

Principal Author: Howard Moutrie	Issue.	Revision	Date
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# report

## **Statement of Compliance Access For People With A Disability**

### **Benson Ave Shellharbour**

#### **Accessible Building Solutions**

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# Report

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**Report Type:** BCA Access Provisions & Adaptable Housing Statement of Compliance  
**Development:** Shoptop housing at Lot 164212 DP 809265 Benson Ave Shellharbour

## Introduction:

This report has been prepared to accompany a Development Application and has been based on the following drawings prepared by ADM Architects:

A08	Site Plan
A09	Basement 2 Plan
A10	Basement 2 & 1 Plan
A11	Basement 1 & Ground Plan
A12	Ground & Level 1 Plan
A13	Level 1 & Level 2 Plan
A14	Level 2 & Level 3 Plan
A15	Level 3 & Level 4 Plan
A16	Level 4 Plan
A17- A20	Elevations
A22, A22.a, A22.b A22.c	Adaptable Unit Plans

## Limitations and Copyright information:

This report is not to be used for any other purpose than its original intention. The assessment is based on the provided drawings and compliance relies upon the implementation of all the recommendations listed in this report and the works constructed in accordance with AS1428.1-2009 and other latest, relevant standards and regulations applicable at the time of construction.

Assessment is based on the classification/use of the building. If the Class of the building changes to any other building Class, this access report will have to be updated accordingly.

All dimensions mentioned in the report are CLEAR dimensions and are not to be reduced by projecting skirting, kerbs, handrails, lights, fire safety equipment, door handles less than 900mm above FFL (finished floor level) or any other fixtures/fit out elements. Only some numerical requirements from relevant AS (Australian Standards) have been noted in the report, however for further details and for construction purposes refer to the relevant AS, a copy of which can be purchased from SAI Global.

This report and the drawings in this report are a copyright of Accessible Building Solutions and can only be used for the purposes of this particular project. This document may also contain Standards Australia Ltd copyrighted material which may not be reproduced.

This report does not assess compliance matters related to WHS, Structural design, Services design, Parts of DDA other than those related to APS or Parts of BCA or Parts of Australian Standards other than those directly referenced in this report.

## **Assessment**

### Assessment Criteria

This assessment has been undertaken to the extent necessary to issue a development consent under the Environmental Planning and Assessment Act. Generally, assessment has been in regard to the capability of the proposal to achieve the spatial requirements to provide access for people with a disability and it is assumed that assessment of the detailed requirements will occur at CC stage.

Compliance is required with the following:

- The Access provisions of the BCA
- The Access To Premises Standard
- AS1428 suite of Standards
- AS2890.6 for car parking
- AS1735.12 for lifts
- AS4299 Adaptable Housing
- SEPP 65 – Part 4Q

### Assessment

The building comprises of basement carparking, ground floor retail and apartments over in 4 blocks.

Under the BCA the building is classified as follows,

- Class 2 (building containing 2 or more SOUs i.e. sole-occupancy units)
- Class 6 (shops, sale of goods and services by retail)
- Class 7a (car park)

The following tables assess compliance with the relevant parts of the BCA and Standards.

BCA Part D3 Access for People with a Disability  
**BCA D3.1 Requirements for Access for people with a disability**  
 SOU refers to Sole Occupancy Unit

