

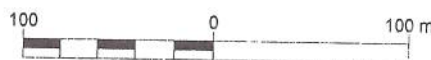
ATTACHMENT 2 LOCALITY MAP

DA 10.2009.231 - 25 Etonville Parade



Ashfield Municipal Council

Scale 1:3,888

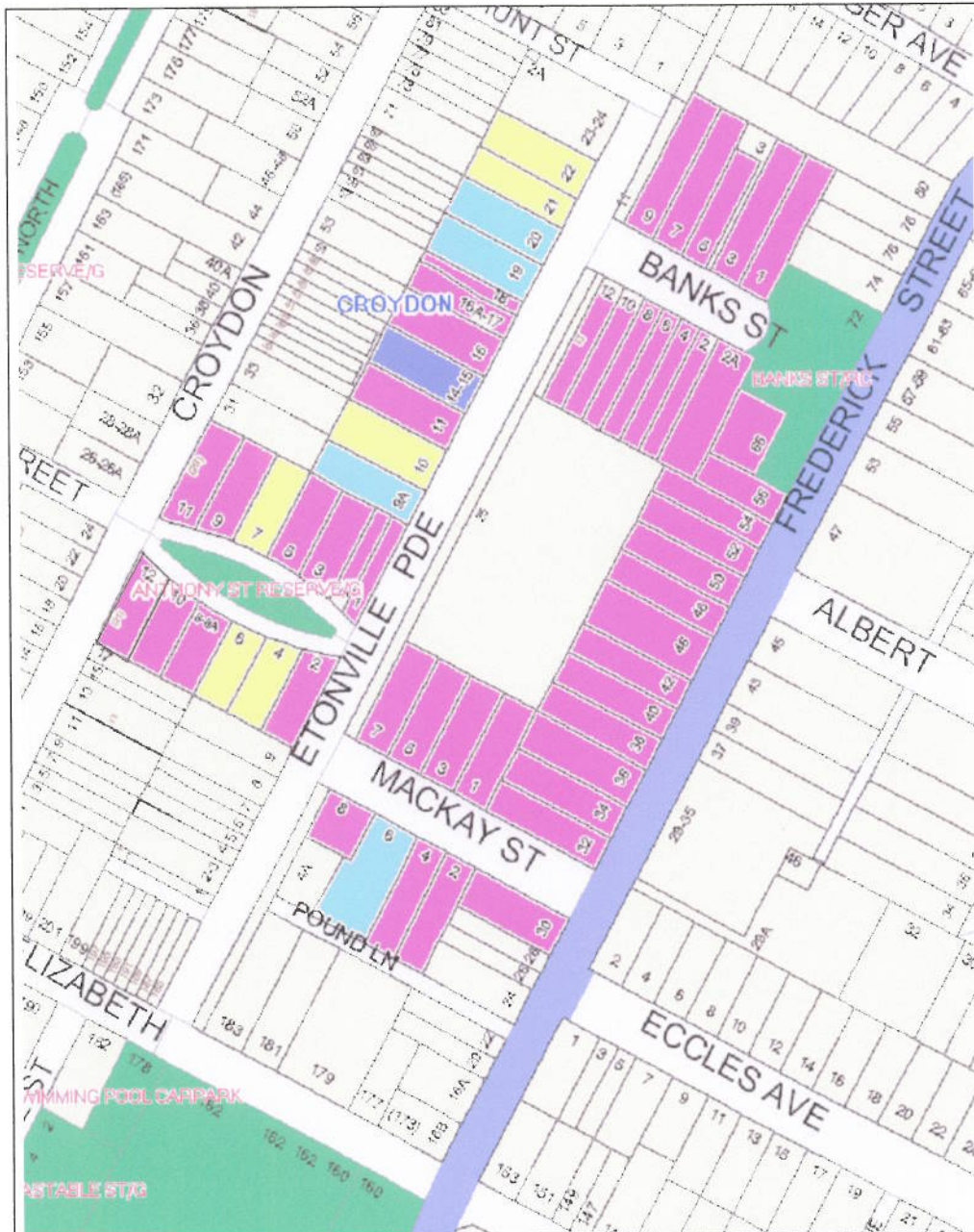


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Map - Surrounding Area



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{Title}

Zoom Width: 353.4 m



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Single-storey dwelling
Two-storey dwelling
Two-storey residential flat building
Three-storey residential flat building

22 02 2010

Attention: **Martin Amy**
Planner, Development Assessment
Ashfield Municipal Council
260 Liverpool Road, Ashfield

Dear Mr Amy,

**RE: Development Application 25 Etonville Parade and 1-3 Mackay Street, Ashfield
SEPP 65 COMMENTS AND RECOMMENDATIONS**

Thank you for inviting me to comment on this project.

The following comments have been prepared based on the drawings and documents supplied by Council including: Drawings by JPR Architects Pty Ltd received by Council on the 30th December 2009. Including DA 101,2,3 DA 201,2,3,4,5 DA 301,2,3,4,5,6 DA 308, 311 DA 431,2,3, DA 431,2,3 DA 410-430, DA 501, DA 601, DA 801. A statement of environmental effects by Urbis dated December 2009

We take on face value the accuracy of all the documents given to us and rely on them to form our assessment.

DESIGN QUALITY PRINCIPLES

Part 2 of SEPP 65 sets out the following design quality principles as a guide to assess a residential flat development. The 'Residential Flat Design Code (The Code)' is referred to as an accepted guide as to how the principles are to be achieved.

1. Context

Good design responds to and contributes to its context. Context can be defined as the key natural and built features of an area. Responding to context involves identifying the desirable elements of a location's character or, in the case of precincts undergoing a transition, the desired future character as stated in Planning and design policies. New buildings will thereby contribute to the quality and identity of an area. (SEPP65)

The site is located northeast of Croydon Railway station and is on the east side of Etonville parade which runs parallel to Frederick Street. The site incorporates two properties along Mackay Street which gives the site two frontages. Etonville parade has a mixture of single and double storey houses and double and triple storey residential flat buildings that date from the 1930's to the 1960's. Mackay Street and Frederick Street has mainly single storey Bungalows that date from the 1920s.



The site has a canal running along the Etonville parade side of the site. The site is in a flood affected zone.

The proposal of two 2x3 storey residential flat buildings and 15 single storey town houses is appropriate in scale to its surroundings. The flat buildings are on the Etonville parade side of the site and are located behind some well established street trees. They will be well suited to the context as will the single storey dwellings along the rear boundary of the site.

There is a present and growing demand for good quality older persons housing near public transport. This development is well suited to this location.

The proposal meets the objectives of this principle.

