

**GRACEWOOD VILLAGE STAGE 3
2-8 FREE SETTLERS DRIVE
KELLYVILLE NSW 2155**

ACCESS REVIEW

Morris-Goding Accessibility Consulting

FINAL AMENDED 3

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1. EXECUTIVE SUMMARY

The Access Review Report is a key element in the design development of Gracewood village stage 3 (cluster buildings 2,3& 4) located at 2-8 Freesettlers Drive Kellyville NSW 2155, and an appropriate response to the AS1428 series, Building Code of Australia (BCA), DDA Access to Premises Standards (including DDA Access Code) and ultimately the Commonwealth Disability Discrimination Act (DDA).

BaptistCare is committed to providing housing choice for seniors and people with disabilities. 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 design principles have been based on the development of housing that is located and designed in a manner particularly suited to both older people who are independent, mobile and active, as well as people with a disability regardless of their age.

Morris-Goding Accessibility Consulting has prepared the Access Report to provide advice and strategies to maximise reasonable provisions of access for people with disabilities. The proposed development has been reviewed to ensure that ingress and egress, paths of travel, circulation areas, sanitary facilities and accommodation comply with relevant statutory guidelines.

The recommendations in this report are to be developed in the ongoing design development and should be confirmed prior to construction certificate stage. As the project proceeds, further review of documentation is strongly recommended to ensure that appropriate access is provided to and throughout the development.

Recommendations are listed throughout the report and we encourage a full review of all recommendations.

2. INTRODUCTION

2.1. BACKGROUND

Impact Group has engaged Morris-Goding Accessibility Consulting, on behalf of BaptistCare, to provide a design review of Gracewood Village Stage 3. The development consists of 3 cluster buildings, each having 5 levels of residential single occupancy Units (herewith know as Clusters 2, 3 and 4) with Private basement car parking and outdoor common facilities.

The proposed development site is bound by Free Settlers Road to the West, Rutherford Ave to the East, existing retirement aged care facility to the North and existing seniors housing SOU's to the South.

The proposed SEPP Seniors Living Development consists of 88 SOU's with a proposed total of 126 car spaces.

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, and
- Recommend solutions that will ensure the design complies with the Disability Discrimination Act (DDA), Building Code of Australia (BCA), SEPP Housing for Seniors or People with a Disability, and the AS 1428 series.

2.2. OBJECTIVES

The Report seeks to ensure compliance with statutory requirements. 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 SEPP 2004 and the Disability Discrimination Act 1992. In doing so, the report attempts to eliminate, as far as possible, discrimination against persons on the ground of disability.

2.3. LIMITATIONS

This report is limited to the accessibility provisions of the building in general. It does not provide comment on detailed design issues, such as: internals of accessible/ambulant toilet, fit-out, lift specification, 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.

2.4. 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, SEPP Housing for Seniors or People with a Disability 2004, and AS 1428 Series to develop appropriate design documentation, to provide reasonable access provisions for people with disabilities.

The Project Architect and an appropriately qualified accessibility consultant will examine key physical elements during design development stage, to identify physical barriers and incorporate solutions as a suitable response to disability statutory regulations.

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 premises, makes it impossible or unreasonably difficult for people with disabilities to make use of a particular service or amenity.

2.5. 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:

- ⇒ State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004
- ⇒ Federal Disability Discrimination Act (DDA);
- ⇒ Disability (Access to Premises – Buildings) Standards 2010;
- ⇒ Building Code of Australia (BCA) Part D3, F2, E3;
- ⇒ AS 1428.1:2009 - (General Requirement of Access);
- ⇒ AS 2890.6:2009 - (Parking for People with Disabilities)

3. PROPOSED SCHEME ANALYSIS AND REGULATORY BACKGROUND

3.1. General

The project, as mentioned, is a modification to an existing section 75J approval of land owned by BaptistCare, for residential purposes.

The project objectives, BCA building classifications, and applicable development controls, bring into relevance the following accessibility standards;

- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

3.2. SEPP Seniors Living

BaptistCare is committed to providing housing choice for seniors and people with disabilities. 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 the accommodation to qualify as SEPP Seniors Living.

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

- 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 AS2890.6.
- 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.

