Morris Goding
Access Consulting

Sam Crawford Architects

6-12 Peters Avenue, Wallsend NSW – LAHC Residential Flat Building Development

Access Review – Final v4 - Part 5

8 August 2022

Morris Goding
Access Consulting
ABN 70 414 330 060

Studio 6, Level 1
56 Bowman Street
Pyrmont NSW 20 09

T 02 9692 9322
F 02 9692 8433
W mgac.com.au

NSW
QLD
VIC

Morris Goding
Access Consulting

REPORT REVISIONS		
Date	Version	Drawing No / Revision
22.03.22	Draft	Drawing No. 105 – Stage AA (rev / – 9.03.22)
29.03.22	Final	Drawing No. 105 01 & 106 01 – 70% DA Submission for LAHC (rev 01 – 24/03/2022)
2.06.22	Final v2	Drawing No. 106, AM2 Submission to LAHC (rev 02 – 25/05/2022)
27.07.22	Final v3	AM2 Submission to LAHC, dated (7/07/2022) Drawing No. 106 Rev.02, No. 107 Rev.01, No. 108 Rev.03, No. 109 Rev.01, No. 110 Rev.03, No. 111 Rev.03, No. 106 Rev.02, No. 201 Rev.03, No. 202 Rev.03, No. 203 Rev.03, No. 106 Rev.02 and 301 Rev.03. Prepared by Sam Crawford Architects.
8.08.22	Final v4	AM2 Submission to LAHC, dated (7/07/2022) Drawing No. 106 Rev.02, No. 107 Rev.01, No. 108 Rev.03, No. 109 Rev.01, No. 110 Rev.03, No. 111 Rev.03, No. 106 Rev.02, No. 201 Rev.03, No. 202 Rev.03, No. 203 Rev.03, No. 106 Rev.02 and 301 Rev.03. Minor adjustment requested by LACH. Prepared by Sam Crawford Architects.

This report was prepared by:

Jhoana Colorado
Senior Access Consultant
Associate Member of ACAA (713)

Morris Goding Accessibility Consulting

Morris Goding
Access Consulting

Table of contents

Morris Goding
Access Consulting

1. Executive Summary

The Access Review Report is a key element in the design development of LAND AND HOUSING CORPORATION (LAHC) residential flat building development located at 6-12 Peters Avenue, Wallsend NSW, and appropriate response to the AS1428 series, Building Code of Australia (BCA), DDA Access to Premises Standards (including DDA Access Code) and ultimately the Commonwealth Disability Discrimination Act (DDA).

Morris-Goding Accessibility Consulting has prepared the Access Report to provide advice and strategies to maximise reasonable provisions of access for people with disabilities.

The review will ensure that ingress and egress, paths of travel, circulation areas, and sanitary facilities comply with relevant statutory guidelines, and in addition, compliance with a higher level of accessibility and inclusiveness benchmarks set by the project.

Morris Goding
Access Consulting

2. Introduction

2.1 Background

Sam Crawford Architects has engaged Morris-Goding Access Consulting, to provide a design review of a LAHC residential development located at 6-12 Peters Avenue, Wallsend NSW. The development consists of,

- Proposed 2 Storey flat building residential building with twenty SOU's.
- Associated external works and landscape.
- 9 car parking bays, including 2 accessible car parking bays.
- Demolition of existing residential building.