Requirement	<b>Class 2</b> From pedestrian entrance to 1 level with SOUs till the entry of doors of the SOUs. To and within 1 of each type of room or space in common use. Where floor is accessed by an AS1428.1 ramp or lift, all SOUs on that level till the entry door and to and within all common use areas on that level.
Compliance	Complies.
Comments	Access has been provided from the main pedestrian entry to the entry doors of all SOUs on all levels by means of a lift. Access has been provided to communal garden on Level 1. Details to be verified at CC stage of works.
Requirement	<b>Class 5, 6, 7b, 8, 9a, 9b- Schools and early childhood centres</b> To and within all areas that are normally used by the occupants.
Compliance	Complies.
Comments	
Requirement	<b>Class 7a</b> To and within any level containing accessible carparking spaces.
Compliance	Complies.
Comments	
Requirement	<b>BCA Part D3.2 Access to buildings</b> <b>Accessway is required from;</b> <ul style="list-style-type: none"> <li>• Main pedestrian entry at the site boundary for new buildings</li> <li>• Main pedestrian entry door for existing buildings</li> <li>• Any other accessible building connected by a pedestrian link</li> <li>• Accessible car parking spaces</li> </ul>
Compliance	Complies.
Comments	Level Access has been provided from the main pedestrian entry at the site boundary Access has been provided from accessible car parking spaces by means of a lift.
Requirement	<b>Accessway</b> is required through: <ul style="list-style-type: none"> <li>• Main entry and</li> <li>• Not less than 50% of all pedestrian entrances and in building with floor area over 500m<sup>2</sup>, non-accessible entry and accessible entry to be not more than 50M apart.</li> </ul>
Compliance	Capable of compliance.
Comments	Details to be verified at CC stage of works.
Requirement	Where <b>Accessible pedestrian entry</b> has multiple doorways <ul style="list-style-type: none"> <li>• At least 1 to be accessible if 3 provided</li> <li>• At least 50% to be accessible, if more than 3 provided</li> </ul> Where doorway has multiple leaves, at least 1 leaf is to have clear opening of 850mm (excluding automatic doors).
Compliance	Capable of compliance.
Comments	This is achievable and the door selections are to be verified at CC stage of works.

### BCA Part D3.3 Parts of buildings required to be accessible

<i>Requirement</i>	Every <b>Ramp</b> (excluding fire-isolated ramp) to be compliant with AS1428.1
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	Verify at CC
<i>Requirement</i>	Every <b>Stairway</b> (excluding fire-isolated stairway) is to be compliant with AS1428.1.
<i>Compliance</i>	Complies with the width and landing space requirements.
<i>Comments</i>	In order for the handrails to comply, the risers have to be offset at the landings so that no vertical sections are created.
<i>Requirement</i>	Every <b>Fire-isolated Stairway</b> is to be compliant with the relevant sections of AS1428.1
<i>Compliance</i>	Complies with the width and landing space requirements.
<i>Comments</i>	Detailed features of the stairway will be assessed with the requirements of AS1428.1 at the CC stage of works.
<i>Requirement</i>	<b>Passing spaces requirement</b> It is a requirement to provide passing spaces in accessways complying with AS1428.1 at maximum 20 M intervals, where a direct line of sight is not available. Space required is width of 1800mmx2800mm (in the direction of travel).
<i>Compliance</i>	N/A
<i>Comments</i>	There are no accessways over 20 M lengths in the development where a direct line of sight is not available.
<i>Requirement</i>	<b>Turning spaces requirement</b> It is a requirement to provide turning spaces in accessways complying with AS1428.1 within 2 M of the end of accessways where it is not possible to continue travelling and at every 20M intervals. Space required is width of 1540mmx2070mm (in the direction of travel).
<i>Compliance</i>	Complies.
<i>Comments</i>	Adequate turning spaces have been provided. Details to be verified at CC stage of works.
<i>Requirement</i>	<b>Small building concession</b> In a Class 5, 6, 7b or 8 building containing not more than 3 storeys, a lift / ramp is not required to provide access to levels other than the entrance level if the floor area of the levels other than the entrance level is not more than 200m <sup>2</sup> .
<i>Compliance</i>	N/A
<i>Comments</i>	
<i>Requirement</i>	<b>Carpet specifications</b> Carpet if used in areas required to be accessible are to be provided with pile height or thickness not more than 11mm and carpet backing not more than 4mm bringing the total height to a maximum of 15mm.
<i>Compliance</i>	Capable of compliance if carpets are provided in the common use areas.
<i>Comments</i>	Selection of carpets as specified above will lead to compliance.

