Proposed BWL Seniors Housing Redevelopment 51-57 & 59 Masons Parade Point Frederick

JWP Compliance Review

DRAFT State Environmental Planning Policy (Housing) 2021

Relevant Provisions

Chapter 3 Diverse Housing – Part 4 Seniors Housing

DRAFT Provision	DRAFT Design Criteria	Compliance	Design Response			
	Division 3 Development standards					
	 (1) This section applies to development for the purposes of seniors housing involving— (a) the erection of a building, or (b) alterations or additions to an existing building. 	\checkmark	The proposal is for an erection of a building.			
Draft Clause 74 Development standards—general	 (2) Development consent must not be granted for the development unless— (a) the site area of the development is at least 1,000m2, 	\checkmark	 The site comprises two (2) existing lots: Lot 8 DP 218157 (777.8sqm with frontage 23.27m); and Lot 51 732632 (11520 sqm with frontage 73.925m). The combined area is 12,297.8 sqm and the existing/combined frontage is 97.2m The proposed building involves a Lot size of 6040.98 sqm with a frontage of 53.30m. The residual lot will be 6,256.82 sqm. 			
	(b) the frontage of the site area of the development is at least 20m measured at the building line,	\checkmark	The proposed site frontage of the proposed lot approximately 53.30m			
	 (c) for development on land in a residential zone where residential flat buildings are not permitted the development will not result in a building— (i) with a height of more than 9m, or (ii) exceeding 2 storeys if the building is adjacent to the boundary of the site area. 	N/A				

DRAFT State Environmental Planning Policy (Housing) 2021 – BWL Redevelopment Compliance with Provisions Relevant to Seniors Housing

DRAFT Provision	DRAFT Design Criteria	Compliance	Design Response
	 (3) The development may result in a building with a height of no more than 11.5m if servicing equipment on the roof of the building— (a) is fully integrated into the design of the roof or contained and suitably screened from view from public places, and 	X	Under SEPP (Gosford City Centre) 2018, the building height is permitted to exceed 11.5m with the endorsement of the City of Gosford Design Review Panel.
	(b) is limited to an area of no more than 20% of the surface area of the roof.	\checkmark	Complies.
	 (4) Subsection (1)(a) and (b) do not apply to development the subject of a development application made by the following— (a) the Land and Housing Corporation, 	N/A	N/A – Legacy is not a Social Housing Provider.
	(b) another social housing provider.	N/A	
Draft Clause 77 Restrictions on occupation of seniors housing	 (1) Development permitted under this Part may be carried out for the accommodation of only the following— (a) seniors or people who have a disability, (b) people who live in the same household with seniors or people who have a disability, (c) staff employed to assist in the administration and provision of services to housing provided under this Part. 	\checkmark	The proposal is for seniors living.

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	 (2) Development consent must not be granted under this Part unless the consent authority is satisfied that only the kinds of people referred to in subsection (1) will occupy accommodation to which the development relates. 	\checkmark	Refer to Schedule 5 Standards concerning accessibility and useability for hostels and independent living units, below.
	(1) This section applies to a building used for the purposes of seniors housing on land zoned primarily for commercial purposes.	\checkmark	Noted
	(2) Development consent must not be granted for development involving the building unless the part of the ground floor of the building that fronts a street will not be used for residential purposes.	\checkmark	The ground floor is not proposed to be utilised for residential purposes.
DRAFT Clause 78 Use of ground floor of seniors	 (3) Subsection (2) does not apply to a part of a building that— (a) faces a service lane that does not require active street frontages, or 		
housing in commercial zones	(b) is used for any of the following purposes—	\checkmark	Noted
	(i) a lobby for a residential, serviced apartment, hotel or tenanted component of the building,	•	
	(ii) access for fire services,		
	(iii) vehicular access.		
	(4) Subsection (2) does not apply if another environmental planning instrument permits the use of the ground floor of the building for residential purposes.	\checkmark	Noted

