



ACCESS CAPABILITY REPORT

40-48 Redan Street, Mosman
Report No. ACR-25114-1 dated 23.06.2026

Prepared for:
Mosman Land No. 1 Pty Ltd

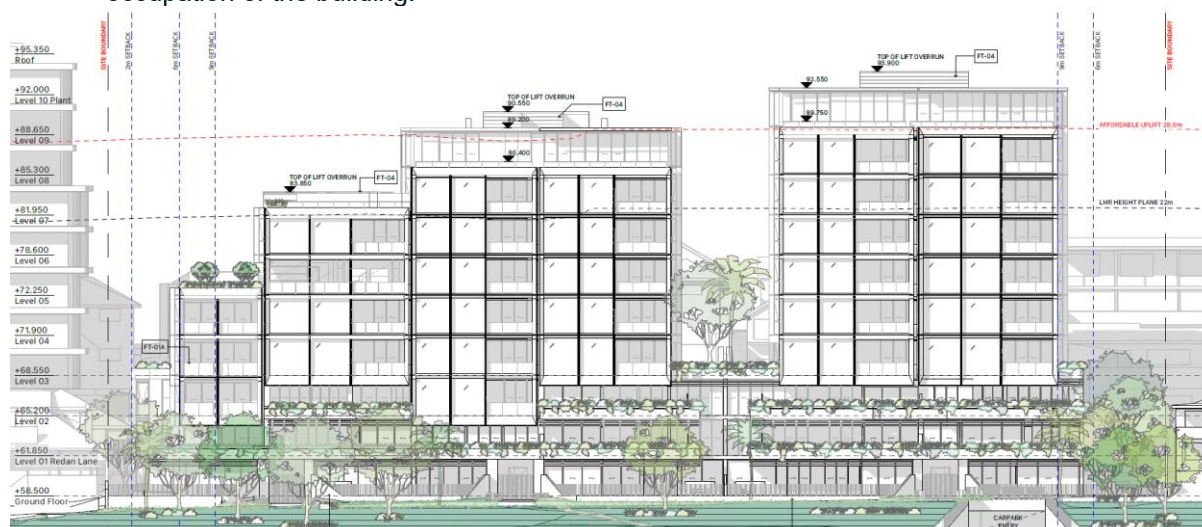


1. Executive Summary

STAC Consulting (NSW) Pty Ltd (STACC) have been engaged by Mosman Land No. 1 Pty Ltd to carry out a review of the proposed development at 40-48 Redan Street, Mosman, against the relevant access provisions of the National Construction Code 2022 Volume One Amendment 2 – Building Code of Australia (BCA) and the Disability (Access to Premises – Buildings) Standards 2010 (DAPS). In addition, 11 apartments (comprising 20% of the total number of apartments) are proposed to be Class C Adaptable and Silver Level Liveable, which have been assessed against the relevant provisions of AS4299-1995 and the Livable Housing Design Guidelines respectively.

The development involves the construction of a ten (10) storey residential flat building, including the demolition of existing onsite structures (including 5 dwellings and vehicle crossovers), comprising the following:

- Two levels of basement for 106 car parking spaces, 9 motorbike parking spaces, 53 bicycle parking spaces, residential storage, plant and services.
- 53 residential dwellings in 2-, 3- and 4-bedroom configurations.
- 883m² of communal open space at Ground Level, Level 1 and Level 5.
- Part ten, part five storey-built form across the site within a podium and two tower forms.
- Site preparation works and landscaping
- Provision of 15% affordable housing to be managed by a community housing provider for a period of 15 years from date of the Occupation Certificate.
- Extension and augmentation of physical infrastructure and utilities as required.
- Public domain improvements to Redan Lane adjacent to the site boundary.
- Lot consolidation of the individual lots will be formalised as part of the strata plan for the final development. Lot consolidation and registration of the strata plan will occur prior to the occupation of the building.



fjcstudio 'Elevation East – Redan Street' Sheet No. 3001 Rev. B dated 27.02.2026

The following Tables identify a summary of key issues that require further information / design amendments. For detailed requirements associated with the proposed development, refer to Table Tables 3.1, 3.2 & 3.3 in Section 3 of this report.

Table 1.1

BCA / DAPS Issues Requiring Further Information and / or Design Amendments		
Item	DtS Clause	Description of Issue
1.	D4D2	(a) All accessible doors to achieve a minimum clear opening of 850mm, including the doors to the garbage chutes in each core.



		(b) The circulation space of the doors from the common lobbies to the garbage chutes in each core is required to be amended to comply with Figure 31(d) of AS1428.1, or the doors are required to be power operated. (c) The circulation space of the door at the bottom landing of the BOH Corridor on Ground Floor leading to Lobby C is required to be amended to comply with Figure 31(f) of AS1428.1.
2.	D4D3	(a) The gradient of the walkway that is within the site boundary but outside the fenceline on Redan Lane is required to comply with AS1428.1 and requires further review to ensure it is not steeper than 1:40 at the gate circulation spaces, not steeper than 1:20 in the direction of travel and has a crossfall not steeper than 1:40. Landings also required to walkways between 1:20-1:33 at intervals in accordance with Clause 7.2 of AS1428.1. (b) 1:40 landings required at changes in direction associated with the accessways from Redan Lane to Lobby B on Level 1 and Lobby A on Level 2. (c) The circulation space of the pedestrian entry pivot doors to the common lobbies on Levels 1 & 2 is required to be amended to comply with Figure 31(d) & (h) of AS1428.1, or the doors are required to be power operated. (d) The circulation space of the pedestrian gate from Redan Lane to Lobby C on Level 1 is required to be amended to comply with Figure 31(d) of AS1428.1.
3.	D4D4	(a) All common ramps and external stairs not within an apartment are required to comply with AS1428.1. The stairs from Redan Lane to Lobby B on Level 1 & immediately to the north of the discharge door of FS01 near the entrance to Lobby A on Level 2 are required to be amended to ensure the required handrail extensions do not encroach on the adjacent accessways. (b) The corridor outside the entrance door to apartment 1.06 must be less than 2m or a 1540mm wide turning space will be required. (c) Confirmation to be provided if Lobby A on Levels 3-8 are common or form part of the title of the apartment they serve.
4.	D4D5	Confirmation is required if a BCA Clause D4D5 exemption will be sought by the developer for the plant / services areas, bin cleaning / non-resident waste areas, cleaner's rooms and maintenance areas, which will need to be in the form of a letter at CC application stage that specifies the exact parts of the building that are proposed to be exempt and the reasons why access for people with a disability is inappropriate. For the purposes of this report, it is noted these areas have not been assessed, and further assessment will be required if an exemption is not applied to any of these areas.

Table 1.2

AS4299 Adaptable Issues Requiring Further Information and / or Design Amendments		
Item	AS Clause	Description of Issue
1.	3.8	Each adaptable unit is proposed to be provided with an accessible parking space in accordance with AS2890.6 which is considered a suitable alternative to the requirements of this clause which states carparking spaces or garages are to be provided for each adaptable unit with a minimum area 6.0m x 3.8m. It is recommended that the proposed arrangement be adopted.
2.	4.6.1	The circulation space at the foot of the bed in the adaptable unit on Level 1 is required to be increased to 1540mm.
3.	4.4.1	A minimum clearance of 2300mm is required in front of the WC in the adaptable units on Level 3-7 on Sheet 6010 to comply with AS1428.1.



		Note: The WC pan in the Level 3-8 adaptable units should either be located in the after-adaptation location initially or be fitted with a P trap.
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Table 1.3

LHDG Livable Housing Issues Requiring Further Information and / or Design Amendments		
Item	LHDG Clause	Description of Issue
1.	4a	1200mm clear circulation space forward of the toilet pan exclusive of the swing of the door required to the visitable toilet in the Livable units on Level 3-8 on Sheet 6011.

