

ACCESS REPORT

DEVELOPMENT APPLICATION

57-69 STRATHALLEN AVENUE NORTHBRIDGE

MIXED RETAIL / RESIDENTIAL DEVELOPMENT



Prepared By Mark Relf

1st July 2024



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Introduction

The purpose of this report is to provide an accessibility review of a Development Application for a mixed commercial / residential development on a site 57-69 Strathallen Avenue, Northbridge.

In particular, the report considers whether the development is consistent with accessibility and adaptable housing requirements of the development controls and standards listed below.

Assessment Criteria

This assessment considers the following legislation, planning instruments and standards pertaining to access for people with disabilities:

- (1) Building Code of Australia (2022) - section D4 and related parts
- (2) Disability (Access to Premises–Buildings) Standards 2010 (hereinafter the DDA Premises Standards)
- (3) SEPP 65 – Apartment Design Guide (2015) – section 4Q - *Universal Access*.
- (4) Willoughby Development Control Plan – 2023 – Part B: - 4.3.3 *Adaptable housing, access & mobility* and Part F: Table 5 – *Accessible Parking*
- (5) Australian Standard AS1428.1 (2009) 1 - Design for Access & Mobility & referenced standards.
- (6) Australian Standard AS1428.1 (2009) 4.1 - Design for Access & Mobility & referenced standards.
- (7) Australian Standard AS4299 – Adaptable Housing.
- (8) Livable Housing Design Guidelines
- (9) Australian Standard AS2890.6 (2009) – Off-Street Parking.

Report Format

The report provides the following Parts to reflect the various elements:

- **Part A – Commercial:** provides a general assessment of the proposed commercial/retail areas on the Ground Floor and common areas throughout the development against the relevant Australian Standards AS1428 and AS2890.6 in accordance with Section D4 and clauses E3D6, E3D7 and F4D5, F4D6 of the BCA 2022, DDA Premises Standards and Council's DCP.
- **Part B – Residential:** provides a regulatory review of the residential component of the development against the accessibility and adaptability requirements of Willoughby DCP 2023, which requires residential flat buildings greater than 3 storeys to provide 50% of apartments to be adaptable to the class C provisions of Adaptable Housing AS4299.
- **Part C – SEPP 65 Assessment:** provides a regulatory review of the residential component of the development against the universal access requirements of SEPP 65 Apartment Design Guide consistent with the Willoughby Development Control Plan – 2023 – Part B - 4.2.4, which 20% of apartments to provide silver level requirements of the Livable Housing guidelines.

Assessment Methodology

This review considers the accessibility requirements of the aforementioned Standards. However, the comments do not cover detailed issues pertaining to construction documentation such as internal design of accessible toilet facilities, tenancy fitout, evaluation of slip resistant floor materials, lift specification, door schedule, tactile ground surface indicators, lighting levels, signage and the like, which can be covered by an appropriate condition of consent subject to consent being granted.

Development Application Plans

The plans relied upon for this accessibility assessment include the following:

Drawing List					
Drawing Number	Drawing Series	Drawing Name	Status	Revision	Date
A00.000		Cover Sheet & Drawing List	Development Application	2	28.06.24
A01.001	Site & Existing Conditions	Site Plan (Existing)	Development Application	2	28.06.24
A01.002	Site & Existing Conditions	Demolition Plan	Development Application	2	28.06.24
A01.003	Site & Existing Conditions	Site Plan (Proposed)	Development Application	2	28.06.24
A03.001	General Arrangement Plan	Basement Level 01	Development Application	3	28.06.24
A03.002	General Arrangement Plan	Basement Level 02	Development Application	3	28.06.24
A03.100	General Arrangement Plan	Ground Level	Development Application	3	28.06.24
A03.101	General Arrangement Plan	Level 01	Development Application	3	28.06.24
A03.102	General Arrangement Plan	Level 02 & 03	Development Application	3	28.06.24
A03.104	General Arrangement Plan	Level 04	Development Application	2	28.06.24
A03.105	General Arrangement Plan	Roof Level	Development Application	2	28.06.24
A09.001	External Elevations	North Elevation	Development Application	3	28.06.24
A09.002	External Elevations	East Elevation	Development Application	3	28.06.24
A09.003	External Elevations	South Elevation	Development Application	3	28.06.24
A09.004	External Elevations	West Elevation	Development Application	3	28.06.24
A10.001	Building Sections	Section A	Development Application	2	28.06.24
A10.002	Building Sections	Section B	Development Application	2	28.06.24
A13.001	Apartment Types	3B_A	Development Application	3	28.06.24
A13.002	Apartment Types	3B_B	Development Application	3	28.06.24
A13.003	Apartment Types	3B_C	Development Application	3	28.06.24
A13.004	Apartment Types	3B_D	Development Application	3	28.06.24
A13.101	Apartment Types	4B_A	Development Application	3	28.06.24
A13.102	Apartment Types	4B_B	Development Application	3	28.06.24
A21.001	Shadow Analysis Diagrams	Shadow Plans	Development Application	2	28.06.24
A21.002	Shadow Analysis Diagrams	Views From The Sun	Development Application	2	28.06.24
A22.001	Area Calculation Plans	GFA	Development Application	2	28.06.24

Development Summary

The development application seeks approval for a five (5) storey mixed use development consisting of ground floor retail, twenty-four (24) apartments and basement car parking for 51 cars plus 2 EV charging bays, motorbike and bicycle parking.