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DRAFT Clause 79 Subdivision	(1) Land on which development has been carried out under this Part may be subdivided with the consent of the consent authority.	\checkmark	Consent is sought via a Development Application to Council.
	(2) Subsection (1) does not apply to land in Zone B3 Commercial Core.	N/A	
DRAFT Clause 80	(1) A consent authority must not grant consent for development for the purposes of a residential care facility unless the facility will include a fire sprinkler system.	N/A	
Fire sprinkler systems in residential care facilities	(2) Development for the purposes of the installation of a fire sprinkler system in a residential care facility may be carried out with development consent.	N/A	
	Division 4 Site-re	elated requireme	ents
DRAFT Clause 82 Location and access to facilities and services—independent living units	 (1) Development consent must not be granted for development for the purposes of an independent living unit unless the consent authority has considered whether residents will have adequate access to facilities and services— (a) directly, or (b) by a transport service that complies with subsection (2), or (c) on-site. 	\checkmark	Public transport available opposite the site within 400m, not directly at the site as per subsection (3)(a) - access is adequate if— (a) the facilities and services are, or the transport service is, located at not more than 400m from the site, and It is considered access is adequate.
	 (2) The transport service must— (a) take the residents to a place that has adequate access to facilities and 	\checkmark	A transport service is available within 400m by way of a suitable access path.

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	services, and (c) for development on land that is not within the Greater Sydney region—be available both to and from the site during daylight hours at least once each weekday.		
	 (3) For the purposes of subsections (1) and (2), access is adequate if— (a) the facilities and services are, or the transport service is, located at a distance of not more than 400m from the site, and (b) the distance is accessible by means of a suitable access pathway, and (c) the gradient along the pathway complies with subsection (4)(c). 	\checkmark	Access is considered adequate, public transport within 400m by way of a suitable access path.
	 (4) In subsection (3)— (a) a suitable access pathway is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and (b) the distance is to be measured by reference to the length of the pathway, and (c) the overall average gradient must be no more than 1:14 and the gradients along the pathway must be no more than— (i) 1:12 for a maximum of 15m at a time, or (iii) 1:8 for a maximum length of 1.5m at a time. 	\checkmark	Public footpath gradient <1:10 (as per UDG plans)

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	 (5) In this section— facilities and services means— (a) shops and other retail and commercial services that residents may reasonably require, and (b) community services and recreation facilities, and (c) the practice of a general medical practitioner. passenger service has the same meaning as in the Point to Point Transport (Taxis and Hire Vehicles) Act 2016. 		Noted.
	Division 5 Des	ign requirement	s
DRAFT Clause 86 Design of seniors housing	A consent authority must not consent to development under this Part unless the consent authority is satisfied that the development demonstrates adequate regard has been given to the principles set out in Division 6.	\checkmark	Noted
	Division 6 De	esign principles	
DRAFT Clause 87 Neighbourhood amenity and streetscape	(a) recognise that the operational, functional and economic requirements of residential care facilities typically require a different building shape from other residential accommodation, and	N/A	The Proposal is not Residential Care facility
Development for the purposes of seniors housing should—	(b) recognise the desirable elements of— (i) the location's current character, or (ii) for precincts undergoing a transition— the future character of the location so new buildings contribute to the quality and identity of the	\checkmark	Refer to IDG Urban Design Analysis - Attachment C.

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	area,		
	(c) complement heritage conservation areas and heritage items in the area, and	\checkmark	No heritage conservation areas and no heritage items in the vicinity of the site
	 (d) maintain reasonable neighbourhood amenity and appropriate residential character by— (i) providing building setbacks to reduce bulk and overshadowing, and (ii) using building form and siting that relates to the site's landform, and (iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and (iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and 		Design complies with SEPP 65 Apartment Design Guidelines and subject to Design excellence review process.
	(e) be designed so the front building on the site is set back generally in line with the existing building line, and	\checkmark	There will be a zero frontage, which is in line with the existing building line.
	(f) includes plants reasonably similar to other plants in the street, and	\checkmark	Landscape plan responds to contact and maintenance considerations.
	(g) retain, wherever reasonable, significant trees, and	\checkmark	No major existing trees to be retained.
	(h) be designed so no building is constructed in a riparian zone.	\checkmark	Design setback from modified riparian zone
DRAFT Clause 88	a) appropriate site planning, the location and design of windows and balconies, the use of screening devices and	\checkmark	The proposed building complies with the visual and acoustic privacy requirements of the SEPP 65 Apartment Design Guidelines.

