

# FORMIGA1

## Access Compliance Report

**Project:** S231104 - New Seniors Housing Development

**Location:** 17-27 Hardwicke Street, Riverwood NSW 2210

**Completed For:** Custance Associates







**On Behalf of:** Land and Housing Corporation

**Date:** 15<sup>th</sup> August 2024

**Revision Number:** C

## Table of Contents

<i>Page Description</i>	<i>Page Number</i>
<b>Cover Page</b>	<b>1</b>
<b>Table of Contents</b>	<b>2</b>
<b>Revision Schedule</b>	<b>3</b>
<b>1. Introduction</b>	<b>4</b>
<b>2. Purpose</b>	<b>4</b>
<b>3. Scope, Limitations and Exclusions</b>	<b>4</b>
<b>4. Compliance Methodology</b>	<b>4</b>
<b>5. Building Compliance</b>	<b>5</b>
5.1. Principal Building Characteristics	5
5.2. Building Code of Australia Access Assessment	5
5.3. SEPP (Housing) 2021 - Schedule 4	9
5.4 SEPP (Housing) Clause 93 Compliance Assessment	18
<b>6. Conclusion</b>	<b>19</b>

Revision Schedule				
Revision	Date	Report Information		
A	09/02/2024	Reason for Revision	Initial report	
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This report has been prepared and checked by the experienced team at Formiga1. For any queries regarding this report, please contact our office.

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## 1. Introduction

Formiga1 has been engaged by Custance to provide a review of access requirements and SEPP (Housing) 2021 - Schedule 4 for the proposed seniors living multi storey development.

The proposal to construct thirty Single Occupancy Units across three storey building has a number of access considerations to be addressed. These access requirements are for people with disabilities under the Access to Premises Standard 2010 and the Building Code of Australia 2022, as well as requirements under the State Environmental Planning Policy (Housing) 2011.

## 2. Purpose

The purpose of this report is to provide guidance as to how building access compliance can be achieved in accordance with the Environmental Planning and Assessment Regulation 2021. We understand that the proposed development is subject to a Development Application and this report will form part of the DA package provided to Council for their determination.

This report seeks to outline the basis from which performance solutions can be developed for a number of access aspects. An exhaustive list of variations to individual prescriptive measures will need to be completed as the design is further developed and performance solutions compiled.

## 3. Scope, Limitations and Exclusions

The scope of this assessment is limited to accessibility requirements for the proposed work and any relevant upgrade requirements under the Access to Premises Standard 2010. This report does not constitute an assessment of or address all safety provisions enforced under the BCA or Local Government Act (eg. Occupational Health and Safety Act, Water, drainage, gas, telecommunications and electricity supply authority requirements, etc.) The application of the Disability (Access to Premises) Standard 2010 has been assessed as part of this report, however, no other provisions of the Disability Discrimination Act 1992 have been reviewed.

## 4. Compliance Methodology

The Environmental Planning and Assessment Regulation 2021 outlines the approval processes for different types of buildings and the method by which they are assessed. These works have been assessed against the Building Code of Australia 2022 that is currently enforced. However, as a requirement of the EP&A Regulation, Section 19, the final design for approval is to be assessed against the BCA enforced at the date of the application for the Construction Certificate. Therefore, the advice provided in this report may become outdated if a revised BCA is released before the Application for a Construction Certificate is received.

The application of the Disability (Access to Premises) Standard and provision for access for people with disabilities will need to be addressed against the current BCA. As this is based in Commonwealth Legislation, State regulatory transitional provisions do not apply and compliance with the current code is required. However, the Access to Premises Standard 2010 outlines that compliance with the current code can be onerous in certain circumstances. In these circumstances, unjustifiable hardship can be argued in a Performance Solution.

Please note that the Deemed to Satisfy Provisions of the BCA are not the only method of compliance and a Performance Solution is expected as part of any work in any building. Generally, compliance with BCA Part D4 and Housing SEPP 2011 will be required throughout.