4. SEPP SENIORS LIVING

4.1. Linkages to facilities and services that are external to the development site

4.1.1. 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:

(c) in the case of a proposed development on land in a local government area that is not within the Sydney Statistical Division—there is a 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 during daylight hours at least once 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), ...

The site is located in the suburb of Kellyville. The suburb of Kellyville is, in turn, located inside the Sydney Statistical Division. Therefore, the proposal will need to comply with clause 26(1)(a, b, c).

There is a bus stop located along Memorial Avenue. This bus stop (Hills Buses route **B619**) is located less than 400mm to the subject site main entry (gate house entry) proposed along Rutherford Avenue and is the closest public transport available to the site. Bus services travel to suburbs as far as Rouse Hill, Stanhope Gardens, Castle Hill and Baulkham Hills.

There are multiple retail, commercial, banking, community, general practitioners and recreation services located in and around the subject site for the satisfaction of section 26

Review of current bus timetables confirm that the services operate at least once a day to and from the site, Monday to Friday, for the satisfaction of clause 26(2)(c)(iii).

4.1.2. Paths of Travel to Transport Links – (SEPP 2004 Part 2, Sub-clause 26(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.*

There is an accessible path of travel from the development site main entry along Rutherford Avenue leading to the bus stops (closest to the site) via existing pedestrian footpath. The path of travel appears to have (cross falls, gradients, landing) that will satisfy the SEPP.

It is to be noted that the bus stop furthest from the development site is unappropriated as there does not appear to be pedestrian link crossing Memorial Avenue. However, the service provider (BaptistCare) has a private shuttle bus in satisfaction of Approval Statement of Commitment Nos 32 & 33 which will satisfy this clause.

4.1.3. Transport services to local centres (SEPP 2004 Part 5, Clause 43)

From the proposed development site the distance to the nearest local centres which features all of the required services to satisfy the SEPP lie outside the 400m distance limit. However, the bus services/shuttle bus described in the earlier section of this report, offers frequent services to a number of different centres containing all the required services.

4.2. Siting Standards

4.2.1. Wheelchair Access (SEPP 2004 Schedule 3, Part 1, Clause 2)

(2)(a) Wheelchair access

If the whole of the site does not have a gradient of less than 1:10, the 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 greater, and

(2)(b)

the wheelchair access provided must be by a continuous accessible path of travel (within meaning of AS 1428.1) to an adjoining public road or an internal road or a driveway that is accessible to all residents.

The site appears to have a gradient of no steeper than 1:10. For this reason, 100% of dwellings are proposed to be wheelchair accessible via a continuous accessible

path of travel from the public pedestrian footpath on Rutherford Avenue and Freesettlers drive.

From the information provided, the development site will generally demonstrate suitable widths and gradients along the path of travel with appropriate opportunities for wheelchair turning and passing.

4.2.2. Pedestrian Links – (SEPP 2004 Part 3, Division 2, Clause 38)

The proposed development should have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities

An obvious and safe pedestrian path of travel will exist from the site to the bus stops on Memorial Ave compliant with this SEPP.

5. COMMON AREAS

Based on the development site having multistorey buildings access to each of the SOU's is via the use of a lobby entry points, common use corridors and the use of passenger lifts

It is to be noted that the following recommendations are silent under the SEPP. However, as the SOU is proposed along a common path of travel the following recommendation are advised to comply.

The following recommendations can be easily achieved and will be reviewed during the design stage of the development.

5.1.1. Main Entries

Entry into each of the cluster building is via the use of dual hinged entry doors. The circulation spaces around the main entries will allow ample manoeuvrability for wheelchair users compliant with AS1428.1.

Recommendations:

- (i) Ensure each of the main entry /lobby doors have a 850mm open clear width (920mm door leaf) compliant with AS1428.1.
- (ii) Ensure door components are compliant with AS1428.1.
- (iii) Ensure doors have a level threshold compliant with AS1428.1.

5.1.2. Paths of Travel

Recommendations:

- (i) Common use doors to have an 850mm open clear width (920mm door leaf) compliant with AS1428.1.
- (ii) Ensure door components are compliant with AS1428.1.
- (iii) Ensure doors have a level threshold compliant with AS1428.1.
- (iv) Paths of travel (internal and external) to have a slip rating compliant with HB198.

