

ACCESS REPORT
DEVELOPMENT APPLICATION

1-5 BROWN STREET
NORTH PARRAMATTA

HOUSING FOR SENIORS OR
PEOPLE WITH A DISABILITY 2021

Prepared by Mark Relf

28th November 2022

Accessibility Report for a Development Application

1-5 BROWN STREET, NORTH PARRAMATTA

Development Overview

The following report has been prepared on behalf the NSW Land and Housing Corporation to review the “accessibility” of a development application to develop a site at 1-5 Brown Street, North Parramatta for the purposes of a new seniors housing that consists of twelve (12) independent living units (ILUs) and associated communal facilities in two buildings of two storey design.

The development proposes the following building elements.

- **Dwelling Mix** - The development proposes 6 X 1 bedroom apartments and 6 X 2 bedroom single level designs in two storey development with outdoor parking.
- **Communal Amenities** - Ground level pedestrian accessways and waste storage.
- **Parking** – The plans indicate; nine (9) parking spaces that include three (3) accessible spaces.

Assessment Criteria

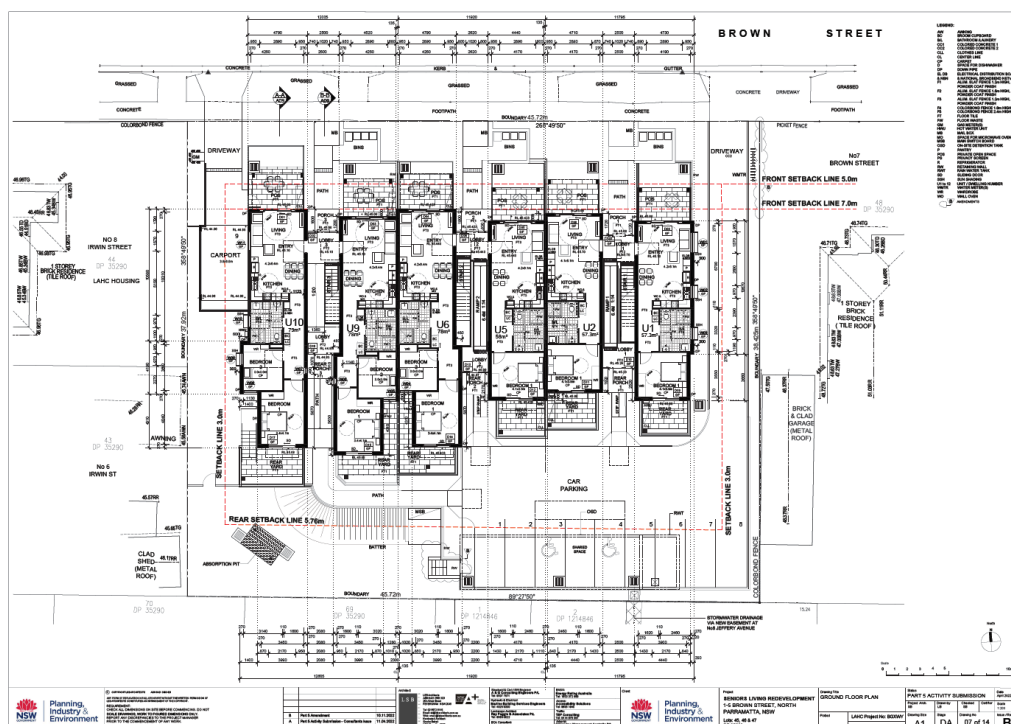
The assessment has considered the technical design standards of the State Environment Planning Policy (Housing) 2021 – Part 5 Housing for Seniors or People with a Disability (hereinafter *Seniors Housing*) and the relevant provisions of the Australian Standards.

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 2019 and related clauses D2.14, D3.2, D3.3 and D3.8 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.
- Seniors Living Urban Design Guideline and Clause 31 and draft Seniors Housing Design Guideline (2021).
- Good Design for Social Housing (2020).

DA Documentation - The appraised documents and plans relied upon for this report include:
Issue of DA architectural plans prepared by LSB Architects.

