</p>  <p>The bottom section contains two diagrams. The left diagram shows a person standing next to a wall or obstruction. It indicates the placement of warning TGSs (tactile ground surface indicators) at the edge of the hazard, with dimensions of 2000 min., 600 to 800, and more than 300 to 300 ±10. The right diagram shows a person standing next to a sign. It indicates the placement of warning TGSs (tactile ground surface indicators) at the edge of the hazard, with dimensions of 2000 min., 600 to 800, 300 ±10, and 1500 min. The sign is labeled 'SIGN' and the area is labeled 'Obstruction-free space'.</p>			
D4D8	Hearing Augmentation	N / A	
D4D9	Tactile Indicators	CRA	<p>For a building required to be accessible, tactile ground surface indicators must be provided to warn people who are blind or have a vision impairment in accordance with this clause. I.e.:</p> <ul style="list-style-type: none"> <li>- A stairway, other than a fire-isolated stairway,</li> <li>- An escalator,</li> <li>- A passenger conveyor of moving walk,</li> <li>- A ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp,</li> <li>- In the absence of a suitable barrier an overhead obstruction less than 2m above floor level, other than a doorway.</li> </ul> <p>Tactile ground surface indicators required by (a) must comply with sections 1 and 2 of AS/NZS 1428.4.1.</p> <p>Design verification to be provided prior to the issue of the Construction Certificate.</p>

Part D4 – Access for People with Disabilities			
Clause	Description	Status	Comments
<p>There are three (3) distinct types of TGSIs, these each need to be assessed as to the most appropriate based on the surface it is to be applied and lighting conditions. AS1428.4.1 – 2009 clearly provides installation requirements.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p>30% contrast to surface</p> </div> <div style="text-align: center;">  <p>45% Contrast to Surface</p> </div> <div style="text-align: center;">  <p>60% Contrast to Surface</p> </div> <div style="text-align: center;">  </div> </div>			
D4D10	Wheelchair Seating Spaces in Class 9b Assembly Buildings	N / A	
D4D11	Swimming Pools	N / A	
D4D12	Ramps	Noted	<p>On an accessway –</p> <p>(a) A series of connected ramps must not have a combined vertical rise of more than 3.6m; and</p> <p>(b) A landing for a step ramp must not overlap a landing for another step ramp or ramp.</p>
D4D13	Glazing on an Accessway	CRA	<p>On an accessway, 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.</p> <p>Design verification to be provided prior to the issue of the Construction Certificate.</p>



## **SECTION E – SERVICES AND EQUIPMENT**

### **Part E3 – Lift Installations**

N / A – No Lift proposed for this development



## **SECTION F – HEALTH AND AMENITY**

### **Part F4 – Sanitary and Other Facilities**

N / A – No Sanitary Facilities proposed for this development



#### **4.0. SEPP SENIORS & PWD REQUIREMENTS**

Noting that the level of documentation at this stage is for a Development Application (DA) assessment purposes, a compliance assessment of the referenced documents identified in Appendix A of this report has been undertaken against the Policy.

Outlined below is a summary of the clauses required in Part 5 of State Environmental Planning Policy (Housing) 2021. All items and relevant clauses to the subject building have been referred to below, including a comment to each clause/item of the proposal's ability to satisfy the requirements of the clause/item and/or the aims of the Policy and Performance Requirements of referenced standards.

The abbreviations outlined below have been used in the following tables:

N/A	The item does not apply to the subject Building.
Complies	The relevant clauses of the Policy appear to have been demonstrated by the proposed design and/or evidence during onsite inspection.
CRA	'Compliance Readily Achievable'. Subject to noting the requirements of each clause/item, it is considered that item compliance can be readily demonstrated without significant implication to the approved design or has been constructed to comply with approved design. When a development has been constructed to an approved design which has not strictly complied with these requirements, a recommendation is provided which appears to comply with the aims of the Policy and the Objectives and Performance Requirements of referenced standards.
FI	Further information is necessary to determine the compliance potential of the building design and/or element.
PS	Performance (Alternative) Solution with respect to the subject clause/item of the Policy is potentially possible to satisfy the relevant BCA Performance Requirements when NCC or Access-to-Premises Standards compliance is required. A detailed assessment is required to determine compliance with the aims of the Policy and the Objectives and Performance Requirements of referenced standards.
DNC	'Does Not Comply' with either a clause/item directly or the relevant Policy aims, and no clear path to compliance is evident.





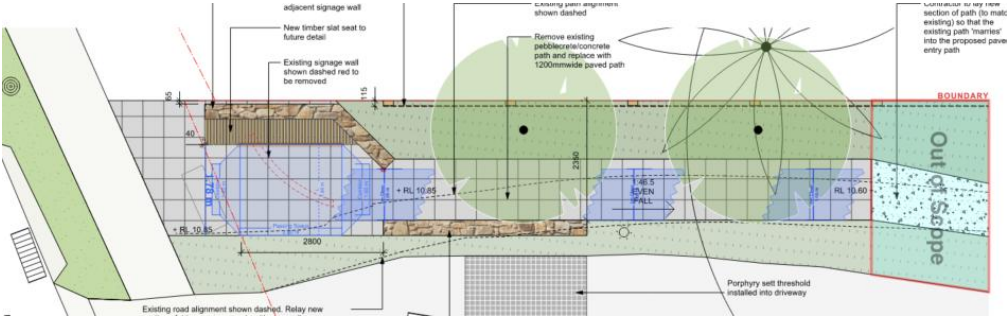
## SCHEDULE 4 – STANDARDS CONCERNING ACCESSIBILITY AND USABILITY FOR HOSTELS AND SELF-CONTAINED DWELLINGS

### PART 1: STANDARDS APPLYING TO HOSTELS AND SELF-CONTAINED DWELLINGS

Application of standards in this Part		
Clause	Status	Clause Description
1	Noted	The standards set out in the Part apply to any seniors housing that consists of hostels or self-contained dwellings.