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Visual and acoustic privacy Development for the purposes of	landscaping, and		
seniors housing should consider the visual and acoustic privacy of adjacent neighbours and residents by—	(b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.	\checkmark	
DRAFT Clause 89 Solar access and design for climate Development for the purposes of seniors housing should—	 (a) for development involving the erection of a new building—be designed— (i) to provide residents of the building with adequate daylight, and (ii) in a way that does not adversely impact the amount of daylight in neighbouring buildings, and (b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation, solar heating and lighting by locating the windows of living and dining areas in a northerly direction. 		The apartments have been designed to promote increased access to daylight and natural ventilation, with the central open courtyard creating a stack effect for hot air to escape the building while residences are cross ventilated. Greenery through the open walkways and within shared spaces helps maintain temperatures in these areas. Significant access to light through solar passive design also means that apartments receive significant daylight not requiring artificial light during daylight hours. The incorporation of LED lighting throughout the residential component of the facility also means that the on-going energy use of the property is significantly reduced. There is a degree of overshadowing of the land to the south which is in the same landownership. This land is proposed to become a separate lot that is likely to be redeveloped in future. Given the proposed building will be setback (50m) from the rear (eastern) boundary, the proposal retains significant solar access to that land. The solar impact is therefore reasonable for an urban environment.

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DRAFT Clause 90 Stormwater Development for the purposes of seniors housing should—	(a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas, and (b) include, where practical, on-site stormwater detention or re-use for second quality water uses.	\checkmark	The proposed redevelopment involves a new drainage system that will treat stormwater runoff before it is diverted into the existing stormwater infrastructure. Refer to Stormwater Management Report - Attachment F . As above.
DRAFT Clause 91 Crime prevention Development for the purposes of seniors housing should be designed in accordance with environmental design principles relating to crime prevention, provide personal property security for residents and visitors and encourage crime prevention by—	(a) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins the area, driveway or street, and (b) providing shared entries, if required, that serve a small number of dwellings and that are able to be locked, and (c) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.		The design of the building and landscaping incorporates passive supervision of public and community areas and pathways, measures to distinguish private areas from the public domain, and controlled access points. Refer to CPTED report - Attachment N .
DRAFT Clause 92 Accessibility Development for the purposes of seniors housing should—	 (a) have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities, and (b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors. 		The ground floor verandah provides passive surveillance to pedestrians moving along Masons Parade, encouraging use of the area. Strong links to the existing road-crossing and traffic lights allows residents of the development to confidently use pedestrian paths and public transport. The design provides a clear separation between pedestrian and vehicular activities on the site, achieved through a designated secure pedestrian way through the centre of the site, and a one way vehicle access road around the site into designated drop-off areas, garages and carparks.

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DRAFT Clause 93 Waste management	Development for the purposes of seniors housing should include waste facilities that maximise recycling by the provision of		Operational Waste will be separated in to waste streams to reduce landfill and encourage recycling.
	appropriate facilities.		Refer to Waste Management Plan.
	Division 7 Non-discretion	nary developmen	t standards
DRAFT Clause 94 Interrelationship of Division with design principles in Division 6	Nothing in this Division permits the granting of consent to development under this Part if the consent authority is satisfied that the development does not demonstrate that adequate regard has been given to the principles set out in Division 6.	\checkmark	Noted
	(1) The object of this section is to identify development standards for particular matters relating to development for the purposes of independent living units that, if complied with, prevent the consent authority from requiring more onerous standards for those matters.	\checkmark	Noted
DRAFT Clause 97 Non-discretionary development standards for independent living units—the Act, s4.15	 (2) The following are non-discretionary development standards in relation to development for the purposes of an independent living unit— (a) no building exceeds a height of 9m, excluding servicing equipment on the roof of a building, (b) servicing equipment on the roof of a building, which results in the building exceeding a height of 9m— (i) is fully integrated into the design of the roof or contained and suitably screened from view from public places, and (ii) is limited to an area of no more than 20% of the surface area of the roof, and 		Noted. The proposed building height is 26.55m (exc. Lift head and plant)