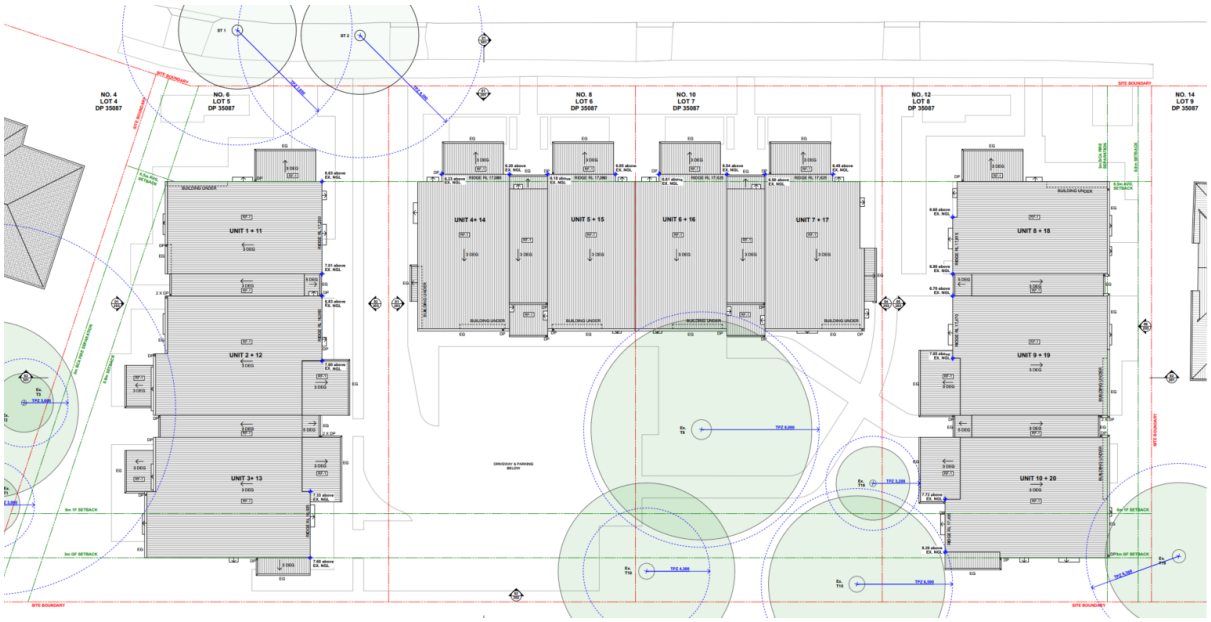

Figure 1. Proposed Roof Plan

The proposed development falls under a number of BCA classifications:

- Class 2 (sole-occupancy units, residential units, multi-residential dwellings, apartments)
- Class 7a (carpark)

The requirements of the investigation are to:

- Review supplied drawings of the proposed development;
- Provide a report that will analyse the provisions of disability design of the development, and

- Recommend solutions that will ensure the design complies with the Disability Discrimination Act (DDA), Building Code of Australia (BCA), relevant Australian Standards, and enhanced benchmark requirements set by the project.

2.2 Objectives

The Report seeks to ensure compliance with statutory requirements and enhanced benchmark requirements set by the project. The Report considers user groups, who include residents, staff, and members of the public. The Report attempts to deliver equality, independence and functionality to people with a disability-inclusive of:

- People with a mobility impairment (ambulant and wheelchair);
- People with a sensory impairment (hearing and vision); and
- People with a dexterity impairment

The Report seeks to provide compliance the Disability Discrimination Act 1992. In doing so, the report attempts to eliminate, as far as possible, discrimination against persons on the ground of disability.

2.3 Limitations

This report is limited to the accessibility provisions of the building in general. It does not provide comment on detailed design issues, such as: internals of accessible/ambulant toilet, fit-out, lift specification, slip-resistant floor finishes, door schedules, hardware and controls, glazing, luminance contrast, stair nosing, TGSIs, handrail design, signage etc. that will be included in construction documentation.

2.4 Accessibility of Design

The proposed design will utilise the Federal Disability Discrimination Act (DDA), Disability (Access to Premises – Buildings) Standards 2010, BCA/DDA Access Code, Universal Design principles, the AS 1428 Series, and other design guidelines, to develop appropriate design documentation, to provide reasonable access provisions for people with disabilities.

The Project Architect and an appropriately qualified accessibility consultant will examine key physical elements during the design development stage, to identify physical barriers and incorporate solutions as a suitable response to disability statutory regulations and other project objectives.

The design will be developed to ensure the principles of the DDA are upheld. Under the DDA, it is unlawful to discriminate against people with disabilities in the provision of appropriate access, where the approach or access to and within a premise, makes it impossible or unreasonably difficult for people with disabilities to make use of a particular service or amenity.

The design will comply with the requirements of the DDA Access to Premises Standards and include requirements for accessible buildings, linkages and the seamless integration of access provisions compliant with AS1428.1. The developed design will consider all user groups, who include members of the public, visitors, residents and staff members.