## 5. Building Compliance

The assessment has been based on the following plans:

- Architectural Plans by Custance, Project Number 3420, Dated 06.09.2024

### 5.1. Principal Building Characteristics

Aspect	Building
Existing Classification	Six existing single storey residential buildings - 1a
Proposed Classification	Independent Living Units - Seniors Housing - Class 2
Rise in Storeys	3 Storeys
Effective Height	6.0m
Construction Type	Type A

### 5.2. Building Code of Australia Access Assessment

Requirement	Comply	Comments
<b>Part D3 Construction of Exits</b>		
<b>D3D16</b> Door thresholds throughout the building must not incorporate a step, except where a threshold ramp with a maximum gradient of 1:8 is provided for a maximum height of 35mm to external doors.	YES	Plans show compliance
<b>Part D4 Access for People with a Disability</b>		
<b>D4D2</b> From a pedestrian entrance required to be accessible to at least 1 floor containing sole-occupancy units and to the entrance doorway of each sole-occupancy unit located on that level.	YES	Access is provided to Ground Floor SOUs directly, and to all other levels utilising two provided lifts.
To and within not less than 1 of each type of room or space for use in common by the residents, including a cooking facility, sauna, gymnasium, swimming pool, common laundry, games room, TV room, individual shop, dining room, public viewing area, ticket purchasing service, lunch room, lounge room, or the like.	YES	Plans show compliance.
Where a ramp complying with AS 1428.1 or a passenger lift is installed— <b>a.</b> to the entrance doorway of each sole-occupancy unit; and <b>b.</b> to and within rooms or spaces for use in common by the residents, located on the levels served by the lift or ramp.	YES	Passenger lift is provided to all three storeys.
Accessible Sole-occupancy Units	N/A	As the proposed building is Class 2 no accessible SOU requirements are applicable

<b>D4D3 (1)</b> Access to the building is required to be provided from: <ol style="list-style-type: none"> <li>The main pedestrian entry points at the allotment boundary, and</li> <li>Another accessible building connected by a pedestrian link, and</li> <li>Any required accessible carparking space on the allotment.</li> </ol>	YES  N/A  YES	Access is shown to be provided,  One building is proposed as part of the scope of work.  Updated plans show provision of sufficient door circulation.
<b>D4D3 (2)</b> An accessway must be provided through the principal pedestrian entrance and through not less than 50% of all pedestrian entrances.  As the building is >500m <sup>2</sup> , a pedestrian entrance that is not accessible must not be located more than 50m from an accessible entrance.	YES          YES	Accessway is provided through more than 50% pedestrian entrances with note that once circulation non-compliance to East Building is addressed this facility will have 100% accessible pedestrian entrances.          Compliance is shown
<b>D4D4 (a)</b> Every ramp or stairway (excluding fire-isolated ramps and stairways or external stairs in lieu of fire-isolated stairways) in accessible areas must comply with AS1428.1. This includes the provisions of: <ul style="list-style-type: none"> <li>Handrails to both sides of the stairway,</li> <li>Handrail mounting heights 865-1000mm,</li> <li>300mm handrail extensions,</li> <li>Opaque risers,</li> <li>Stair nosing luminance contrast and dimensions,</li> <li>TGSIs,</li> <li>All other provisions of AS1428.1, Clauses 11 and 12.</li> </ul> However, fire-isolated stairways and external stairs in lieu must still comply with Clause 11.1(f) and (g) of AS1428.1 for nosing construction and Clause 12 of AS1428.1 for handrail construction. This includes the provisions of: <ul style="list-style-type: none"> <li>Handrail mounting heights 865-1000mm,</li> <li>Stair nosing luminance contrast and dimensions,</li> <li>All other provisions of AS1428.1, Clause 12.</li> </ul>	YES          YES  YES  YES  TBC  TBC  YES  YES  N/A	Compliance is achievable          Handrails are shown on the plans  Compliance is shown on the plans  Compliance is shown on the plans  Insufficient detail provided  Insufficient detail provided  Compliance is shown on the plans  Compliance is shown on the plans  No fire isolated stairs are required for this project.
<b>D4D4(b)</b> Every passenger lift must comply with BCA E3D7.	TBC	Insufficient details have been included at this stage thus compliance of this item could not be assessed.