Overall, the development shall consist of the following elements:

- The 51 basement parking space proposes 24 residential including 3 accessible spaces for the adaptable apartments, 3 visitor spaces with 1 accessible visitor space and 24 retail spaces including 2 accessible spaces. The accessible parking complies with Part F: Table 5 of the Willoughby DCP 2023 and clause D5D6 of the BCA 2022. There are lifts serving both basement levels to ensure equitable access to all areas.
- The retail tenancies ground floor level indicates on-grade access from adjoining public domain footpath with level entry and internal areas throughout.
- Residential lobbies provide a level entry from the central accessway through the centre of the development which incorporate lifts to all 5 storeys and basement parking.
- The residential units include twelve (12), 50% of the twenty-four (24) apartments are designed adaptable to satisfy the requirements of the Willoughby DCP 2023 – Part B: 4.3.3 – Adaptable Housing AS4299.
- The twelve (12) adaptable apartments also comply with the silver level livable housing guidelines to satisfy the SEPP 65 Apartment Design Guide regarding universal access.
- Details of ramps, doorways, lifts, stairways, accessible parking, accessible sanitary facilities and common areas, car park access and the internal fitouts of the retail areas shall be confirmed at a later construction certificate stage in accordance with AS1428.1, AS1428.4.1, AS1735.12, AS2890.6 as required by Section D4 and clauses E3D7, E3D8 and F4D5, F4D6 of the BCA 2022 and DDA Premises Standards.

In summary the access and adaptability review of the plans demonstrates that the development can comply with the relevant objectives and design code requirements of Section D4, E3D7, E3D8 and F4D5, F4D6 of the BCA 2022, DDA Premises Standards, SEPP 65 and the Willoughby DCP 2023 – for mixed residential/retail developments in terms of accessible pathways, accessible common and retail areas, adaptable and livable housing for people with disabilities.

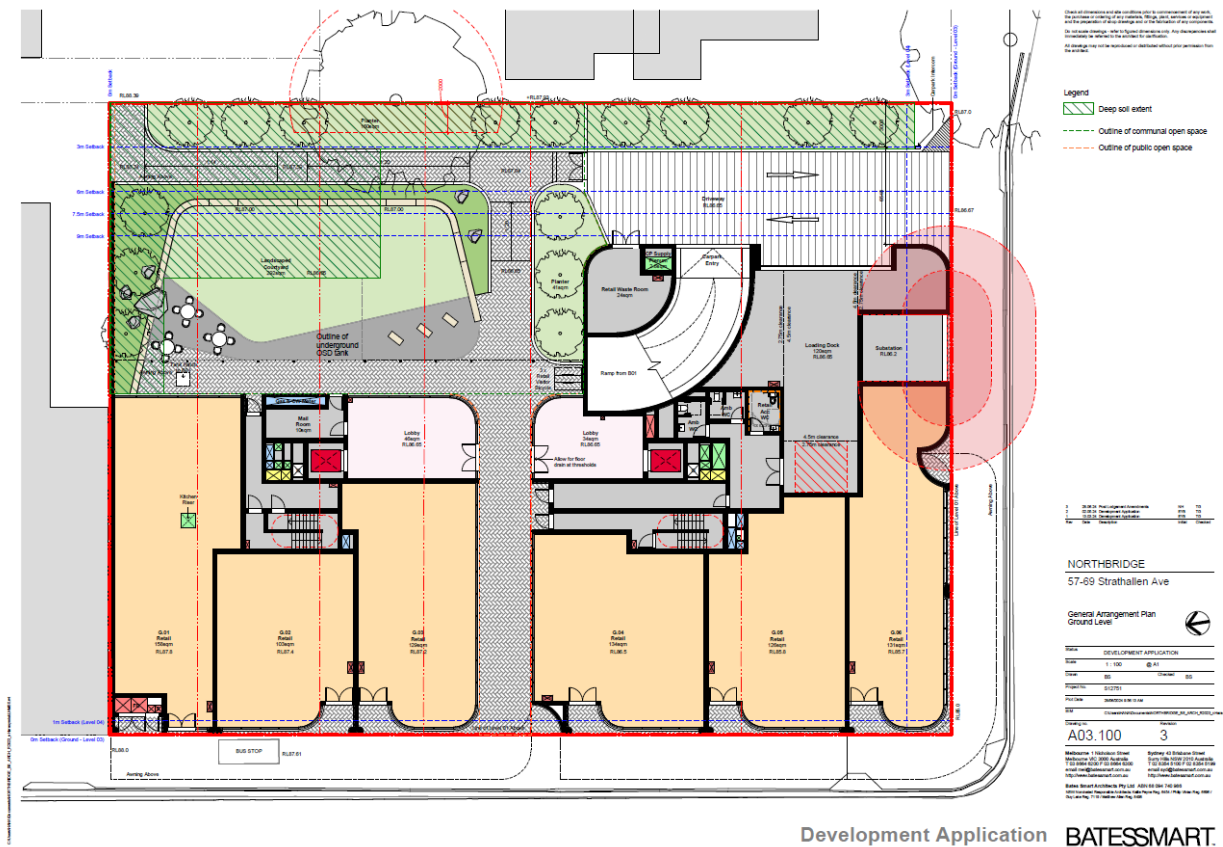
I am also satisfied that the development can comply with the Willoughby DCP 2023 and SEPP 65 pertaining to the requirements for Adaptable Housing (AS4299) and Universal Access.



