

Disability Access Report

Cypress Seniors Living
4 Cypress Parade
BOWRAL NSW

For: Jepton PTY LTD
Ref: LP_21133



Executive Summary

Development application documentation for the proposed Seniors Living Development located at 4 Cypress Parade Bowral NSW 2576, against the requirements of the Building Code of Australia 2019 (BCA), Disability (Access to Premises) Standards 2010, The Disability Discrimination Act 1992 (DDA) and SEPP Housing for Seniors and People with Disabilities with regard to access for persons with a disability.

We consider that the drawings presented for assessment, for the purposes of a development application, generally comply with The Building Code of Australia 2019 and the intent of the Disability Discrimination Act 1992, subject to the recommendations made in this report being implemented during the construction process.

The following table summarises compliance issues.

Item No.	Description	Compliance Status
SEPP Siting Requirements		
4.1	Location & Access to Facilities	Compliant
4.2	Accessibility	Compliant
SEPP Schedule 3		
5.1	Siting Standards	Compliant
5.2	Security	To be addressed in detailed design.
5.3	Letterboxes	To be addressed in detailed design.
5.4	Private Car Accommodation	Compliant
5.5	Accessible Entry	Compliant
5.6	Interior	Compliant configuration
5.7	Main Bedroom	Compliant
5.8	Bathroom	Compliant
5.9	Toilet	Compliant
5.10	Surface Finishes	To be addressed in detailed design.
5.11	Door Hardware	To be addressed in detailed design.
5.12	Ancillary Items	To be addressed in detailed design.
5.13	Living and Dining Room	Compliant
5.14	Kitchen	Compliant
5.15	Access to kitchen, main bedroom & bathroom	Compliant
5.16	Lifts in multi-storey buildings	Not Applicable
5.17	Laundry	Compliant
5.18	Storage	Compliant
5.19	Garbage	Compliant

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Revision Summary:

Date	Description	Revision
7 May 2021	DA Access Report	draft
7 August 2021	DA Access Report	Rev 1

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Qualifications:

Lindsay Perry, principle of Lindsay Perry Access Pty Ltd, is a qualified Access Consultant, holding the Certificate IV in Access Consulting. Her other qualifications are as follows:

- Internationally Certified Access Consultant GAATES ICAC BE-02-106-18
- ACAA Accredited Member No. 136
- Registered Architect NSW 7021
- Livable Housing Assessor 20047
- NDIS SDA Assessor SDA00049



Clarifications:

This report is limited to items within drawings listed in this report only.

Construction is to be in accordance with the recommendations made in this access report to ensure compliance. Where construction differs from the drawings, further assessment will be required to ascertain compliance.

Any dimensions quoted throughout this report and within Australian Standards are CLEAR dimensions, not structural. This needs to be considered during construction to account for wall linings and the like.

Best practice options, as noted in the report, are not mandatory but will minimise the risk of a complaint made under the DDA.

The recommendations throughout this report reflect the professional opinion and interpretation of Lindsay Perry Access Pty Ltd. This may differ from that of other consultants.



Document Control:

prepared by:		
Jillian Coram-Parker ACAA Affiliate Member No. 712	Draft Revision 1	4 May 2021 29 June 2021
approved by:		
Lindsay Perry ACAA Accredited Member No. 136	Draft Revision 1	7 May 2021 7 August 2021



1 Project Description

The project provides six (6) two storey dwellings each comprising three (3) bedrooms with a single or double garage. A central driveway with pedestrian pathways provides access to all dwellings from the allotment boundary. An accessible carparking bay and three (3) visitor car spaces are provided within the development.

2 Reviewed Documentation

Documentation prepared by ELK Designs has been reviewed as follows:

dwg no.	drawing name	revision
DA000	Cover Page	P5
DA010	Site Analysis Plan	P3
DA020	Demolition Plan	P4
DA030	Site Plan	P8
DA035	Site Coverage Plan	P6
DA045	Max Height Plane	P1
DA100	Overall Ground Floor	P8
DA101	Unit 1-2 Ground Floor	P5
DA102	Unit 3-4 Ground Floor	P7
DA103	Unit 5-6 Ground Floor	P7
DA110	Overall First Floor Plan	P8
DA111	Unit 1-2 First Floor	P7
DA112	Unit 3-4 First Floor	P7
DA113	Unit 5-6 First Floor	P7
DA150	Roof Plan	P5
DA300	Elevations	P7
DA301	Elevations	P7
DA302	Elevations	P4
DA350	External Finishes	P2
DA400	Sections	P3