<b>D4D4(c)(i)</b> Passing bays must be provided at maximum 20m intervals and comply with AS1428.1.	N/A	Passing bays are not required as line of sight is present within internal corridor
<b>D4D4(c)(ii)</b> Turning spaces must be provided at maximum 20m intervals and within 2m of a dead end passage in accordance with AS1428.1 (ie. 1540mm x 2070mm).	Yes	Turning spaces are provided throughout.
<b>D4D4(g) and (h)</b> Carpet pile height shall not exceed 11mm and the backing thickness shall not exceed 4mm.	TBC	Insufficient details have been included at this stage thus compliance of this item could not be assessed.
<b>D4D5</b> It is not necessary to provide access to the following areas: a. An area which would be inappropriate because of its particular use, or b. An area that would pose a health or safety risk for people with a disability, or c. A path of travel to a space exempted in (a) or (b).	N/A	No such areas were identified on the provided plans.
<b>D4D6</b> Accessible carparking spaces must be constructed in accordance with AS2890.6, generally as follows: <ul style="list-style-type: none"> <li>2400mm x 5400mm car space,</li> <li>2400mm x 5400mm shared space next to car space,</li> <li>Bollard to shared space,</li> <li>Hatching to shared space,</li> <li>Signage to car space (max 1200mm x 1200mm).</li> </ul>	YES YES    YES YES YES	Plans show compliance, Current plans do not clearly identify the location of shared spaces to be provided. This is assumed to be a drafting error and shared spaces are to be provided as shown on previously assessed plans.  Plans show compliance, Plans show compliance, Plans show compliance,  Please note that BCA does not require Class 2 buildings to be provided with accessible parking spots, see our SEPP assessment for further comments on provision of accessible parking
<b>D4D7</b> Braille signage in accordance with BCA Specification 15 (ie. between 1200-1600mm above the floor, on the latch side of the door and where this is not possible, located on the door itself, etc.).  Required signage is as follows: <ul style="list-style-type: none"> <li>Exits - Each exit door required to be provided with a sign under BCA E4.5,</li> <li>Directional accessible entrance signage,</li> <li></li> </ul>	TBC	Insufficient details have been included at this stage thus compliance of this item could not be assessed.

<b>D4D8</b> Hearing Augmentation systems in accordance with BCA D4D8.	N/A	No inbuilt amplification system is proposed.
<b>D4D9</b> Tactile ground surface indicators (TGSIs) are to be provided to all stairways, escalators and ramps (other than fire-isolated stairways and ramps, step ramps, kerb ramps or swimming pool ramps).  TGSIs are to be provided in areas with an overhead obstruction less than 2m above the floor level (other than a doorway) and/or where an accessway meets a vehicular way in the absence of a suitable barrier.	YES  NO  YES	Plans show compliance,  Elevation plans provided for the updated assessment show a number of areas where the external stairs create issues with overhead obstructions. Plans do not include sufficient detail to clearly show that a barrier is to be provided in these areas. Please note the requirements of stair handrail extension and 1m width to be provided to discharge pathways. <b>Design team provided clarification that a guard rail will be provided to achieve DtS compliance with this item.</b>
<b>D4D12</b> Ramps must not be connected to have a combined vertical rise of more than 3.6m.	YES	Ramps do not have vertical rise of more than 3.6m
<b>D4D13</b> All glazing to accessways, where there is no chair rail, handrail or transom, must be clearly marked with a solid contrasting line in accordance with AS1428.1 if the glazing is capable of being mistaken for a doorway opening.	TBC	Insufficient details have been included at this stage thus compliance of this item could not be assessed.
In areas required to be accessible, the following are to be considered: <b>a.</b> Accessways must be a minimum 1m width and increased for door circulation, turning areas and passing areas are required,	YES	The required 1m width is achieved throughout the common areas. Please see SEPP assessment for any non-compliances within the SOUs.
<b>b.</b> Doors shall provide a minimum 850mm clear opening width,	YES	Compliance is shown on the plans
<b>c.</b> Door circulation spaces in accordance with AS1428.1, Clause 13.3,	YES	Compliance is shown on the plans
<b>d.</b> Luminance contrast, circulation spaces and door hardware in accordance with AS1428.1 to all doors in all areas that have not been exempted under BCA D3.4 as mentioned above,	TBC	Insufficient details have been included
<b>e.</b> Floor grates, door mats, sliding door tracks and abutment surface tolerances shall comply with AS1428.1,	TBC	Insufficient details have been included
<b>f.</b> Light switches in accessible paths of travel shall be located between the heights of 900-1,100mm and not less than 500mm from internal corners,	TBC	Insufficient details have been included