2.5 Statutory Requirements

The statutory and regulatory guidelines to be encompassed in the developed design to ensure effective, appropriate and safe use by all people including those with disabilities will be in accordance with:

- Federal Disability Discrimination Act (DDA);
- Disability (Access to Premises – Buildings) Standards 2010;
- Building Code of Australia (BCA) Amdt1 - Part D3, F2, E3;
- AS 1428.1:2009 - (General Requirement of Access);
- AS 1428.4.1:2009 - (Tactile Ground Surface Indicators);
- AS 2890.6:2009 - (Parking for People with Disabilities);
- AS 1735.12:1999 - (Lift Facilities for Persons with Disabilities);
- AS 4299:1995 – (Adaptable Housing)
- Newcastle Local Council DCP

Please note that there are also additional advisory standards (not currently referenced by BCA or DDA Premises Standards) as well as other relevant guidelines that will be considered, as relevant to promote equity and dignity in line with over-arching DDA principles and aspirational objectives. These include:

- Universal Design Principles;
- Human Rights Commission (HEREOC)
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture;
- AS1428.2:1992 Enhanced and Additional requirements;
- AS1428.4.1 Draft Way-finding Standard;
- AS3745:2010 – Planning for Emergencies in Facilities (to assist with design strategies for provision for escape for people with disability that may require assistance);
- Livable Housing Design Guidelines (LHA) – Fourth Edition.

Morris Goding
Access Consulting

3. General Access Planning Considerations

The Disability Discrimination Act 1992 (DDA) is a legislative law that protects the rights of all people. The Act makes disability discrimination unlawful and promotes equal rights, equal opportunity and equal access for people with disabilities. The Australian Human Right Commission is the governing body who control and enforce DDA compliance.

Nevertheless, building elements that provide insufficient accessible provisions for people with disabilities remain subject to the DDA. The improvement of non-compliant building elements and areas to meet current access requirements will mitigate the risk of a DDA complaint be made against the building owner.

Since the 1st May 2011, the Commonwealth's Disability (Access to Premises – Buildings) Standards 2010 (DDA Premises Standards) apply to all new building works and to affected parts of existing buildings.

The DDA Premises Standards' requirements (DDA Access Code) are mirrored in the access provisions of the BCA. New building work and affected parts must comply with the DDA Premises Standards and AS1428.1-2009 in the same manner as they would comply with the BCA by meeting deemed-to-satisfy provisions or by adopting an alternative solution that achieves the relevant performance requirements.

By utilizing AS 1428 suite of Standards, the overall aim is to provide continuous accessible paths of travel to connect the proposed development to and through public domain areas and between associated accessible buildings in accordance with the DDA Access Code.

MGAC supports the use and consideration of universal design (UD) principles into the design to maximize access for all people. We will assist the design team to incorporate UD principles where possible within the project, while still meeting mandatory compliance requirements.

A UD approach has numerous benefits for the client as an education provider, for businesses within the building, for individual users and for society in general. An inclusive environment that can be accessed, understood and used by as many people as possible, is good business sense, is more sustainable and is socially progressive, in line with the aims of the DAP.

Universal design principles consider the needs of a broad range of people including older people, families with children and pushing prams, people from other cultures and language groups, visitors in transit and people with disability. By considering the diversity of users, the design will embed access into and within it, so that benefits can be maximized, without adding on specialized 'accessible' features that can be costly, visually unappealing and may perpetuate exclusion and potential stigma.

The seven key Universal design principles to consider in the ongoing design include:

- Principle 1: Equitable Use
- Principle 2: Flexibility in Use
- Principle 3: Simple and Intuitive Use

- Principle 4: Perceptible Information
- Principle 5: Tolerance for Error
- Principle 6: Low Physical Effort
- Principle 7: Size and Space for Approach and use.

Morris Goding
Access Consulting

4. Ingress & Egress

4.1 External Linkages

The BCA and DDA Premises Standards contain requirements for site approaches for the use of persons with disabilities. These requirements can be summarised as follows:

- It will be necessary to provide an accessible path of travel from main pedestrian entry points at the site allotment boundary to all building entrances compliant with AS1428.1:2009. There are two main accessible entrances show below with a red arrow via Peters Avenue. These are capable to achieve provide compliance with AS1428.1.