Report History		
Revision	Date	Status
0	20.05.2026	Issue for SSDA Submission
1	23.06.2026	Updated Development Description

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2. Introduction

2.1 Aim

The aim of this report is to carry out a review of the proposed development at the subject premises to:

- Identify any BCA / DAPS / Class C Adaptable Housing / Silver Level Livable Housing compliance issues (as related to access for people with a disability) that require resolution / attention or a Performance Solution.
- Provide appropriate recommendations to achieve an acceptable level of compliance with the accessibility provisions of the BCA, having regard to minimum legislative requirements and desired outcomes for the project.
- Provide appropriate recommendations to achieve an acceptable level of compliance with the Class C requirements of AS4299 and Silver Level requirements of the Livable Housing Design Guidelines for 20% of the apartments.
- Confirm that the SSDA architectural documentation has been reviewed by an appropriately qualified Access Consultant to demonstrate that the accessibility provisions required under the BCA / DAPS / Class C Adaptable Housing / Silver Level Livable Housing have been met in the design or are capable of being met.

2.2 Development

We understand the development involves the construction of a ten (10) storey residential flat building, including the demolition of existing onsite structures (including 5 dwellings and vehicle crossovers), comprising the following:

- Two levels of basement for 106 car parking spaces, 9 motorbike parking spaces, 53 bicycle parking spaces, residential storage, plant and services.
- 53 residential dwellings in 2-, 3- and 4-bedroom configurations.
- 883m² of communal open space at Ground Level, Level 1 and Level 5.
- Part ten, part five storey-built form across the site within a podium and two tower forms.
- Site preparation works and landscaping
- Provision of 15% affordable housing to be managed by a community housing provider for a period of 15 years from date of the Occupation Certificate.
- Extension and augmentation of physical infrastructure and utilities as required.
- Public domain improvements to Redan Lane adjacent to the site boundary.
- Lot consolidation of the individual lots will be formalised as part of the strata plan for the final development. Lot consolidation and registration of the strata plan will occur prior to the occupation of the building.

2.3 Reviewed Documents

- National Construction Code 2022 Amendment 2 Volume One – Building Code of Australia (BCA)
- AS1428.1-2021 – General requirements for access – New building work
- AS1428.4.1-2009 – Means to assist the orientation of people with vision impairment – Tactile ground surface indicators
- AS2890.6-2009 – Parking facilities – Off-street parking for people with disabilities
- AS4299-1995 – Adaptable housing
- Disability (Access to Premises – Buildings) Standards 2010 (DAPS)
- Apartment Design Guide prepared by NSW Department of Planning and Environment dated July 2015
- Livable Housing Design Guidelines prepared by Livable Housing Australia dated 2017
- Environmental Impact Statement Report No. Final V2, Reference No. P0062816 dated 27.02.2026 prepared by Urbis Ltd
- Email regarding proposal of Mosman Councils DCP control requiring 100% LHA Silver Level apartments prepared by Time and Place Management Pty Ltd, dated 08.04.2026.



- Architectural Plans prepared by fjcstudio:

Sheet No.	Revision	Date	Sheet No.	Revision	Date
21B1	B	27.02.2026	3000	B	27.02.2026
21B2	B	27.02.2026	3001	B	27.02.2026
2102	B	27.02.2026	3002	B	27.02.2026
2103	B	27.02.2026	3003	B	27.02.2026
2104	B	27.02.2026	4000	B	27.02.2026
2105	B	27.02.2026	4001	B	27.02.2026
2106	B	27.02.2026	4002	B	27.02.2026
2107	B	27.02.2026	4003	B	27.02.2026
2108	B	27.02.2026	6008	B	27.02.2026
2109	B	27.02.2026	6009	B	27.02.2026
2110	B	27.02.2026	6010	B	27.02.2026
2111	B	27.02.2026	6011	B	27.02.2026
2112	B	27.02.2026	6012	-	-
2113	B	27.02.2026			

2.4 Legislative Framework

Pursuant to Section 19 of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021, all new building work must comply with the current BCA as in force on the 'Relevant Date', however the existing features of an existing building need not comply with the BCA unless upgrade is required by other legislation. In this regard, a 'New Building' and the 'New Part' of an existing building are required to comply with the current BCA and the DAPS, and the 'Affected Part' of an existing building must achieve compliance where applicable.

Note: At the date of issue of this report, the BCA in force is **BCA 2022 Amendment 2** which forms the basis of this report.

2.5 BCA Compliance Structure

Clause A2G1 – Compliance

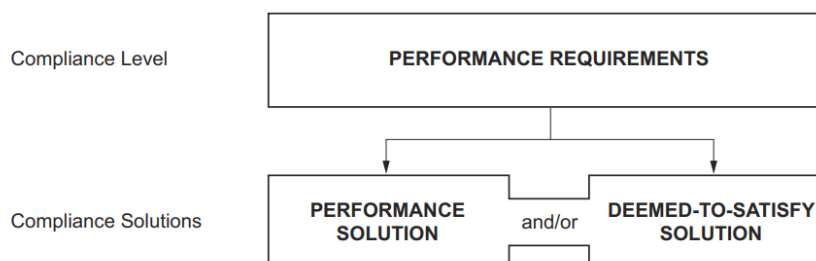
Compliance with the NCC is achieved by complying with—

- the Governing Requirements of the NCC; and
- the Performance Requirements.

Performance Requirements are satisfied by one of the following, as shown in Figure A2G1:

- Performance Solution.
- Deemed-to-Satisfy Solution.
- A combination of (a) and (b).

Figure A2G1: NCC compliance structure



2.6 Limitations & Exclusions

- While every reasonable effort has been made to ensure that this document is correct at the time of issue, STAC Consulting (NSW) Pty Ltd (STACC) disclaim all liability to any third party in respect of anything or the consequences of anything done or omitted to be done in reliance or upon the whole or any part of this document.



- STACC do not guarantee acceptance of any advice, reports or the like by the Principal Certifier, Consent Authority, or other relevant authorities or project stakeholders.
- Where the “Comment” column in Table 3.1 below states “Compliance Readily Achievable”, it does not necessarily mean that there is sufficient information on the referenced plans to confirm compliance, but that there is no apparent reason to believe a non-compliance exists based on referenced information.
- This report does not include assessment or advice in relation to any legislative Act, Statutory Instrument or Environmental Planning Instrument. Any reports, statements or other written advice issued by STACC does not relieve any other party of their contractual or statutory obligations.
- This report does not include assessment or advice in relation to the number and range of Adaptable and Livable apartments required under relevant legislation and guidelines. The assessment contained in this report is based on advice from the Town Planner that 20% of apartments are required to be Class C Adaptable and Silver Level Livable in accordance with AS4299 and the Livable Housing Design Guidelines respectively. It is noted all adaptable apartments are the same (or similar) 3 bedroom configuration, except for 1x 2 bedroom affordable housing unit. From an equity standpoint, consideration should be given to spreading these amongst 2, 3 and 4 bedroom apartments to accommodate various household sizes (including affordable housing units). Notwithstanding, Town Planner to advise on requirements to comply with relevant legislation and guidelines.
- This report does not include assessment or advice in relation to any provisions of the BCA that do not relate to access for people with a disability.
- This report does not include assessment or advice in relation to the Design and Building Practitioners Act 2020 or supporting Regulation.
- This report is not to be used as a Design Compliance Declaration under the Design and Building Practitioners Act 2020 and supporting Regulation or by any parties to satisfy their obligations under this legislation.
- No part of this document may be reproduced in any form or by any means without written permission from STACC. This report is based solely on client instructions, and therefore, should not be used by any third party without prior knowledge of such instructions.
- STACC are unable to confirm compliance with the Disability Discrimination Act 1992 (DDA) as this is a complaints-based piece of legislation and does not contain prescriptive compliance requirements. In this regard, the Client is to be satisfied that they have addressed their requirements under the DDA.
- No assessment has been undertaken to consider the equitable evacuation of occupants.
- This report does not include assessment or advice in relation to safety in design or requirements of the Work Health and Safety Act 2011 (WHS Act).
- This report does not constitute certification or approval under Part 4 or Part 6 of the Environmental Planning and Assessment Act 1979 (EPAA).
- No assessment has been carried out of any conditions of a Development Consent unless expressly referenced.