2. Scale

Good design provides an appropriate scale in terms of the bulk and height that suits the scale of the street and the surrounding buildings.

Establishing an appropriate scale requires a considered response to the scale of existing development. In precincts undergoing a transition, proposed bulk and height needs to achieve the scale identified for the desired future character of the area. (SEPP65)

As mentioned in the context Principle section, the proposal is generally in keeping with the scale of the buildings and site configuration of the area. The additional height of the residential Flat buildings caused by the raising of the ground floor level above the flood level increases the overall height of the buildings, however this has been mitigated by the low profile roof form that has been employed and the stepping back of the top storey which reduces the visual bulk of the buildings as seen from the street.

The single storey town houses are an appropriate scale.

The proposal meets the objectives of this principle.

3. Built form

Good design achieves an appropriate built form for a site and the building's purpose, in terms of building alignments, proportions, building type and the manipulation of the building elements.



Appropriate built form defines the public domain, contributes to the character of streetscape and parks, including their views and vistas, and provides internal amenity and outlook. (SEPP65)

As discussed in Scale, the stepping back of the top storey of the Residential Flat Buildings reduces the effective bulk of the buildings. These are further modulated by the use of projecting masonry balcony surrounds, which also provide shelter from the sun. Roof top terraces with integrated planters will further soften the buildings.

The only area of concern with respect to built form is the façades of the buildings facing the side boundaries. These are not set back sufficiently (required 6m) and are not stepped back enough at the top floor to form a satisfactory transition from the single storey dwellings on the adjacent properties.

The buildings are arranged so that the main entry to the site is via a bridge over the canal in the centre of the site. The turning circle acts as a visual focus for the complex. The rear boundary has the 15 town houses arranged along the whole length of the site. The repetition of the small scale skillion and gable end roofs will create a counterpoint to the simpler and more massive forms of the apartment blocks.

The proposal generally meets the objectives of the principle.

4. Density

Good design has a density appropriate for a site and its context, in terms of floor space yields (or number of units or residents)

Appropriate densities are sustainable and consistent with the existing density in an area or, in precincts undergoing a transition, are consistent with the stated desired future density. Sustainable densities respond to the regional context, availability of infrastructure, public transport, community facilities and environmental quality. (SEPP 65)

The proposal is for 38 self-contained dwellings, fifteen of which are 3 bedroom townhouses. The bulk of the units in the residential Flat buildings are 2 bedroom units (19) with two 1 and 3 bedroom units. This is a good mix of unit types and the site and context will absorb the additional residents comfortably.

Whilst the FSR is above the recommended level for this zoning, it is considered that a 0.2:1 increase is acceptable due to the size and configuration of the site.

The proposal meets with the objectives of this principle.

5. Resource, energy and water efficiency

Good design makes efficient use of natural resources, energy and water throughout its full life cycle, including construction. Sustainability is integral to the design process. Aspects include demolition of



existing structures, recycling of materials, selection of appropriate and sustainable materials, adaptability and reuse of buildings, layouts and built form, passive solar design principles, efficient appliances and mechanical services, soil zones for vegetation and re-use of water. (SEPP65)

The proposal generally addresses the principle well. A large proportion of the units have good cross ventilation and sunlight. Sun control has generally been well considered throughout the project.

The BASIX report shows a commitment to using low energy and water consumption appliances and fittings.

I am concerned about the masonry balcony surrounds on the western façades which will act as heat sinks in the summer and will retain heat. Perhaps a lighter form of construction could be considered here.

The proposal generally meets the objectives of this principle

6. Landscape

Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in greater aesthetic quality and amenity for both occupants and the adjoining public domain.

Landscape design builds on the site's natural and cultural features in responsible and creative ways. It enhances the development's natural environment performance by coordinating water and soil management, solar access, microclimate, tree canopy and habitat values. It contributes to the positive image and contextual fit of development through respect for streetscape and neighbourhood character, or desired future character.

Landscape design should optimise usability, privacy and social opportunity, equitable access and respect for neighbours' amenity and provide for practical establishment and long-term management. (SEPP65)

The proposal complies with the minimum 30% landscaped area and has approximately 20% deep Soil zone. A significant number of established trees are to be retained especially along the south eastern Boundary.

The design of planter boxes and garden beds appears to be well considered, providing privacy and a sense of enclosure.

It is unfortunate that the outdoor seating area on the southern side of the southern apartment building is not more in the sunshine on the northern side of the building. This would improve the amenity of the landscaped area significantly.

The proposal can meet the objectives of this principle with some additional landscape design.



7. Amenity

Good design provides amenity through the physical, spatial and environmental quality of a development.

Optimising amenity requires appropriate room dimensions and shapes, access to sunlight, natural ventilation, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas, outlook and ease of access for all age groups and degrees of mobility. (SEPP65)

The set backs to the northern and southern Boundaries from the apartment buildings (Side boundaries) are not sufficient. A minimum of 6m should be respected for habitable rooms. This will improve perceived privacy issues and the apparent bulk. Further stepping back of the top stories is also recommended. Privacy screens have been incorporated to ensure that there is no overlooking into neighbouring properties.

Of concern is the arrangement of the town houses along the southeastern boundary. All the living rooms are orientated to the southeast or the rear of the site and open to very small decks that are enclosed with screening to protect the privacy of the properties adjacent. The proposed decks are too small to be useful private open space and the remaining strip of land too narrow to be a useful garden area other than as a clothes drying area.

We recommend modifying the planning of the units so that the living areas are oriented to the centre of the site where there is the scope for a larger garden and better orientation for the living spaces. Living areas to the more public side of the unit will improve passive surveillance. The bedrooms would then be orientated to the cooler and quieter side of the unit.

The proposal does not meet the objectives of this principle everywhere. Some re-design is required.

8. Safety and security

Good design optimises safety and security, both internal to the development and for the public domain. This is achieved by maximising overlooking of public and communal spaces while maintaining internal privacy, avoiding dark and non-visible areas, maximising activity on streets, providing clear, safe access points, providing quality public spaces that cater for desired recreational uses, providing lighting appropriate to the location and desired activities, and clear definition between public and private spaces. (SEPP65)

The proposal could be improved by making the changes to the units as recommended above. The Mackay Street entrance is likely to be the major pedestrian access into the site. The benefit of passive surveillance to the main pedestrian routes through the site will improve real and perceived safety and security.



The proposal does not meet with the objectives of the principle

9. Social dimensions

Good design responds to the social context and needs of the local community in terms of lifestyles, affordability and access to social facilities. New developments should optimise the provision of housing to suit the social mix and needs of the neighbourhood or, in the case of precincts undergoing transition, provide for the desired future community. (SEPP65)

The proposed mix of dwellings will certainly fill a need in the community. It is important to offer as many opportunities for residents to engage in social activities both inside and outside the site.