Drawing No	Revision	Title
A01 of 14	B	Cover Page
A02 of 14	A	Site Analysis & Demolition Plan
A03 of 14	B	Block Plan
A04 of 14	B	Fill and Cut Plan
A05 of 14	B	Site Plan with new drainage plan
A06 of 14	B	Site Plan
A07 of 14	B	Ground Floor Plan
A08 of 14	B	First Floor Plan
A09 of 14	B	Roof Plan
A10 of 14	B	Elevations
A11 of 14	B	Elevation & Sections
A12 of 14	A	Colour scheme
A13 of 14	A	Shadow Diagrams
A14 of 14	A	Cross Ventilation Diagram
5 Sheets	16/04/2021	Footpath Survey by Total Surveying Solutions



Site / Ground Floor 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;

- Part D3 of the Building Code of Australia (BCA).
- 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.

85 Development standards for hostels and independent living units

- (1) Development consent must not be granted for development for the purposes of a hostel or an independent living unit unless the hostel or independent living unit complies with the relevant standards specified in Schedule 4.
- (2) An independent living unit, or part of an independent living unit, located above the ground floor in a multi-storey building need not comply with the requirements in Schedule 4, sections 2, 7–13 and 15–20 if the development application is made by, or by a person jointly with, a social housing provider.

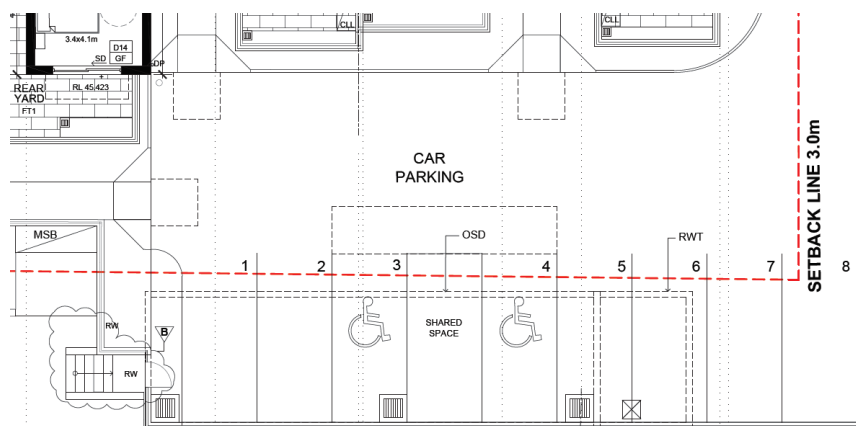
Note— Development standards concerning accessibility and usability for residential care facilities are not specified in this Policy. For relevant standards, see the *Building Code of Australia*.

- 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.
- Seniors Living Urban Design Guideline and Clause 31 and draft Seniors Housing Design Guideline (2021).
- Good Design for Social Housing (2020).

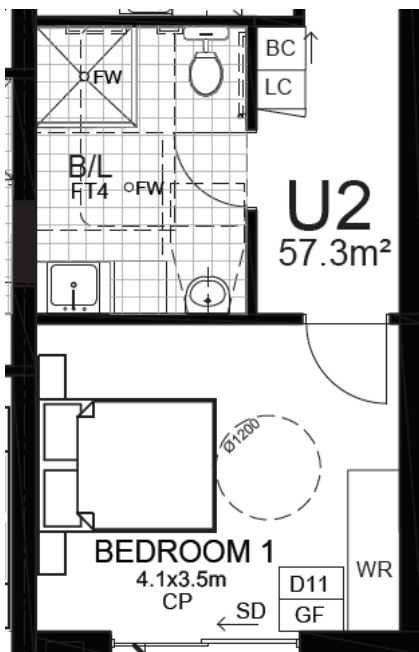
Clause	Item Assessment	Complies
Table D3.1 & Part D3.2 of the BCA	Site Entry Access	
	The principal site entrances on Brown Street provide 1:30 to 1:40 sloping walkways from the front boundary along common accessways to the three front entrances, which facilitate to access to individual dwelling entrances on the ground floor level in accordance with AS1428.1 to satisfy Part D3.2 of the BCA and clause 2 of the Seniors Housing Policy. Detailing of drainage grates shall be in accordance with AS1428.1.	YES
	The layout of the 1200mm width outdoor walkways, 2500 X 1800 entrance doorway landings and 2500mm width internal foyers will inherently provide Turning Areas in accordance with AS1428.1 to satisfy Parts D3.2 and D3.3 of the BCA.	YES
	To access the outdoor carpark the development proposes internal common corridors to be ramped to the rear foyer areas 1800-2500	YES