Mark Relf,
Access Consultant (ACAA)

Part A – Retail & Common Residential Areas

Accessibility Assessment



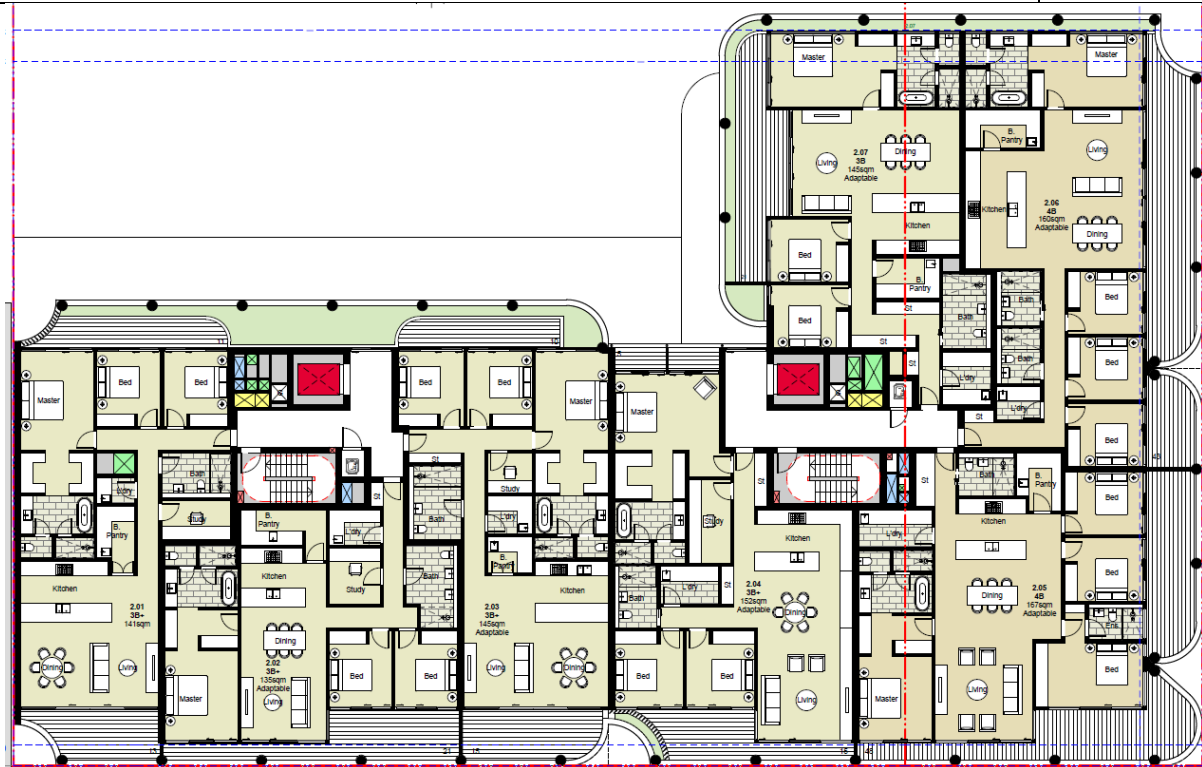
Ground Level

External Pathway Links & Building Entrances

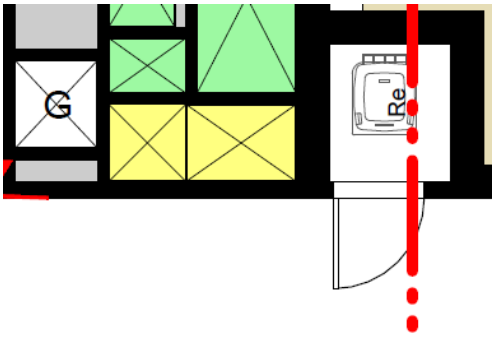
BCA / DDA Premises Standards Review	Complies
1. Ground Floor- A review of the public domain footpath levels indicates accessible entrance thresholds to the central common accessway @RL86.50 and the retail tenancies in accordance with AS1428.1 to comply with clauses D4D2 and D4D3 of the BCA, except retail G.06 @RL85.70 which is elevated approximately 200mm above the footpath, which may require a step ramp and auto opening door.	Can comply
2. The almost level accessway to the residential lift lobbies and communal resident and retail amenities proposes appropriate access in accordance with AS1428.1 to comply with clauses D4D2 and D4D3 of the BCA.	YES
3. With regard to the doorway entrances the CC plans will provide details of door widths, thresholds, door hardware, glazing markings, ramping, stairways and handrails in accordance with AS1428.1 to facilitate wheelchair access to comply with clauses D4D2, D4D3 and D4D4 of the BCA and Council's Access DCP requirements.	YES at CC Stage