3. Compliance Assessment

3.1 BCA Classification

The following table presents a summary of the key BCA characteristics for the proposed residential development which is required to be confirmed by the BCA Consultant:

BCA Classification:	Class 2 (Residential Apartment Building) & Class 7a (Carpark)
Rise in Storeys:	Eleven (11)
Effective Height:	Greater than 25m

3.2 BCA / DAPS Assessment

The following Tables include a summary of our high-level assessment of the referenced documentation against the relevant access provisions of **BCA 2022 Amendment 2** and the Disability (Access to Premises – Buildings) Standards 2010 and should be read in conjunction with these provisions (see Note 1 below). Additionally, it is noted a further detailed assessment against AS1428.1-2021, AS1428.4.1-2009 & AS2890.6-2009 will be required at CC application stage.

Note 1: Although AS2890.6-2022 has been published by Standards Australia, it is noted that it has not been adopted by BCA 2022 Amendment 2 under Schedule 2, and therefore the applicable edition is AS2890.6-2009.

Note 2: Confirmation is required if a BCA Clause D4D5 exemption will be sought by the developer for the plant / services areas, bin cleaning / non-resident waste areas, cleaner's rooms and maintenance areas, which will need to be in the form of a letter at CC application stage that specifies the exact parts of the building that are proposed to be exempt and the reasons why access for people with a disability is inappropriate. For the purposes of this report, it is noted these areas have not been assessed, and further assessment will be required if an exemption is not applied to any of these areas.

Table 3.1 – BCA Assessment

BCA / AS Clause	Summary of Requirement	Comment
BCA Part D3 – Construction of Exits		
D3D11 Pedestrian ramps	(1) A fire-isolated ramp may be substituted for a fire-isolated stairway if the construction enclosing the ramp and the width and ceiling height comply with the requirements for a fire-isolated stairway. (2) A ramp serving as a required exit must— (a) where the ramp is also serving as an accessible ramp under Part D4, be in accordance with AS 1428.1; or (b) in any other case, have a gradient not steeper than 1:8. (3) The floor surface of a ramp must have a slip-resistance classification not less than that listed in Table D3D15 when tested in accordance with AS 4586.	Compliance Readily Achievable Ramps are required to be slip resistant in accordance with Table D3D15 below. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance.



BCA / AS Clause	Summary of Requirement	Comment															
Table D3D15: Slip-resistance classification <table> <tr> <th>Application</th><th>Dry Surface conditions</th><th>Wet surface conditions</th></tr> <tr> <td>Ramp steeper than 1:14</td><td>P4 or R11</td><td>P5 or R12</td></tr> <tr> <td>Ramp steeper than 1:20 but not steeper than 1:14</td><td>P3 or R10</td><td>P4 or R11</td></tr> <tr> <td>Tread or <i>landing</i> surface</td><td>P3 or R10</td><td>P4 or R11</td></tr> <tr> <td>Nosing or <i>landing</i> edge strip</td><td>P3</td><td>P4</td></tr> </table>			Application	Dry Surface conditions	Wet surface conditions	Ramp steeper than 1:14	P4 or R11	P5 or R12	Ramp steeper than 1:20 but not steeper than 1:14	P3 or R10	P4 or R11	Tread or <i>landing</i> surface	P3 or R10	P4 or R11	Nosing or <i>landing</i> edge strip	P3	P4
Application	Dry Surface conditions	Wet surface conditions															
Ramp steeper than 1:14	P4 or R11	P5 or R12															
Ramp steeper than 1:20 but not steeper than 1:14	P3 or R10	P4 or R11															
Tread or <i>landing</i> surface	P3 or R10	P4 or R11															
Nosing or <i>landing</i> edge strip	P3	P4															
D3D16 Thresholds	The threshold of a doorway must not incorporate a step or ramp at any point closer to the doorway than the width of the door leaf unless: c) in a building required to be accessible by Part D4, the doorway— (i) opens to a road or open space; and (ii) is provided with a threshold ramp or step ramp in accordance with AS 1428.1; or d) in other cases— (i) the doorway opens to a road or open space, external stair landing or external balcony; and (ii) the door sill is not more than 190 mm above the finished surface of the ground, balcony, or the like, to which the doorway opens.	Compliance Readily Achievable The threshold of all internal and external doorways (except within the non-Adaptable / non-Livable apartments) must be level, except external doorways which lead to a road or open space which are permitted to be provided with a threshold ramp or step ramp in accordance with AS 1428.1, or if it is an external doorway that serves an area of the building that is not required to be accessible, it contains a step down to outside not greater than 190mm. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance.															
D3D22 Handrails	Handrails in a required exit that serve an area that is required to be accessible are required to comply with clause 9 of AS 1428.1 (refer to requirements under clause D4D4 below), except that clause 9(d) does not apply to a handrail required by (1)(c)(ii) of this clause.	Compliance Readily Achievable The handrails to and within the accessible parts of the building, and the handrails associated with the egress stairs from the accessible parts of the building, are required to comply with clause 9 of AS1428.1. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance.															



BCA / AS Clause	Summary of Requirement	Comment
		Note: Ensure an offset tread is provided at landings that require turning to ensure the handrail height remains consistent.
BCA Part D4 – Access for People with a Disability		
D4D2 General building access requirements	Buildings and parts of buildings must be accessible as required by this clause, unless exempted by D4D5.	Further Information / Clarification Required at CC Stage Access is required to and within Basement 1 (which is the only Class 7a storey which contains accessible parking spaces), to the entrance door of each apartment and to and within all rooms or spaces for use in common by the resident in accordance with this clause and the Disability (Access to Premises – Buildings) Standards 2010, except for areas that are exempted under D4D5, with particular attention drawn to the following: • All accessible doors to achieve a minimum clear opening of 850mm, including the doors to the garbage chutes in each core. • The circulation space of the doors from the common lobbies to the garbage chutes in each core is required to be amended to comply with Figure 31(d) of AS1428.1, or the doors are required to be power operated. • The circulation space of the door at the bottom landing of the BOH Corridor on Ground Floor leading to Lobby C is required to be amended to comply with Figure 31(f) of AS1428.1. Note: Ensure door recess of accessible



BCA / AS Clause	Summary of Requirement	Comment
		doors is not more than 300mm. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance. Note: It is considered access is not required to storage cages that are not for use in common by residents.
D4D3 Access to buildings	(1) An accessway must be provided to a building required to be accessible— (a) from the main points of a pedestrian entry at the allotment boundary; and (b) from another accessible building connected by a pedestrian link; and (c) from any required accessible carparking space on the allotment. (2) In a building required to be accessible, an accessway must be provided through the principal pedestrian entrance, and— (a) through not less than 50% of all pedestrian entrances including the principal pedestrian entrance; and (b) in a building with a total floor area more than 500 m², a pedestrian entrance which is not accessible must not be located more than 50 m from an accessible pedestrian entrance, except for pedestrian entrances serving only areas exempted by D4D5. (3) Where a pedestrian entrance required to be accessible has multiple doorways— (a) if the pedestrian entrance consists of not more than 3 doorways — not less than 1 of those doorways must be accessible; and (b) if a pedestrian entrance consists of more than 3 doorways — not less than 50% of those doorways must be accessible. (4) For the purposes of (3)— (a) an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where— (i) all doorways serve the same part or parts of the building; and (ii) the distance between each doorway is not more than the width of the widest doorway at that pedestrian entrance (see Figure D4D3); and (b) a doorway is considered to be the clear, unobstructed opening created by the opening of one or more door leaves (see Figure D4D3).	Further Information / Clarification Required at CC Stage Access must be provided to the building in accordance with this clause and the Disability (Access to Premises – Building) Standards 2010, with particular attention drawn to the following: • The gradient of the walkway that is within the site boundary but outside the fenceline on Redan Lane is required to comply with AS1428.1 and requires further review to ensure it is not steeper than 1:40 at the gate circulation spaces, not steeper than 1:20 in the direction of travel and has a crossfall not steeper than 1:40. Landings also required to walkways between 1:20-1:33 at intervals in accordance with Clause 7.2 of AS1428.1. • 1:40 landings required at changes in direction associated with the accessways from Redan Lane to Lobby B on Level 1 and Lobby A on Level 2.