Clause	Item Assessment	Complies
	width X 1800 length with the doors positioned to achieve doorway circulation spaces almost level thresholds that will be graded in accordance with AS1428.1 to satisfy Parts D3.2 and D3.3 of the BCA. The access paths continue with either step ramps, walkways and kerb ramps to the outdoor communal carpark consistent with AS1428.1 to satisfy Parts D3.2 and D3.3 of the BCA.	
	With respect to turning and passing the entrance and rear porches, internal foyer areas provide several 1800mm width X 2000mm length areas that comply with AS1428.1 to satisfy Parts D3.2 and D3.3 of the BCA.	YES
Table D3.1 & Part D3.3 of the BCA	First Floor Access While the minimum requirements of Table D3.1 are satisfied by the ground floor accessibility for this class 2 residential development the common stairways are designed with two handrails with projections at landings as specified by AS1428.1 to satisfy Part D3.3 of the BCA. Details concerning step nosings, tactiles, slip resistance and luminance contrast shall be confirmed during construction documentation phase in accordance with AS1428.1, AS1428.4.1 as required by Parts D2.14, D3.3 and D3.8 of the BCA.	YES TBA
Schedule 4, Clause 2(1)(2)	Site Access – Wheelchair Access The development proposes accessible principal pedestrian entrances and intrasite walkways that enable wheelchair access to all ground floor dwellings and incorporate doorway landings with appropriate circulation spaces and accessible thresholds that comply with AS1428.1 to enter the dwellings and satisfy the SEPP HS.	YES
Clause 31 & Seniors Urban Design Guideline	Internal Site Amenity Pedestrian Accessways The development provides on-grade pedestrian walkways that have no interface with communal vehicular driveway movements at the ground plane to enable appropriate safe access for older people and people with disabilities consistent with the Guideline objectives. Communal Open Space The communal open spaces for resident access along the common walkways and communal lawn areas generally satisfies the Urban Design Guideline and D3.3 of the BCA.	YES YES
Parts D3.3, D2.14 and D3.8 of the BCA	Common Stairway The plans show three common lobby stairways that will be detailed to provide handrails on both sides and with extensions at landings for safer	YES Can Comply

Clause	Item Assessment	Complies
	access and luminance contrasting stair nosings in accordance with AS1428.1 to satisfy Part D3.3 and D2.14 of the BCA.	
	The stairways are appropriately set back from doorways to allow the installation of tactile indicators which will be confirmed at the construction certificate stage.	
Schedule 4 Clause 3	Security – Low level lighting along the entry pathways can be a condition of consent which can be confirmed at construction certificate stage.	YES at CC stage
Schedule 4 Clause 4	Letterboxes – The plans indicate that letterboxes will be installed adjacent to the front boundary, which will include a generally level 2000 X 2000 area adjacent to the letterboxes to comply with this requirement.	YES
Clause 108 (h)(j)	Parking – With respect to the numerical parking requirement of SEPP HS the development proposes 12 dwellings and 9 parking spaces, which easily satisfies the minimum SEPP HS requirements of 1 space per 5 dwellings for a social housing provider such as the NSW Land & Housing Corporation.	YES
Schedule 4 Clause 5	Private Car Accommodation – The development proposes a total of nine (9) car spaces within an outdoor car park and one (1) carport. The parking includes two (2) accessible spaces complying with AS2890.6 and one (1) complying with AS4299.	YES
	In accordance with the SEPP HS the development proposes:	
	<ul style="list-style-type: none"> 1 carport of 3800mm width X 6000mm length comply with AS4299, which can be detailed with 2500mm height clearance. 	YES
	<ul style="list-style-type: none"> 2 spaces; 3 and 4 of 2400mm width adjoining a 2400mm width shared area X 5400mm length accessible parking spaces, which satisfies the accessibility requirements of AS2890.6, clause 108(j) and schedule 4, clause 5(a) of the Housing for Seniors Policy. 	YES
	<ul style="list-style-type: none"> The unrestricted height over the parking spaces 3 and 4 satisfies the accessibility requirements of AS2890.6 and schedule 4, clause 5(a) of the Housing for Seniors Policy. 	YES



