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DA ACCESS REPORT SEPP (HOUSING) 2021 – SCHEDULE 4

PROJECT NAME 96-98 Brenan St Smithfield
PROJECT NUMBER CA230016
CLIENT SARM

REVISION	ISSUE DATE	DETAILS
DA-DRAFT1	22/09/2023	Draft for Stage B
DA-DRAFT2	20/12/2023	Draft for Stage C
DA	5/02/2024	Stage C – DA Access Report
DA-A	19/03/2024	Stage C Amendment A
DA-B	21/03/2024	Stage C Amendment B

REPORT PREPARED BY

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DOCUMENTATION REVIEWED

Refer to Appendix A.



INTRODUCTION

This Access Report is an assessment of the proposed development to demonstrate consideration of access for people with a disability for the development application submission.

The following comments are based on access requirements of the State Environmental Planning Policy (Housing) 2021 – Schedule 4 (SEPP), Building Code of Australia 2022 (BCA), Disability (Access to Premises – Buildings) Standards 2010 (including Compilation No. 2) (Premises Standards), Australian Standards (AS) and Disability Discrimination Act (DDA)

This report contains comments regarding issues of non-compliance and identifies where insufficient information has been provided for an assessment to be made. Recommendations may also be made to enhance accessibility and minimise the risk of action under the Disability Discrimination Act (DDA).

Unless otherwise specified, all Australian Standards references are from the following:

- AS 1428.1-2009 (including Amendments No. 1 and 2)
- AS 1428.2-1992
- AS/NZS 1428.4.1-2009 (including Amendment No. 1)
- AS 1735.12-1999
- AS/NZS 2890.6-2009
- AS 4299-1995



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
1.	SITING AND ACCESS REQUIREMENTS		
1.1	10 seniors living units are proposed for this development. Units have been assessed against accessibility requirements for independent living units in this report, as outlined in Schedule 4 of the SEPP and referenced Australian Standards.		
1.2	The SEPP requires that each unit have a continuous accessible path of travel complying with AS 1428.1 to an adjoining public road. Similarly, BCA accessibility requirements for a Class 2 apartment building prescribe access as follows:	SEPP 2 (1)	Compliance achievable/ refer to comment
	a) From the main points of pedestrian entry at the allotment boundary.	BCA D4D3 (1)(a)	Compliance achievable
	b) From required accessible car parking on the allotment.	BCA D4D3 (1)(c)	Compliance achievable
	c) Through the principal pedestrian entrance – three are proposed in this case with approaches from different directions of the site.	BCA D4D3 (2)	Compliance achievable
	d) To at least one floor containing sole-occupancy units and to the entrance of each sole-occupancy unit on that level.	BCA D4D2	Compliance achievable
	e) To and within spaces for use in common by the residents (ie the bin area).	BCA D4D2	Compliance achievable
	Comment: Units 6 to 10 are on the upper level with stair access to this level only and the BCA permits this. As the applicant is a social housing provider, the upper level units are not subject to SEPP Schedule 4 clauses 2, 5-13, 15-21, although the client's Universal Design Principles suggest upper level dwellings without lift access are to have compliant interiors.	SEPP Clause 85	



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
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1.4 Access is required to a bus stop within 400m of the site. The average gradient of the pathway is to be not steeper than 1:14. Shorter sections may be steeper within the following limitations: 1:12 for a maximum length of 15m, 1:10 for a maximum length of 5m and 1:8 for a maximum length of 1.5m

SEPP
Division 4
Clause 93

Compliance
achievable

The survey plans show bus stops within these distances and with the average and individual gradients satisfying the above requirements. While the survey identifies a kerb ramp at Green Avenue with a gradient of 1:6 (15.894%), in recent photos provided it appears that kerb ramps have been reconstructed and are likely improved.

The timetable for bus 808 was also provided to demonstrate that clause 93 (2) (b) (ii) is achieved for the frequency of public transport to and from the site.

2. ACCESSIBLE PATH OF TRAVEL

2.1 The continuous accessible path of travel to and within areas required to be accessible is to comply with AS 1428.1.

AS 1428.1
7.2
Fig. 6, 7

Compliance
achievable

A scaled assessment indicates that this is achievable subject to confirmation of specific dimensions and features which are not fully detailed on the plans at this early stage of design, including flush transitions between floor surfaces. For the path between the boundary and entry 3, which also leads to the common open space, AS 1428.1 accessible path of travel will require a kerb beside the path where there is otherwise a level change downward.