Internal parts of buildings required to be accessible

BCA / DDA Premises Standards Review	Complies
4. Retail Tenancies – The retail tenancies propose single levels throughout to comply with AS1428.1 and satisfy clause D4D4 of the BCA.	YES
5. Retail Sanitary facilities propose a unisex accessible toilet and ambulant accessible male and female toilets and access to them in accordance with AS1428.1 to satisfy clauses D4D4, F4D5 and F4D6 of the BCA.	YES
6. Common area courtyard and terrace – The plans propose a Communal Outdoor Landscaped Terrace with on-grade access RL86.50 with outdoor seating that enables equitable access from the central accessway and residential lobbies in accordance with AS1428.1 and satisfy clause D4D4 of the BCA.	YES
7. The central accessway continues to the rear of the site @1:20 slope and a 1:14 ramp with landings at appropriate intervals as required by AS1428.1 to comply with clause D4D4 of the BCA and Council's Access DCP requirements.	YES
8. Common lift lobbies and basement access is achievable from both common lobbies, and lifts, which propose ample circulation spaces on all levels in accordance with AS1428.1 and satisfy clause D4D4 of the BCA. In particular the 1800mm width lift landings and corridors, which enable turning and passing areas to satisfy clause D4D4 of the BCA.	YES



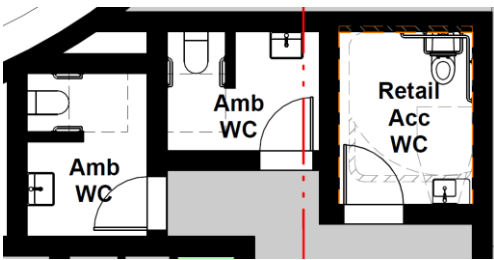
Level 2-3 (Same lobby designs on levels 1 and 4)

BCA / DDA Premises Standards Review		Complies
<p>9. Residential Bin Rooms & Chutes</p> <p>– The residential levels provide communal bin rooms with garbage chutes and recycle bins on each level adjacent to the lifts, subject to a 920mm outward swing door with a delayed action door closer to enable access for people who use a wheelchair to satisfy clause D4D4 of the BCA.</p>		<p>YES at CC stage</p>

Parking

BCA / DDA Premises Standards Review		Complies
<p>10. The basement parking proposes are twenty-four (24) retail spaces on B01 level including two (2) accessible parking spaces on a level surface with direct access to both lifts complying with AS2890.6 which complies with table D4D6 and D4D4 of the BCA.</p>		<p>YES</p>
<p>11. 2200mm minimum entry and driveway aisle heights and 2500mm height clearance over the spaces as required by AS2890.6 to comply with table D4D6 of the BCA.</p>		<p>YES</p>
<p>12. Residential Parking level B02 – Please refer to section B of this report as the BCA does not have any requirements pertaining to residential parking.</p>		<p>N/a</p>

Accessible Sanitary Facilities

BCA / DDA Premises Standards Review		Complies
<p>13. The ground floor proposes a unisex accessible toilet and male and female ambulant accessible toilets with layouts and circulation spaces complying with AS1428.1 to satisfy clauses F4D5 and F4D6 of the BCA.</p>		<p>YES</p>
<p>14. The base building plans illustrate sanitary facilities within communal areas on the ground floor, which are required to be detailed at construction certificate stage to include a unisex accessible fixtures and fittings to comply with AS1428.1 and satisfy clauses F4D5 and F4D6 of the BCA.</p>		<p>YES at CC stage</p>

Identification – Braille and tactile signage

BCA / DDA Premises Standards Review		Complies
<p>15. Details concerning the provision of raised tactile and Braille signage for the toilets associated with the retail / commercial areas and FIRE EXITS, as required by clause</p>		<p>YES at CC</p>

D4D7 and Specification I5 of the BCA, will be provided at construction certificate stage.	Stage
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Tactile ground surface indicators

BCA / DDA Premises Standards Review	Complies
16. Details concerning the provision of tactile ground surface indicators (TGSIs) as required by clause D4D9 of the BCA will be provided at construction certificate stage for pedestrian ramps and stairs (excluding fire/egress only stairs) in accordance with AS1428.4.1.	YES at CC stage

Lifts

BCA / DDA Premises Standards Review	Complies
17. The plans show two lifts that indicate the lift cars will be at least 2000mm X 1400mm in size, which complies with clauses E3D7 and E3D8 of the BCA .	YES