3 Legislation

Access assessment has been made against Access Legislation including:

- State Environmental Planning Policy – Housing for Seniors and Persons with a Disability 2004 (SEPP), Current Amendment – 28 February 2019
- The Commonwealth Disability Discrimination Act 1992 (DDA)
- Disability (Access to Premises (Buildings)) Standards 2010
- Access Code for Buildings 2010
- The Building Code of Australia 2019 (BCA) Section D3 – Access for People with Disabilities
- The Building Code of Australia 2019 (BCA) Section D2 (in part) – thresholds and slip resistant
- Australian Standards AS1428.1(2009) Amendment 1, AS1428.2(1992), AS1428.4(2009) – Design for Access and Mobility
- Australian Standard AS2890.6 (2009) – Parking Facilities – Off street carparking For People with Disabilities.
- Australian Standard AS4299 – Adaptable Housing



A summary of the requirements of relevant legislation follows.

- **SEPP** Housing for Seniors and People with a Disability encourages the provision of housing for seniors and persons with a disability. It accommodates the requirements of AS1428, AS4299 and AS2890.1.
- The **DDA** requires independent, equitable, dignified access to all parts of the building for all building users regardless of disability. The DDA makes it unlawful to discriminate against a person on the grounds of disability.
- The **Disability (Access to Premises - buildings) Standards 2010** (the Premises Standards) commenced on 1 May 2011. Any application for a building approval for a new building or upgrade of an existing building on or after that date triggers the application of the Premises Standards.
The Premises Standards include an **Access Code** written in the same style as the Building Code of Australia. It has a number of Performance Requirements that are expressed in broad terms and references a number of technical Deemed-to-Satisfy Provisions.
- The **Building Code of Australia (BCA)** is contained within the National Construction Code (NCC) and provides the minimum necessary requirements for safety, health, amenity and sustainability in the design and construction of new buildings (and new building work in existing buildings) throughout Australia. The BCA is a performance based code and compliance can be met through satisfying the deemed-to-satisfy provisions or by meeting the prescribed performance requirements. provisions, have been met. This can be done through methods such as a comparative analysis or expert judgement.

For Class 1a buildings that are private dwellings, BCA has no specific accessibility requirements – the requirements of the SEPP are required.

- **AS1428 – Design for Access and Mobility**
 - Australian Standard AS1428.1 (2009) Amendment 1 & 2, – Design for Access and Mobility contains access requirements that are mandatory for the provision of access for persons with a disability and is referred by the BCA
 - Australian Standard AS1428.2(1992) – Design for Access and Mobility: Enhanced and additional requirements – Buildings and facilities provides enhanced and best practice requirements that will minimize DDA risk
 - Australian Standard AS1428.4.1 (2009) Amendment 1 – Design for Access and Mobility: Means to assist the orientation of people with vision impairment – Tactile ground surface indicators
- **AS4299 – Adaptable Housing** provides housing for different community groups with different needs. It involves a move away from special accommodation for persons with a disability, avoiding social dislocation and is referenced by the SEPP.
- **AS2890.6** applies to the carparking areas generally.



4 SEPP – Siting Requirements

The proposed development has been designed to reflect the requirements of the SEPP and the Australian Standards nominated in this document including AS1428 and AS4299. This development contains self-contained dwellings. Therefore, the requirements of SEPP Clause 26: Location and Access to Facilities, Clause 38: Accessibility are relevant.

4.1 SEPP Clause 26 Location & Access to Facilities

A SEPP development must offer access to services such as shops, banks, retail services, commercial services, recreational facilities, community facilities and doctors. These facilities are to be located within 400m of the site via a pathway that provides a suitable access pathway.

The SEPP states that 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.

Further, the SEPP defines **wheelchair access** as follows (clause 3: interpretation)
wheelchair access, in relation to any 2 points, means a continuous path of travel between those points that can be negotiated by a person using a wheelchair.

The overall aims of the SEPP are to:

- increase the supply and diversity of residences that meet the needs of seniors or people with a disability, and
- make efficient use of existing infrastructure and services, and
- be of good design.

For development outside the Sydney Statistical Division, these services can be located at a distance greater than 400m from the site if there is a transport service available. The transport service is required to take residents to a place that is located at a distance of not more than 400m from the relevant facilities or services and is to be available to and from the proposed development. It must be available both to and from the proposed development during daylight hours at least once each day from Monday to Friday (both days inclusive).