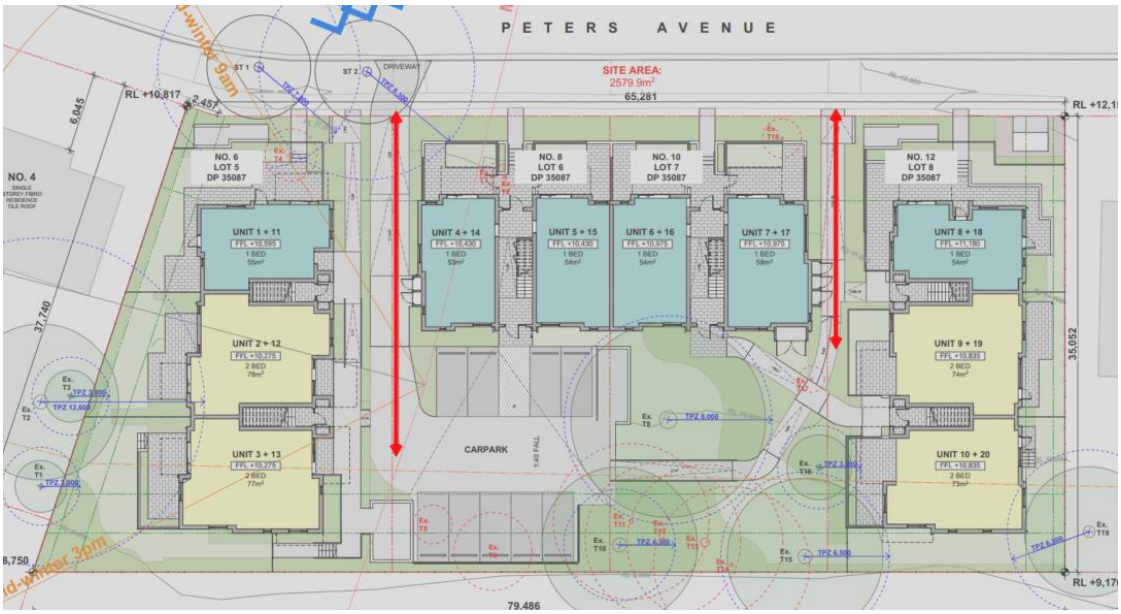

Figure 2. Ground - Accessible Entry Points

- An accessible path of travel between buildings (or parts of buildings) that are connected by a pedestrian linkage, within the site allotment boundary, compliant with AS1428.1:2009 is also required. Currently, this requirement has been achieved as access connection is via car parking on both directions.

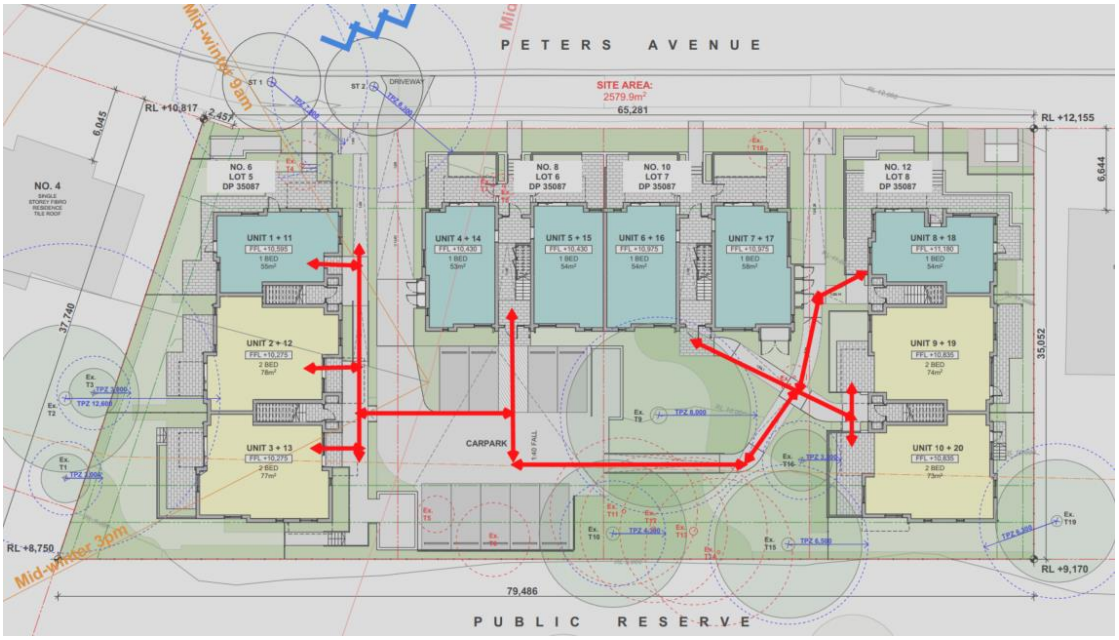

Figure 3. Ground - Buildings Links

- An accessible path of travel to building entrances (required to be accessible) from associated accessible car-parking bays, compliant with AS1428.1:2009 is required. Currently, this requirement is achieved as the path of travel from and to the accessible car park bay is provided. 1:10 proposed ramp will require to be compliant with AS1428.1.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