Part B – Residential

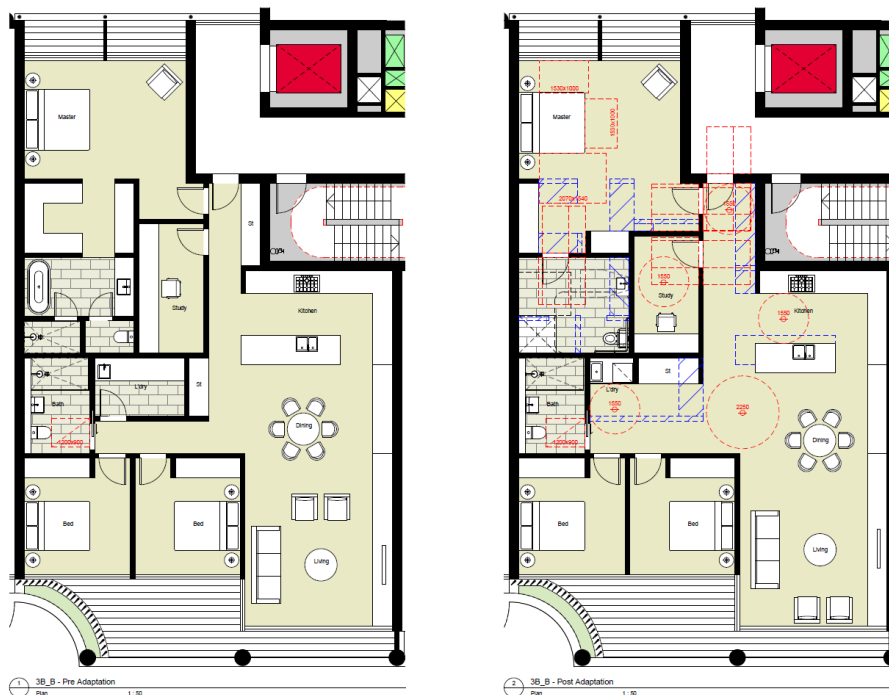
Adaptability Assessment

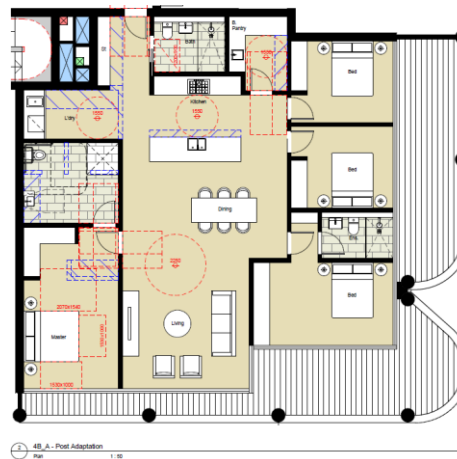
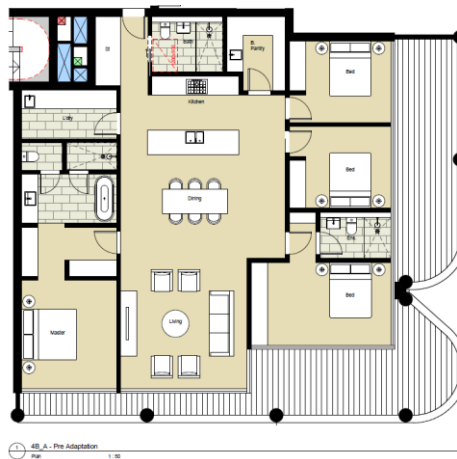
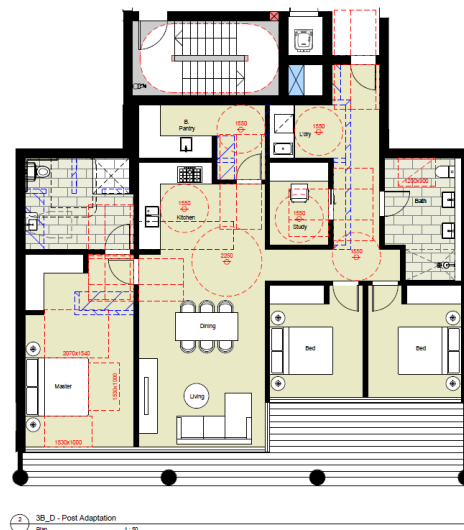
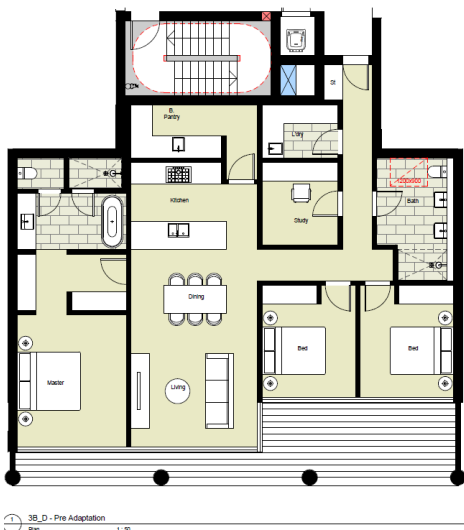
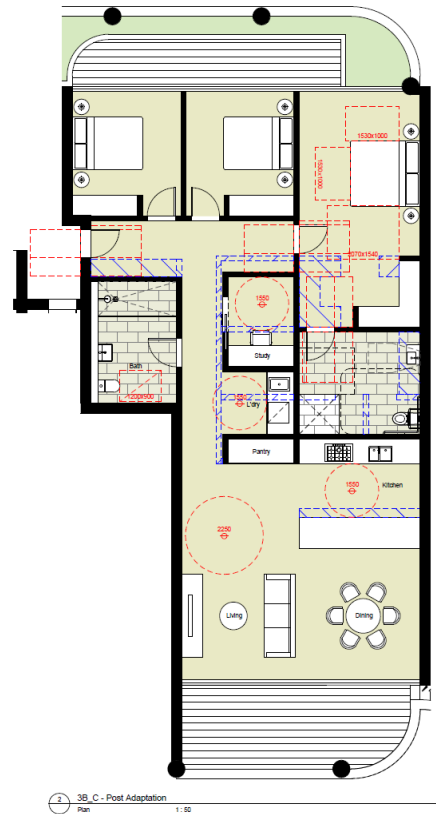
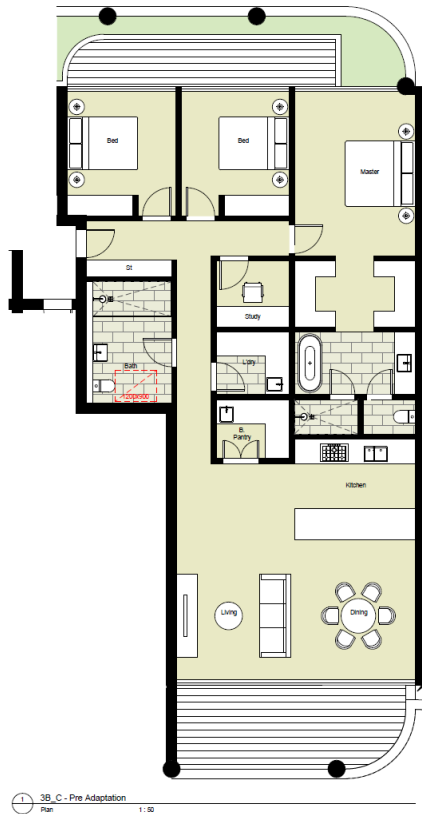
The following provides an assessment of the designated “adaptable” apartments in accordance with Category C of the Adaptable Housing Standard – AS4299 to satisfy the Willoughby DCP 2023 requirement for 50% to be adaptable for developments greater than 3 storeys.