Within the SEPP, a **suitable access pathway** has an average gradient of 1:14. Other allowable gradients include 1:12 for a length of up to 15m, 1:10 for a length of up to 5m and 1:8 for a length of up to 1.5m.

Compliance Summary:

Compliance is achievable

The site lies within 310m of bus stops on Kangaloon Road (opposite Burradoo Road) to the west of the site.

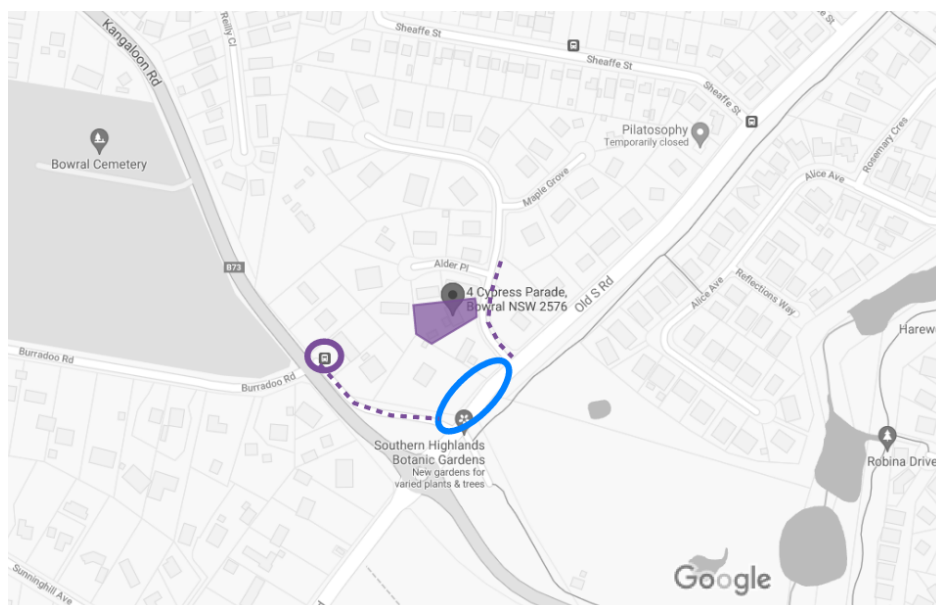


Figure 1 | Location of the Site

Formed footpaths are provided along the eastern side of Cypress Parade and along Kangaloon Road. They have a concrete surface, are relatively level and in good condition. They provide a suitable accessway per SEPP requirements.

There is no formed footpath along Old S Road – this will need to be provided to ensure that a continuous suitable pathway within the meaning of the SEPP is provided between the development site and the bus stop.



Figure 2 | Footpath to Cypress Parade



Figure 3 | Intersection Cypress Pde & Old S Road



Figure 4 | Verge to Old S Road

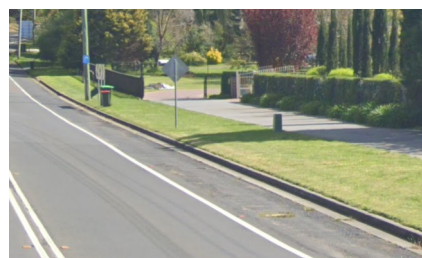


Figure 5 | Bus Stop

*photos sourced from GoogleMaps



Bus Route 815 travels along Kangaloon Road offering a loop service to East Bowral. It operates six (6) days a week in keeping with SEPP requirements.