<p><b>g.</b> In accessible sanitary compartments and accessible SOUs, light switches shall be a minimum dimension of 30x30mm for rocker action or toggle switches or a minimum diameter of 25mm for push-pad switches. GPOs shall be located between the heights of 600-1100mm above the floor and 500mm from an internal corner.</p>	TBC	Insufficient details have been included
<b>Part E3 Lift Installations</b>		
<p><b>E3D7</b> Every passenger lift must have accessible features in accordance with BCA Table E3.6b (eg. minimum lift car dimensions of 1100 x 1400mm, handrails, door opening width, control buttons, etc. in accordance with AS1735.12)</p>	TBC	Insufficient details have been included at this stage thus compliance of this item could not be assessed. Proposed lift shafts are noted to contain sufficient space to be able to fit a compliant lift car.
<b>Part F4 Sanitary and Other Facilities</b>		
<p><b>F4D5 (a)</b> Unisex sanitary facilities are to be provided in every accessible SOU.</p>	N/A	Accessible SOUs are not required for Class 2 SOUs.
<p><b>F4D6</b> Where sanitary compartments serve areas that are not exempt under D3.4, not less than 50% of the banks must contain an accessible WCs.</p>	N/A	No public sanctuary compartments are being proposed as part of the scope for this project.
<p><b>F4D5 (c)</b> Where a bank of WCs contain one or more WC in addition to the accessible WC, separate ambulant WCs are required to be provided (1x for each gender or 1x unisex).</p>	N/A	No public sanctuary compartments are being proposed as part of the scope for this project.
<p><b>F4D5 (g)</b> Where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right handed mirror image facilities must be provided evenly.</p>	N/A	No public sanctuary compartments are being proposed as part of the scope for this project.

### 5.3. SEPP (Housing) 2021 - Schedule 4

The State Environmental Planning Policy (Housing) 2021 outlines a number of measures for the design and construction of Hostels and Self-contained Dwellings that provide residential accommodation for seniors and people with a disability. The measures are in addition to the requirements of the BCA and should be addressed as part of the design. The following table contains the Schedule 3 assessment of the SEPP.

**NOTE:** These provisions are additional to the requirements of BCA Part D3.

**NOTE:** SEPP requires compliance with Australian Standard AS1428.1. Schedule 10 of the Housing SEPP states that the standard applicable is the one which is currently published in the Building Code of Australia. Current BCA notes in Schedule 2 that AS1428.1-2009 is the one applicable thus that is the standard year used in this assessment.

Requirement	Comply	Comments
<b>Siting Standards</b>		
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 AS1428.1) to an adjoining public road.	N/A	Site does not include gradients less than 1:10.
<p>If the whole of the site does not have a gradient of less than 1:10:</p> <p>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</p> <p>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.</p>	NO	Site does not contain gradients less than 1:10
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.	Yes	Compliance is shown on the plans
<b>Letterboxes</b>		
Must be situated on a hard standing area and have wheelchair access and circulation by a continuous accessible path of travel (within the meaning of AS1428.1), and	YES	Plans show compliance
Must be lockable by a lock that faces a wheelchair accessible path	TBC	Insufficient detail is provided to assess this item.
If a structure contains multiple letterboxes, the structure must be in a prominent location.	YES	Structure is located in prominent location
At least 20% of the letterboxes on the site must be more than 600mm and less than 1,200mm above ground level (finished).	TBC	Insufficient detail is provided for assessment. Compliance can be achieved for this item.
<b>Car Parking</b>		
<p>If parking spaces attached to or integrated with a class 1 building under the Building Code of Australia are provided for use by occupants who are seniors or people with a disability, at least 1 parking space must—</p> <p>(a) be at least 3.2m wide, and</p> <p>(b) be at least 2.5m high, and</p> <p>(c) have a level surface with a maximum gradient of 1:40 in any direction, and</p> <p>(d) be capable of being widened to 3.8m without requiring structural modifications to a building.</p>	N/A	Building is not Class 1
<p>If parking spaces associated with a class 1, 2 or 3 building under the Building Code of Australia are provided in a common area for use by occupants who are seniors or people with a disability, the following applies—</p> <p>(a) for a parking space not in a group—the parking space must comply with AS/NZS 2890.6,</p> <p>(b) for a group of 2–7 parking spaces—</p>	YES	SEPP Section 108(2)(j) requires provision of 6 parking spaces for 29 dwellings. Plans show that all 6 of those spaces are designed to be accessible. Additional parking spaces provided for the use of