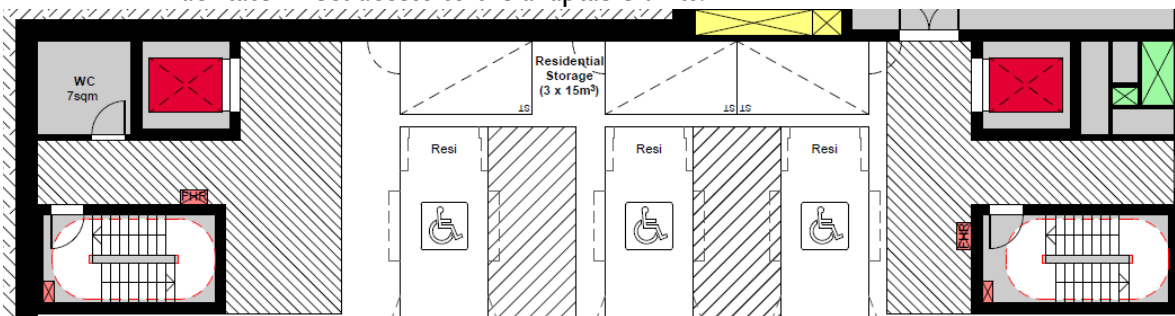
The plans show a minimum of twelve (12) apartments will be “adaptable” with internal layouts for four types. The basement carpark provides three (3) resident and one (1) accessible visitor parking spaces on level B2.