BCA / AS Clause	Summary of Requirement	Comment
	(5) Where a doorway on an accessway has multiple leaves (except an automatic opening door), one of those leaves must have a clear opening width of not less than 850 mm in accordance with AS 1428.1.	- The circulation space of the pedestrian entry pivot doors to the common lobbies on Levels 1 & 2 is required to be amended to comply with Figure 31(d) & (h) of AS1428.1, or the doors are required to be power operated. - The circulation space of the pedestrian gate from Redan Lane to Lobby C on Level 1 is required to be amended to comply with Figure 31(d) of AS1428.1. Details and design certification from the Architect and Civil Engineer (as relevant) to be submitted with the CC application demonstrating compliance.
D4D4 Parts of buildings to be accessible	In a building required to be accessible— (a) every ramp and stairway, except for ramps and stairways in areas exempted by D4D5, must comply with— (i) for a ramp, except a fire-isolated ramp, clause 7 of AS 1428.1; and (ii) for a stairway, except a fire-isolated stairway, clause 8 of AS 1428.1; and (iii) for a fire-isolated stairway, clause 8.1(f) and (g) of AS 1428.1; and (b) every passenger lift must comply with E3D7 and E3D8; and (c) accessways must have— (i) passing spaces complying with AS 1428.1 at maximum 20 m intervals on those parts of an accessway where a direct line of sight is not available; and (ii) turning spaces complying with AS 1428.1— (A) within 2 m of the end of accessways where it is not possible to continue travelling along the accessway; and (B) at maximum 20 m intervals along the accessway; and (d) an intersection of accessways satisfies the spatial requirements for a passing and turning space; and (e) a passing space may serve as a turning space; and	Further Information / Clarification Required at CC Stage All stairs and ramps to and within accessible parts of the building, and fire-isolated stairs, are required to comply with this clause and the relevant provisions of AS1428.1, and the lifts are required to comply with clause E3D7 and AS1735.12, with particular attention drawn to the following: - All ramps are required to comply with Section 7 of AS1428.1. - All common external stairs not within an apartment are required to comply with AS1428.1. The stairs from Redan Lane to Lobby B on Level 1 & immediately to the north of the discharge door of



BCA / AS Clause	Summary of Requirement	Comment
	(f) a ramp complying with AS 1428.1 or a passenger lift need not be provided to serve a storey or level other than the entrance storey in a Class 5, 6, 7b or 8 building— (i) containing not more than 3 storeys; and (ii) with a floor area for each storey, excluding the entrance storey, of not more than 200 m².	FS01 near the entrance to Lobby A on Level 2 are required to be amended to ensure the required handrail extensions do not encroach on the adjacent accessways. • The corridor outside the entrance door to apartment 1.06 must be less than 2m or a 1540mm wide turning space will be required. • The turning spaces and circulation spaces within the cores that contain garbage chutes required to comply with AS1428.1. • Confirmation to be provided if Lobby A on Levels 3-8 are common or form part of the title of the apartment they serve. Note: It is understood the lobbies that only serve 1 apartment form part of the title of the apartment they serve. Details and certification from the Architect and Lift Consultant / Contractor (as relevant) to be submitted with the CC application demonstrating compliance.
D4D5 Exemptions	The following areas are not required to be accessible: (a) An area where access would be inappropriate because of the particular purpose for which the area is used. (b) An area that would pose a health or safety risk for people with a disability. (c) Any path of travel providing access only to an area exempted by (a) or (b).	Further Information / Clarification Required at CC Stage Confirmation is required if a BCA Clause D4D5 exemption will be sought by the developer for the plant / services areas, bin cleaning / non-resident waste areas, cleaner's rooms and maintenance areas, which will need to be in the form of a letter at CC application stage that



BCA / AS Clause	Summary of Requirement	Comment
		specifies the exact parts of the building that are proposed to be exempt and the reasons why access for people with a disability is inappropriate. For the purposes of this report, it is noted these areas have not been assessed, and further assessment will be required if an exemption is not applied to any of these areas.
D4D6 <i>Accessible car parking</i>	Accessible carparking spaces must be provided in a Class 7a building required to be accessible and in a carparking area on the same allotment of a building required to be accessible in accordance with this clause and must comply with AS2890.6-2009.	Note Accessible parking spaces are not required to Class 2 apartment buildings under this clause. Refer to Table 3.2 below regarding the accessible parking spaces associated with the adaptable apartments. Details and certification from the Architect and Traffic Engineer (as relevant) to be submitted with the CC application demonstrating compliance. Note 1: Ensure the vehicular way on the path to and from accessible parking spaces is not less than 2200mm in height clear of all obstructions (including structure and services), and the accessible parking spaces and shared areas are not less than 2500mm in height per AS2890.6. Note 2: Ensure the surface of the accessible parking spaces & shared areas is not steeper than 1:40.
D4D7 <i>Signage</i>	(1) In a building required to be accessible— (a) braille and tactile signage complying with Specification 15 must— (i) incorporate the international symbol of access or deafness, as appropriate, in	Compliance Readily Achievable Braille and tactile signage is required to be provided to the common sanitary facilities and to each door



BCA / AS Clause	Summary of Requirement	Comment
	accordance with AS 1428.1 and identify each— (A) sanitary facility, except a sanitary facility associated with a bedroom in a Class 1b building or a sole-occupancy unit in a Class 3 or Class 9c building; and (B) space with a hearing augmentation system; and (ii) identify each door required by E4D5 to be provided with an exit sign and state— (A) “Exit”; and (B) “Level”; and (C) the floor level number or floor level descriptor, or a combination of the two. (b) signage including the international symbol for deafness in accordance with AS 1428.1 must be provided within a room containing a hearing augmentation system identifying— (i) the type of hearing augmentation; and (ii) the area covered within the room; and (iii) if receivers are being used and where the receivers can be obtained; and (c) signage in accordance with AS 1428.1 must be provided for accessible unisex sanitary facilities to identify if the facility is suitable for left or right-handed use; and (d) signage to identify an ambulant accessible sanitary facility in accordance with AS 1428.1 must be located on the door of the facility; and (e) where a pedestrian entrance is not accessible, directional signage incorporating the international symbol of access, in accordance with AS 1428.1, must be provided to direct a person to the location of the nearest accessible pedestrian entrance; and (f) where a bank of sanitary facilities is not provided with an accessible unisex sanitary facility, directional signage incorporating the international symbol of access in accordance with AS 1428.1 must be placed at the location of the sanitary facilities that are not accessible, to direct a person to the location of the nearest accessible unisex sanitary facility. (2) In a building that is subject to F4D12 and is required to be accessible, directional signage complying with Specification 15 to direct a person to the location of the nearest accessible adult change facility within that building must be provided at the location of each—	required by E4D5 to be provided with an exit sign. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance.



BCA / AS Clause	Summary of Requirement	Comment
	(a) bank of sanitary facilities; and (b) accessible unisex sanitary facility, other than one that incorporates an accessible adult change facility.	
D4D8 Hearing augmentation	(1) A hearing augmentation system must be provided where an inbuilt amplification system, other than one used only for emergency warning, is installed— (a) in a room in a Class 9b building; or (b) in an auditorium, conference room, meeting room or room for judicatory purposes; or (c) at any ticket office, teller's booth, reception area or the like, where the public is screened from the service provider. (2) If a hearing augmentation system required by (1) is— (a) an induction loop, it must be provided to not less than 80% of the floor area of the room or space served by the inbuilt amplification system; or (b) a system requiring the use of receivers or the like, it must be available to not less than 95% of the floor area of the room or space served by the inbuilt amplification system, and the number of receivers provided must not be less than— (i) if the room or space accommodates up to 500 persons, 1 receiver for every 25 persons or part thereof, or 2 receivers, whichever is the greater; and (ii) if the room or space accommodates more than 500 persons but not more than 1000 persons, 20 receivers plus 1 receiver for every 33 persons or part thereof in excess of 500 persons; and (iii) if the room or space accommodates more than 1000 persons but not more than 2000 persons, 35 receivers plus 1 receiver for every 50 persons or part thereof in excess of 1000 persons; and (iv) if the room or space accommodates more than 2000 persons, 55 receivers plus 1 receiver for every 100 persons or part thereof in excess of 2000 persons. (3) The number of persons accommodated in the room or space served by an inbuilt amplification system must be calculated according to D2D18. (4) Any screen or scoreboard associated with a Class 9b building and capable of displaying public announcements must be capable of supplementing any public address system, other than a public address system used for emergency warning purposes only.	Note No rooms or spaces in accordance with D4D8(1) are proposed.



