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Oatlands Golf Club

**SEPP Seniors SCC  
Access Review - Rev B**

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REPORT REVISIONS		
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## 1 Executive Summary

The Access Review Report is a key element in the design of the SEPP Seniors residential development and Golf Club building known as Oatlands Golf Club, located at Bettington Road, Oatlands NSW 2117, and an appropriate response to the SEPP Seniors Living Policy, AS1428 series, Building Code of Australia (BCA), and DDA Access to Premises Standards (including DDA Access Code).

Morris Goding Access Consulting has prepared this Access Report to demonstrate compliance with the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (SEPP Seniors Living) and other applicable standards in relation to access, appropriate to the level of detail of the current scheme and for the purposes of SEPP Seniors Site Compatibility Certificate application only.

## 2 Introduction

### 2.1 Background

Oatlands Golf Club has engaged Morris Goding Access Consulting to provide a design review of the proposed SEPP Seniors residential development and Golf Club building known as Oatlands Golf Club, located at Bettington Road, Oatlands NSW 2117, for the purposes of a SEPP Seniors Site Compatibility Certificate (SCC) application.

The development consists of the following:

- Residential Buildings
- Club Building
- Basement Parking
- Associated roads, pathways, landscape and common facilities

The proposed development falls under a number of BCA classifications:

- Class 2 (residential)
- Class 9b (club)
- Class 7a (parking)

The requirements of the investigation are to:

- Review supplied drawings of the proposed development;
- Provide a report that will analyse the provisions of disability design of the development, in particular the suitability of the site for future compliance with the disability access related requirements of SEPP Seniors.

### 2.2 Objectives

The Report seeks to ensure compliance with statutory requirements and enhanced benchmark requirements set by the project, appropriate to the level of detail of the scheme. The Report considers user groups, who include residents, staff, and members of the public. The Report attempts to deliver equality, independence and functionality to people with a disability inclusive of:

- People with a mobility impairment (ambulant and wheelchair);
- People with a sensory impairment (hearing and vision); and
- People with a dexterity impairment

The Report seeks to provide compliance with the Disability Discrimination Act 1992. In doing so, the report attempts to eliminate, as far as possible, discrimination against persons on the grounds of disability.

### **2.3 Accessibility of Design**

The proposed design will utilise the Federal Disability Discrimination Act (DDA), Disability (Access to Premises – Buildings) Standards 2010, BCA/DDA Access Code, Universal Design principles, SEPP Seniors Living Policy, AS1428 Series, and other design guidelines, to develop appropriate design documentation, to provide reasonable access provisions for people with disabilities.

The design will be developed to ensure the principles of the DDA are upheld. Under the DDA, it is unlawful to discriminate against people with disabilities in the provision of appropriate access, where the approach or access to and within a premise, makes it impossible or unreasonably difficult for people with disabilities to make use of a particular service or amenity.

### **2.4 Statutory Requirements**

The statutory and regulatory guidelines to be encompassed in the developed design to ensure effective, appropriate and safe use by all people including those with disabilities will be in accordance with:

- Federal Disability Discrimination Act (DDA);
- Disability (Access to Premises – Buildings) Standards 2010;
- Building Code of Australia (BCA) Part D3, E3.6, F2.4;
- AS 1428.1:2009 - (General Requirement of Access);
- AS 1428.4.1:2009 - (Tactile Ground Surface Indicators);
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004
- AS 2890.6:2009 – (Parking for people with disabilities)

### **2.5 Limitations**

This report is limited to the accessibility provisions of the building and existing site in general. It does not provide comment on detailed design issues, such as: internals of accessible/ambulant toilet, fit-out, slip resistant floor finishes, door schedules, hardware and controls, glazing, luminance contrast, stair nosing, TGSIs, handrail design, signage etc. that will be included in construction documentation.

The purpose of the report is to assess the high level scheme and relevant existing site characteristics for the purposes of a SEPP Seniors Site Compatibility Certificate.

## 3 Proposed Scheme and Regulatory Background

### 3.1 General

The project objectives, BCA building classifications, and applicable development controls, bring into relevance the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, the Building Code of Australia 2019 and the Disability (Access to Premises – Buildings) Standards 2010.

### 3.2 SEPP Seniors Living Policy

The SEPP (Housing for Seniors or People with a Disability) 2004, hereinafter cited as ‘the SEPP’, is intended to promote a balance between the need for greater housing choice and the need to safeguard the character of residential neighbourhoods.

The proposed development proposes 100% of the accommodation to qualify as SEPP Seniors Living.

Compliance issues associated within the SEPP can be summarised as follows;

- Appropriate pedestrian linkages to essential services external to the development site.
- Appropriate paths of travel to public transport which connects with local centres containing all essential services.
- Wheelchair accessible paths of travel to a minimum percentage of dwellings (determined by site gradients).
- Wheelchair accessible paths of travel to common areas and common facilities, including letterbox areas and garbage areas.
- Private car accommodation for SEPP Seniors Living dwellings designed in accordance with AS2890.
- Accessible entry and passage through the dwelling, including through all internal doorways, in compliance with AS1428.1.
- Main bedroom suitably sized to accommodate a queen size bed and circulation around all edges including an area for wheelchair turning in accordance with AS1428.1.
- Main bathroom suitably sized and fitout as a compliant AS1428.1 layout with a visitable toilet compliant with AS4299.
- Slip resistant floor surfaces.
- Door hardware and ancillary items in compliance with AS4299.
- Suitable living area circulation in compliance with AS4299.
- Kitchen circulation, joinery, and appliance layout in compliance with AS4299.
- Suitable circulation space forward of laundry appliances.