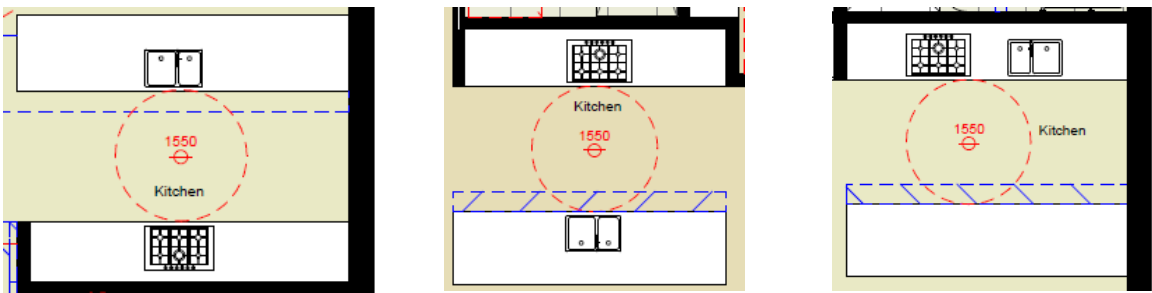


Apartments 2.02, 2.03, 2.04, 2.05, 2.06, 2.07 which are repeated on level 3

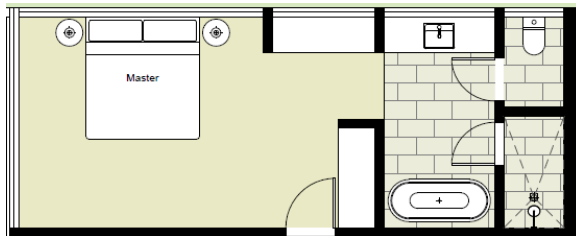




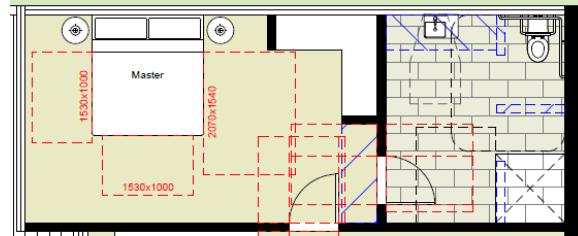
Clause	Adaptability Assessment	Compliance
AS4299 Clause 3.8	Letterboxes Mail Room within the ground floor entrance lobby shows that the development will provide at least 1550mm X 2100mm internal circulation area and access to comply with AS4299.	YES
AS4299 Clauses 3.3 and 3.5	Building Entrances - Ground Floor Residential Lobbies The plans show accessible entrance lobbies on the ground level with an almost level on-grade central accessway from Strathallen Avenue footpath which enable and accessible path of travel to the adaptable apartments. The access to enter the buildings comply with AS1428.1 and AS4299, subject to the detailing of doors, door hardware doorway landings/thresholds, doorway luminance contrast and intercom systems in accordance with AS1428.1. The lift lobbies incorporate multiple lifts that travel to the residential parking levels and the upper residential levels that contain the adaptable units.	YES YES YES at CC stage
AS4299 Clause 3.7	Resident Car Parking The basement car park provides three (3) spaces for the adaptable units that and 2 accessible visitor spaces facilitate 2400mm width adjacent to a 2400mm width shared area consistent with AS2890.6. The designated accessible spaces are required on generally level gradient areas (up to 1:40) with direct access to the northern lifts that facilitate direct access to the adaptable units.	YES YES
 <p>The diagram is a floor plan of Basement B2. It shows three accessible parking spaces, each marked with a wheelchair icon. There are also two accessible visitor spaces. A central area is labeled 'Residential Storage (3 x 15m²)'. To the left, there is a 'WC 7sqm'. The plan also shows lifts and stairs, with some areas highlighted in red and green. The overall layout is designed to provide accessible access to the adaptable units.</p> <p style="text-align: center;">Basement B2</p>		YES
Part E3D7 of the BCA AS1735.12	Lift Access The plans indicate the lift cars will be at least 1400mm X 2000mm which will comply with clauses E3D7 and 3D8 of the BCA for lifts that travel more than 12 metres and will be detailed at a future stage to comply with AS1735.12 – <i>Lifts For People With Disabilities</i> .	YES

Clause	Adaptability Assessment	Compliance
AS4299 Clauses 4.3.1, 4.3.2 and 4.3.3	<p>Accessible entries – The front entrances to the adaptable units provide at least 1500mm X 1550mm externally with 530mm minimum latch side clearance, which complies with the spatial requirements of AS4299.</p> <p>Internally the joinery adjoining the entry door can be adapted to achieve 530mm latchside clearance consistent with AS4299.</p>	<p>YES</p> <p>YES at CC stage</p>
AS4299 Cls 4.3.7	<p>Interior of Unit Type: general – The post adapted floor plans show the internal corridor and doorway approach to a <u>main bedroom</u>, adaptable bathroom and storage facilities the development complies with the doorway circulation space requirements of AS1428/4299.</p> <p>Doors and Door Hardware The plans will confirm 920mm minimum door widths providing 850mm minimum clear opening and lever handles at construction drawing stage to confirm compliance.</p>	<p>YES</p> <p>YES at CC stage</p>
AS4299 Clause 4.7	<p>Living and Dining rooms – The plans show combined living and dining areas on a single level with sufficient area to provide a 2250mm diameter turning area to comply with this clause.</p>	YES
AS4299 Clause 4.5	<p>Kitchen – With regard to kitchen designs the apartments provide double galley kitchens with an island bench that can be adapted to provide at least 1550mm clearance adjoining benches, which complies with the basic requirements of AS4299.</p> <p>Adjoining panty rooms also illustrate modified doorways to enable wheelchair access if desired by an occupant.</p>	YES
		
	<p>With regard to the “adaptability” of the kitchen the post adaptation plans do not show a wall oven or height adjustable workbench. Although these items can be added at the construction certificate stage to satisfy AS4299.</p>	YES at CC stage
AS4299 Clause 4.6	<p>Main bedroom – The plans show a main bedroom for the adaptable units that require modification to wardrobes and walls to achieve the required circulation spaces around a queen sized bed and doorway. As there are no structural elements in the relocated robes or services then the adaptations comply with AS4299</p>	YES

Clause	Adaptability Assessment	Compliance
	The room sizes allow a circulation area of 1540mm X 2070mm clear of a queen sized bed while maintaining 1000mm clearance on both sides of the bed and clear of a robe to satisfy AS4299. The doorway access to exit the room also complies with AS4299.	YES



Example pre-adapted unit 2.07



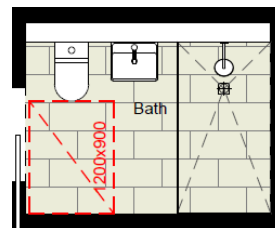
Example post-adapted unit 2.07

AS4299 Clause 4.7	Bathroom – The plans show that at least one bathroom in each unit will provide the following size and subject with internal layouts that comply with AS4299 in terms of spatial area and ease of adaptation by retaining plumbing from pre to post adaptation and overall room sizes.	YES
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The plans confirm ease of adaptation by providing;

- Toilet pan in a corner with easy access for future grabrails and circulation spaces to comply with AS1428/4299.
- Installation of a hobless shower that can achieve 1160 X 1100 and required circulation spaces as specified by AS4299/1428.1 following removal of shower screen walls.
- Washbasin / vanity with appropriate circulation spaces to comply with AS1428/4299.
- Wall strengthening for future grabrails.