<b>BCA Part D3.4 Exemption</b>	
<i>Requirement</i>	<b>Access is not required to be provided in the following areas :</b> <ul style="list-style-type: none"> <li>• where access would be inappropriate because of the use of the area</li> <li>• where area would pose a health and safety risk</li> <li>• any path which exclusively provides access to an exempted area</li> </ul>
<i>Compliance Comments</i>	For information only. Areas such as lift machine rooms, fire services room, and plant rooms in the development are exempted.
<b>BCA Part D3.5 Accessible Carparking</b>	
<i>Requirement</i>	<b>In situations where not more than 5 carparking spaces have been provided</b> The car parking space need not be designated, so as to restrict the use of the carparking space only for people with a disability.
<i>Compliance Comments</i>	N/A
<i>Requirement</i>	<b>Class 2</b> There are no carparking requirements for a Class 2 under the BCA. If adaptable housing has been mandated by the Council, carparking spaces will be required under the requirements of AS4299- Adaptable housing
<i>Compliance Comments</i>	Complies
<i>Requirement</i>	<b>Class 6</b> <ul style="list-style-type: none"> <li>• 1 space per 50 carparking spaces ( up to 1000 spaces) and</li> <li>• additional 1 space per additional 100 spaces provided</li> </ul>
<i>Compliance Comments</i>	Complies. 39 spaces – 1 accessible
<b>BCA Part D3.6 Signage</b>	
<i>Requirement</i>	Braille and Tactile signage is required to identify Accessible Sanitary facilities, Ambulant Sanitary Facilities, Hearing Augmentation, Exits and location of accessible entrances
<i>Compliance Comments</i>	Capable of compliance. Verify at CC

**BCA Part D3.8 Tactile indicators (TGSIs)**

<i>Requirement</i>	TGSIs are required when approaching; <ul style="list-style-type: none"><li>• Stairways other than fire-isolated stairways</li><li>• Escalators / passenger conveyor / moving walk</li><li>• Ramp (other than fire-isolated ramps / kerb or step or swimming pool ramps)</li><li>• Under an overhead obstruction of &lt;2M if no barrier is provided</li><li>• When accessway meets a vehicular way adjacent to a pedestrian entry (if no kerb / kerb ramp provided at the location)</li></ul>
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	In the proposal, TGSIs are required in the following locations: <ul style="list-style-type: none"><li>• At <u>top and bottom landings</u> of stairways and 1:14 ramps, <u>600-800mm</u> depth or min 12 discrete cones are required at 300+/-10mm from edge of hazard</li><li>• At <u>mid landings</u> of stairway and 1:14 ramp, <u>300-400mm</u> depth or min 6 discrete cones are required <u>only where handrails are not continuous</u> or landing is more than 3M</li><li>• Where accessway meets a vehicular way, 600-800mm depth or min 12 discrete cones are required at 300+/-10mm from edge of hazard.</li><li>• Under the stairway to warn of overhead obstruction, 600-800mm depth or min 12 discrete cones are required at 300+/-10mm from edge of hazard</li></ul>
<b>BCA Part D3.11 Limitations on Ramps</b>	
<i>Requirement</i>	<ul style="list-style-type: none"><li>• A series of connecting ramps cannot have a vertical height of 3.6M</li><li>• A landing for a step ramp cannot overlap a landing for another ramp</li></ul>
<i>Compliance</i>	Complies.
<i>Comments</i>	
<b>BCA Part D3.12 Glazing on Accessways</b>	
<i>Requirement</i>	<b>Glazing requirements-</b> Where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening are required to have a glazing strip as per requirements of AS1428.1
<i>Compliance</i>	Capable of compliance, where provided in common use areas such as lift lobbies,
<i>Comments</i>	common passageways and in all commercial use areas.