4.2 Entrances

The BCA and DDA Premises Standards contain requirements for building entry for the use of persons with disabilities. These requirements can be summarised as follows:

- Access is required through at least 50% of entrances, including the principal pedestrian entrance/s to all buildings or parts of buildings (ie. when they have a separate function and/or use eg. external retail tenancy). Note it is preferred that all entrances are accessible. Currently, the requirement has been achieved.

- A non-accessible entry cannot be located more than 50m distance from an accessible entry (for buildings greater than 500m2). Currently, this requirement has not been achieved as there is over 52-metres from the non-accessible entrance to the accessible entry. Furthermore, the accessible path of travel is between unit 1 and unit 4. Private use gates will be incorporated prior to the proposed steps to restrict his use by the public. This departure may be supported under a Performance Based Solution at a

later stage. It is also noted that non-accessible entries via stairs are secondary entries as the principal pedestrian entries (PPE) are located where the letterboxes are been proposed.

- All accessible doors to have 850mm min. clear width opening and suitable door circulation area, compliant with AS1428.1:2009. Note: Manual doors require lightweight door forces to be operable by people with disabilities (20N max.). We recommend that main entrances include automated sliding doors to be used where possible. Currently this requirement is not achieved as the principal pedestrian entrance leading to units 6 and 7 lack of internal latch side clearance. This door is to be flipped and to comply with AS1428.1 Fig.31 (d) internal. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. There are two continuous accessible paths of travel in parallel to entries via sets of stairs. The accessible path of travel adjacent to Unit 1 appears to be longer than the accessible entrance adjacent to Unit 8.

The design is to consider the continuous accessible path of travel (CAPT) journey to be made by a wheelchair user from the allotment boundary at the left side (adjacent to Unit 1) of the site to the central building entrance. The trajectory of the continuous paths of travel should be equitable to each other, currently this is not the case as an able-bodied person entering to the site from Peter Avenue will enter. This is a departure from the requirements of the DDA Premises Standards. Above maybe supported under a Performance Based Solution. This includes creating a designated accessible path travel from the allotment boundary facing Peters Avenue to building containing units (4,14,5 and 15). This designated accessible path travel will be using side entrance access. The accessible path of travel of the side entrance will have suitable quality and finish as the main entrance to ensure appropriate equity.

The design is capable of achieving compliance, subject to the above being addressed. It is understood that this will be refined during the design development stage and prior to Construction Certification (CC). Further work will be required during design development stage to ensure appropriate outcomes are achieved.

4.3 Emergency Egress

BCA 2016 Part D2.17 has requirements for all fire-isolated egress stairs from areas required to be accessible (not communication stairs) to include at least one continuous handrail designed to be compliant with AS1428.1 Clause 12. Provision of an off-set tread at the base of stair flights or an extended mid-landing that will allow a 300mm extension clear of egress route is considered appropriate for achieving a consistent height handrail (without vertical or raked sections). Such an offset tread configuration has been shown at the majority of stairs and would appear to be possible elsewhere, subject to further detail design.

Where fire-isolated egress stairs will also be used for communication stair purposes between levels, they should be designed to meet AS1428.1:2009. Confirmation is required on the likely use of certain stairs for this purpose.

There is currently no mandatory requirement within BCA or DDA Premises Standards for provision of independent accessible egress for people with a disability in accordance AS1428.1 and this remains an important DDA issue. Consideration of an accessible egress strategy with an emergency evacuation plan will be needed as a minimum starting point.