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
3.	APPROACHES AND ENTRANCES		
3.1	Plans show gradients not steeper than 1:20 for the approaches to the building, and gradients not steeper than 1:40 for landings and door circulation. This enables accessible paths of travel subject to specific details being confirmed as the design progresses.	SEPP 6 AS 4299 4.3.1, 4.3.2	Compliance achievable
3.2	Plans show stairs to the upper level. These are to comply with AS 1428.1, including non-slip contrasting nosing strips, opaque risers, a sharp nosing profile, handrails on both sides and tactile ground surface indicators at the top and bottom. CC plans are to demonstrate compliance.	AS 1428.1 11.1	Compliance achievable
4.	DOORWAYS		
4.1	All doorways are to have a clear opening width of 850mm to the active leaf (a standard 870mm door leaf will not meet this requirement). A door schedule is to be provided at CC stage to confirm compliance.	SEPP 5, 6 AS 4299 4.3.1, 4.3.2	Confirm for detailed design
4.2	Circulation spaces at doorways are to comply with AS 1428.1. Plans were scaled where dimensions are not shown, and circulation spaces were generally found to be in accordance with AS 1428.1 except for: a) In units 4, 5, 9, and 10, the second bedrooms have reduced door circulation space. This is permitted by SEPP Sch 4 Clause 6 (3).	SEPP 5, 6	Compliance achievable/ Confirm for detailed design



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
4.3	Where the transition between floor surfaces is not flush at doorways, a ramped threshold is to be provided with a maximum length of 280mm, maximum height of 35mm and maximum gradient of 1:8. It is to be located within 20mm of the door leaf which it serves.	AS 4299 4.3.2 AS 1428.1 10.5 Fig. 21	Confirm for detailed design
	Comment: Careful consideration is required prior to construction regarding sliding doors to enable the installation of compliant ramped thresholds while addressing any drainage requirements pertinent to the site. Typically, sliding door tracks will need to be recessed into flooring and specific track types chosen.		
4.4	All door handles and hardware are to have lever handles which are capable of being unlocked and opened with one hand. A 'D' type handle is required on all sliding doors. Handles are to be placed at a height of 900-1100mm.	SEPP 11 AS 4299 4.3.4 AS 1428.1 13.5.2 13.5.3	Confirm for detailed design
5.	INTERNAL SPACE		
5.1	Internal corridors are to have a minimum unobstructed width of 1000mm.	SEPP 6 (2)	Compliance achievable
5.2	At least one bedroom in each unit is to have space for a queen size bed with at least 1000mm clearance on each side, 1200mm clearance at the foot of the bed and additional space for door circulation and a wardrobe. The required clearances are to be measured to finished surfaces (i.e. skirtings).	SEPP 7	Compliance achievable
5.3	The living room in each unit is required to have circulation space to allow the 360° turn of a wheelchair after furniture has been placed that is, a 2250mm clear diameter.	SEPP 16 (2) a AS 4299 4.7.1	Compliance achievable



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
5.4	<p>The kitchen in each unit is required to have circulation space with a diameter of 1200mm between each bench top, cupboard, or large appliance, and each other bench top, cupboard or large appliance. In addition, each of these circulation spaces are to be capable of being increased to a diameter of 1550mm without relocating the sink, moving any load bearing wall, or breaching another circulation requirement.</p> <p>The SEPP also specifies the following kitchen features and CC plans are to demonstrate compliance, including:</p> <ul style="list-style-type: none">a) A work bench at least 800mm in length which is not in the corner of the room and is clear of obstructions.b) Lever taps with the operating handles and water source within 300mm of the front of the sink.c) A cooktop next to the work surface and with an isolating switch.d) An oven located adjacent to the 800mm wide work bench. It is required to have operative elements between 450-1250mm AFFL.e) Cupboards are to not be entirely located in the corner of the bench or room and are to face where the user of the fixture is likely to be.f) 'D' pull handles on cupboards located near the top of below-bench cupboards and near the bottom of overhead cupboards.	<p>SEPP 18 – 2</p> <p>SEPP 18 – 4 a</p> <p>SEPP 18 – 4 a</p> <p>SEPP 18 – 4 c, d</p> <p>SEPP 18 – 4 e</p> <p>SEPP 18 – 5</p> <p>SEPP 18 – 6, 7</p>	<p>Compliance achievable/ Confirm for detailed design</p>