<p>(i) at least 1 of the parking spaces must comply with AS/NZS 2890.6, and</p> <p>(ii) 50% of the parking spaces must—</p> <p>(A) comply with AS/NZS 2890.6, or</p> <p>(B) be at least 3.2m wide and have a level surface with a maximum gradient of 1:40 in any direction,</p> <p>(c) for a group of 8 or more parking spaces—</p> <p>(i) at least 15% of the parking spaces must comply with AS/NZS 2890.6, and</p> <p>(ii) at least 50% of the parking spaces must—</p> <p>(A) comply with AS/NZS 2890.6, or</p> <p>(B) be at least 3.2m wide and have a level surface with a maximum gradient of 1:40 in any direction.</p>		visitors are noted.
To avoid doubt, a parking space that complies with AS/NZS 2890.6 is only counted toward 1 of the requirements in subsection (2)(b)(i) or (ii) or (c)(i) or (ii).	NOTE	Clarification to the above
At least 5% of any visitor parking spaces must comply with AS/NZS 2890.6.	YES	Compliance is shown on the plans as of the 6 provided accessible parking spaces 1 can be assigned as visitor accessible parking spot.
A parking space required by this section to comply with AS/NZS 2890.6, other than a visitor parking space, is not required to include the international symbol of access.	N/A	All accessible parking spaces are shown to be provided with compliant signage
<b>If multiple parking spaces are accessible by a common access point, the access point must be secured by a power-operated garage door, vehicle gate, vehicle barrier or similar device.</b>	<b>NO</b>	<b>No gate or barrier is shown provided to the parking access point</b>
A parking space, other than a parking space under subsection (6), must be—	N/A	Above clause is applicable
<p>(a) secured by a power-operated door, or</p> <p>(b) capable of accommodating the installation of a power-operated door, including by having—</p> <p>(i) access to a power point, and</p> <p>(ii) an area for motor or control rods for a power-operated door.</p>		
A requirement in this section for a parking space to comply with AS/NZS 2890.6 extends to the associated shared area within the meaning of AS/NZS 2890.6.	YES	Plans show compliance
In this section, a parking space is in a <i>common area</i> if it is not attached to or integrated with a hostel or independent living unit	NOTE	Clarification
<b>Accessible Entry (Every Entry into the Dwelling)</b>		
<p><b>The main entrance to a dwelling must have—</b></p> <p>(a) a clear opening that complies with AS 1428.1, and</p>	YES	Compliance for clear opening is shown on the plans
<p>(b) a circulation space in front of the door and behind the door that complies with AS 1428.1.</p> <p>This section does not apply to an entry for employees.</p>	YES	Compliance is shown on the provided plans

<b>Interior General</b>		
Internal doorways must have a minimum clear opening that complies with AS1428.1.	YES	Plans show compliance
Internal corridors must have a minimum unobstructed width of 1,000mm.	YES	Plans show compliance
<p>Circulation space at approaches to internal doorways must comply with AS1428.1.</p> <p>The circulation spaces in front of and behind an internal doorway in the following areas must comply with AS 1428.1—</p> <ul style="list-style-type: none"> <li>(a) a kitchen,</li> <li>(b) a laundry,</li> <li>(c) a bathroom,</li> <li>(d) a toilet,</li> <li>(e) a bedroom,</li> <li>(f) a living area,</li> <li>(g) the main area of private open space.</li> </ul> <p>To avoid doubt, subsection (3)(b) does not apply to laundry facilities in a cupboard.</p>	YES	Plans show compliance
<b>Bedroom (At Least One Bedroom on the Ground Floor in Each Dwelling)</b>		
<p>An area sufficient to accommodate a wardrobe and a bed sized as follows:</p> <ul style="list-style-type: none"> <li>a. In the case of a dwelling in a hostel—a single-size bed,</li> <li>b. In the case of a self-contained dwelling—a queen-size bed, and</li> </ul>	YES	Queen size beds shown to at least one bedroom per SOU
<p>A clear area for the bed of at least:</p> <ul style="list-style-type: none"> <li>a. 1,200mm wide at the foot of the bed, and</li> <li>b. 1,000mm wide beside the bed between it and the wall, wardrobe or any other obstruction, and</li> </ul>	YES	Plans show compliance
2 double general power outlets on the wall where the head of the bed is likely to be, and	TBC	Insufficient detail is provided for assessment. Compliance can be achieved for this item.
At least one general power outlet on the wall opposite the wall where the head of the bed is likely to be, and	TBC	Insufficient detail is provided for assessment. Compliance can be achieved for this item.
<b>Bathroom (At Least One Bathroom on the Ground Floor in Each Dwelling or on a floor servicers by a private passenger lift accessible only from inside the dwelling)</b>		
A slip-resistant floor surface that achieves a minimum rating of P3 in accordance with AS 4586—2013	TBC	Insufficient detail is provided for assessment. Compliance can be achieved for this item.
A washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS1428.1,	YES	Provided plans show limited detail of the proposed washbasin with indicative location noted. With space provided clearances to the washbasin can achieve compliance either currently or in the future.