ROUTE 815		East Bowral															
		Monday - Friday												Saturday			
		AM	AM	AM	AM	AM	AM	PM	PM	PM	PM	PM	PM	AM	AM	AM	PM
Route No.		815	815	815	808	815	815	815	815	815	815	815	815	815	815	815	815
BOOLWEY STREET - TERMINUS				9.00		10.35	11.45	12.35	1.45	2.35	3.15#	4.30	5.15	10.15	11.45	3.15	
Before Harris Farm- Station/Bowral St Bus Zone				9.02		10.37	11.47	12.37	1.47	2.37		4.32	5.17	10.17	11.47	3.17	
Kangaloon Rd Roundabout		6.45		9.04		10.39	11.49	12.39	1.49	2.39		4.34	5.19	10.19	11.49	3.19	
Kenilworth Gardens Retirement Village		6.46		9.05		10.40	11.50	12.40	1.50	2.40		4.35	5.20	10.20	11.50	3.20	
Kangaloon & Old South Rds		6.48	8.29	9.07	10.25	10.42	11.52	12.42	1.52	2.42	3.55	4.37	5.22	10.22	11.52	3.22	
Boardman & King Ranch		6.49	8.30	9.08		10.43	11.53	12.43	1.53	2.43	4.00	4.38	5.23	10.23	11.53	3.23	
Bottom of Robinia Drive		6.51	8.35	9.10		10.45	11.55	12.45	1.55	2.45	4.05	4.40	5.25	10.25	11.55	3.25	
Highland Dr & Isabella Way		6.55	8.41	9.14		10.49	11.59	12.49	1.59	2.49	3.58*	4.44	5.29	10.29	11.59	3.29	
Community Centre - Boardman/Rowland Rd		6.57	8.43	9.16		10.51	12.01	12.51	2.01	2.51	4.08	4.46	5.31	10.31	12.01	3.31	
Rowland & Loris Harley Sts		6.59	8.45	9.18		10.53	12.03	12.53	2.03	2.53	4.10	4.48	5.33	10.33	12.03	3.33	
Emily & Old South Rds		7.02	8.48	9.21		10.56	12.06	12.56	2.06	2.56	4.13	4.51	5.36	10.36	12.06	3.36	
Ascot & Purcell Sts		7.04	8.50	9.23		10.58	12.08	12.58	2.08	2.58		4.53	5.38	10.38	12.08	3.38	
Bowral Hospital- Bowral St		7.06	8.52	9.25	10.29	11.00	12.10	1.00	2.10	3.00	4.25	4.55	5.40	10.40	12.10	3.40	
BOOLWEY STREET - TERMINUS		7.08	9.00*	9.27	10.31	11.02	12.12	1.02	2.12	3.02	4.27	4.57	5.42	10.42	12.12	3.42	

4.2 SEPP Clause 38 – Accessibility

A SEPP development should have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities. A development should provide attractive, yet safe, environments for pedestrian and motorists with convenient access and parking for residents and visitors.

Compliance Summary:

Compliant

The proposed development meets the intent of this Clause with links to public transport.

Carparking is provided for residents attached to the dwellings with visitor carparking provided at the front of the site with an accessible path of travel to dwellings.



5 SEPP – Schedule 3 Standards Concerning Accessibility & Usability for Hostels and Self-Contained Dwellings

The dwellings within the proposed development have been considered against SEPP- Housing for Seniors and People with Disabilities (SEPP) and the Australian Standards nominated in this document including AS1428 and AS4299.

A “self-contained dwelling” is defined as a dwelling or part of a building (other than a hostel), whether attached to another dwelling or not, housing seniors or people with a disability, where private facilities for significant cooking, sleeping and washing are included in the dwelling or part of the building, but where clothes washing facilities or other facilities for use in connection with the dwelling or part of the building may be provided on a shared basis.

There are 6 dwellings on the site. They are provided as 3 bedrooms with single or double garage. Each unit is over two levels.

5.1 SEPP Schedule 3, Clause 2 – Siting Standards

This Clause contains 3 parts regarding siting standards as follows.

(1) Wheelchair Access

Where the whole of the site has a gradient of less than 1:10, 100% of the dwellings must have wheelchair access by a continuous path of travel within the meaning of AS1428 to an adjoining public road.

(2) If the whole of the site does not have a gradient of less than 1:10:

- 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
- b) the wheelchair access provided must be by a continuous accessible path of travel (within the meaning of AS 1428.1) to an adjoining public road or an internal road or a driveway that is accessible to all residents.

(3) Common Areas

Access must be provided in accordance with AS 1428.1 so that a person using a wheelchair can use common areas and common facilities associated with the development.

The applicable siting standard for this development is (1) only. The site has an overall gradient less than 1: 10 and no community facilities are provided.

Compliance Summary:

Compliant

All of the units on the site are accessible to people with a disability. Each unit has direct access to the driveway area and an accessible path of travel by way of a pedestrian ramping system alongside the driveway gives access to the street footpath along Cypress Parade.



5.2 SEPP Clause 3 – Security

Pathway lighting is to be designed and located to avoid glare for pedestrians and adjacent dwellings. Lighting to be minimum 20 lux at ground level.

Compliance Summary:

To be addressed during detailed design.

5.3 SEPP Clause 4 – Letterboxes

Letterboxes are required to be lockable, in a central location and be accessible to persons using a wheelchair via an accessible path of travel.