BCA Part F Accessible Sanitary Facilities  
**BCA F2.4 Accessible sanitary facilities**

<i>Requirement</i>	<b>Accessible unisex toilet</b> is to be provided in accessible part of building such that; <ul style="list-style-type: none"> <li>It can be entered without crossing an area reserved for 1 sex only</li> <li>Where male and female sanitary facilities are provided at different locations, Accessible unisex toilet is only required at one of the locations</li> <li>Even distribution of LH and RH facilities</li> </ul> If no lift is required to be provided to a level, then accessible facility is not required on that level.
<i>Compliance</i>	Complies.
<i>Comments</i>	
<i>Requirement</i>	Accessible unisex toilet are to be designed in accordance with AS1428.1
<i>Compliance</i>	Complies with the width and length requirements, depending on selected fixtures.
<i>Comments</i>	
<i>Requirement</i>	<b>Ambulant use male / female toilets</b> are to be provided if an additional toilet to the Accessible unisex toilet is provided.
<i>Compliance</i>	Complies
<i>Comments</i>	The following Ambulant facilities have been provided Male Ambulant use toilets Female Ambulant use toilets
<i>Requirement</i>	<b>Ambulant use toilets are to be designed in accordance with AS1428.1.</b>
<i>Compliance</i>	Complies with the width and length requirements
<i>Comments</i>	Verify at CC.
<i>Requirement</i>	<b>BCA F2.4(a) Accessible unisex sanitary compartments</b> <b>Class 2</b> At least 1 when sanitary compartments are provided in common areas.
<i>Compliance</i>	N/A
<i>Comments</i>	No common use toilets
<i>Requirement</i>	<b>Class 5, 6, 7, 8 or 9 ( excluding ward area of 9a health-care)</b> 1 on every storey containing sanitary compartments. Where more than 1 bank of sanitary compartments on a level, at 50% of banks
<i>Compliance</i>	Complies
<i>Comments</i>	Shared toilets on Ground floor



**BCA Part E Lift Installations**

<i>Requirement</i>	In an accessible building, every passenger lift must comply with Tables E3.6(a) and E3.6(b).
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	Lift floor dimensions (excluding stairway platform lift) are listed below. <ul style="list-style-type: none"><li>• Lifts travelling more than 12M, floor size 1400mm wide x 1600mm deep</li></ul>
<i>Requirement</i>	If the effective height of the building is over 12M, at least one of the lifts is required to be a stretcher lift, which is to accommodate a raised stretcher with clear space of not less than 600 x 2000mm long x 1400mm high above FFL.
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	Verify at CC

## DCP Requirements

### Adaptable Housing

30 adaptable units are required by the Council's DCP. The units designated as adaptable are listed below:

Stage 1			Stage 2		
	Current Adaptable	Adaptable no design changes needed	Current Adaptable	Adaptable no material design changes	TOTALS
	A102	B303	C104	C109	
	A109	B308	C204	C209	
	A202		C304	C309	
	A209		D104	C105	
	A302		D204	C205	
	A309		D304	C305	
	B103			D105	
	B108			D205	
	B203			D305	
	B208			D110	
				D210	
				D310	
<b>Total</b>	10	2	6	12	30
<b>Total Apartments</b>					157
<b>Percentages</b>					19.11%

At DA stage there is insufficient information to certify compliance with the Standard, however, in accordance with the table below, the units can comply with the spatial requirements of AS4299 for Adaptable Housing.