5.1.3. Passenger Lifts

Recommendations:

- (i) Lifts to be installed compliant with AS1735.12.
- (ii) Lift call buttons and arrival indicators to be compliant with AS1735.12.

6. PATHWAYS TO COMMON FACILITIES UNDER THE SEPP

6.1.1. Common Areas and Facilities – SEPP 2004 Schedule 3, Sub-clause 2(3)

Access must be provided in accordance with AS 1428.1 so that a person using a wheelchair can use common areas and common facilities associated with the development.

Common facilities in the development include the communal landscape area between building clusters 2, 3 and 4.

The drawings demonstrate suitable widths and gradients along the path of travel to and between these common areas in accordance with this clause.

This section under the SEPP can be easily achieved and will be reviewed during the design stage of the development.

6.1.2. Security – (SEPP 2004 Schedule 3, Clause 3)

Pathway lighting will be designed and located so as to avoid glare for pedestrians and adjacent dwellings, and must provide the appropriate lux level at ground level.

This section under the SEPP can be easily achieved and will be reviewed during the design stage of the development.

6.1.3. Letterboxes – (SEPP 2004 Schedule 3, Part 1, Clause 4)

Under Schedule 3 clause 4 of the SEPP, a gate house and letterbox area is also proposed near the property boundary along Rutherford Ave and Freesettlers Drive.

The gatehouse/letterbox area will be located along a continuous accessible path of travel (within the meaning of AS1428.1) on a hardstand area. At present no letterbox compounds have been shown to assess compliance.

This section under the SEPP can be easily achieved and will be reviewed during the design stage of the development.

7. DWELLING DESIGN

SEPP 2004 clause Part 4, division 3 section 41(2) :

“Despite the provision of 2, 7, 8, 9, 10, 11, 12, 13 and 15-20 of the schedule 3, a self-contained dwelling, or part of such a dwelling, that is located above the ground floor in a multi – story building does not have to comply with the requirements of those provisions if the development application is made by or by a person jointly with, a social housing provider”.

For this reason the following will be specifically relevant to the ground floor SOU’S (specified types A-G, B, C, D-G, E-F and F-G).

7.1.1. Design Requirements

Under SEPP 2004 clause 13(1), the definition of ‘self-contained dwelling’ includes the following:

“a dwelling... housing seniors or people with a disability, where private facilities for significant cooking, sleeping and washing are included in the dwelling or part of the building...”

Under the above definition, all of the ground floor dwellings proposed as part of the development fall within the above definition of ‘self-contained dwellings’. As self-contained dwellings, all of the dwellings are required to comply with the detailed design requirements of Schedule 3 of SEPP 2004.

Review of the plans proposed by DKO indicates all ground floor dwellings will comply with the design requirements of schedule 3 of the SEPP.

7.1.2. Private Car Accommodation – (SEPP 2004 Schedule 3, Part 1, Clause 5)

The drawings describe 126 total parking spaces including 7 accessible bays (3.8m in width) in a basement “open plan” arrangement.

However it is to be acknowledged that condition B17 has made comment that parking bays to be typical spots and can be converted to accessible parking bays under AS2890.6.

From the information and drawings provided the DDA conversion arrangement has allocated 120 cars total with 22 accessible spots in accordance with AS2890.6.

7.1.3. Accessible Entry – (SEPP 2004 Schedule 3, Part 1, Clause 6)

All units are capable of compliant accessibility via the main pedestrian entrance at the street frontage. The drawings can demonstrate suitable widths and gradients along the path of travel.

The entry doorway into the dwellings have / or can achieve a sufficient clear open width of 850mm and latch side clearances in accordance with AS1428.1.

Details relating to accessible door widths and components will be finalised during design development stage.

7.1.4. Interior General – (SEPP 2004 Schedule 3, Part 1, Clause 7)

All internal doorways have achieved clear opening widths of at least 850mm, compliant with AS1428.1 – 2009.

All internal corridors have a minimum obstruction width of 1000mm.

In general most doors have circulation spaces at approached to internal doors compliant with AS1428.1. Adjustments to all non-compliant doors will be reviewed and modified at a later stage

Details relating to accessible door components and circulation spaces will be finalised during design development stage.