Compliance Summary:

To be addressed during detail design stage

Letterboxes are to be provided in an accessible location with a hardstand surface.

Letterboxes should be within the accessible height range of 900-1100mm above ground level to assist persons using a wheelchair / scooter.

5.4 SEPP Clause 5 – Private Car Accommodation

If car parking (not being for employees) is provided,

- Carparking spaces must comply with the requirements for parking for persons with a disability set out in AS2890 and,
- 5% of the total number of car parking spaces must be designed to enable the width of the spaces to be increased to 3.8m and,
- Any garage must have a power operated door.

Note:

SEPP was released when AS2890.1 (2004) was applicable. Within AS2890.1 (2004), it is stated that for carparking for people with disabilities, AS2890.1(1993) Clause 2.4.5 should be adopted (AS2890.6 Carparking or People with Disabilities was pending publication). Further, SEPP Clause 3: Interpretation specifically states AS 2890 Part 1 as the applicable standard.

This, and the requirement for the capability of 5% of carparking to be increased to 3800mm wide, suggests that carparking for residents should have a minimum width of 3200mm (per AS2890.1(1993) Clause 2.4.5, rather than the 4800mm required by AS2890.6.

For enclosed spaces such as garages, the minimum width is required to be 3800mm for compliance with AS2890.1(1993 & 2004) which requires an additional 300mm for each enclosing wall to ensure wheelchair access.

Compliance Summary:

Compliant

All units are provided with a garage that measures over 3800mm



5.5 SEPP Clause 6 – Accessible Entry

Every entrance to each residence, whether it be the front entry or not, must comply with Clauses 4.3.1 and 4.3.2 of AS4299. Clauses 4.3.1 and 4.3.2 of AS4299 require the entry door to comply with AS1428.2 – the minimum clear opening width of the doorway is to be 850mm and allow for wheelchair maneuverability (provide minimum 1550mm long area in front of the doorway).

Door hardware is to comply with AS1428. In this regard, entry door hardware is to be in the accessible height range of 900-1100mm above finished floor level. The use of lever handles is encouraged to assist persons with a manual disability such as arthritis.

Compliance Summary:

Compliant Configuration

Circulation space offers compliance as noted in dotted lines on drawings.

Door leaf sizes of 920mm should be used as a minimum which will achieve clear width of 850mm.

5.6 SEPP Clause 7 – Interior

Widths of internal corridors 1000mm and circulation at internal doorways must comply with AS1428.1.

Compliance Summary:

Compliant configuration

Doorway circulation to achieve compliance with AS1428.1 as per SEPP requirements.

5.7 SEPP Clause 8 – Main Bedroom

At least one bedroom is required to have adequate space for a wardrobe and a queen size bed with minimum 1200mm wide circulation at the foot of the bed, 1000mm between the bed and wall / wardrobe or any other obstruction. There are also requirements for locations of GPOs and telephone outlets and illumination levels.

Compliance Summary:

Compliant

The main bedroom within each unit offers adequate circulation area.

Additional requirements listed above to be implemented during detailed design.

5.8 SEPP Clause 9 – Bathroom

At least one bathroom must be located on the entry level and have an area that complies with AS1428, slip resistant floor, shower minimum 1100x1160mm with future provision for accessible features, washbasin capable of adaption to comply with AS4299 and a wall cabinet with illumination levels as described.

Compliance Summary:

Compliant

Ensuite to Bedroom 1 within each of the units is conducive to the requirements of an accessible bathroom, meeting the requirements of the SEPP.



5.9 SEPP Clause 10 – Toilet

A self-contained residence is required to have a toilet on the ground (or main) floor that complies with the requirements for sanitary facilities of AS4299. That is, a visitable toilet.

Compliance Summary:

Compliant

A visitable toilet is provided within each unit that meets the requirements of AS4299.

5.10 SEPP Clause 11 – Surface Finishes

Balconies and external paved areas must have slip resistant surfaces.

Compliance Summary:

To be addressed during detailed design.

5.11 SEPP Clause 12 – Door Hardware

Door handles and hardware for all doors must be provided in accordance with AS4299.

Door hardware is to be operable with one hand and in the height range of 900-1100mm above the floor level. The use of lever handles is encouraged to assist persons with a manual disability such as arthritis.

Compliance Summary:

To be addressed during detailed design.

5.12 SEPP Clause 13 – Ancillary Items

Switches such as light switches must be located within the accessible height range of 900-1100mm above the floor level as required by AS4299.