AS 4299 Adaptable Housing Class C

<i>The Site</i>	<b>Requirement</b>	<b>An accessible path of travel from the street, letterboxes, car park and to common facilities is provided</b>
	<b>Compliance Comment</b>	Yes Verify at CC
<i>Carparking</i>	<b>Requirement</b>	<b>A carspace 6m x 3.8m is provided</b>
	<b>Compliance Comment</b>	Yes Layout based on AS 2890.6 which is acceptable
<i>Unit Entry</i>	<b>Requirement</b>	<b>The entry is accessible, covered, level, has a low threshold, permits wheelchair manouverability and has an 850 clear door with lever handles</b>
	<b>Compliance Comment</b>	Yes Verify at CC
<i>Interior - General</i>	<b>Requirement</b>	<b>Access to bathroom, kitchen, laundry, living areas and outside areas is provided.</b>
	<b>Compliance Comment</b>	Yes Verify at CC
	<b>Requirement</b>	<b>Doors are 820mm clear ( 870 leaf) with corridors a min. 1000mm wide with circulation space at doors as per AS1428.1</b>
	<b>Compliance Comment</b>	Yes Verify at CC
<i>Living/ Dining Rms</i>	<b>Requirement</b>	<b>Provision for circulation space of min 2250 dia, a telephone point adjacent to GPO and lighting which can achieve min 300 lux</b>
	<b>Compliance Comment</b>	Yes Verify at CC
<i>Kitchen</i>	<b>Requirement</b>	<b>Floor surface to be non slip with 1550 clear between benches and circulation space at door to comply with AS1428.1. workbenches can be setout to provide requirements of AS 4299 including tap type and location, GPO locations.</b>
	<b>Compliance Comment</b>	Yes Verify at CC
<i>Main Bedroom</i>	<b>Requirement</b>	<b>Can accommodate a queen size bed, wardrobe and circulation to AS 1428.2</b>
	<b>Compliance Comment</b>	Yes Verify at CC
<i>Bathroom</i>	<b>Requirement</b>	<b>Provision to allow bathroom to be converted to complying with AS 1428.1. The floor is slip resistant and the shower recess is hobless and can provide a compliant shower area with provision for grabrails, mirror, GPO etc.</b>
	<b>Compliance Comment</b>	Yes Main bathroom assessed Verify at CC

<i>Toilet</i>	<b>Requirement</b>	<b>An accessible toilet or an enlarged toilet with an area 1200x900w in front of pan is provided which is capable of modification to comply with AS 1428.1. The floor is slip resistant and the wall is capable of installing grabrails.</b>
	<b>Compliance Comment</b>	Yes Verify at CC
<i>Laundry</i>	<b>Requirement</b>	<b>Circulation at doors to comply with AS 1428.1 is provided with adequate circulation in front of appliances (min 1550mm). Provision for washing machine and drier is available with a double GPO and an accessible path of travel to clothes line if provided. The floor is slip resistant.</b>
	<b>Compliance Comment</b>	Yes
<i>Door Hardware</i>	<b>Requirement</b>	<b>Lever door handles are provided, located 900-1100mm above floor</b>
	<b>Compliance Comment</b>	Yes

#### SEPP 65 – Part 4Q1

Objective 4Q1, of SEPP 65, requires that 20% of the units are to incorporate the features of the Livable Housing Guidelines Silver level.

As 20% of the units are adaptable it is considered that these units at least achieve the features of Silver level of Livable Housing Guidelines as tabled below.

<b>Criteria</b>	<b>Requirement</b>	<b>Compliance</b>
<i>Dwelling Access</i>	Provide a safe and continuous pathway from: - the front boundary of the allotment or - carparking space, where provided, which may include the driveway on the allotment, to an entrance that is step-free (not applicable to sites steeper than 1:14)	Complies
	The path to be 1M clear, step-free, even, firm, slip-resistant with a crossfall of not more than 1:40. Landings to be every 9M for 1:14 and every 15M for 1:20	Complies
	Step ramp can be provided for maximum height of 190mm, maximum grade of 1:10, minimum width of 1M and maximum length of 1900mm.	
	Level landings of 1200mm required exclusive of the swing of the door or gate and to be provided at the head and foot of the ramp.	
<i>Dwelling Entrance</i>	Sheltered entry with minimum clear opening width of door to be 820mm Step free threshold of maximum 5mm with rounded or bevelled lip Permissible threshold is 56mm where provided with a threshold ramp.	Complies 850 clear opening provided with a low threshold.