7.1.5. Bedroom – (SEPP 2004 Schedule 3, Part 1, Clause 8)

The bedrooms achieve sufficient overall dimensions to accommodate a queen size bed clear of door circulation, with all specified clearances around the bed maintained, compliant with the SEPP.

Details relating to bedroom components can be easily achieved and will be reviewed during the design stage of the development.

7.1.6. Bathroom and Toilet – (SEPP 2004 Schedule 3, Part 1, Clauses 9&10)

The layout of the main bathroom in all ground floor SOU'S have an overall dimension of 2600mm (L) x 2400mm (W). This internal dimension is sufficient space to accommodate all the required circulation spaces around the visitable pan, pan, basin and shower recess, compliant with AS1428.1 as required by the SEPP.

All sanitary fixtures and fittings such as the shower, wash basin, grab rails, portable shower head and folding seat will be detailed to be compliant with AS1428.1 as required by the SEPP in design development stages.

All wet area floor surfaces shall be detailed to be slip resistant in accordance with HB198 and AS4586 in design development.

Detail for all other bathroom components will be reviewed during the design stage of the development

7.1.7. Surface Finishes – (SEPP 2004 Schedule 3, Part 1, Clause 11)

All external balcony surfaces will be detailed to be slip resistant in accordance with the SEPP in design development stages.

This recommendation can be readily achieved and will be reviewed during the design stage of the development.

7.1.8. Door Hardware – (SEPP 2004 Schedule 3, Part 1, Clause 12)

All door hardware components will be detailed to comply with the SEPP during design development stages.

This recommendation can be readily achieved and will be reviewed during the design stage of the development.

7.1.9. Ancillary Items – (SEPP 2004 Schedule 3, Part 1, Clause 13)

All electrical switches and power points will be detailed to comply with the SEPP in design development stages.

This recommendation can be readily achieved and will be reviewed during the design stage of the development.

7.1.10. Living and Dining Rooms – (SEPP 2004 Schedule 3, Part 1, Clause 15)

All SOU living and dining areas have circulation spaces that will sufficiently accommodate a 2250mm diameter clear circulation space which is compliant with clause 4.7.1 of AS4299.

All GPOs, telephone outlets and wiring for lighting will be provided in accordance with the SEPP in design development stages.

This recommendation can be readily achieved and will be reviewed during the design stage of the development.

7.1.11. Kitchen – (SEPP 2004 Schedule 3, Part 2, Clause 16)

The drawings describe a straight galley style kitchen and island configuration for all SOU's. There is at least 1550mm clear space forward of kitchen benches, compliant with clause 4.5.2 of AS4299 as required by the SEPP.

All kitchen joinery, fittings and fixtures such as the tap, cooktop, bench work surface, oven and cupboard hardware will be detailed to be compliant with clause 4.5 of AS4299 as required by the SEPP in design development stages.

Additionally, all electrical switches and outlets inside the kitchen will be detailed in design development stages.

This recommendation can be readily achieved and will be reviewed during the design stage of the development.

7.1.12. Laundry – (SEPP 2004 Schedule 3, Part 2, Clause 19)

The drawings describe a cupboard style laundry within each of the SOU's. There is at least 1300mm long clear circulation space in front of the laundry appliances, compliant with the SEPP.

Although provisions have been made for a washing machine no detail of a clothes dryer has been provided. This recommendation can be readily achieved and will be reviewed during the design stage of the development.

In line with the SEPP an accessible path of travel is required to any clothes line provided in relation to the dwelling.

If applicable this recommendation can be readily achieved and will be reviewed during the design stage of the development.

7.1.13. Storage for Linen – (SEPP 2004 Schedule 3, Part 2, Clause 20)

In general, all SOU's show provisions of storage for linen or similar compliant with the SEPP.

7.1.14. Garbage – (SEPP 2004 Schedule 3, Part 2, Clause 21)

The drawings describe services corridors (garbage chutes) located near the passenger lifts for all cluster buildings. The location of the services corridors garbage areas is accessible through the network of pathways and walkways.

All doors have a compliant 850mm open clear widths and 1550mm circulation spaces (in front of the garbage chutes) compliant with the SEPP. The doors have internal door latch side clearances will need to be modified to satisfy this SEPP.

Details of the garbage area will be reviewed during the design stage of the development.