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	(iii) does not result in the building exceeding a height of 10.5m,		
	(c) the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less,	N/A	The allowable FSR under SEPP (Gosford City Centre) 2018 is 2:1 and the proposed FSR is 0.76:1
	(d) for a development application made by a social housing provider—at least 35m2 of landscaped area per dwelling,	N/A	Not a social housing provider
	(e) if paragraph (d) does not apply—at least 30% of the site area is landscaped,	\checkmark	Required landscape area (30%) is 1812.29sqm. Proposed landscaped area is 2,425.15sqm. Proposed Lot area is 6040.98sqm so proposed landscaping is 40.14%.
	(f) a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 6m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site,	\checkmark	Required Deep soil area (15%) is 906.15sqm. Proposed landscaped area is 2,020.98sqm. Proposed Lot area is 6,040.98sqm so proposed Deep soil area is 33.45%
	(g) at least 70% of the dwellings receive at least 3 hours of direct solar access between 9am and 3pm at mid-winter in living rooms and private open spaces,	\checkmark	Setting aside 30 units that are orientated for view amenity and not solar purposes, 18 of the 24 units meet or exceed the 3 hour minimum $-18/24 = 75\%$
	(i) for a dwelling in a multi-storey building not located on the ground floor- a balcony accessible from a living area with minimum dimensions of 2m and— (i) an area of at least 10m2, or (ii) for a 1 bedroom dwelling—an area of at least 6m2	\checkmark	All proposed balconies exceed the 6sqm or 10sqm minimum area and exceed the 2m x 2m dimension accessible from the living area
	(j) for a development application made by, or made by a person jointly with, a social housing provider—at least 1 parking space for every 5 dwellings,	N/A	N/A

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	(k) if paragraph (j) does not apply—at least 0.5 parking space for each bedroom.		A total of 39 car spaces is required for the proposed 78 room seniors living facility.
		\checkmark	An additional 4 car spaces is required for the proposed offices on the ground floor.
		, , , , , , , , , , , , , , , , , , ,	Therefore, a total of 43 car spaces is required.
			Its is proposed to provide approximately 48 car spaces on the site therefore complies with the requirement.

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	Application of standards in this Part 1				
DRAFT Clause 2 Siting standards	1) 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 AS 1428.1) to an adjoining public road.	\checkmark	The whole of the site the subject of the new building has a gradient of less than 1:10 and a compliant continuous path of travel is provided to the street.		
	 (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 (i) the proportion of the site, expressed as a percentage, that has a gradient of less than 1:10, or (ii) 50%, and (b) the wheelchair access provided must be by a continuous accessible path of travel to an adjoining public road or an internal road or a driveway accessible to all residents. 	•	Complies. The whole of the site the subject of the new building has a gradient of less than 1:10.		
	(3) 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.	\checkmark	Access report indicates that 'The ramps are suitably configured to comply with Cl. 10 and 12 of AS 1428.1 subject to review of the handrails / finer design details at CC stage'.		
DRAFT Clause 3 Security Pathway lighting—	(a) must be designed and located to avoid glare for pedestrians and adjacent dwellings, and	\checkmark	Noted		

DRAFT Schedule 5 Standards concerning accessibility and useability for hostels and independent living units