<p>A shower that—</p> <p>(i) is accessible without a shower-hob or step, and</p> <p>(ii) complies with the requirements of AS 1428.1 for the entry, circulation space, floor gradient to the wastewater outlet and location of the mixer tap, and</p> <p>(iii) is in the corner of a room, and</p> <p>(iv) has a wall capable of accommodating the installation of AS 1428.1 compliant:</p> <ul style="list-style-type: none"> <li>• a grab rail,</li> <li>• portable shower head with supporting grab rail</li> <li>• shower seat,</li> </ul>	TBC	Insufficient information provided to assess if hobless showers are being proposed
	YES	Plans show compliance
	YES	All showers are located in corners.
	YES	Showers are shown to be provided with seat, grab rails and portable shower head
A wall cabinet with shelving illuminated by an illumination level of at least 300 lux,	TBC	Insufficient information is provided but this item can be compliant.
A double general power outlet in an accessible location, in accordance with AS 1428.1.	TBC	Insufficient information is provided but this item can be compliant.
<b>Toilet</b>		
At least one toilet in a dwelling must be located on—	YES	Proposed SOUs are single storey
(a) the same floor as the entry to the dwelling, or		
(b) a floor serviced by a private passenger lift accessible only from inside the dwelling.		
The toilet must have the following—		
(a) a water closet pan—	YES	Plans show compliance,
(i) in the corner of the room, and	YES	Plans show compliance,
(ii) with a centreline set-out in accordance with AS 1428.1,	YES	Toilet pans are shown to be positioned in a compliant location
(b) a circulation space in front of the water closet pan that is—	YES	Plans show compliance
(i) at least 1,200mm long and at least 900mm wide, and		
(ii) clear of door swings and fixtures, other than a toilet paper dispenser or grab rails,		
(c) a circulation space around the water closet pan that complies with AS 1428.1,	YES	Plans show compliance
(d) a slip resistant floor surface that achieves a minimum rating of P3 in accordance with AS 4586—2013	TBC	Insufficient information is provided but this item can be compliant.
(e) a wall capable of accommodating the installation of a back rest and grab rail that will comply with AS 1428.1.	YES	Plans show that backrest and and grab rails are to be provided throughout
A removable shower screen may be located in the circulation space around the water closet pan	TBC	Insufficient information is provided but this item can be compliant.
<b>Surface Finishes</b>		
Balconies and external paved areas must have slip-resistant surfaces and comply with—	TBC	Insufficient information is provided but this item can be compliant.
(a) the Building Code of Australia, or		