In addition to the re-orientation of the plans of the units, as mentioned above, it would be very beneficial to the residents for there to be common room and associated outdoor area in a well orientated and central area within the site that could become a focus for communal activities.

As described in the Landscape section, the proposed outdoor seating area will largely be in shadow and is not considered to be of sufficient amenity to fulfil the important role of a communal area in a complex such as this. A room and outdoor area at the end of the turning circle would be better placed.

The proposal does not meet the objectives of this principle.

10. Aesthetics

Quality aesthetics require the appropriate composition of building elements, textures, materials and colours and reflect the use, internal design and structure of the development. Aesthetics should respond to the environment and context, particularly to desirable elements of the existing streetscape or, in precincts undergoing transition, contribute to the desired future character of the area. (SEPP65)

The proposal will be a positive addition to the streetscape. The materials and colours selected are generally appropriate to the area. The residential flat buildings are generally well articulated and have a modern restrained language. (See note on the balconies in section 5)

The skillion roofs and gables of the town houses effectively communicate the smaller scale of the individual houses. The reorientation of the Mackay Street unit will improve the way the development looks from the Street. It is better to address the street with the front of a building.

The proposal generally meets the objectives of this principle



Conclusion

The proposal generally satisfies the principles of good design. However, the following items are of concern and should be addressed prior to the granting of consent:

- Setbacks from the side boundaries should be 6m and stepping back at the third levels from the same boundaries by about 3m.
- Orientation of the living spaces in the units should be towards the centre of the site to improve amenity, social interaction and security.
- Re-orientation of Town House on Mackay Street so that living space is on Northwest corner and garage is on southeastern corner facing the street.

Tim Williams
Architect RAIA

10th February 2010

Martin Amy - Development Assessment Officer
Ashfield Council
PO Box 1145
ASHFIELD
NSW 1800

25 Etonville Parade Ashfield

I refer to your letter dated 18th January 2010 and accompanying documentation for DA 10.2009.231.1 at 25 Eton Parade, Ashfield. The proposed development is for an aged care complex and includes proposed primary access via a new bridge across the adjacent Sydney Water channel. An older existing bridge would be demolished and removed.

In considering the request for permission to construct the new bridge over the Sydney Water storm water channel, Sydney Water is bound to consider flooding issues associated with the proposal.

The proposal is supported by a Flood Study "Glenmore Gardens Flood Study – Revision 6 November 2009" prepared by Hughes Truman. I have requested and received the HEC-RAS data files associated with the supporting Flood Study.

I have reviewed the study and data files and have concerns regarding the proposed development. Overall I believe that the potential flood impacts affecting the subject property are likely to have been significantly understated. A number of considerations behind this view are somewhat technical in nature and the following points may be considered illustrative rather than comprehensive:

- Downstream Boundary Conditions

The flood model depicts significant overbank flows along Etonville Parade. Shortly downstream of the model boundary a major choke point occurs at the intersection of Etonville Parade and Hunt Street where similar overbank capacity is not available.

The omission of this choke point is considered to be a significant issue in terms of the validity of the model outputs with actual flood levels likely to be higher than current estimates.

- Supercritical Flow

The Flood Study contends that calculation issues associated with 'invalid tail water' levels dictate that supercritical flows only are applicable through the full length of the model. The stated logic behind this contention is considered to be unconvincing.

Directing the HEC-RAS program to enforce supercritical flows at all points in the model is not considered to be appropriate. For example, at the proposed bridge the water level rises above the low chord of the proposed bridge. The HEC-RAS Hydraulic Reference Manual states that:

Pressure flow occurs when the flow comes into contact with the low chord of the bridge. Once the flow comes into contact with the upstream side of the bridge, a backwater occurs and orifice flow is established (Section 5.19).

This flow behaviour is not apparent in the submitted model, either in Supercritical or Mixed calculation mode. It is noted that preferentially selected interpolated cross sections have been included in the lower reaches of the model only. The model is very sensitive to the inclusion of interpolated cross sections more generally and the resultant flow profile would appear to be more consistent with the expectations stated in the Hydraulic Reference Manual, and results in significantly higher estimates of flood levels.

- Proposed Bridge

The proposed bridge access to the site incorporates in the HEC-RAS model a 1.2 metre benched widening of the Sydney Water channel immediately upstream, through and downstream of the bridge. The "Driveway and Bridge Plan and Sections" Drawing No 05S711-SKC11 Sheet 1 of 2 Revision A does not depict such a localised widening.

It can be difficult to confidently account for localised channel widening when substantial overbank flows are present. The flow exchange capacity between channel and overbank areas needs to be carefully considered when using a 1D hydraulic model such as HEC-RAS. It may be necessary to utilise a 2D hydraulic model to fairly depict the situation.

Sydney Water is not satisfied that the flood potential confronting the proposed development has been reasonably represented and suggests that the impacts of flooding on the aged care facility need to be very carefully considered. Any significant increase in hazard exposure due to development intensification must be critically reviewed.

Sydney Water would be very concerned if the proposed development were to place aged residents at undue risk, particularly given that the sites primary vehicular access to Etonville Parade via the proposed new bridge would be cut before flood water continued to rise within the development.

It is noted that the proposed development has street frontage to Mackay Street. It appears that previously the site may have been 'land locked' and the only legal access available by the old bridge crossing. The existing and proposed bridges are likely to obstruct major flood flows and ideally should be eliminated. On the basis of the information currently before it, Sydney Water would not agree to the construction of the new bridge as part of the current Development Application and would request removal of the existing bridge as part of the current application.

Sydney Water suggests that an independent critical review of flood behavior and impact in this area be undertaken prior to determination of this development application. Ideally, though not necessarily, such a review would be undertaken as part of the Council Floodplain Management process through the Floodplain Management Committee. Sydney Water would be pleased to participate and contribute to this process.

Yours sincerely



Ray Parsell
Senior Stormwater Asset Planner



ACCESS REPORT
DEVELOPMENT APPLICATION

“GLENMORE GARDENS”

1-3 MACKAY STREET & 25 ETONVILLE PARADE
ASHFIELD

HOUSING FOR SENIORS OR
PEOPLE WITH A DISABILITY

Prepared by Mark Relf

February 2010



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Accessibility Review of Development Application

“GLENMORE GARDENS”

1-3 MACKAY STREET & 25 ETONVILLE PARADE, ASHFIELD

Development Summary

The following report has been prepared to review the “accessibility” of a development application to establish seniors housing that consists of thirty-nine (39) self-care dwellings and communal facility on the Glenmore Gardens site at 1-3 Mackay Street & 25 Etonville Parade Ashfield.