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
	g) The lever tap set, cooktop, isolating switch, oven and double general power outlets are to not be in the corner of the bench or room, and are to face where the user of the fixture is likely to be.	SEPP 18 -	
	h) Any cabinetry below a work surface must be able to be easily removed to allow wheelchair access to the work surface.	SEPP 18 – 9	
5.5	The laundry in each unit is to have minimum 1540mm x 2070mm circulation clearance, space for a washing machine and dryer, a clear space of 1550mm length in front of each appliance, slip resistant floor surface with a minimum rating of P3 and a continuous accessible path of travel to the private open space or any clothes line provided for the dwelling.	SEPP 19 2	Compliance achievable/ Confirm for detailed design
5.6	A linen cupboard is required with a minimum width of 600mm and adjustable shelving to comply with AS 4299. These have been assessed as the storage cupboards shown on plans.	SEPP 20 AS 4299 4.11.5	Compliance achievable
6.	BATHROOM AND TOILET		
6.1	At least one bathroom in each unit is to be located on the entry level. It is to be capable of providing circulation spaces in accordance with AS 1428.1 and a scaled assessment indicates that compliance will be achievable.	SEPP 8, 9	Compliance achievable
6.2	The following bathroom features are required by the SEPP and are to be confirmed at CC stage:		
	a) A toilet pan installed in the corner of the room with a centreline set-out in accordance with AS 1428.1.	SEPP 9 AS 1428.1 Fig. 38	Compliance achievable/ Confirm for detailed design



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
b)	900mm wide x 1200mm long clearance in front of the WC pan, clear of door swings, and fixtures (other than a toilet paper dispenser or grabrails).	SEPP 9 2 b	Compliance achievable
	Comment: On level 1, units 6, 7, 8, 9 and 10 have the doors swinging into this space, however, SEPP clause 85 effectively permits this.		
c)	AS 1428.1 toilet pan circulation space (although a removable shower screen may be located in this space).	SEPP 9 2 c, 3	Compliance achievable
d)	A slip resistant floor surface that achieves a minimum rating of P3.	SEPP 9 – 2 d 8 – 2 a AS 4586-2013	Confirm for detailed design
e)	A wall capable of accommodating the installation of a toilet back rest, toilet and shower grabrails, portable shower head with supporting grabrail and shower seat that will comply with AS 1428.1.	SEPP 9 – 2 e 8 – 2 c iv	Confirm for detailed design
f)	A washbasin with tap ware capable of complying with AS 1428.1, including by future adaptation if the washbasin and tap ware continue to use existing hydraulic lines.	SEPP 9 2 b	Confirm for detailed design
g)	A shower that is accessible without a shower-hob or step, is in the corner of the room, complies with AS 1428.1 for entry, circulation space, floor gradient to wastewater outlet and location of the mixer tap.	SEPP 8 – 2 c	Confirm for detailed design
h)	A wall cabinet with sufficient illumination to allow for reading of labelled items in it.	SEPP 9 – 1 d	Confirm for detailed design



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
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7. POWER, LIGHTING, SWITCHES AND CONTROLS

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|-----|--|--|-----------------------------|
| 7.1 | Light switches and power points are to comply with AS 1428.1 or be capable of complying through future adaptation. | SEPP 12 | Confirm for detailed design |
| 7.2 | Power, lighting, switches, and controls are to be provided in accordance with the SEPP throughout the unit and on external accessways. Details are to be demonstrated at CC stage. | SEPP 4 – 7 b i, 7 c, d, 8 (2) e, 16 (2) b, 18 (4) d, f | Confirm for detailed design |

8. SIGNAGE

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|-----|--|-----------------------------|-----------------------------|
| 8.1 | Each door required to be provided with an exit sign is to be identified by Braille and tactile signage complying with BCA Specification 16. These are to state 'Exit' and 'Level' followed by the floor level number and be located in accordance with BCA Specification 16. (Consideration should be given to the practicality of installing exit signage at any glazed doors or double leaf doors, as installation locations specified by the BCA do not offer guidance for such scenarios.) | BCA D4D7 (1)(a)(ii) Spec 16 | Confirm for detailed design |
|-----|--|-----------------------------|-----------------------------|

9. CAR PARKING

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|-----|---|---------|---|
| 9.1 | SEPP Schedule 4 Clause 4 (2) specifies for the group of 4 common area car parks, that at least one be accessible in accordance with AS 2890.6, and that 50% of spaces either comply with AS 2890.6 or be at least 3.2m wide with a level surface and maximum gradient of 1:40 in any direction. | Sch 4 4 | Compliance achievable/
Confirm for detailed design |
|-----|---|---------|---|

Plans show this is achieved with one accessible space in a configuration consistent with AS 2890.6 and one space with a 3.2m width. Maximum 1:40 falls are indicated.