Clause	Item Assessment	Complies
	<ul style="list-style-type: none"> The provision of the (2) accessible spaces of 2400mm width adjoining a 2400m width shared area will comply with schedule 4, clause 5(b) of the Housing for Seniors Policy which specifies that 10% of the spaces shall comply with AS2890.6. 	YES
	<ul style="list-style-type: none"> There are no doors or gates that will impede vehicular access and hence there is no requirement for power operated operators 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;</p> <ul style="list-style-type: none"> The provision of the small outdoor parking area as discussed above with clear visual access for motorists and pedestrians combined with pedestrian pathways to the two buildings provides convenient access for motorists and generally safe areas for resident and visitor pedestrians. 	YES
Clause 31 & the Urban Design Guideline	<p>Internal Site Amenity</p> <p><i>Parking, garaging and vehicular circulation</i></p> <p>In review of the carparking it is my opinion that the design provides resident parking in close proximity to the units and building entries to enable adequate safe pedestrian access while the provision of accessible resident parking provides an appropriate outcome consistent with the SEPP HS and Urban Design Guideline.</p> <p>Visitor Parking – The development provides unreserved outdoor parking for eight (8) cars which available to visitor to satisfy the objectives of clause 31(b) and the Urban Design Guideline.</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
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>	Can Comply
		YES

Clause	Item Assessment	Complies	
	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 ASI428.1 to satisfy clause 7 of schedule 4.		
Schedule 4 Clause 8	<p>Main bedroom – The plans show a main bedroom on the accessible entry level on the ground floor 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 ASI428.1.</p> <p>Generally, the main bedrooms provide 1200mm minimum clearance at the foot of a queen bed and 1000mm minimum on each side with doorway access to the robe, ensuite and exit from the room that comply with ASI428.1.</p>	<div></div> <p>Example layout</p>	YES
Schedule 4 Clause 9	<p>Bathroom – The plans show a bathroom on the accessible entry level for the ground floor dwellings that will provide at least 3250mm X 2350mm with a layout that complies with AS4299/1428.1 and the provisions of the SEPP HS in the following manner:</p> <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,▪ Vanity washbasin that will have plumbing that can be adapted to comply with ASI428.1.▪ 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 ASI428.1.▪ Wall cabinet and mirror with an adjoining power outlet 600-1100mm height above the floor in accordance with AS4299.	<div><p>YES</p><p>YES at CC stage</p><p>YES at CC stage</p><p>YES at CC stage</p><p>YES at CC stage</p></div>	
Schedule 4 Clause 10	<p>Toilet – The plans show a toilet on the accessible entry level of every dwelling that provides a toilet pan in the corner of a room to enable future grabrails. While the inward swing door encroaches on the 1250mm X 900mm clearance in front of the pan there is ample internal area for wheelchair turning due to the absence of shower screens to achieve the objective of AS4299 to satisfy the SEPP HS. Alternatively, the shower and toilet pan positions can be mirrored.</p>	YES	

Clause	Item Assessment	Complies
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 ASI 428.1 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). Details regarding other aspects of adjustable cupboards and fitments as per the requirements of sub-paragraphs (d) to (j) which will be provided at construction certificate stage to satisfy the Housing for Seniors Policy.	YES At CC stage
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 the bathrooms which have appropriate 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

Clause	Item Assessment	Complies
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 ground floor 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.	YES
	Details the doors and doorway thresholds can be confirmed at a later date in accordance with AS1428.1 to satisfy clause 108(h) of the SEPP HS.	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

Site Related requirements

(iii) 1:8 for a maximum length of 1.5m at a time.