(b) the Standards Australia Handbook SA HB 198:2014, Guide to the specification and testing of slip resistance of pedestrian surfaces, published on 16 June 2014.		
<b>Door Hardware</b>		
Door handles and hardware for all doors, including entry doors and external doors, must comply with AS 1428.1.  To avoid doubt, subsection (1) does not apply to cabinetry.	TBC	Insufficient information is provided but this item can be compliant.
<b>Switches and power points</b>		
Switches and power points must— (a) comply with AS 1428.1, or (b) be capable of complying with AS 1428.1 through future adaptation.  (2) The above does not apply to— (a) remote controls, or (b) power points likely to serve appliances that are not regularly moved or turned off.	TBC	Insufficient information is provided but this item can be compliant.
<b>Private passenger lifts</b>		
(1) This section applies to a private passenger lift that is required by this schedule to be accessible only from inside a particular dwelling.	N/A	N/A
The private passenger lift must— (a) be at least 1,100mm wide and at least 1,400mm long, measured from the lift car floor, and (b) have a clear indoor landing on all floors serviced by the lift, other than the floor on which the main area of private open space is located, at least 1,540mm long and at least 2,070mm wide, and (c) have controls that comply with— (i) AS 1735.12:2020, Lifts, escalators and moving walks, Part 12: Facilities for persons with disabilities, published on 26 June 2020, or (ii) AS 1735.15:2021, Lifts, escalators and moving walks, Part 15: Safety rules for the construction and installation of lifts — Special lifts for the transport of persons and goods — Vertical lifting platforms intended for use by persons with impaired mobility, published on 23 July 2021.	N/A	N/A
The width of the door opening of the private passenger lift must be at least 900mm.	N/A	N/A
The private passenger lift must not be a stairway platform lift.	N/A	N/A
<b>Bedroom</b>		
At least one bedroom in an independent living unit that complies with this schedule, section 7 must be located on— (a) the same floor as the entry to the unit, or (b) a floor serviced by a private passenger lift accessible only from inside the unit.	YES	All proposed SOUs are single storey.

Living Room and Dining Room		
A living room in an independent living unit must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling	YES	All proposed SOUs are single storey.
The living room must have— (a) a circulation space that— (i) is clear of all fixtures, and (ii) has a diameter of at least 2,250mm, and  (b) a telecommunications or data outlet adjacent to a general power outlet.	YES  TBC	Provided plans show compliance throughout  Insufficient information is provided but this item can be compliant.
Main area of private open space		
The main area of private open space for an independent living unit must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling.	YES	All proposed SOUs are single storey.
Kitchen		
A kitchen in an independent living unit must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling.	YES	All proposed SOUs are single storey.
The kitchen must have a circulation space with a diameter of at least 1,200mm between each: <ul style="list-style-type: none"> <li>• bench top,</li> <li>• cupboard</li> <li>• large appliance and each other bench top,</li> <li>• cupboard or large appliance.</li> </ul>	YES	Provided plans show compliance noting that dining table and chairs are not fixed furnishing thus any encroachment is not applicable.
Each circulation space specified above must be capable of being increased to a diameter of 1,550mm without— (a) relocating the sink, or (b) moving a load-bearing wall, or (c) breaching another circulation requirement.	YES	Provided plans show compliance
The following fittings: A bench that includes at least one work surface that is— (i) at least 800mm long, and (ii) clear of obstructions, and (iii) not in the corner of the room,  A lever tap set with the lever and water source that is within 300mm of the front of the bench,  A cooktop next to the work surface, provided with an isolating switch for the cooktop,  Has operative elements between 450mm and 1,250mm above the finished floor level, and is next to the work surface,	YES  TBC  TBC  TBC	Provided plans show compliance.  Insufficient information is provided but this item can be compliant.  Insufficient information is provided but this item can be compliant.  Insufficient information is provided but this item can be compliant.



The cupboards must— (a) not be entirely located in the corner of the bench or the corner of the room, and (b) face where the user of the fixture is likely to be.	YES  YES	Provided plans show compliance.  Provided plans show compliance.
An overhead cupboard in the kitchen must be capable of being fitted with “D” pull cupboard handles towards the bottom of the cupboard.	TBC	Insufficient information is provided to identify if overhead cupboards are to be utilised.
A below-bench cupboard in the kitchen must be capable of being fitted with “D” pull cupboard handles towards the top of the cupboard.	TBC	Insufficient information is provided but this item is capable of compliance.
The lever tap set, cooktop, isolating switch, oven and double general power outlet must— (a) not be in the corner of the bench or the corner of the room, and (b) face where the user of the fixture is likely to be.	TBC	Insufficient information is provided but this item is capable of compliance.
Cabinetry below a work surface must be able to be easily removed to allow wheelchair access to the work surface.	TBC	Insufficient information is provided but this item is capable of compliance.
General power outlets: At least one of which is a double general power outlet within 300 millimetres of the front of a work surface	TBC	Insufficient information is provided but this item is capable of compliance.
<b>Lifts in Multi-storey Buildings</b>		
An independent living unit on a storey above the ground storey must be accessible by a lift that complies with the <i>Building Code of Australia</i> , Volume 1, Part E3.	TBC	<ul style="list-style-type: none"> <li>- Provided lift shaft will be capable of housing lift car with compliant internal dimensions and door openings,</li> <li>- Access and egress is provided in accordance with BCA Part D4,</li> <li>- Insufficient information is provided to assess if the following accessible features are provided:               <ul style="list-style-type: none"> <li>a. Handrail compliant with AS1735.12,</li> <li>b. Lift car and landing control buttons compliant with AS1735.12,</li> <li>c. Lighting compliant with AS1735.12,</li> <li>d. Provision of automatic audible information in the car,</li> <li>e. Audible and visual indicators at each lift landing,</li> <li>f. Emergency hands-free communication.</li> </ul> </li> </ul>
<b>Laundry</b>		
A laundry in an independent living unit must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling.	YES	All proposed SOUs are single storey.