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
	Specific features are to be confirmed as the design progresses.		
9.2	<p>Additionally, plans show a car parking space allocated and attached to unit 5. SEPP contains requirements for parking spaces attached to or integrated with a class 1 building and this car parking space has been compared to these requirements in the absence of anything prescribed for spaces allocated to a class 2 unit. SEPP Schedule 4 Clause 4 (1) prescribes a minimum width of 3.2m, minimum height of 2.5m, level surface with a maximum gradient of 1:40 in any direction and a capability of being widened to 3.8m without any structural modifications.</p> <p>Plans show the car park to have a width exceeding 3.8m and a 1:40 gradient is indicated. The height is to be confirmed as the design progresses.</p>	Sch 4 4	Compliance achievable/ Confirm for detailed design
9.3	SEPP Schedule 4 Clause 4 notes that any accessible space which is not intended for visitor use, is not required to have the international symbol of access marked on it.	Sch 4 4	Compliance achievable/ Confirm for detailed design
9.4	Where there are multiple parking spaces accessible from a common access point, the access point is required to be secured by a power-operated garage door, vehicle gate, vehicle barrier or similar device.	Sch 4 4	Confirm design acceptance
	Comment: The client has requested removal of the gate.		
9.5	For the unit 5 car park, a power-operated door is required or the capability to install one is required by having access to a power point and an area for motor or control rods for a power-operated door.	Sch 4 4	Compliance achievable/ Confirm for detailed design



ITEM	ACCESS ELEMENTS	REFERENCE	ASSESSMENT
10.	EXTERNAL SPACES		
10.1	<p>Letterboxes are to be located on a hard-standing surface which is connected to a continuous accessible path of travel, including a 1540mm x 2070mm turning space to facilitate a 180° turn for someone to return to their unit.</p> <p>Letterboxes are to be lockable with the lock facing the wheelchair accessible path of travel. At least 20% of the letterboxes are to be between 600-1200mm AFFL.</p> <p>Plans indicate letterboxes beside the Brenan St entrance path. A gradient of 1:40 is nominated and the width scales close to 1540mm to facilitate turning, subject to confirmation of this dimension at detailed design stage.</p>	SEPP 3	Compliance achievable/ Confirm for detailed design
10.2	<p>A garbage storage area is to be provided in a location which is accessible from the associated unit, including a 1540mm x 2070mm turning space to facilitate a 180° turn for someone to return to their unit.</p> <p>Plans indicate this near the car parking area.</p>	SEPP 21	Compliance achievable/ Confirm for detailed design
10.3	<p>Balconies and external paved areas must have surfaces that are slip resistant and comply with the BCA or SA HB 198:2014 (16/06/2014).</p>	SEPP 10	Confirm for detailed design



CONCLUSION

Generally, the plans assessed show that compliance with requirements for access for people with a disability is achievable subject to incorporation of specific details, and acceptance of removal of the car parking gate.

At this early stage of design, full details are not shown on plans. As further planning occurs, consideration is to be given to elements such as switches, lighting, surface finishes, door hardware, and more specific dimensions and features.

Requirements and recommendations to achieve compliance with the SEPP (Housing) 2021 Schedule 4 and referenced Australian Standards and to minimise the risk of action under the Disability Discrimination Act, have been explained in this report and are to be assessed at CC stage to confirm compliance.

Reference numbers are provided for clarification of comments within this report. Alternatively, the author may be contacted on the details on page 1 for further clarification.

Reasonable care and skill have been exercised in the assessment of the building and the preparation of this report. However, this report shall not be construed as relieving any other party of their responsibilities or obligations.

The advice given is based on the assessment of the plans and other relevant documentation supplied regarding access requirements in the SEPP, Australian Standards, and Disability Discrimination Act current at the time. The advice relates specifically to this project and may not apply to any other building or to this building at any other point in time.



APPENDIX A: DOCUMENTATION REVIEWED

Plans by SARM Architects | Project BGWYN

DOCUMENT NUMBER NAME	REVISION	DATE
A000	3	12/03/24
A001	3	12/03/24
A101	3	12/03/24
A102	3	12/03/24
A103	3	12/03/24
A104	3	12/03/24
A105	3	12/03/24
A106	3	12/03/24
A201	3	12/03/24
A202	3	12/03/24
A203	3	12/03/24
A204	3	12/03/24
A301	3	12/03/24
A302	3	12/03/24
A303	3	12/03/24
A304	3	12/03/24
A305	3	12/03/24
A401	3	12/03/24
A402	3	12/03/24
A403	3	12/03/24
A404	3	12/03/24
A405	3	12/03/24
A506	3	12/03/24