(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 3.0 klm to the centre of the Parramatta Shopping precinct which provides a wide variety of shops and services.

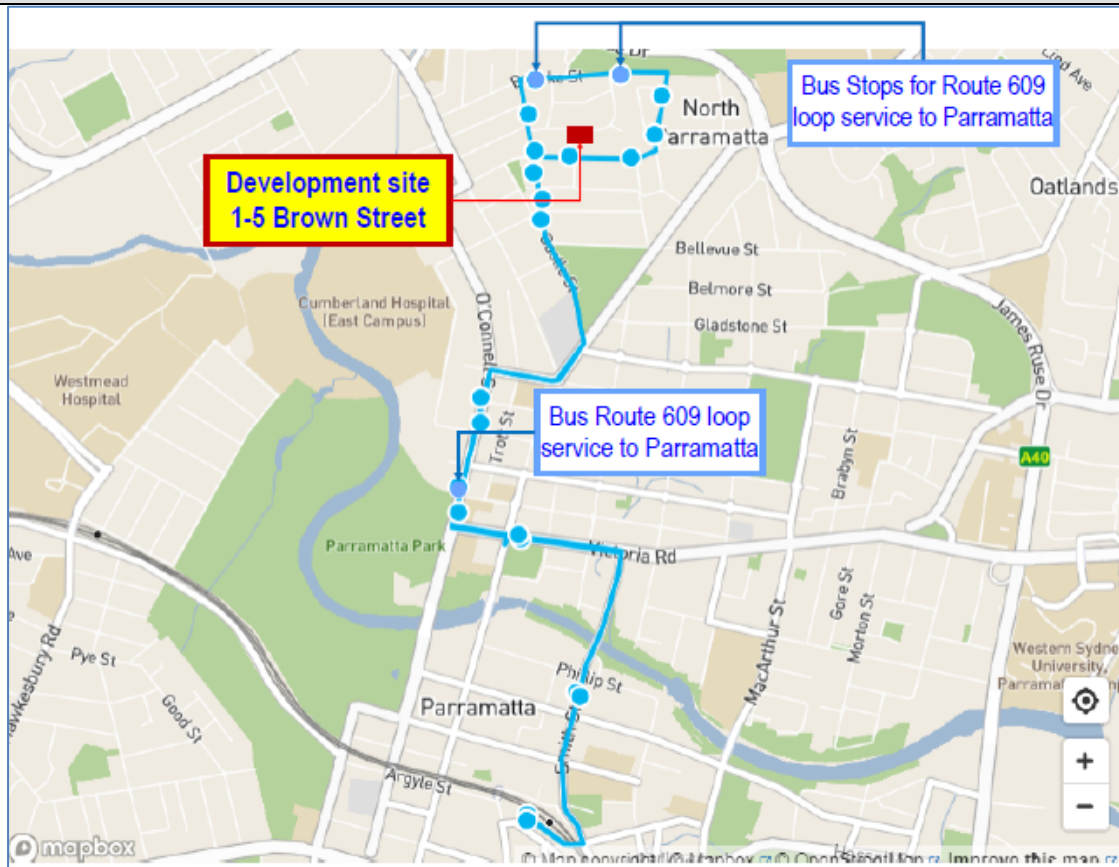
Therefore, the development relies upon the use of public transport to access shops and services as specified by Clause 93 (2) of the SEPP HS, which requires a 400 metre maximum distance from the site to a bus stop and upon arriving at a destination a further 400 metres maximum distance to reach the specified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

2.2 The site is located at I-5 Brown Street, North Parramatta in the midst of the North Parramatta Bus Route 609 loop which provides 4 bus stops within 400 metres of the development site;

- Bus stop 1 on Bourke Street east is 242 metres
- Bus stop 2 on Bourke Street west is 200 metres
- Bus stop 3 on Iron Street north is 234 metres
- Bus stop 4 on Iron Street south is 258 metres

Following a review of the footpath survey drawings it is evident the bus stop 2 provides the best and shortest access to the 609 bus route which operates a loop to Parramatta to satisfy Clause 93(2) and 93(3) of the SEPP HS.