AS4299 Cls 4.4.3	Toilet – The layouts within a common bathroom comply with AS4299 by providing 1200mm X 900mm in front of the WC pan.	YES
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AS4299 Clause 4.8	Laundry – The laundry facilities are provided in a closet, which enables at least 1550mm X 1550mm clear circulation space in front of the appliances to comply with AS4299.	YES
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AS4299 Cls 3.5(b)	Outdoor Private Open Space – The plans show outdoor terrace areas adjacent living area with sliding doors. The areas provide adequate space to perform a 180 degree wheelchair manoeuvre.	YES
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Detailed construction plans will confirm a step-down in the slab with recessed door track with a wheelchair accessible threshold to the external raised paving to comply with AS1428/4299.

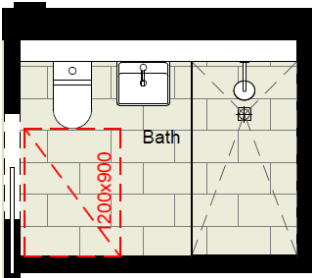
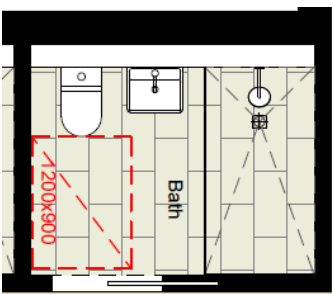
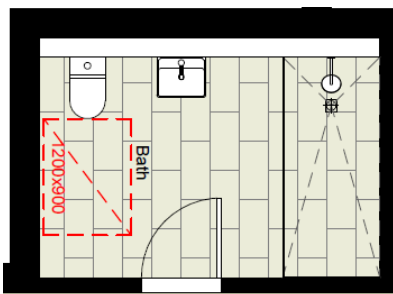
In summary, I conclude that these units and associated common domain facilities will comply with fundamental spatial design criteria of AS4299 and consequently the SEPP 65 Apartment Design Guide and Willoughby DCP 2023 – Adaptable Housing AS4299.

PART C – SEPP 65 Apartment Design Guide Universal Access

SEPP 65 Apartment Design Code – Section 4Q : Universal Access

The following assessment findings are provided to demonstrate compliance with the Silver Level requirements of the Livable Housing Guidelines as required the SEPP 65 Apartment Design Guide for 20% of the apartments.

The same adaptable apartments also provide silver level livable housing features to satisfy the universal access requirements of the Apartment Design Guide.

Silver Level Livable Housing	Assessment Findings
Element 1 – Common Area Access to Apartments	Section A of this report confirms that the site entrance and pathway to the principal entry lobby will comply with AS1428.1 and enable access to lifts which travel to all floors and along 1540mm minimum width accessways to the abovementioned apartments in accordance with AS1428.1 to satisfy clauses D4D2, D4D3 and D4D4 of the BCA. As a consequence the access to apartments also satisfies the Silver Level Livable Housing Guidelines.
Element 2 – Apartment Entrances	The entrances doorways will be detailed with 920mm doors with level thresholds and 1200mm X 1200mm minimum external corridor doorway landing areas to comply with the Silver Level Livable Housing Guidelines.
Element 3 – Car Parking	The parking is located within the basement and does not form, part of an access path to an apartment entrance and therefore Class 2 residential flat building are exempted from this clause.
Element 4 – Internal Doors & Corridors	The plans illustrate 1000mm minimum width corridors while the construction documentation shall confirm 870mm minimum internal doors to achieve 820mm clear opening widths to comply with the Silver Level Livable Housing Guidelines.
Element 5 – Toilet	The 20% of the twenty-four (3) apartments will be detailed with a toilet complying with the Silver level requirements of the Livable Housing Guidelines with a toilet in the corner of a room to allow for future installation of grabrails and provide at least 900mm X 1200mm clear circulation space in front of the toilet pan with a sliding door to comply with the Silver Level Livable Housing Guidelines.
	 

Silver Level Livable Housing	Assessment Findings
Element 6 – Shower	The bathrooms as mentioned above shall provide a shower in the corner of a room with a level entry (no hob) and a slip resistant floor surface, which will be confirmed at the construction certificate stage to comply with the Silver Level Livable Housing Guidelines.
Element 7 – Reinforcement of bathroom walls & toilet walls	The construction certificate documentation shall confirm wall reinforcing around the toilet pan and a hobless shower in accordance within the technical specifications of the Silver Level Livable Housing Guidelines.
Element 8 – Internal apartment stairs	This element is not applicable as all apartments are single level.

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, DDA Premises Standards, DDA Transport Standard, State Environment Planning Policy (Housing) 2021, SEPP 65 – Apartment Design Guide, Livable Housing Guidelines 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 principal consultant Mark Relf has considerable experience and expertise in a wide range of access related projects and is an accredited member of 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.
- Assessor Livable Housing.
- Member, NSW Heritage Office's – Technical Advisory Panel.