BCA / AS Clause	Summary of Requirement	Comment
D4D9 Tactile indicators	(1) For a building required to be accessible, tactile ground surface indicators must be provided to warn people who are blind or have a vision impairment that they are approaching— (a) a stairway, other than a fire-isolated stairway; and (b) an escalator; and (c) a passenger conveyor or moving walk; and (d) a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp; and (e) in the absence of a suitable barrier— (i) an overhead obstruction less than 2 m above floor level, other than a doorway; and (ii) an accessway meeting a vehicular way adjacent to any pedestrian entrance to a building, excluding a pedestrian entrance serving an area referred to in D4D5, if there is no kerb or kerb ramp at that point, except for areas exempted by D4D5. (2) Tactile ground surface indicators required by (1) must comply with sections 1 and 2 of AS/NZS 1428.4.1. (3) A hostel for the aged, nursing home for the aged, a residential aged care building, Class 3 accommodation for the aged, Class 9a health-care building or a Class 9c aged care building need not comply with (1)(a) and (d) if handrails incorporating a raised dome button in accordance with AS/NZS 1428.4.1 are provided to warn people who are blind or have a vision impairment that they are approaching a stairway or ramp.	Compliance Readily Achievable TGSIs are required to be provided to accessible stairways and ramps and in the absence of another suitable barrier and to any areas where there is an overhead obstruction that is less than 2m AFFL not protected by another suitable barrier. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance.
D4D11 Swimming pools	(1) Not less than 1 means of accessible water entry/exit in accordance with Specification 16 must be provided for each swimming pool required by D4D2 to be accessible. (2) An accessible entry/exit must be by means of— (a) a fixed or movable ramp and an aquatic wheelchair; or (b) a zero depth entry and an aquatic wheelchair; or (c) a platform swimming pool lift and an aquatic wheelchair; or (d) a sling-style swimming pool lift. (3) Where a swimming pool has a perimeter of more than 70 m, at least one accessible water entry/exit must be provided by a means specified in (2)(a), (b) or (c). Latching devices on gates and doors forming part of a swimming pool safety barrier need not comply with AS 1428.1.	Note No common use swimming pools are proposed.



BCA / AS Clause	Summary of Requirement	Comment
D4D12 Ramps	On an accessway— (a) a series of connected ramps must not have a combined vertical rise of more than 3.6 m; and (b) a landing for a step ramp must not overlap a landing for another step ramp or ramp.	Compliance Readily Achievable Ramps are required to comply with this clause. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance.
D4D13 Glazing on an accessway	On an accessway, 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, must be clearly marked in accordance with AS 1428.1.	Compliance Readily Achievable Visual indicators are required to be provided to internal and external glazing on an accessway that can be mistaken as an opening in accordance with clause 3.7 of AS1428.1. Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Part E3 – Lift Installations		
E3D6 Landings	Access and egress to and from lift well landings must comply with the Deemed-to-Satisfy Provisions of Parts D2, D3 and D4	Note BCA Consultant to advise on all requirements not associated with Part D4.
E3D7 Passenger lift types and their limitations	(1) In an accessible building, every passenger lift must be one of the following lift types, subject to the limitations (if any) of each lift type: (a) There are no limitations on the use of electric passenger lifts, electrohydraulic passenger lifts or inclined lifts. (b) Stairway platform lifts must not— (i) be used to serve a space in a building accommodating more than 100 persons calculated according to D2D18; or (ii) be used in a high traffic public use area such as a theatre, cinema, auditorium, transport interchange, shopping centre or the like; or (iii) be used where it is possible to install another type of passenger lift; or (iv) connect more than 2 storeys; or (v) where more than 1 stairway lift is installed, serve more than 2 consecutive storeys; or	Compliance Readily Achievable Passenger lifts must be one of the lift types referenced in this clause, subject to the limitations (if any) of each lift type. Details and design certification from the Lift Consultant / Contractor to be submitted with the CC application demonstrating compliance.



BCA / AS Clause	Summary of Requirement	Comment
	(vi) when in the folded position, encroach on the minimum width of a stairway required by D2D8 to D2D11. (c) A low-rise platform lift must not travel more than 1000 mm. (d) A low-rise, low-speed constant pressure lift must not— (i) for an enclosed type, travel more than 4 m; or (ii) for an unenclosed type, travel more than 2 m; or (iii) be used in a high traffic public use areas in buildings such as a theatre, cinema, auditorium, transport interchange, shopping complex or the like. (e) A small-sized, low-speed automatic lift must not travel more than 12 m. (2) A passenger lift referred to in (1) must not rely on a constant pressure device for its operation if the lift car is fully enclosed.	
E3D8 Accessible features required for passenger lifts	In an accessible building, every passenger lift must have the following features where applicable: (a) A handrail complying with the provisions for a mandatory handrail in AS 1735.12 for all lifts except— (i) a stairway platform lift; and (ii) a low-rise platform lift. (b) Lift floor dimensions of not less than 1400 mm wide x 1600 mm deep for all lifts which travel more than 12 m. (c) Lift floor dimensions of not less than 1100 mm wide x 1400 mm deep for all lifts which travel not more than 12 m, except a stairway platform lift. (d) Lift floor dimensions of not less than 810 mm wide x 1200 mm deep for a stairway platform lift. (e) Minimum clear door opening complying with AS 1735.12 for all lifts except a stairway platform lift. (f) Passenger protection system complying with AS 1735.12 for all lifts with power-operated doors. (g) Lift landing doors at the upper landing for all lifts except a stairway platform lift. (h) Lift car and landing control buttons complying with AS 1735.12 for all lifts except— (i) a stairway platform lift; and (ii) a low-rise platform lift. (i) Lighting in accordance with AS 1735.12 for all enclosed lift cars. (j) For all lifts serving more than 2 levels—	Compliance Readily Achievable Every passenger lift must have the features listed in this clause where applicable. Details and design certification from the Lift Consultant / Contractor to be submitted with the CC application demonstrating compliance. BCA Consultant to advise on additional requirements associated with emergency lifts / stretcher facilities (where applicable).



BCA / AS Clause	Summary of Requirement	Comment
	(i) automatic audible information within the lift car to identify the level each time the car stops; and (ii) audible and visual indication at each lift landing to indicate the arrival of the lift car; and (iii) audible information and audible indication required by (i) and (ii) is to be provided in a range of between 20 - 80 dB(A) at a maximum frequency of 1500 Hz. (k) Emergency hands-free communication, including a button that alerts a call centre of a problem and a light to signal that the call has been received, for all lifts except a stairway platform lift.	
BCA Part F4 – Sanitary and Other Facilities		
F4D5 Accessible sanitary facilities	In a building required to be accessible— (a) accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and (b) accessible unisex showers must be provided in accordance with F4D7; and (c) at each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided; and (d) an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and (e) the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; and (f) an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and (g) where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right handed mirror image facilities must be provided as evenly as possible; and (h) where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; and (i) an accessible unisex sanitary compartment or an accessible unisex shower need not be	Compliance Readily Achievable The accessible unisex sanitary facility on Level 5 is required to comply with the relevant provisions of AS 1428.1. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance.