Site Related requirements



609 Bus Route Maps3 – Parramatta to North Parramatta



Site Related requirements

- 2.3 The destination retail/commercial precinct at Parramatta CBD provides a comprehensive range of facilities and services to readily satisfy Clauses 93(1) and 93(5) of the SEPP HS.
- Bus stops within this retail/commercial precinct 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”.

Footpath access to Bus Stops, to shops and services

- 2.4 A review of the footpath along Brown Street, Irwin Street and Bourke Street to bus stop 2 on Bourke Street confirms gradual 1:14 to 1:30 gradients with kerb ramps being 1:8 to 1:10 over 1.5 metres at Brown and Irwin Streets and 1:25 at Bourke and Irwin Streets which comply with Clause 93(3) and (4) of the SEPP HS.



Brown Street & Irwin Street footpaths and kerb ramps



Bourke Street & Irwin Street footpaths and kerb ramps

- 2.5 The existing bus shelter and boarding point complies with ASI 428.1 and the DDA Transport Standard to satisfy the SEPP HS.



Bourke Street footpath and bus stop

Site Related requirements

2.6 Destination Bus Stops

With respect to the accessibility of the destination bus stops at the Parramatta rail/bus interchange on Argyle Street and intermediate stops on Smith Street, Victoria Road, O'Connell Street, Iron Street shopping strip and Prince Street it is evident that the 609 bus route facilitates appropriate access to footpath infrastructure consistent with clause 93(4) and (5) of the SEPP HS.

Bus Route Timetable

2.7 Bus Route Frequency

With respect to requirements of clause 93(2) of the SEPP HS the timetable for the 609 route confirms a total of 21 services daily, Monday to Friday that travel to the Parramatta shopping precinct with;

- a) 14 services depart from the Bourke Street stops daily with 9 services between 8.00am and noon Mon–Fri travelling to Parramatta; and
- b) 5 return services to the Bourke Street bus stops between noon and 6.00pm from Parramatta.

2.8 The timetable also confirms that the abovementioned bus route provides 9 services on Saturday and 3 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 to satisfy clause 93 (2) and (5) of the SEPP HS.

Scope and adequacy of facilities and services

2.9 **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 Parramatta.

2.10 **Parramatta Shopping Centre** is a large regional centre with a bus interchange at the railway station which is wheelchair accessible.

Route 609 buses operate from the Argyle Street interchange, Smith Street, Victoria Road, and O'Connell Street where there are footpaths, kerb ramps and signalized crossings throughout the Parramatta CBD that facilitate appropriate access to access shops and services in accordance with Clauses 93(1)(3)(4)(5) of the SEPP HS.

2.11 **North Parramatta Shops** are located on Iron Street approximately 50-250 metres from the bus stop and there is a 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.

Site Related requirements



2.12 Other Services

In addition to the abovementioned retail/commercial precincts there are a wide range of health/medical, recreational, social and cultural services within the surrounding areas of Parramatta to confirm that the development is well located and provides an appropriate range of shops and services for future residents to fully satisfy Clauses 93(1) and (5) of the SEPP HS.

Summary of Access to Services, Bus Stops and Bus Services

2.13 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 and destinations;
- The available bus services provided by bus Route 609 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 609 bus route and destination shopping centres and services at Parramatta and North Paramatta 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 made by the NSW Land and Housing Corporation being a social housing provider 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 and guidelines in the following manner;

- The development demonstrates compliance with the minimum requirements of visitability by virtue of 100% of the independent living units on the ground floor 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, part D3 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, part D3 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 for a development made by the Land and Housing Corporation being a social housing provider.
- The development will facilitate access to shops and services through the provision of a **transport service** (as detailed in Appendix A) that will travel from the subject bus stops in Bourke Street to Parramatta and North Parramatta shopping precincts and recreational services at least fourteen (14) 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 Parramatta and North Parramatta 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.

I am also of the view that the proposed development is designed in a manner consistent with the Seniors Housing Design Guideline (draft 2021) Good Design Principles for Social Housing by satisfying the associated goals and principles of; healthy environments and quality homes that are good for tenants with a sense of belonging for our communities.