The development proposes the following dwelling types, communal amenities and building elements.

- 15 X 3 bedroom villas
- 7 X 1 bedroom units
- 15 X 2 bedroom units
- 2 X 3 bedroom units
- Common Room Facility
- 54 parking spaces consisting of 46 resident (43 basement & 3 garages) and 8 visitor spaces (4 basement and 4 parking spaces adjoining the entry driveway).
- Outdoor barbecue area
- External pathways

Assessment Criteria

The assessment has considered whether the outcomes from this development will be consistent with the technical design standards of the State Environment Planning Policy: Housing for Seniors or People with a Disability (hereinafter *Housing for Seniors Policy*) and the relevant provisions of the Australian Standards AS1428 *Design for Access and Mobility* and AS4299 *Adaptable Housing* as referenced by the Housing for Seniors Policy.

In particular, this report considers whether the proposed development will provide appropriate housing accessibility and adaptability in accordance with:

- (a) Housing for Seniors Policy [2004-Amdt No.3 2008], Clauses 26 and 38 concerning Location and Access to facilities.
- (b) Housing for Seniors Policy [2004-Amdt No.3 2008], Schedule 3, Clauses 2-21 and 38(b) concerning the self-contained detached dwellings and common amenities.
- (c) Relevant aspects of Australian Standards as referenced by Clause 3 and Schedule 3;
 - i) **AS1428.1 (2001)** – Design for Access and Mobility (as adopted by the BCA),
 - ii) **AS2890.1 (2004 & 1993)** – Off Street Parking (as adopted by the BCA),

iii) **AS4299** (1995) – Adaptable Housing.

iv) **AS1735.12** (1999) – Lifts (as referenced by Part E3.56 of the BCA).

(d) Clause 31 and the Seniors Living Urban Design Guideline relating to “accessibility” matters.

Plans - The appraised plans relied upon for this report include:

- Architectural Plans prepared by JPR Architects dated 9th November 2009 and in particular the following versions.

Dwg No.	Revision	Description
DA 101	D	Site Analysis Plan
DA 102	C	Demolition Plan
DA 103	D	Building Setback Plan
DA 201	G	Basement Parking Plan
DA 202	G	Ground Floor Plan
DA 203	F	First Floor Plan
DA 204	G	Second Floor Plan
DA 205	G	Roof Plan
DA 301	G	Sections 1 & 2
DA 302	G	Sections 3 & 4
DA 303	G	Sections 5 & 6
DA 304	G	Elevations West & Streetscape
DA 305	G	Elevations North & South
DA 306	G	Elevations East
DA 308	E	Bridge Cross Section
DA 311	B	Garbage Collection Details
DA 601	G	Typical Unit Plan
Job 0513	Issue 1 - Dec 2009	Landscape Plan
Job 0513	Issue 1 - Dec 2009	Landscape Plan – Second Floor

Access Assessment

Location and Site Related Accessibility

1.1 To assess the suitability of the proposed site clauses 26 and 38 of the Housing for Seniors Policy include specific criteria which include;

- Distance to shops and services.
- Distance and Quality of footpath access to bus stops, shops and services.
- Bus route destinations and frequency of bus services.
- Have obvious and safe pedestrian links from the site that provide access to public transport services and local facilities, and
- Variety of retail and commercial services available to intended residents either within walking distance or by bus transport links.

The following assessment has considered the above criteria and provides evidence regarding suitability of the location and surrounding environment.

Distance to shops and services

1.2 Access to Shops

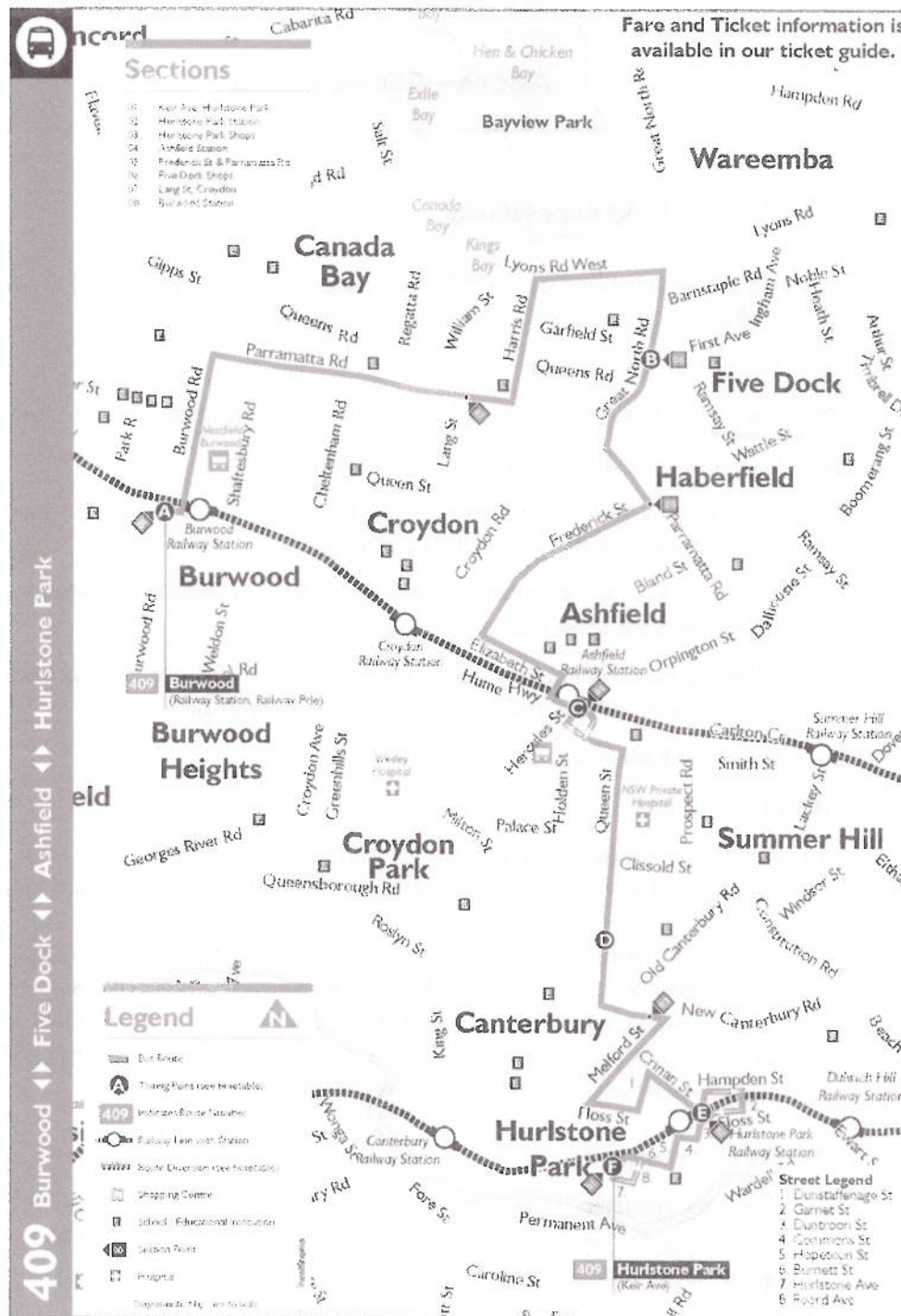
To assess the suitability of the site in terms of compliance with clause 26(2) the assessment considers options as expressed under sub-clause 26(2)(a) and 26(2)(b).