A circulation space at door approaches that complies with AS1428.1, and	YES	Provided plans show compliance throughout.
Provision for the installation of an automatic washing machine and a clothes dryer, and	YES	Plans show location of internal laundry facility to each SOU. This area will support provision of standard width washing machines and clothes dryers vertically one above another.
A clear space in front of each appliance of at least 1,550mm.  The space may overlap with a door swing or the circulation space for a door.	YES	Plans show compliance
A slip-resistant floor surface that achieves a minimum rating of P3 in accordance with AS 4586—2013,	TBC	Insufficient information is provided but this item is capable of compliance.
A continuous accessible path of travel to the main area of private open space or any clothes line provided for the dwelling.	YES	Plans show compliance
For laundry facilities in a cupboard, the cupboard must be capable of being fitted with “D” pull cupboard handles in the following locations— (a) for below-bench cupboards—towards the top, (b) for overhead cupboards—towards the bottom, (c) for floor-to-ceiling doors—between 900mm and 1,100mm above the finished floor level.	N/A	Laundry facilities are shown not to be located in cupboards
<b>Storage for Linen</b>		
An independent living unit must have a floor-to-ceiling linen storage cupboard that— (a) is at least 600mm wide, and (b) has adjustable shelving.	TBC	Plans show provision of a 600mm linen storage cupboard. No information is provided to assess if this cupboard is floor to ceiling and if it contains adjustable shelving.
<b>Garbage</b>		
A garbage storage area and a recycling storage area provided for an independent living unit must be accessible by a continuous accessible path of travel from the dwelling entrance	YES	Plans show compliance.

#### **5.4 SEPP (Housing) Clause 93 Compliance Assessment**

As the proposed building is identified as an independent living unit for housing of seniors the requirement of Clause 93 for provision of suitable access to facilities and services are being triggered.

The proposed works aim to utilise new and existing footpaths from the development through to the bus stop along Hardwicke Street, Hedley Street, Peakhurst Park, Jacques Avenue and Belmore Road. Bus stops are located in front of the Riverwood Baptist Church on 1A Army Road, Peakhurst and adjacent to the FRNSW Station located on 136A Belmore Road.

Requirements applicable to the existing and proposed footpaths to the nearest bus stop are as per Clause 93(4) of the SEPP, being:

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

Scope of proposed work includes upgrades or new pathways and crossings to all above mentioned roads including:

- a. Hardwicke St - new path will connect proposed building with the existing path at the intersection with Hedley St.
- b. Hedley St - New street crossing is proposed as well as a new path providing access to the Peakhurst Park.
- c. Jacques Avenue - New path is proposed connecting Peakhurst Park with Jacques Avenue and new crossing of Jacques Avenue.

All other existing pathways have been confirmed to be compliant with the above requirements.

Further to this, it is confirmed that the travel from the development site to both bus stops is measured to be <400m and **compliance is achieved.**

The proposed plans have been prepared by Henry & Hymas, Drawing Number 22T46\_DA\_EX04, Dated 12.06.2024

## 6. Conclusion

This report provides an assessment of the referenced architectural documentation against the Environmental Planning and Assessment Act, referenced Australian Standards, as well as, the Performance Requirements and the Deemed to Satisfy provisions of the National Construction Code Series, Building Code of Australia (Volume 1) for the proposed development.

Key compliance issues have been identified through this assessment. These issues are to be resolved prior to the approval stage by means of; Performance Solutions, altered design documentation or clarification of information on building plans.

Notwithstanding the above, it is considered that compliance with the provisions of the BCA is readily achievable, provided the above matters are appropriately addressed by the project team.