Mark Relf
Access Consultant (ACAA)

Appendix A – Bus Services

609**Parramatta to North Parramatta
(Loop Service)**

Valid from: 20 Dec 2021

Creation date: 11 Jan 2022

NOTE: Information is correct on date of download.

Monday to Friday									
Parramatta Station	-	-	-	-	-	-	08:52	09:53	10:53
Parramatta Leagues Club, O'Connell St, Parramatta	-	-	-	-	-	-	09:02	10:02	11:02
Prince St opp Mary St, North Parramatta	06:00	06:30	07:00	07:30	08:05	08:35	09:05	10:05	11:05
Gloucester Ave opp Courtlands Village, North Parramatta	06:01	06:31	07:01	07:31	08:07	08:37	09:07	10:07	11:07
Iron St at Prince St, North Parramatta	06:03	06:33	07:03	07:34	08:11	08:41	09:11	10:11	11:11
Our Lady of Mercy College, O'Connell St, Parramatta	06:08	06:38	07:09	07:40	08:17	08:47	09:15	10:15	11:15
Parramatta Station	06:16	06:46	07:19	07:52	08:30	09:00	09:27	10:25	11:25
Monday to Friday									
Parramatta Station	11:53	12:53	13:53	14:54	15:35	16:05	16:35	17:05	17:35
Parramatta Leagues Club, O'Connell St, Parramatta	12:02	13:02	14:02	15:04	15:45	16:15	16:45	17:17	17:47
Prince St opp Mary St, North Parramatta	12:05	13:05	14:05	15:07	15:48	16:18	16:48	17:20	17:50
Gloucester Ave opp Courtlands Village, North Parramatta	12:07	13:07	14:06	15:08	15:49	16:19	16:49	17:21	17:51
Iron St at Prince St, North Parramatta	12:11	13:11	14:10	15:12	15:53	16:23	16:52	17:24	17:54
Our Lady of Mercy College, O'Connell St, Parramatta	12:15	13:15	14:13	15:15	15:56	-	-	-	-
Parramatta Station	12:25	13:25	14:23	15:26	16:07	-	-	-	-
Monday to Friday									
Parramatta Station	18:05	18:35	19:05						
Parramatta Leagues Club, O'Connell St, Parramatta	18:17	18:46	19:16						
Prince St opp Mary St, North Parramatta	18:20	18:49	19:19						
Gloucester Ave opp Courtlands Village, North Parramatta	18:21	18:50	19:20						
Iron St at Prince St, North Parramatta	18:24	18:53	19:23						
Saturday									
Parramatta Station	08:50	09:50	10:50	11:50	12:50	13:50	14:50	15:50	16:50
Parramatta Leagues Club, O'Connell St, Parramatta	08:58	09:58	10:59	11:59	12:59	13:59	14:59	15:58	16:58
Prince St opp Mary St, North Parramatta	09:01	10:01	11:02	12:02	13:02	14:02	15:02	16:00	17:00
Gloucester Ave opp Courtlands Village, North Parramatta	09:03	10:03	11:04	12:04	13:04	14:04	15:04	16:02	17:02
Iron St at Prince St, North Parramatta	09:06	10:06	11:07	12:07	13:07	14:07	15:07	16:04	17:04
Our Lady of Mercy College, O'Connell St, Parramatta	09:10	10:10	11:11	12:11	13:11	14:11	15:11	16:08	17:08
Parramatta Station	09:19	10:19	11:20	12:20	13:20	14:20	15:20	16:17	17:17
Sunday & Public Holidays									
Parramatta Station	09:50	13:50	15:50						
Parramatta Leagues Club, O'Connell St, Parramatta	09:58	13:59	15:58						
Prince St opp Mary St, North Parramatta	10:01	14:02	16:00						
Gloucester Ave opp Courtlands Village, North Parramatta	10:03	14:04	16:02						
Iron St at Prince St, North Parramatta	10:06	14:07	16:04						
Our Lady of Mercy College, O'Connell St, Parramatta	10:10	14:11	16:08						
Parramatta Station	10:19	14:20	16:17						

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.