DRAFT Provision	DRAFT Design Criteria	Compliance	Design Response
	(b) must provide at least 20 lux at ground level.	\checkmark	Noted
	(a) must be situated on a hard standing area and have appropriate wheelchair access by a continuous accessible path of travel, and	\checkmark	Letterboxes are located on hard stand with wheelchair access and circulation by a continuous accessible path of travel.
DRAFT Clause 4 Letterboxes	(b) must be lockable, and		Noted
	 (c) must be located adjacent to the street entry— (i) together in a central location, or (ii) for independent living units— together in 1 or more central locations. 	\checkmark	Letterboxes are located together in a central location adjacent to the street entry.
DRAFT Clause 5 Private car accommodation If car parking (not being car parking for employees) is provided—	 (a) at least the following amount of car parking spaces must be designed to enable the width of each space to be increased to 3.8m and to comply with the requirements for parking for persons with a disability set out in AS/NZS 2890.6— (i) 10% of the total number of car parking spaces, or (ii) if there are less than 10 car parking spaces, 	\checkmark	Complies.
	 (b) a garage must have— (i) a power-operated door, or (ii) a power point and an area for motor or control rods to enable a power- operated door to be installed. 	\checkmark	Design Complies with Access Assessment - Attachment O.

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DRAFT Clause 6 Accessible entry	Every entry (whether a front entry or not) to a dwelling, not being an entry for employees, must comply with clauses 4.3.1 and 4.3.2 of AS 4299.	\checkmark	Dwelling entries are suitably detailed, some units may require slight adjustments at CC stage. Compliance is readily achievable at the CC design phase.
	(1) Internal doorways must have a minimum clear opening that complies with AS 1428.1.	•	All secondary bedrooms and balcony doors shall have AS 1428.1-2009 door circulation. Referenced plans do not detail compliance but shall be adjusted at CC stage to demonstrate compliance.
DRAFT Clause 7 Interior: general	(2) Internal corridors must have a minimum unobstructed width of 1m		
	(3) Circulation space at approaches to internal doorways must comply with AS 1428.1.		
DRAFT Clause 8 Bedroom At least one bedroom within each dwelling must have—	 (a) an area sufficient to accommodate a wardrobe and a bed sized as follows— (ii) for an independent living unit—a queen-size bed, and 		At least one accessible bedroom is detailed in each dwelling that is capable of compliance. All other required features to be documented into the detailed design documentation.
	 (b) a clear area for the bed of at least— (i) 1,200mm wide at the foot of the bed, and (ii) 1m wide beside the bed between it and the wall, wardrobe or another obstruction 		
	(c) 2 double general power outlets on the wall where the head of the bed is likely to be, and		
	(d) at least 1 general power outlet on the wall opposite the wall where the head of the bed is likely to be, and		
	(e) a telephone outlet next to the bed on		

DRAFT Provision	DRAFT Design Criteria	Compliance	Design Response
	the side closest to the door and a general power outlet beside the telephone outlet, and		
	(f) wiring to allow a potential illumination level of at least 300 lux.		
	(a) a slip-resistant floor surface,		
DRAFT Clause 9 Bathroom At least one bathroom within a dwelling must be on the ground (or main) floor and have the following facilities arranged within an area that provides for circulation space for sanitary facilities in accordance with AS 1428.1—	(b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS 1428.1,		
	 (c) a shower that complies with AS 1428.1, except that the following must be accommodated either immediately or in the future— (i) a grab rail, (ii) portable shower head, (iii) folding seat, 		At least one accessible bathrooms is detailed in each dwelling that is capable of compliances. All other required features to be documented into the detailed design documentation.
	(d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it,		Compliance is readily achievable at the CC design phase.
	(e) a double general power outlet beside the mirror.		
	(2) Subclause (1) (c) does not prevent the installation of a shower screen that can easily be removed to facilitate future accessibility.		
DRAFT Clause 10 Toilet	A dwelling must have at least one toilet on the ground (or main) floor and be a visitable toilet that complies with the requirements for sanitary facilities of AS	\checkmark	Each dwelling has at least one visitable toilet capable of compliance however a number of units (i.e. Unit 1.04 as one example) incorporates a sliding door inside the grabrail zone. Plan to be amended at CC to comply.