BCA / AS Clause	Summary of Requirement	Comment
	provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.	
F4D6 Accessible unisex sanitary compartments	The minimum number of accessible unisex sanitary compartments for each class of building is required to achieve compliance with the requirements of this clause.	Complies The number and location of accessible unisex sanitary facilities complies with this clause. Details and design certification from the Architect to be submitted with the CC application demonstrating compliance.
F4D7 Accessible unisex showers	Where required by F4D5(b), the minimum number of accessible unisex showers for each class of building is required to achieve compliance with the requirements of this clause.	Note No common showers are proposed.
F4D12 Accessible adult change facilities	(1) One unisex accessible adult change facility must be provided in an accessible part of a— (a) Class 6 building that is a shopping centre having a design occupancy of not less than 3,500 people, calculated on the basis of the floor area and containing a minimum of 2 sole-occupancy units; and (b) Class 9b sports venue or the like that— (i) has a design occupancy of not less than 35,000 spectators; or (ii) contains a swimming pool that has a perimeter of not less than 70 m and that is required by D4D2 to be accessible; and (c) museum, art gallery or the like having a design occupancy of not less than 1,500 patrons; and (d) theatre or the like having a design occupancy of not less than 1,500 patrons; and (e) passenger use area of an airport terminal building within an airport that accepts domestic and/or international flights that are public transport services as defined in the Disability Standards for Accessible Public Transport 2002. (2) Accessible adult change facilities required by (1)— (a) must be constructed in accordance with Specification 27; and (b) cannot be combined with another sanitary compartment. (3) For the purposes of (1), design occupancy must be calculated in accordance with D2D18, but excluding any area that—	Note Accessible adult change facilities are not required.



BCA / AS Clause	Summary of Requirement	Comment
	(a) can only be accessed by staff, employees, contractors, maintenance personnel and the like; or (b) is subject to an exemption under D4D5.	
BCA Part G7 – Livable Housing Design		
NSW Part G7 Livable housing design	Part G7 does not apply in NSW as livable housing design requirements do not apply to sole-occupancy units in a Class 2 building in NSW.	Note Refer to Table 3.3 below regarding Livable Housing.

3.3 AS4299 Assessment – Class C Essential Features

According to the Statutory Compliance Table in Appendix C of the Environmental Impact Statement Report No. Final V2, Reference No. P0062816 dated 27.02.2026 prepared by Urbis Ltd, “the ADG refers to the local Council DCP for adaptable housing. As per the Mosman Development Control Plan 2012, the development provides 20% of apartments as adaptable.” It is further noted that Clause 5.11 of the Mosman Development Control Plan 2012 states “Adaptable housing designed in accordance with Class C of AS 4299: 1995 - Adaptable Housing must be incorporated into multiple dwelling developments.”

The following Table includes a summary of our high-level assessment of the referenced documentation against the Class C Essential Features within AS4299 and should be read in conjunction with these provisions. Where compliance with the prescriptive requirements is not proposed or achievable, recommendations are provided below for consideration by the Consent Authority and relevant project stakeholders.

Table 3.2 – AS4299 Class C Assessment

AS Clause	Room / Item	Comment
Drawings		
2.3	Provision of drawings showing the housing unit in its pre-adaptation and post-adaptation stages	Compliance Readily Achievable Architect to provide a description of how the adaptation is to be achieved. Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Siting		
3.3.2	A continuous accessible path of travel from street frontage and vehicle parking to entry complying with AS 1428.1	Further Information / Clarification Required at CC Stage Refer to comments under BCA Clauses D4D2 & D4D3 in Table 3.1 above. Details and certification from the Architect and Civil Engineer (as relevant) to be submitted



AS Clause	Room / Item	Comment
		with the CC application demonstrating compliance.
Letterboxes in Estate Developments		
3.8	Letterboxes to be on hard standing area connected to accessible pathway	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Private Car Accommodation		
3.7.2	Carparking space or garage min. area 6.0m x 3.8m	Alternative Arrangement Proposed Each adaptable unit is proposed to be provided with an accessible parking space in accordance with AS2890.6 which is considered a suitable alternative. Details and certification from the Traffic Consultant to be submitted with the CC application demonstrating compliance.
Accessible Entry		
4.3.1	Accessible entry	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.3.2	Accessible entry to be level (max. 1:40 slope)	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.3.2	Threshold to be low level	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.3.2	Landing to enable wheelchair manoeuvrability	Compliance Readily Achievable



AS Clause	Room / Item	Comment
		Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.3.1	Accessibly entry door to have 850mm min. clearance	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.3.4	Door lever handles and hardware to AS 1428.1	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Interior: General		
4.3.3	Internal doors to have 820mm clearance	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.3.7	Internal corridors min. width of 1000mm	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.3.7	Provision for compliance with AS 1428.1 for door approaches.	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Living Room & Dining room		
4.7.1	Provision for circulation space of min. 2250mm	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.7.4	Telephone adjacent to GPO	Compliance Readily Achievable



AS Clause	Room / Item	Comment
		Details and certification from the Architect / Electrical Consultant to be submitted with the CC application demonstrating compliance.
4.10	Potential illumination level min.300lux	Compliance Readily Achievable Details and certification from the Architect / Electrical Consultant to be submitted with the CC application demonstrating compliance.
Kitchen		
4.5.2	Min. width 2.7m (1550mm clear between benches)	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance. Note: 1550mm not provided from the outset, however it is understood the kitchen services are located in the pre and post adaptation arrangements and will not require modification as noted on Sheet 6011.
4.5.1	Provision for circulation at doors to comply with AS 1428.1	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.5	Provision for benches planned to include at least one worksurface of 800mm length, adjustable in height from 750mm to 850mm or replaceable. Refer to Figure 48	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.5	Refrigerator adjacent to work surface	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.



AS Clause	Room / Item	Comment
4.5.6	Kitchen sink adjustable to heights from 750mm to 850mm or replaceable	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.6	Kitchen sink bowl max. 150mm deep	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.6(e)	Tap set capstan or lever handles or lever mixer	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.6(e)	Tap set located within 300mm of front of sink	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.7	Cooktops to include either front or side controls with raised cross bars	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.7	Cooktops to include isolating switch	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.7	Worksurface min 800mm length adjacent to cooktop at same height	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.8	Oven located adjacent to an adjustable height or replaceable work surface.	Compliance Readily Achievable Details and



AS Clause	Room / Item	Comment
		certification from the Architect to be submitted with the CC application demonstrating compliance.
4.5.11	GPOs to comply with AS 1428.1. At least one double GPO within 300mm of front of worksurface	Compliance Readily Achievable Details and certification from the Architect / Electrical Consultant to be submitted with the CC application demonstrating compliance.
4.5.11	GPO for refrigerator to be easily reachable when the refrigerator is in its operating position	Compliance Readily Achievable Details and certification from the Architect / Electrical Consultant to be submitted with the CC application demonstrating compliance.
4.5.4	Slip-resistant floor surface	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Main Bedroom		
4.6.1	At least one bedroom of area sufficient to accommodate queen size bed and wardrobe and circulation space requirements of AS 1428.2	Further Information / Clarification Required at CC Stage The circulation space at the foot of the bed in the adaptable unit on Level 1 is required to be increased to 1540mm. Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Bathroom		
4.4.1	Provision for bathroom area to comply with AS 1428.1	Further Information / Clarification Required at CC Stage A minimum clearance of 2300mm is required in front of the WC in the adaptable units on Level 3-7 on Sheet 6010 to comply with AS1428.1.