Compliance Summary:

To be addressed during detailed design.

5.13 SEPP Clause 15 – Living and Dining Room

Living areas within each residence are required to have circulation areas in accordance with AS4299, Clause 4.7. In this regard, an area with 2250mm diameter is required, clear of furniture.

A telephone outlet adjacent to a general power outlet and illumination level of 300 lux is also a requirement for living areas.

Compliance Summary:

Compliant

The open plan arrangement of living / dining areas within each of the units provides sufficient area to satisfy SEPP requirements for circulation spaces within living and dining rooms.

The requirement for telephone outlet, general purpose outlet and lux levels should be implemented during detailed design.



5.14 SEPP Clause 16 – Kitchen

A kitchen in a self-contained dwelling must have:

- Circulation space in accordance with AS4299, Clause 4.5.2 (1550mm between opposing benches)
- A width at door approaches complying with Clause 7 of this schedule
- Fittings and fittings in accordance with the relevant sub clauses of AS4299, Clause 4.5.

Compliance Summary:

Compliant

Kitchens within each unit have adequate width to accommodate 1550 mm clear between opposing benches.

Additional requirements for kitchens as listed above, should be implemented during detailed design.

5.15 SEPP Clause 17 – Access to kitchen, main bedroom, bathroom and toilet

In multi-storey residences, the kitchen, main bedroom, bathroom and toilet must be located on the entry level.

Compliance Summary:

Compliant

5.16 SEPP Clause 18 – Lifts in multi-storey developments

In a multi storey building containing self-contained dwellings, lift access must be provided to dwellings above the ground level by way of a lift complying with Clause E3.6 of the BCA.

Compliance Summary:

Not applicable

5.17 SEPP Clause 19 – Laundry

A self-contained dwelling must have a laundry that has:

- A width at door approaches that complies with Clause 7 of this schedule.
- Provision for the installation of an automatic washing machine and a clothes dryer.
- A clear space in front of appliances of at least 1300mm
- Slip resistant floor
- An accessible path of travel to any clothesline.

Compliance Summary:

Compliant

Laundries are provided with adequate circulation – see Section 5.6 of this report for commentary around the doorways.

Requirements such as floor finish and access to clothes lines to be implemented during preparation of the construction certificate documentation to ensure compliance.



5.18 SEPP Clause 20 – Storage

A self-contained dwelling must be provided with a linen cupboard in accordance with AS4299, Clause 4,1,1,5. It should be at least 600mm wide that have adjustable shelving.

Compliance Summary:

Compliant

The requirement for adjustable shelving is to be implemented during detailed design.

5.19 SEPP Clause 21 – Garbage

A garbage storage area must be provided in an accessible location.

Compliance Summary:

Compliant

Garbage bins are supplied to each unit in the garage.



6 Conclusion

This report demonstrates that the fundamental aims of accessibility legislation are achievable within the proposed Seniors Living development 4 Cypress Parade Bowral NSW Spatial planning and general arrangements of facilities will offer inclusion for all building users.

Disability is often defined as any limitation, restriction or impairment which restricts everyday activities and has lasted or is likely to last for at least 6 months. Disabilities can be very varied. They can be physical, cognitive, intellectual, mental, sensory, or developmental. They can be present at birth or can occur during a person's lifetime. They can also be permanent or temporary. In Australia, almost one in five people – 4.3 million – have a disability with one in three having severe or profound core activity limitation.

Equity and dignity are important aspects in the provision of access to buildings for all users. With respect to people with a disability, equity and dignity are sometimes overlooked in the construction of new buildings or refurbishment works. The design approach needs to maintain a high level of equity for people with disabilities and meet the performance requirements of the BCA. The performance requirements adopt two main concepts in the provision of access for people with a disability being **to the degree necessary** and **safe movement**. Both of these concepts need to be achieved within the context of equitable and dignified access.

In this respect, a wide range of disabilities needs consideration and a compromise reached between requirements of different disability groups. Measures need to be implemented to ensure inclusion of all users, not a particular disability group in isolation.

This report is limited to items within drawings listed in this report only. Future alterations and additions to the building will render the recommendations in this report null and void as we cannot guarantee continued compliance where changes to the building fabric are made.

All dimensions quoted throughout this report and within Australian Standards are CLEAR dimensions, not structural. This needs to be considered in the preparation of the construction certificate documentation to account for wall linings and the like.

Best practice options, as noted in the report, are not mandatory but will minimise the risk of a complaint made under the DDA.