Siting standards		
Clause	Status	Clause Description
2	CRA	<p><b>Wheelchair access</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>If the whole of the site does not have a gradient of less than 1:10: <ul style="list-style-type: none"> <li>(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</li> <li>(b) The wheelchair access provided must be by a continuous accessible path of travel (within the meaning of AS1428.1) to an adjoining public road or an internal road or a driveway that is accessible to all residents.</li> </ul> </li> </ul> <p><i>Note: For example, if 70% of the site has a gradient of less than 1:10, then 70% of the dwellings must have wheelchair access as required by this subclause. If more than 50% of the site has a gradient greater than 1:10, development for the purposes of seniors housing is likely to be unable to meet these requirements.</i></p> <p><b>Common Areas</b></p> <ul style="list-style-type: none"> <li>Access must be provided in accordance with AS1428.1 so that a person using a wheelchair can use common areas and common facilities associated with the development.</li> </ul> <p><u>A continuous path of travel from the street frontage and vehicle parking to entry complying with AS1428.1:</u></p> <p><i>As a minimum, this accessible path shall comply with AS 1428.1 and shall be continuous, slip-resistant, hard-surfaced and shall not incorporate any step, stairway or other impediment which would prevent it from being safely negotiated by people with disabilities. It is advisable for walkways to be provided with passing areas, as specified in AS 1428.2.</i></p> <p><u>Within a residential estate development, common use facilities to be accessible:</u></p> <p><i>In addition to the requirements in Clause 3.3.1, where housing units are within a residential development, consideration should be given to the following:</i></p> <p><i>(a) Access for people with disabilities should be available to all common use facilities including carpark, letterbox area, laundry and clothes drying area, garbage disposal area and at least part of the garden.</i></p>



Siting standards		
Clause	Status	Clause Description
		<p>A continuous path of travel from the street frontage appears to be provided from street frontage, as illustrated below:</p>  <p><b>Ground Floor Level Access from Street Frontage</b></p> <p>Compliance with the Building Code of Australia indicates compliance with the requirements of this item.</p>



## **5.0. CONCLUSION**

### **5.1. BCA Accessibility Indicative Assessment Conclusion**

Although demonstrating compliance with the BCA at DA assessment stage is not a prescribed head of consideration under Section 4.15 (formally Section 79C) of the Environmental Planning & Assessment Act 1979, Council has an obligation to consider whether the proposal, as lodged, is indicatively capable of complying with the BCA - without significant modification to those plans for which approval is sought.

In this instance we are confident that any modifications and advancement in level of details required to the proposal in order to satisfy the requirements of the BCA (in force at the time the Construction Certificate application is lodged) will not necessitate the need for any significant design changes that in turn would necessitate the submission of an application under Section 4.55 (formally Section 96) of the Environmental Planning and Assessment Act 1979.

In the same regard, we draw Council's attention to the requirements of Section 19 of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021, and suggest that detailed & specific BCA compliance matters shall be addressed to the satisfaction of the appointed Certifying Authority prior to the issue of the Construction Certificate.

Further, it is considered that this BCA review and the additional preparation of the required Construction Certificate documentation will be sufficient to ensure that the proposed design will achieve the necessary compliance with the BCA.

### **5.2. SEPP 2021 Seniors Housing Consistency Statement**

This report has reviewed the subject development to determine compliance with the aims of the State Environmental Planning Policy (SEPP) (Housing) 2021, with the relevant clause of Schedule 4 of the SEPP outlined within the clause of this report. This assessment has been conducted through a review of the architectural plans detailed in Appendix A below.

This statement is strictly limited to the clauses of Schedule 4 relevant to in-fill self-contained dwellings of the units identified within this report and does not include a BCA, Adaptable Housing, Access to Premises Standards compliance assessment or the like unless expressly identified.

This consistency statement confirms that upon action of recommendations identified in this report, the subject development appears to either comply directly with the design features of each clause of Schedule 4 directly or complies indirectly with the aims of the SEPP and Performance Requirements of the referenced standard(s) relevant to these items/clauses as permitted during development consent determination by Clause 79C(3A)(b) of the Act.



**BUILDING  
INNOVATIONS  
AUSTRALIA**

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*B.Med.Sci (Bachelor of Medical Science)*  
*Building Professionals Board, NSW- A1 Accredited Certifier BPB 2572*



## **APPENDIX A – REFERENCED DOCUMENTATION**

The following documentation was used in the preparation of this report:

Drawing No.	Title	Rev.	Project No.	Date	Drawn By
LC-02	ENTRY WALL CONCEPT	E	-	23.07.2024	CONTEXT Landscape Architecture