- Linen storage in accordance with AS4299.

For the purposes of SEPP Seniors Site Compatibility Certificate disability access requirements, the following two elements will be analysed in the next section of this report:

- Appropriate pedestrian linkages to essential services external to the development site.
- Appropriate paths of travel to public transport which connects with local centres containing all essential services.

It is noted that the remaining compliance matters from the above list are relevant to Development Application level of design and so are not commented on further in this report. It is also noted that some of the above requirements overlap with minimum requirements for BCA compliance which is expected to be achieved and demonstrated with any future DA application as a matter of course.

### **3.3 DDA Premises Standards**

The Disability (Access to Premises – Buildings) Standards 2010 ('Premises Standards 2010') are a federal legislative instrument that was made under the Disability Discrimination Act 1992 (DDA). The Premises Standards 2010 prescribe minimum design and performance standards of accessibility in relation to built premises in general.

The site is subject to the requirements of the Premises Standards due to proposals for buildings, or spaces, within the development, that are categorised by a particular building classification in the Building Code of Australia.

The BCA building classifications of relevance to the development will include at a minimum;

- Class 2 (residential)
- Class 9b (club)
- Class 7a (parking)

Areas of the development classified under the above BCA building classifications will need to consider the following key issues;

- Access to and within principal entrances to the premises from the allotment boundary
- Access to and within common use areas
- Access to and within all areas normally used by the occupants
- Accessible car parking spaces (if parking is proposed)
- Signage for persons with disabilities
- Sanitary facilities for persons with disabilities



For the purposes of SEPP Seniors Site Compatibility Certificate disability access requirements, the above elements are not analysed in this report as minimum requirements for BCA compliance are expected to be achieved and demonstrated with any future DA application as a matter of course.

## 4 SCC Access Analysis

### 4.1 Location and access to facilities – (SEPP 2004 Part 2, Sub-clauses 26(1) and (2))

***(1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the proposed development will have access that complies with subclause (2) to -***

***(a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and***

***(b) community services and recreation facilities, and***

***(c) the practice of a general medical practitioner.***

***(2) Access complies with this clause if -***

***(b) in the case of a proposed development on land in a local government area within the Greater Sydney (Greater Capital City Statistical Area) – there is a public transport service available to the residents who will occupy the proposed development:***

***(i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and***

***(ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and***

***(iii) that is available both to and from the proposed development at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday (both days inclusive),***

***and the gradient along the pathway from the site to the public transport services (and from the public transport services to the facilities and services referred to in subclause (1)) complies with subclause (3).***

***(3) For the purposes of subclause (2) (b) and (c), the overall average gradient along a pathway from the site of the proposed development to the public transport services (and from the transport services to the facilities and services referred to in subclause (1)) is to be no more than 1:14, although the following gradients along the pathway are also acceptable—***

***(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,***

***(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,***

***(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time.***

## Assessment

The site is located in the suburb of Oatlands, which is understood to be within the Sydney Statistical Division.

The main retail and commercial precinct of Parramatta is located within 5km from site. This area contains abundant supermarkets, medical and dental, banking, cafes and restaurants and specialty stores. There are also community centres in this precinct.

The proposal can achieve compliance with clause 26 (2)(b) due to existing bus stops on Bettington Road. These stops are serviced by Route 546 (Epping to/from Parramatta) multiple times seven days a week. Both stops are well within the 400m limit from the proposed site main entrance.

In the case of the Epping bound bus stop on the far side of the road this is near level with the proposed site entrance, noting however that suitable kerb and road crossings will need to be introduced to the scheme to achieve the access requirements.

In the case of the Parramatta bound bus stop on the near side of the road, according to survey there is approximately 6m vertical difference with the proposed site entrance. However overall gradients appear compliant at approximately 1:15, with localised adjustments to footpath levels nearer the bus stop possibly necessary to achieve the requirements, subject to detailed survey. Should it be discovered during detailed design that such adjustments are not adequate it may be necessary to relocate the existing bus stop to a location closer to the entry to the development where grades have been found to be closer to assured compliance. In any event a compliant accessible path of travel is readily achievable.

## 4.2 Housing Siting (Schedule 3 Part 1 Clause 2 (1) & (2))

***(1) If the whole of the site has a gradient of less than 1:10, 100% of the dwellings must have wheelchair access by a continuous accessible path of travel (within the meaning of AS 1428) to an adjoining public road.***

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

- ***a percentage of dwellings that must have wheelchair access must equal the proportion of the site that has a gradient of less than 1:10. or 50%, whichever is the greater, and***
- ***the wheelchair access provided must use by a continuous accessible path of travel (within the meaning of AS1428.1.) to an adjoining public road or an internal road or a driveway that is accessible to all residents.***

## Assessment

As the building will attract BCA classification 2, as a matter of ordinary compliance under the BCA, the doorways to every sole occupancy unit will achieve wheelchair accessible paths of

travel from the boundary. This is irrespective of the natural site topography as the proposal describes a consistent entrance level to all buildings which is understood to match the existing levels at the site boundary at the location of the proposed entrance.

## 5 Conclusion

MGAC has assessed the proposed scheme for the SEPP Seniors residential development and Golf Club building known as Oatlands Golf Club.

The proposed drawings and site information indicate that accessibility requirements, pertaining to external site linkages and building access can be readily achieved.

It is advised that MGAC will work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in building design and external domain design.