While the proposed development is more than 400 metres to local shops at Croydon and approximately 1 kilometre to Ashfield shopping precinct it is apparent that the application relies upon the provisions of clause 26(2)(b) of the SEPP HS which requires a development to be within 400 metres of a public transport service that will travel to a shopping precinct that provides the required range of services.

1.3 Access to Transport

To assess the suitability of the site in terms of compliance with clause 26(2)(b) the site survey work examined the proximity to bus services from the subject site that travel to an appropriate shopping centre.

The only public transport service in reasonable proximity to the subject site is bus route 409 which travels along Frederick Street to Ashfield, Burwood, Fivedock, Canterbury and Hurlstone Park.



1.4 With respect to pedestrian footpath access to the nearest bus stops on Frederick Street there is some ambiguity regarding the options available to intended residents.

- The site plan shows a driveway and pedestrian access ramp via No. 3 Mackay Street which facilitates a direct route to the Frederick Street bus stops at distances of 160 and 290 metres via the signalised crossing at the intersection of Frederick Street and Elizabeth Street.
- The Etonville Parade, Elizabeth Street pedestrian route also provides access to the Frederick Street bus services, albeit the distance is 420 metres to the bus stops.

Therefore, the Mackay Street route, which provides a distance less than 400 metres to public bus stops / services, complies with clause 26(2)(b)(i) of the SEPP HS in terms of distance.

1.5



Quality of footpath access

- 1.6 **Footpath Gradients; Mackay Street Route** – The site inspection confirms that the topography from the site to the nearest bus stops on Frederick Street easily comply with clause 26(2)(c) of the SEPP HS.
- 1.7 **Kerb Ramps** – However, the survey reveals that kerb ramps that do exist do not comply with AS1428 and the SEPP HS while various intersections do not provide kerb ramps and therefore the route fails to comply with clauses 26(4) and 38(a) of the SEPP HS.

In particular:

- The 2 corners of Mackay Street and Frederick Street.
- The 2 corners of Frederick Street and Pound Lane.
- The 2 corners of Frederick Street and Elizabeth Street.

Various uneven and broken pavement exists on Mackay Street adjoining No 32 Frederick Street causing unacceptable trip hazards for older people and people with a disability.



No.3 Mackay Street



adjoining No 32 Frederick Street



Mackay Street and Frederick Street.

1.8



Frederick Street and Pound Lane.



Frederick Street and Elizabeth Street.

1.9

Footpath Gradients; Etonville Parade Pedestrian Route to the bus stops

Assuming this route is relied upon for pedestrian footpath access to the bus stops then a similar scenario prevails with non-compliant kerb ramps at;

- Ramp crossing (2 ramps) from the site entrance to the footpath on the western side of Etonville Parade.
- The 2 corners of Etonville Parade and Anthony Street.
- 1 corner of Etonville Parade and Elizabeth Street.
- The 2 corners of Frederick Street and Elizabeth Street.

I.10



Etonville Parade site entry



Etonville Parade and Anthony Street.

I.11



Etonville Parade and Elizabeth Street.



Frederick Street and Elizabeth Street.

I.12

Etonville Pde Site Entrance – The site entrance proposes a new bridge with adjoining footpaths parallel to the driveway with a 1:8 gradient driveway ramp 2500mm in length and 1:14 gradient ramped transition to the Etonville Parade footpath.

However, the existing trees, power poles and generally broken pavement prevents safe pedestrian access and does not comply with ASI428.1 and clause 38(a) of the SEPP HS.



Etonville Parade Site entrance.

I.13

Etonville Parade Pedestrian Route Summary

In summary, while the gradient of the pedestrian footpath complies with clause 26(2)(b) the 420 metre distance to the bus stops and lack of compliant kerb ramps and poor conditions along the footpaths do not satisfy clauses 26(2)(c), 26(4) and 38(a) of the SEPP HS.

I.14

Mackay Street Pedestrian Route Summary

In summary, the distance and gradient of the pedestrian footpath comply with clause 26(2)(c) and 26(2)(b).

However, the lack of compliant kerb ramps and poor condition of the footpaths in several locations do not satisfy clause 26(4) and 38(a) of the SEPP HS.

Bus route, destination and frequencies

- 1.15 **Bus Route 409** – The transport assessment identified that Sydney Buses operate bus route 409 providing a daily service of 29 services along Frederick Street Monday to Friday from Burwood to Hurlstone Park, which satisfies the requirements of clause 26(2)(b) of the SEPP HS.

1.16 **Bus Stop Destination, Shops and Services**

With respect to footpath access at Ashfield and Burwood there are adequate footpaths and kerb ramps to facilitate access from the bus stops to various shops and facilities as listed in clauses 26(1) and 26(5) to satisfy clauses 26(3) and 26(4) of the SEPP HS.

- 1.17 It is evident from a survey of the nearest major shopping precinct at nearby Ashfield and Burwood that there are a variety of shops, banks, chemists, grocery stores, green grocers and medical services available that meet the expectation of clauses 26(1)(5) of the SEPP HS.

1.18 **Transport Services & Access to Shops and Services Summary**

In summary the Mackay Street pedestrian accessway complies with the distance and topography requirements of clauses 26(2)(b)(c) and subject to the installation of 6 new kerb ramps and footpath rectification works in Mackay Street then all aspects of clause 26 and 38(a) of the SEPP HS can be satisfied.