AS Clause	Room / Item	Comment
		Details and certification from the Architect to be submitted with the CC application demonstrating compliance. Note: The WC pan in the Level 3-8 adaptable units should either be located in the after-adaptation location initially or be fitted with a P trap.
4.4.2	Slip-resistant floor surface	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(f)	Shower recess-no hob, Min size 1160mm x 1100mm to comply with AS 1428.1. (Refer Figures 4.6 and 4.7)	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(f)	Shower area waterproofed to AS 3740 with floor to fall to waste	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(f)	Recessed soap holder	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(f)	Shower taps positioned for easy reach to access side of shower sliding track	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(h)	Provision for adjustable, detachable handheld shower rose mounted on a slider grabrail or fixed hook (plumbing and wall strength provision)	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC



AS Clause	Room / Item	Comment
		application demonstrating compliance.
4.4.4(h)	Provision for grabrail in shower (refer to Figure 4.7) to comply with AS 1428.1	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(c)	Tap sets to be capstan or lever handles with single outlet	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(g)	Provision of washbasin with clearance to comply with AS 1428.1	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(d)	Double GPO beside mirror	Compliance Readily Achievable Details and certification from the Architect / Electrical Consultant to be submitted with the CC application demonstrating compliance.
Toilet		
4.4.3	Provision of either “visitable toilet” or accessible toilet	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.1	Provision to comply with AS 1428.1	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance. Note: The WC pan in the Level 3-8 adaptable units should either be located in the after-adaptation



AS Clause	Room / Item	Comment
		location initially or be fitted with a P trap.
4.4.3	Location of WC plan at correct distance from fixed walls	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.4(h)	Provision of grabrail rail zone (refer Figure 46)	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.4.2	Slip resistant floor finishes (vitreous tiles or similar)	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Laundry		
4.8	Circulation at doorways to comply with AS 1428.1	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance. Note: Hold open devices to be specified to laundry doors associated with the adaptable unit on Level 1 in the post adaptation arrangement.
4.8	Provision for adequate circulation space in front in front of or beside appliances (min. 1550mm depth)	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance. Note: Hold open devices to be specified to laundry doors associated with the adaptable unit on Level 1 in the post adaptation arrangement.



AS Clause	Room / Item	Comment
4.8(e)	Provision for automatic washing machine	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.8(a)	Where clothes line is provided, an accessible path of travel to this	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
4.8(g)	Double GPO	Compliance Readily Achievable Details and certification from the Architect / Electrical Consultant to be submitted with the CC application demonstrating compliance.
4.9.1	Slip resistant floor surface	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Door locks		
4.3.4	Door hardware operable with one hand located 900-1100mm above floor.	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.

3.4 Livable Housing Design Guidelines Assessment – Silver Level

BCA Part G7 does not apply in NSW as livable housing design requirements do not apply to sole-occupancy units in a Class 2 building in NSW. Notwithstanding, provision for a minimum of 20% of units which incorporate the Livable Housing Design Guideline's silver level features are to be addressed in accordance with the Apartment Design Guide and the Statutory Compliance Table in Appendix C of the Environmental Impact Statement.

Although Clause 5.11 of the Mosman Development Control Plan 2012 states "All dwellings in any new mixed use and multiple dwelling development (including dual occupancy), are to meet or exceed the Livable Housing Design Guideline's Silver Level universal design features", the Statutory Compliance Table in Appendix C of the Environmental Impact Statement states "Section 2.10 of the Planning Systems SEPP provides that DCPs do not apply to SSDAs. As such, compliance with the Mosman Residential DCP 2012 is not a mandatory consideration." As a result, the client has advised that the development will target 20% of apartments to meet or exceed the Livable Housing Design Guideline's



Silver Level universal design features in accordance with the Apartment Design Guide and advice from the Town Planner.

The following Table includes a summary of our high-level assessment of the referenced documentation against the Livable Housing Guideline's silver level universal design features and should be read in conjunction with these provisions. Where compliance with the prescriptive requirements is not proposed or achievable, recommendations are provided below for consideration by the Consent Authority and relevant project stakeholders.

Table 3.3 – LHDG Silver Level Assessment

LHDG Element	Summary of Requirement	Comment
Dwelling Access		
1a	Provide a safe, continuous step-free pathway from the front boundary of the property to an entry door to the dwelling. This provision does not apply where the average slope of the ground where the path would feature is steeper than 1:14.	Compliance Readily Achievable Details and certification from the Architect and Civil Engineer (as relevant) to be submitted with the CC application demonstrating compliance. Note: Refer to comments under BCA Clauses D4D2 & D4D3 in Table 3.1 above regarding the pathway from the allotment boundary.
1b	The path of travel referred to in (a) should have a minimum clear width of 1000mm and have: i. no steps; ii. an even, firm, slip resistant surface; iii. a crossfall of not more than 1:40; iv. a maximum pathway slope of 1:14. Where ramps are required they should have landings provided at no greater than 9m for a 1:14 ramp and no greater than 15m for ramps steeper than 1:20. Landings should be no less than 1200mm in length.	Compliance Readily Achievable Details and certification from the Architect and Civil Engineer (as relevant) to be submitted with the CC application demonstrating compliance. Note: Refer to comments under BCA Clauses D4D2 & D4D3 in Table 3.1 above regarding the pathway from the allotment boundary.
1c	The path of travel referred to in (a) may be provided via an associated car parking space for the dwelling. Where a car parking space is relied upon as the safe and continuous pathway to the dwelling entrance, the space should incorporate: i. minimum dimensions of at least 3200mm (width) x 5400mm (length); ii. an even, firm and slip resistant surface; and iii. a level surface (1:40 maximum gradient, 1:33 maximum gradient for bitumen).	Compliance Readily Achievable Details and certification from the Architect and Civil Engineer (as relevant) to be submitted with the CC application demonstrating compliance. Note: Refer to comments under Clause 3.7.2 of AS4299 in Table 3. above



LHDG Element	Summary of Requirement	Comment
		regarding the accessible parking spaces.
1d	A step ramp may be incorporated at an entrance doorway where there is a change in height of 190mm or less. The step ramp should provide: i. a maximum gradient of 1:10 ii. a minimum clear width of 1000mm (please note: width should reflect the pathway width) iii. a maximum length of 1900mm	Compliance Readily Achievable Details and certification from the Architect and Civil Engineer (as relevant) to be submitted with the CC application demonstrating compliance. Note: Refer to comments under BCA Clauses D4D2 & D4D3 in Table 3.1 above regarding the pathway from the allotment boundary.
1e	Where a ramp is part of the pathway, level landings no less than 1200mm in length, exclusive of the swing of the door or gate than opens onto them, must be provided at the head and foot of the ramp.	Compliance Readily Achievable Details and certification from the Architect and Civil Engineer (as relevant) to be submitted with the CC application demonstrating compliance. Note: Refer to comments under BCA Clauses D4D2 & D4D3 in Table 3.1 above regarding the pathway from the allotment boundary.
Dwelling Entrance		
2a	The dwelling should provide an entrance door with - i. a minimum clear opening width of 820mm (see Figure 2(a)); ii. a level (step-free) transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or beveled); and iii. reasonable shelter from the weather.	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
2b	A level landing area of at least 1200mm x 1200mm should be provided at the level (step free) entrance door. A level landing area at the entrance door should be provided on the arrival side of the door (i.e. the external side of the door) to allow a person to safely stand and then open the door.	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
2c	Where the threshold at the entrance exceeds 5mm and is less than 56mm, a ramped threshold may be provided (see Figure 1(b)).	Compliance Readily Achievable Details and certification from the Architect to be



LHDG Element	Summary of Requirement	Comment
		submitted with the CC application demonstrating compliance.
2d	The level (step-free) entrance should be connected to the safe and continuous pathway as specified in Element 1.	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Internal Doors & Corridors		
3a	Doorways to rooms on the entry level used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes should provide: i. a minimum clear opening width of 820mm (see Figure 2(a)); and ii. a level transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or beveled).	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
3b	Internal corridors/passageways to the doorways referred to in (a) should provide a minimum clear width of 1000mm. Note: Corridor widths should be measured as described in of AS 1428.1.	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Toilet		
4a	Dwellings should have a toilet on the ground (or entry) level that provides: i. a minimum clear width of 900mm between the walls of the bathroom if located in a separate room; and ii. a minimum 1200mm clear circulation space forward of the toilet pan exclusive of the swing of the door in accordance with Figure 3(a). iii. The toilet pan should be located in the corner of the room (if the toilet is located in a combined toilet / bathroom) to enable installation of grabrails at a future date. Reinforcement guidelines for walls in bathrooms and toilets are found in element 6.	Further Information / Clarification Required at CC Stage 1200mm clear circulation space forward of the toilet pan exclusive of the swing of the door required to the visitable toilet in the Livable units on Level 3-8 on Sheet 6011. Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Shower		
5a	One bathroom should feature a slip resistant, hobless shower recess. Shower screens are permitted provided they can be easily removed at a later date. Note: For hobless specification please see Australian Standard AS3740-3.6. Reinforcement	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.