Consideration of waiting spaces within fire-stairs should be strongly considered for people with mobility impairment. The current configuration of stairs suggests the spatial requirements would not be incorporated without layout amendments, but if provided with future design development these would generally require:

- 850mm min. clear width egress door and 510mm min. external door circulation area, compliant with AS1428.1:2009;
- Wheelchair space (800mm W x 1300mm L min. dimensions) within fire-isolated stair, outside of the required egress path, that can be accessed on a continuous path of travel.
- Alternative evacuation means eg. emergency passenger lift/s could be provided instead of/or only in addition to 'waiting spaces' in line with ABCB Handbook and/or consideration of stair evacuation devices (with appropriate storage and staff training) within fire stairs.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

All open stairs are to ensure compliance with AS1428.1 Clause 11.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

5. Paths of Travel

5.1 Circulation Areas

The BCA and DDA Premises Standards contain requirements for circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- Wheelchair passing bays (1800mm width x 2000 length) is also required when a direct line of sight is not available and are to be provided at 20m max. intervals along accessways.
- Turning spaces (at least 1540mm W x 2070mm L) are required within 2m of every corridor end and at 20m.max intervals along all accessways. This is needed for wheelchairs to make a 180-degree turn, compliant with AS1428.1:2009.
- Turning spaces (at least 1500mm W x 1500mm L with splays) are required to achieve a 90-degree turn. This is needed for wheelchairs to make a 180-degree turn, compliant with AS1428.1:2009.
- All common-use doors (ie. not excluded under Part D3.4) to have 850mm min. clear width opening (each active door leaf) and suitable door circulation area, compliant with AS1428.1:2009.
- All common-use corridors and accessible paths of travel to be at least 1000mm min. width when traveling in linear direction. Note: Increased clear width paths of travel required for doorway circulation, turning areas, etc.
- Ensure curved walkways have 1500mm min. clear width with appropriate min. inside curve radius compliant with AS1428.1.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Ensure all commonly use doors are to provide suitable latch sides clerances in accordance with AS1428.1 Fig.31.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

5.2 Passenger Lifts

The project does not include lifts.

5.3 Stairs & Ramps

The BCA and DDA Premises Standards contain requirements for stairs and ramps for the use of persons with disabilities. These requirements can be summarised as follows:

- Ramps are to have a maximum 1:14 gradient with landings at no more than 9 metre intervals. Ramps are to have handrails on both sides with a minimum 1 metre clearance in accordance with AS1428.1.

- Walkways are to have maximum 1:20 gradient with landings at no more than 15 metres intervals. Walkways are to have kerbs or suitable barrier on both sides with minimum 1 metre clearance in accordance with AS1428.1.
- Landings are to have 1200mm length with 1500 mm length at 90-degree turns. Currently, this requirement has not been achieved as 1:14 ramp lack of 1200mm landing prior to parking area. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.
- Ramps and walkways doorways at landings are to comply with AS1428.1 Fig. 25(D).
- Stairs are to have handrails on both sides in accordance with AS1428.1. Currently, this requirement appears capable of been achieved as stairs do not provide 1200mm min. overall width, which is required to accommodate handrails on both sides at a later stage.
- Stairs and ramps are to be offset to ensure no encroachment of handrail extensions into from the transverse path of travel at the top and bottom of the stair/ramp.
- Stairs and ramps are to be offset from the property allotment boundary by 900mm min. this is to ensure no encroachment occurs at a later stage of handrail extensions into from transverse path of travel.
- Step ramp is to have a 1:10 gradient, 190mm max. height and 1900mm max. length.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Ensure stairs are set back away from door circulation space in accordance with AS1428.1. Note handrail encroachment into door circulation clearance will not be allowed.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

6. Adaptable Units

6.1 Adaptable Unit Provision

The concept of adaptable housing is to design units with provisions in place from the outset (pre-adaption) so they can be easily adapted to meet changing needs of residents in the future (post-adaption) in accordance with AS4299.

City of Newcastle Local Council does not have a development control to include adaptable housing.

The LAHC brief calls for Adaptable Housing as:

"The Land and Housing Corporation (LAHC) Dwelling Requirements inform the design and development of the LAHC social housing property portfolio." Also:

Gold standard – future adaptation
LAHC may opt to provide a percentage of 'adaptable' dwellings, to be specified in the development brief. These are designed for cost effective future conversion to Gold Standard. Apply AS 4299 Class C to adaptable dwellings.

Assessment

2x adaptable dwellings have been proposed throughout the development of 20 units.

The adaptable units are designed in accordance with AS4299 Class C and the nominated adaptable units are:

- Unit 2 has 2 x bedrooms and
- Unit 7 has 1 x bedroom type

There is no indication on the drawings making reference to 'Gold Standard'.

6.2 Adaptable Unit Design

The following requirements are to be satisfied in the provision of adaptable unit design at the pre-adaptation stage.

- The entry door of the unit achieves an 850mm clear width opening (920 door leaf). Latch side clearance of 530mm needs to be achieved at pre-adaptation, externally and internally of the door in accordance with AS4299.