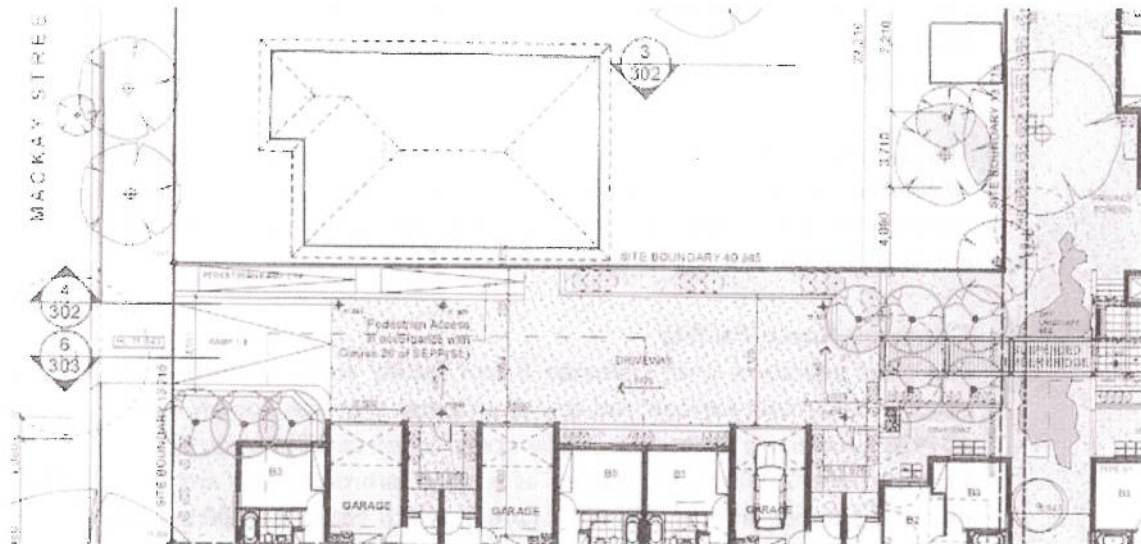
Development Standards - [schedule 3] Self-Contained Dwellings

Clause	Item Assessment	Complies
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- Schedule 3, **Site Access – Wheelchair Access**
 Clause 2(1)(2) The plans show two site entry points from;
- Mackay Street
 - Etonville Parade

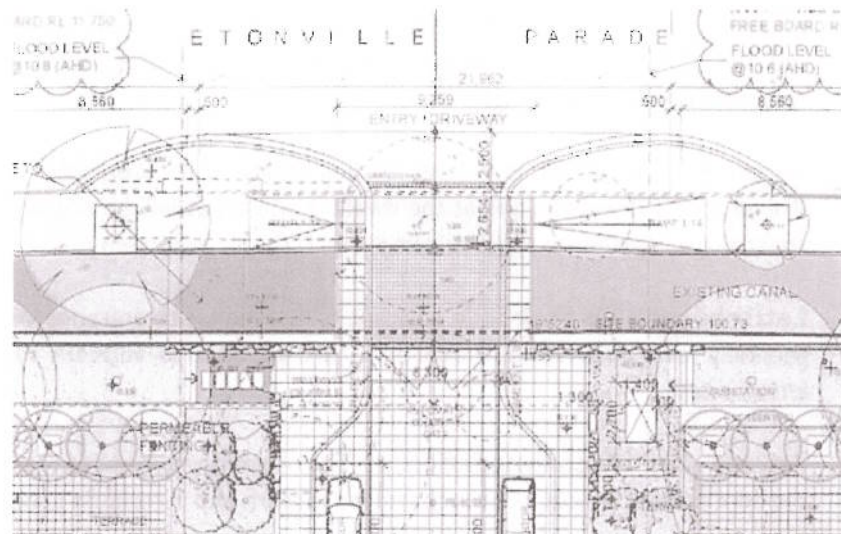
Mackay Street – The plans show a 1:14 pedestrian access ramp from the Mackay Street footpath into the site and to a pedestrian bridge and the central podium area of the development in a manner that can comply with ASI428.1 and the SEPP; HS, subject to further detailing of the ramp, ridge and pathway surfaces at construction certificate stage.

YES



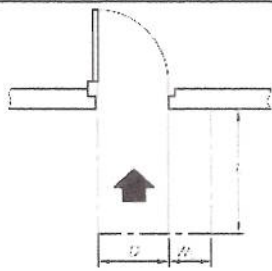
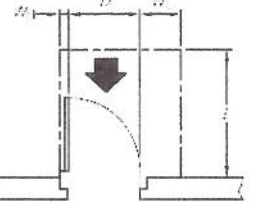
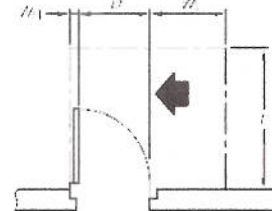
- Schedule 3, **Etonville Parade** - The plans show that the development will provide a new driveway bridge entry from Etonville Parade with a 2500mm length driveway with a 1:14 gradient adjoining ramps consistent with ASI428.1.

Partial



Clause	Item Assessment	Complies
	The 1:14 gradient ramps can comply with AS1428.1 if handrails are installed. However, the adjacent footpaths are inaccessible due to trees, power poles and broken pavement and there are no kerb ramps to cross the road.	NO
	The pedestrian gates on each of the side of the driveway entry do not provide the circulation space to comply with AS1428.1.	NO
	Therefore the entrance is effectively inaccessible and fails to satisfy clauses 38 and Schedule 3 clause 2 of the SEPP HS.	NO
Schedule 3, Clause 2(1)(2)	Intrasite Pathways - Within the site the plans indicate on-grade pathways and ramps to facilitate wheelchair accessible paths of travel to all building entrances, villas and communal facilities in a manner that will comply with AS1428.1 and thereby satisfy schedule 3 clause 2(1) of the Housing for Seniors Policy, subject to further detailing of ramps, doors and landings at construction certificate stage.	YES
	The 2 three storey apartment blocks incorporate lifts which facilitate wheelchair access from the basement carpark to the upper levels in a manner that will comply with AS1428.1 and thereby satisfy schedule 3 clause 2(1) of the Housing for Seniors Policy.	YES
Schedule 3, Clause 2(3)	Common Room Facility The plans indicate a small Common Room Facility with a kitchen, and outdoor deck with ramped pathway approaches that can comply with AS1428.1 subject to further detailing at construction certificate stage.	Partial
	However, the 2100mm X 1800mm accessible bathrooms are less than the size required by AS1428.1 (2001), which requires 2300mm X 2000mm for a layout such as these.	NO
	Barbecue Area The plans indicate an outdoor barbecue area in an accessible location adjoining communal ramped pathways that can comply with AS1428.1 and the SEPP SL Urban Design Guide subject to further detailing at construction certificate stage.	YES
Schedule 3 Clause 3	Security – Details of low level lighting adjacent to footpaths, along shared access driveways and at the dwelling entrances will be required at construction certificate stage to comply with this requirement.	YES at CC stage
Schedule 3 Clause 4	Letterboxes – To be provide adjacent to the main site entrance with a generally level 1550 X 1550 minimum hard paved area adjacent to the letterboxes.	at CC stage
Schedule 3 Clause 5	Private Car Accommodation – The development proposes 46 resident parking spaces; 43 in a basement carpark and 3 resident garages.	