LHDG Element	Summary of Requirement	Comment
	guidelines for walls in bathrooms and toilets are found in element 6.	
5b	The shower recess should be located in the corner of the room to enable the installation of grabrails at a future date.	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Reinforcement of Bathroom & Toilet Walls		
6a	Except for walls constructed of solid masonry or concrete, the walls around the shower, bath (if provided) and toilet should be reinforced to provide a fixing surface for the safe installation of grabrails.	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
6b	The walls around the toilet are to be reinforced by installing: i. noggings with a thickness of at least 25mm in accordance with Figure 6(a); or ii. sheeting with a thickness of at least 12mm in accordance with Figure 6(b).	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
6c	The walls around the bath are to be reinforced by installing: i. noggings with a thickness of at least 25mm in accordance with Figure 7(a); or ii. sheeting with a thickness of at least 12mm in accordance with Figure 7(b).	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
6d	The walls around the hobless shower recess are to be reinforced by installing: i. noggings with a thickness of at least 25mm in accordance with Figure 8(a); or ii. sheeting with a thickness of at least 12mm in accordance with Figure 8(b).	Compliance Readily Achievable Details and certification from the Architect to be submitted with the CC application demonstrating compliance.
Internal Stairways		
7a	Stairways in dwellings must feature: i. a continuous handrail on one side of the stairway where there is a rise of more than 1m.	Note The Livable units are all single storey with no changes in level.



4. Conclusion

This report contains a review of the proposed development of 40-48 Redan Street, Mosman, against the relevant access provisions of the BCA 2022 Amendment 2 and the Disability (Access to Premises – Buildings) Standards 2010. Arising from the review, it is considered that the proposed development can readily achieve compliance with the relevant provisions of the BCA and is acceptable from an accessibility perspective, subject to the requirements of this report being implemented and further detailed review at CC application stage. Where compliance matters are proposed to comply with the Performance Requirements (rather than DtS Provisions), the development of a Performance Solution Report will be required.

Furthermore, it is considered 20% of the apartments can readily achieve compliance with the Class C Essential Criteria of AS4299-1995 and the Silver Level criteria of the Livable Housing Design Guideline, subject to the requirements of this report being implemented and further detailed review at CC application stage. Where compliance with the prescriptive requirements is not proposed or achievable, recommendations are provided in Tables 3.2 & 3.3 above for consideration by the Consent Authority and relevant project stakeholders.



Appendix 1 – Definitions

Access Code

Means the *Access Code for Buildings*, prepared by the Office of the Australian Building Codes Board, a copy of the text of which is set out in Schedule 1 of the DAPS.

Accessible

Having features to enable use by people with a disability.

Accessway

A continuous accessible path of travel (as defined in AS 1428.1) to, into or within a building.

Adaptable housing unit

Housing unit which is designed and constructed to meet the performance requirements stated in Clause 2.2 of AS4299 and to include the essential features listed in Appendix A. An adaptable housing unit is designed in such a way that it can be modified easily in the future to become accessible to both occupants and visitors with disabilities or progressive frailties

Affected Part

An affected part is:

- (a) The principal pedestrian entrance of an existing building that contains a new part; and
- (b) any part of an existing building, that contains a new part, that is necessary to provide a continuous accessible path of travel from the entrance to the new part.

Circulation space

A clear unobstructed area, to enable persons using mobility aids to manoeuvre.

Complying Development Certificate (CDC)

Building Approval issued by the Certifying Authority pursuant to Part 4 of the EP&A Act 1979.

Construction Certificate (CC)

Building Approval issued by the Certifying Authority pursuant to Part 6 of the EP&A Act 1979.

Dedicated (parking) space

A parking space set aside exclusively for the parking of a single vehicle.

Deemed to Satisfy Provisions (DtS)

BCA Provisions which are deemed to satisfy the Performance Requirements.

Landing

Flat or crowned surface with a gradient and crossfall not steeper than 1 in 40, to provide a rest area on a ramp, stairway or walkway.

Luminance contrast

The ratio of luminance of a surface to that of a perfect reflector, identically illuminated.

National Construction Code 2022 Volume One Amendment 2 – Building Code of Australia (the BCA)

Document published on behalf of the Australian Building Codes Board. The BCA contains technical design and construction requirements for all Class 2 to 9 buildings (multi-residential, commercial, industrial, and public assembly buildings) and their associated structures. throughout Australia and is adopted in New South Wales (NSW) under the provisions of the EPA Act and Regulation. Building regulatory legislation stipulates that compliance with the BCA Performance Requirements must be attained and hence this reveals BCA's performance-based format.

New Building

A building is a **new building** if:

- (a) it is not a part of a building;



- (b) either
 - i. an application for approval for its construction is submitted, on or after 1 May 2011, to the competent authority in the State or Territory where the building is located; or
 - ii. all of the following apply:
 - i. it is constructed for or on behalf of the Crown;
 - ii. the construction commences on or after 1 May 2011;
 - iii. no application for approval for the construction is submitted, before 1 May 2011, to the competent authority in the State or Territory where the building is located.

New Part

A part of a building is a **new part** of the building if it is an extension to the building or a modified part of the building about which:

- (a) an application for approval for the building work is submitted, on or after 1 May 2011, to the competent authority in the State or Territory where the building is located; or
- (b) all of the following apply:
 - i. the building work is carried out for or on behalf of the Crown;
 - ii. the building work commences on or after 1 May 2011;
 - iii. no application for approval for the building work is submitted, before 1 May 2011, to the competent authority in the State or Territory where the building is located.

Occupation Certificate (OC)

Building Occupation Approval issued by the Principal Certifying Authority pursuant to Part 6 of the EPA Act 1979.

Performance Solution

An alternative design solution that demonstrates compliance with the Performance Requirements of the BCA in lieu of compliance with the Deemed to Satisfy provisions.

Performance Requirement

A Building Solution will comply with the BCA if it satisfies the Performance Requirements. A Performance requirement states the level of performance that a Building Solution must meet.

Compliance with the Performance Requirements can only be achieved by-

- (a) complying with the DtS Provisions; or
- (b) formulating an Alternative Solution which-
 - i. complies with the Performance Requirements; or
 - ii. is shown to be at least equivalent to the DtS Provisions; or
- (c) a combination of (a) and (b).

Ramp

An inclined surface on a continuous accessible path of travel between two landings with a gradient steeper than 1 in 20 but not steeper than 1 in 14.

Sanitary compartment

A room or space containing a closet pan or urinal.

Shared area

An area adjacent to a dedicated space provided for access or egress to or from a parked vehicle and which may be shared with any other purpose that does not involve other than transitory obstruction of the area e.g. a walkway, a vehicular aisle, dual use with another adjacent dedicated space.

Storey

A space within a building which is situated between one floor level and the floor level next above, or if there is no floor above, the ceiling or roof above, but not—

- (a) a space that contains only—
 - (i) a lift shaft, stairway or meter room; or
 - (ii) a bathroom, shower room, laundry, water closet, or other sanitary compartment; or
 - (iii) accommodation intended for not more than 3 vehicles; or
 - (iv) a combination of the above; or
- (b) a mezzanine.



Tactile ground surface indicators (TGSIs)

Truncated cones and/or bars installed on the ground or floor surface, designed to provide pedestrians who are blind or vision-impaired with warning or directional orientation information.

Composite discrete TGSIs

Tactile ground surface indicators that are individually installed and which provide a differing luminance for the sloping sides and upper surface of the truncated cone.

Discrete TGSIs

Tactile ground surface indicators that are individually installed, which provide the same luminance for the sloping sides and upper surface of the truncated cone.

Integrated TGSIs

Tactile ground surface indicators that are in a defined pattern and which are of the same luminance and material as the base surface.

Visitable Toilet

A toilet which has a space of minimum 1250 mm in front of the toilet × 900 mm wide clear of door swings and fixtures.

Walkway

Any surface on a continuous accessible path of travel with a gradient not steeper than 1 in 20.