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	4299		All other required features to be documented into the detailed design documentation.			
			Compliance is readily achievable at the CC design phase.			
DRAFT Clause 11 Surface finishes	Balconies and external paved areas must have slip-resistant surfaces	\checkmark	To be documented into the detailed design documentation. Compliance is readily achievable at the CC design phase.			
DRAFT Clause 12 Door hardware	Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS 4299.	\checkmark	To be documented into the detailed design documentation. Compliance is readily achievable at the CC design phase.			
DRAFT Clause 13 Ancillary items	Switches and power points must be provided in accordance with AS 4299.	\checkmark	To be documented into the detailed design documentation. Compliance is readily achievable at the CC design phase.			
	Part 2 Additional standards for self-contained dwellings					
	14 Application of The standards set out in this Part apply t living units in addition to th	o seniors housing	g consisting of independent			
	(a) a circulation space in accordance with clause 4.7.1 of AS 4299, and	~	Living / dining room suitably detailed to comply. All other required features to be documented into the detailed design documentation. Compliance is readily achievable at the CC design phase.			
DRAFT Clause 15 Living room and dining room A living room dwelling must have—	(b) a telephone adjacent to a general power outlet.					
	(2) A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux.					
DRAFT Clause 16 Kitchen	(a) a circulation space in accordance with clause 4.5.2 of AS 4299, and	\checkmark	Kitchens in some units do not achieve 1550mm clearance between benches. All kitchens to be reviewed and adjusted at			

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A kitchen dwelling must have—	(b) a circulation space at door approaches that complies with AS 1428.1, and		CC stage. All other required features to be documented into the detailed design documentation.
	(c) the following fittings in accordance with the relevant subclauses of clause 4.5 of AS 4299—		Compliance is readily achievable at the CC design phase.
	(i) benches that include at least one work surface at least 800 millimetres in length that comply with clause 4.5.5 (a),		
	(ii) a tap set (see clause 4.5.6),		
	(iii) cooktops (see clause 4.5.7), except that an isolating switch must be included,		
	(iv) an oven (see clause 4.5.8), and		
	(d) "D" pull cupboard handles that are located towards the top of below-bench cupboards and towards the bottom of overhead cupboards, and		
	(e) general power outlets—		
	(i) at least one of which is a double general power outlet within 300 millimetres of the front of a work surface, and		
	(ii) one of which is provided for a refrigerator in such a position as to be easily accessible after the refrigerator is installed.		
DRAFT Clause 18 Lifts in multi-storey buildings	In a multi-storey building containing separate independent living units on different storeys, lift access must be provided to dwellings above ground level (existing) by way of a lift complying with clause E3.6 of the Building Code of	\checkmark	Lift access detailed to all levels. Refer to Section 2.0 at Cl. E3.6 of this report for lift requirements. Compliance is readily achievable at the CC design phase.

DRAFT Provision	DRAFT Design Criteria	Compliance	Design Response
	Australia.		
DRAFT Clause 19 Laundry	(a) a circulation space at door approaches that complies with AS 1428.1, and		Laundry in some units do not have compliant door circulation. All laundries to be reviewed and adjusted at CC stage, All other required features to be documented into the detailed design documentation. Compliance is readily achievable at the CC design phase.
	(b) provision for the installation of an automatic washing machine and a clothes dryer, and		
A self-contained dwelling must have a laundry that has	(c) a clear space in front of appliances of at least 1,300 millimetres, and		
	(d) a slip-resistant floor surface, and		
	(e) an accessible path of travel to any clothes line provided in relation to the dwelling.		
DRAFT Clause 20 Storage for linen	Linen storage must be provided in accordance with clause 4.11.5 of AS 4299.	\checkmark	Linen cupboard shown at every dwelling. Compliance is readily achievable at the CC design phase.
DRAFT Clause 21 Garbage	A garbage storage area must be provided in an accessible location.	\checkmark	Garbage room to be detailed at CC stage connected to an accessible path of travel.