Clause	Item Assessment	Complies
	<ul style="list-style-type: none"> There are 41 X 3200 and 2 X 3800mm minimum width X 6000mm minimum length spaces to comply with AS2890.1 schedule 3, clause 5(a) of the Housing for Seniors Policy, except for spaces 1, 23, 27 which are located next to a wall and are required to be 3500mm minimum width. The 3 X 3500mm width single garages attached to Villas 13, 14, 15 fail to comply with the requirements of AS2890.1 which requires 3800mm minimum width for an enclosed single garage. 	Partial NO NO
	Other aspects of 2500mm minimum headroom clearance over the parking spaces clear of structural beams and services and 2200mm entrance height and power operated doors will be required at construction certificate stage.	YES at CC stage
Clause 38(b)	Visitor Parking There are 4 outdoor visitor spaces parallel to the entry driveway that inherently allow 3200mm width to facilitate appropriate access in obvious and convenient locations to comply with clauses 38(b).	YES
	There are 4 visitor spaces in the basement carpark including a 3500mm width space to suit visitors with a disability.	YES
	The security doorway adjacent to the visitor parking to access the lift does not provide appropriate doorway circulation spaces as required by Figure 12(c)(g) of AS1428.1.	NO
Schedule 3 Clause 6	Accessible entry – The plans indicate that the external porch landings shall provide 1550mm X 1550mm circulation space and can achieve 520mm minimum latch side clearance in accordance with AS4299, although details of 920 entry doors, level thresholds and lever door handles will be required at construction certificate stage.	YES At CC Stage
Schedule 3 Clause 7	Interior: general – The plans show that while some internal corridors and doorway circulation spaces shall comply with AS1428.1 there are numerous examples of significant non-compliances with AS1428.1 (2001) which necessitate significant re-planning of nearly every dwelling layout. Many of the non-compliances have been perpetuated from previous plans and it is obvious that subsequent amendments to plans have ignored the need to re-plan the layouts. Examples of the non-compliances appear below;	NO

Clause	Item Assessment	Complies												
	<ul style="list-style-type: none">• Unit Type A – the 1200mm width corridor approach to the main bedroom does not provide 470mm latch side clearance to enter the Bedroom 1 door as required by Figure 12(c) of AS1428.1.	NO												
														
	<table><tr><th>Dimension D</th><th>Dimension L</th><th>Dimension WH</th><th>Dimension WL</th></tr><tr><td>800</td><td>1350</td><td>0</td><td>470</td></tr><tr><td>850</td><td>1350</td><td>0</td><td>480</td></tr></table>	Dimension D	Dimension L	Dimension WH	Dimension WL	800	1350	0	470	850	1350	0	480	NO
Dimension D	Dimension L	Dimension WH	Dimension WL											
800	1350	0	470											
850	1350	0	480											
	(c) Front approach—door opens away from a user													
		NO												
	<table><tr><th>Dimension D</th><th>Dimension L</th><th>Dimension WH</th><th>Dimension WL</th></tr><tr><td>800</td><td>1350</td><td>110</td><td>470</td></tr><tr><td>850</td><td>1350</td><td>110</td><td>480</td></tr></table>	Dimension D	Dimension L	Dimension WH	Dimension WL	800	1350	110	470	850	1350	110	480	NO
Dimension D	Dimension L	Dimension WH	Dimension WL											
800	1350	110	470											
850	1350	110	480											
	(d) Front approach—door opens towards a user													
		NO												
	<table><tr><th>Dimension D</th><th>Dimension L</th><th>Dimension WH</th><th>Dimension WL</th></tr><tr><td>800</td><td>1510</td><td>110</td><td>840</td></tr><tr><td>850</td><td>1510</td><td>110</td><td>810</td></tr></table>	Dimension D	Dimension L	Dimension WH	Dimension WL	800	1510	110	840	850	1510	110	810	NO
Dimension D	Dimension L	Dimension WH	Dimension WL											
800	1510	110	840											
850	1510	110	810											
	(e) Latch side approach—door opens towards a user													
	<ul style="list-style-type: none">• Unit Type D – the 1200mm width corridor approach to the main bedroom does not provide 470mm latch side clearance to enter the Bedroom 1 door as required by Figure 12(c) of AS1428.1.• The doorway circulation spaces to exit Bedroom 2 doorway does not comply with Figures 12 (g) of AS1428.1.• Unit Type E – the corridor approach to Bedrooms 2 and 3 do not provide 470mm latch side clearance to enter the bedroom doors as required by Figure 12(c) of AS1428.1.• Unit Type F – the corridor approach to Bedroom 2 does not	NO												

Clause	Item Assessment	Complies
	provide 470mm latch side clearance to enter the bedroom door as required by Figure 12(c) of AS1428.1.	NO
	<ul style="list-style-type: none"> • Villa Types 1 and 7 – the 1200mm width corridor approach to Bedroom 2 do not provide 470mm latch side clearance to enter the Bedroom 1 door as required by Figure 12(c) of AS1428.1. 	NO
	<ul style="list-style-type: none"> • Villa Type 6 – the Bedroom 2 wardrobe is too close to the door and does not provide 470mm latch side clearance to exit the room as required by Figure 12(c) of AS1428.1. 	NO
	<ul style="list-style-type: none"> • Villa Type 15 – the 1200mm width corridor approach to Bedroom 3 does not provide 470mm latch side clearance to enter the room and the wardrobe is too close to door to achieve the required 1510mm clearance as required by Figure 12(f) of AS1428.1. 	NO
Schedule 3 Clause 8	Main bedroom – The plans show the main bedrooms for all units and villas will provide an area large enough to accommodate a queen sized bed with 1000mm on each side of the bed and 1200mm minimum at the foot of the bed.	YES
Schedule 3 Clause 9	Bathroom – The plans show an ensuite bathroom in every unit that will generally provide adequate internal spatial area that will comply with AS4299/1428.1.	Partial
	However, the3 internal LAYOUT OF EVERY “ADAPTABLE” BATHROOM FAILS TO COMPLY with AS1428.1 due to washbasin and toilet fittings encroaching on shower circulation spaces.	NO
	These layouts of fittings will require amendment prior to DA assessment in accordance with AS1428.1/4299.	
Schedule 3 Clause 10	Toilet – The plans show that the ensuite or common bathroom in each unit shall provide a toilet which is partially “Visitable” in terms of compliance with AS4299 and AS1428 by providing at least 1250mm X 900mm clearance in front of the pan. However, the toilet pans are not in locations that are “adaptable”.	Partial
Schedule 3 Clause 11	Surface finishes – Details regarding paving finishes in accordance with the Housing for Seniors Policy will be required at construction certificate stage to comply with this requirement.	YES at CC stage
Schedule 3 Clause 12	Doors – Details regarding doors and door handles will be required at construction certificate stage to ensure 870mm width internal doors and entry doors 920mm width with lever handles in accordance with the Housing for Seniors Policy and AS1428.1.	YES at CC stage
Schedule 3 Clause 13	Ancillary items – Details regarding installation of switches, power points and the like will be required at construction certificate stage to comply with the Housing for Seniors Policy.	YES At CC stage