<i>Car Parking</i>	<b>Where the parking forms part of the dwelling access, the space shall have dimensions of 3.2m wide and 5.4m long and a slip resistant surface of 1:40 gradient ( 1:33 for bitumen)</b>	<b>N/A</b> The units are part of <b>Class 2</b> development with parking space not being a part of the dwelling access.
<i>Internal Doors &amp; Corridors</i>	Doors to rooms on the entry level used for living, dining, bedroom, bathroom, kitchen, laundry and bathroom to be 820mm clear opening and provided with a level threshold of maximum 5mm with rounded or beveled lip	Complies
	Internal corridors and passageways to doorway to be 1M clear.	Complies
<i>Toilet</i>	Dwellings should have a toilet on the ground or entry level.	Complies
	Minimum 900mm between walls if located in separate room with minimum 1200mm clear space in front of the WC pan exclusive of door swing.	Complies
	If toilet is located in bathroom, toilet pan should be located in corner of the room to enable installation of grabrails.	
<i>Shower</i>	One bathroom shall have a hobless shower located in the corner of the room to enable installation of grabrails.	Complies
<i>Bathroom Walls</i>	Bathroom walls shall be constructed of masonry or provided with wall reinforcement to allow the later fixing of grabrails around the shower, bath (if provided) and toilet.	Complies
<i>Internal Stairs</i>	Where an internal stair rises more than 1M, a continuous handrail must be provided on 1 side.	N/A The units do not have an internal staircase

### Statement of Compliance

On the basis of the above assessment, I am satisfied that the proposal can achieve compliance with the access provisions of the BCA and AS 4299 Adaptable Housing.



**Howard Moutrie**

ACAA Accredited Access Consultant No 177

# Statement of experience

Name: **Howard Moutrie**

Qualifications: B. Arch (Hons)  
Registered Architect ARB Reg. No 4550 Registered 1988  
OHS Induction Training  
OHS – Monitoring a Safe Workplace  
QA Assessor/Auditor  
Registered Assessor of Livable Housing Australia (License no 10054)

Memberships:  
Past & Current ACAA Accredited Access Consultant Reg. No. 177  
RAIA A+ Member Level 1  
Standards Australia ME/64 Committee (Access Standards)  
Sutherland Council Design Review Panel  
Sutherland Council Access Committee  
City of Sydney Access Panel 2010  
Building Professionals Board Access Advisory Panel  
ACAA NSW Management Committee

Experience: Howard Moutrie is an architect with over 30 years of experience and an accredited Access Consultant with the Association of Consultants in Access Australia (ACAA). Howard has worked both in Australia and internationally.



Howard is an experienced practicing access consultant and has previously spent 10 years on the Standards Australia Disabled Access Committee ME/64, providing input into the AS 1428 suite of Standards and the Adaptable Housing Standard. Howard has provided comment to numerous Councils on their Access Policy and acted as an expert witness in the Land & Environment Court.



Howard specializes in access consultancy services within the built environment. Services include design advice, access auditing of buildings, reports for building and development approval, alternative solutions, expert witness and luminance contrast testing.

Howard maintains a high level of continuing education programs and has presented at numerous seminars and training sessions including:

- ACAA National Conference
- ACAA State Network Seminars
- RAIA Network Seminars
- Building Designers Association Seminars
- Sutherland Council Assessment Staff



**Farah Madon** is a Sub-Consultant of Accessible Building Solutions.

Farah is a

- Registered Architect (ARB Reg. No 6940) with 16 years of experience
- ACAA Accredited Access Consultant (Reg. No. 281) with ACAA
- Registered Assessor of Livable Housing Australia (License no 10032)

Farah is an experienced practicing access consultant is also a member of:

- Penrith City Council's Access Committee
- Management Committee member of ACAA
- Secretary of NSW Network of Access Consultants
- Member of the Australian Institute of Architects (RAIA) National Access Work Group