- The kitchen needs 1550mm circulation space outside of the kitchen workspaces

- The bathroom needs to be of an adequate size to achieve an AS1428.1 compliant bathroom or shower, WC, and basin with required circulation spaces. Capped off service can be provided for the relocation of the basin at post adaptation.

- The living area needs to be large enough to achieve a circulation space of 2250mm min diameter after furniture placement, compliant with AS4299.

- The bedroom needs to achieve 1 metre either side of queen size bed and 1550 x 2070mm at the base of bed or similar configuration
- The laundry area requires 1500mm in front of laundry appliances in accordance with AS4299.
- All doors need to achieve 850mm clear opening width from the outset and easily achievable latch side clearances at post adaptation, compliant with AS1428.1:2009.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

7. SEPP 65 Silver Livable Units

7.1 Silver Livable Unit Provision

Livable Housing Australia (LHA) Silver rating is to be applied to all new LAHC dwellings where level access is available (including ground level and dwellings serviced by a lift). Upper-level dwellings interior have not been assessed.

Assessment

A total of 20 dwellings have been proposed throughout the development.

All units on the ground floor are designed to be silver and to meet the following requirements.

Assessment

A total of 20 dwellings have been proposed throughout the development. There are 10 apartments (50% of total) designed to be Silver Livable and to meet the above requirements.

The Livable housing units have been nominated as units 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10 Silver Livable Unit Design

Assessment (*SLLHA_GuidelinesJuly2017FINAL4)*

- The entry door into the units are to be detailed to achieve suitable clear width of at least 820mm during detailed design development stage.
- From the unit entry, there needs to be appropriate 1m clearances throughout the unit to allow suitable accessible paths of travel within.
- All internal doorways into the bathroom, bedroom and out to balcony are required to achieve at least 820mm clear open widths.
- The silver levels units require bathrooms that can accommodate the required 900mm wide by 1200mm long clear visitable toilet circulation space in front of the leading edge of the pan.
- The walls surrounding the shower and toilet pan require sufficient reinforcements for the provision of grab rails in the future when required.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

Morris Goding
Access Consulting

8. Facilities & Amenities

8.1 Sanitary Facilities

The project does not have common sanitary facilities.

8.2 Common Areas

The BCA and DDA Premises Standards contain requirements for common use areas suitable for the use of persons with disabilities. These requirements can be summarised as follows:

- For class 2 buildings, access is required to a unique common use facility such as a swimming pool, sauna, common laundry, entertainment rooms.
- Accessibility is required to common use courtyards within buildings
- Mailboxes and garbage rooms within residential buildings require appropriate accessibility.
- Wheelchair access is required to any external and outdoor terrace areas including roof terraces compliant with AS1428.1.
- Under the DDA Premises Standards and BCA all commonly use rooms normally used by occupants of the building are to be accessible, except only areas exempt under BCA D3.4 such as plant rooms, loading dock, garbage compactor and the like.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

8.3 Car Parking

The BCA and DDA Premises Standards contain requirements for parking which are applicable to this project. These requirements can be summarised as follows:

- Class 2 residential. Provide an adaptable unit car bay for each adaptable unit. These car bays can have 3.8 metre width or 2.4 metre with 2.4 metre shared zone x 5.4metre length.
- All accessible car bays to be located near relevant lifts and/or associated building entry points to minimise the distance to relevant lift and ensure accessible path of travel between these areas.
- Ensure 2.5m min. height clearance, compliant with AS2890.6 fig 2.7 over accessible car bays with 2.2 m min. vertical clearance leading to the accessible and adaptable unit car bays (Note: consideration for 2.3 or 2.4m min. height preferred for higher vans/adapted vehicles is recommended as good practice).

- All adaptable units must to provide at least 1 accessible car parking bay.
- Continuous accessible path of travel from accessible car parking bays to proposed buildings and associated facilities is to be 1:40 max. gradient or 1:33 bitumen.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

Morris Goding
Access Consulting

9. Conclusion

MGAC has assessed the proposed scheme for LAND AND HOUSING CORPORATION (LAHC) residential development located at 6-12 Peter's Avenue, Wallsend NSW. The proposal indicates that accessibility requirements, pertaining to external site linkages, building access, entry SOU'S access, common areas and car parking can be readily achieved.

It is advised that MGAC work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in building design and external domain design.