Clause	Item Assessment	Complies
Schedule 3 Clause 15	Living and Dining rooms – The plans show combined living and dining areas which indicate that the circulation space requirements do comply with this clause.	YES
Schedule 3 Clause 16	Kitchen – The plans indicate the floor area and general kitchen layout will comply with this clause by providing the required 1550mm circulation space between kitchen cupboards. Details regarding other aspects of a wall oven, hotplate, sink and fridge in accessible positions, adjustable cupboards and fitments as per the requirements of sub-paragraphs (a) to (j) which will be required at construction certificate stage to satisfy the Housing for Seniors Policy.	YES YES at CC stage
Schedule 3 Clause 17	Access to kitchen, main bedroom, bathroom and toilet – As ALL dwellings are single level and provide all the living and main bedrooms on the entry level then this clause does not apply.	YES
Schedule 3 Clause 18	Lifts in Multi-Storey Buildings – The three storey buildings incorporate lifts that facilitate access from the basement carpark to the ground floor and upper levels and enable access to dwellings to comply with this clause, subject to the detailing of the lift car at construction certificate stage to comply with the E3.6 of the BCA.	YES YES at CC stage
Schedule 3 Clause 19	Laundry – The plans show that the laundry facilities shall be provided in a room adjoining the hallway. In all cases the laundry facilities provide an area for washing machine, basin and drier and at least 1300 X 1300mm clear circulation space in front of the appliances in accordance with the Housing for Seniors Policy. Details regarding other requirements for slip resistant floors and tempering valves, which will be required at construction certificate stage to comply with this clause.	YES YES at CC stage
Schedule 3 Clause 20	Storage – The plans indicate that all units shall have a storage / linen cupboard adjoining the hallway.	YES
Schedule 3 Clause 21	Garbage – With respect to waste management the development proposes 2 basement garbage rooms at the southern and northern ends in reasonable proximity to the 2 basement lifts with appropriate physical access to technically comply with the circulation space requirements to enable wheelchair access to satisfy the SEPP HS. However, the storage facilities are very remote from the villas.	Partial
Cls 50 (f)	Private Open Space – Villas - The plans for the ground level VILLAS all fail to provide a deck adjoining a living area that is at least 3000mm X 3000mm in area and it is also noted that each one provides only stairway access to the courtyard	NO

Clause	Item Assessment	Complies
	which is not appropriate for a Seniors Housing development.	
	Ground Floor Units - The plans indicate that there are terraces/courtyards for all ground floor self-contained Units that provide private open space to meet the requirements of at least 15M ² with one area adjoining the living room that is at least 3.0 X 3.0 metres and subject to the detailing of finished floor levels with 1:8 gradient threshold ramps in accordance with AS1428 then the areas will comply, EXCEPT UNIT B-05.	YES
	Upper Level Units - With respect to the upper level units there are several Type C first floor units that provide limited 4110mm X 1950-1190mm balconies, which fail to provide 10 square metres in minimum useable area as required by clause 50(f)(ii) of the SEPP HS.	NO



Mark Relf
Access Consultant (ACAA)

Conclusion

It is evident from the above assessment that while many aspects of the development proposal provide satisfactory "access" and "adaptability" there are a number of fundamental issues which require rectification and / or clarification to achieve compliance with the SEPP Housing for Seniors Policy including;

- Provision of a wheelchair accessible path of travel from both site entrances (Mackay Street and Etonville Parade) complying with AS1428 and clause 26 and 38 of the SEPP HS that forms part of a wheelchair accessible route to public transport services on Frederick Street and the general community.
- Internal circulation within apartments that do not comply with AS1428.1 as defined by the SEPP HS should be amended prior to final consideration of the DA.
- Several garages and parking spaces that do not comply with the accessibility requirements of AS2890.1.
- All villas and some units fail to provide appropriate access to private open spaces as required by the SEPP HS.



Mark Relf
Access Consultant (ACAA)

Appendix A – Statement of Expertise

CONSULTANCY PROFILE & STATEMENT OF EXPERTISE

Accessibility Solutions consultancy offers a range of services to provide advice for clients to develop new and modify existing buildings, facilities and services to be accessible to people with disabilities to comply with legislation and regulations relevant to people with disabilities.

Relevant legislation and regulations that underpins advice includes the Disability Discrimination Act (DDA) Building Code of Australia, Australian Standards 1428, HREOC Advisory Notes on Premises, DDA Transport Standard, State Environment Planning Policy No. 5 Housing for Older People or People With a Disability (SEPP 5) / Seniors Living Policy, SEPP 65 – Residential Flat Buildings Design Code and various local government DCP's.

The scope of services provided by Accessibility Solutions includes:

- Plan Appraisals and design advice
- Access Reports for development applications and construction certificates
- Expert Reports for Court evidence
- Access Auditing of existing buildings, facilities, transport conveyances and infrastructure
- Policy and document reviews and development of Disability Action Plans
- Staff training in access auditing

The services consider issues concerning people with all types of disability including; physical; vision; hearing, intellectual and other cognitive impairments that may affect access for people with a disability consistent with the Disability Discrimination Act.

As principle consultant Mark Relf has considerable experience and expertise in a wide range of access related projects and is a recognised Access Adviser approved by the NSW Ageing and Disability Department and has attained accreditation with the Association of Consultants in Access Australia for the purposes of providing advice concerning access to the built environment and services for people with disabilities.

His expertise has been gained over 20 years working in management and advocacy roles within the disability sector and since 1994 providing advice to clients on access issues. Mark also participates on various key committees concerning access for people with disabilities. His qualifications and affiliations are:

- Accredited Member of the Association of Consultants in Access Australia.
- Member, Standards Australia ME/64 Committee responsible for the AS1428 suite and AS4299 – Adaptable Housing.
- Member, NSW Heritage Office's – Fire, Access and Services Advisory Panel.

