



inclusive  
places

# Disability Access Report

**Stage:** Section 4.55

**Project:** Opal St Ives Botanica  
S221104 - New 210 Bed Residential Care Facility at Opal St  
Ives

**Location:** 285-289, 293 & 295 Mona Vale Road and 1  
Flinders Ave, St Ives NSW 2075

**Prepared for:** Midson Group

**On behalf of:** OHCA Property Holdings Pty Ltd

**Date**

18 November 2025

**Project No.**

P000958



inclusive  
places

## Document Control

Filename	Revision	Status	Date
251111_Inc Pla_Opal_St Ives_0958_Stage 2_S4.55_rev 1.0	1	Draft issued for review by Project team	11 November 2025
251118_Inc Pla_Opal_St Ives_0958_Stage 2_S4.55_rev 2	2	Final	18 November 2025

### Copyright Statement

Cheung Access is the owner of the copyright in this report. Other than as permitted by the Copyright Act and as outlined in the Contract Terms and Conditions, no part of this report may be reprinted or reproduced or used in any form, copied or transmitted by any electronic, mechanical, or by other means, now known or hereafter invented, without the prior written permission of Cheung Access. Legal action will be taken against any breach of its copyright. This document may only be used for the purposes for which it was commissioned. Unauthorised use of this document in any form whatsoever is prohibited. Cheung Access assumes no responsibility where the document is used for purposes other than those for which it was commissioned

# Contents

<b>Contents</b>	<b>3</b>
<b>1 Introduction</b>	<b>4</b>
1.1 Report Background	4
1.2 Report Methodology and Purpose	4
1.3 Report Limitations & Exclusions	5
1.4 Disability Discrimination Act 1992 (DDA)	6
1.5 Proposed Development	7
1.6 Report Structure	8
<b>2 Summary of Key Access elements to check at CC</b>	<b>8</b>
<b>3 Disability Access Assessment</b>	<b>10</b>
3.1 Overview of Accessible Building Features	10
3.2 BCA Part D4 – Access For People with Disability	10
<b>Appendix A: Report Documentation Relied Upon</b>	<b>27</b>

# 1 Introduction

## 1.1 Report Background

This Access report has been prepared by Inclusive Places on behalf of OHCA Property Holdings Pty Ltd (the Applicant) and accompanies a Modification Application made under Section 4.55(2) of the Environmental Planning & Assessment Act 1979 (EP&A Act). The application seeks approval for a range of modifications to the approved Residential Care Facility (RCF) at 285, 287, 287A, 289 Mona Vale Road and 1 Flinders Avenue, St Ives (the site).

A State Significant Development Application (SSD-48028209) was approved under delegation by the Independent Planning Commission (IPC) for redevelopment of the site including demolition, excavation and construction of a part three storey (plus basement) RCF comprising 145 beds, onsite kitchen and laundry facilities, onsite services including café, salon, gym, health consulting rooms, and basement car parking comprising 42 car parking spaces, 3 motorbike bays and a mini bus.

This Modification Application is submitted to the Department of Planning, Housing and Infrastructure (DPHI) for assessment and seeks approval for the following modifications:

- Inclusion of additional land at 293 and 295 Mona Vale Road;
- Reconfiguration of the site layout to accommodate the new northern wing and extension of the car park;
- Refinement of 'Home' planning and interior layouts;
- Enhancements to the landscape design, including additional tree planting and communal open spaces for residents at ground level; and
- Changes to the wording of conditions to facilitate the amended development.

Our engagement involved a detailed desktop assessment of the architectural design documentation against the provisions of the Part D3D22, D4, E3D7 and F4D5 of the National Construction Code Series Volume 1- Building Code of Australia 2022 Amendment 2 (BCA 2022 Amdt 2) and relevant Australian Standards.

## 1.2 Report Methodology and Purpose

This report references the SSDA architectural drawings provided by Group GSA Architects as listed in Appendix A. Our engagement involved a desktop assessment of the architectural plans against the relevant provisions of the NCC Series (Volume 1) Building Code of Australia 2022 Amendment 2, under the Disability Discrimination Act (1992) and relevant Australian Standards.

The key objectives of the report are as follows:

- ❑ Undertake an assessment of the proposed development against:
  - ❑ Part D3D22, D4, E3D7, E3D8 and F4D5 Deemed to satisfy provisions of the National Construction Code Series – National Construction Code Series – Volume 1- Building Code of Australia 2022 Amendment 2.
  - ❑ State Significant Development Application (SSD-48028209) , dated 31 July 2025
  - ❑ The Disability (Access to Premises—Buildings) Standards 2010 (the Premises Standards)
  - ❑ Relevant Australian Standards listed in BCA 2022 Amdt 2, as follows:

- ❑ AS1428.1 Design for Access and Mobility: General requirements for Access – New Building Work (2021)
- ❑ AS1735.12 Lifts, escalators and moving walks Part 12: Facilities for persons with disabilities
- ❑ AS2890 (Part 6) (2009) – Parking Facilities – Off-street parking for people with disabilities
- ❑ AS4586 (2013) Slip resistance classification of new pedestrian surface materials
- ❑ Identify any compliance departures that require resolution/attention for the proposed development by way of design change or Performance Solutions prior to the issuing of the Construction Certificate.
- ❑ Verify that the referenced documentation has been reviewed by an appropriately qualified Accredited Access Consultant and demonstrate that compliance with the BCA / Access to Premises – Building Standard 2010 is readily achievable.
- ❑ Enable the certifying authority to satisfy its statutory obligations of the Environmental Planning and Assessment Regulation, 2000 and its statutory obligations under the Building Professionals Regulation 2020.
- ❑ Accompany the S4.55 documents to enable them to be satisfied that the building design is capable of complying with the NCC/BCA and that subsequent compliance with the access requirements of the BCA, will not give rise to design changes, which may necessitate the submission of additional Section 4.55 applications under the Environmental Planning and Assessment Act, 1979

### 1.3 Report Limitations & Exclusions

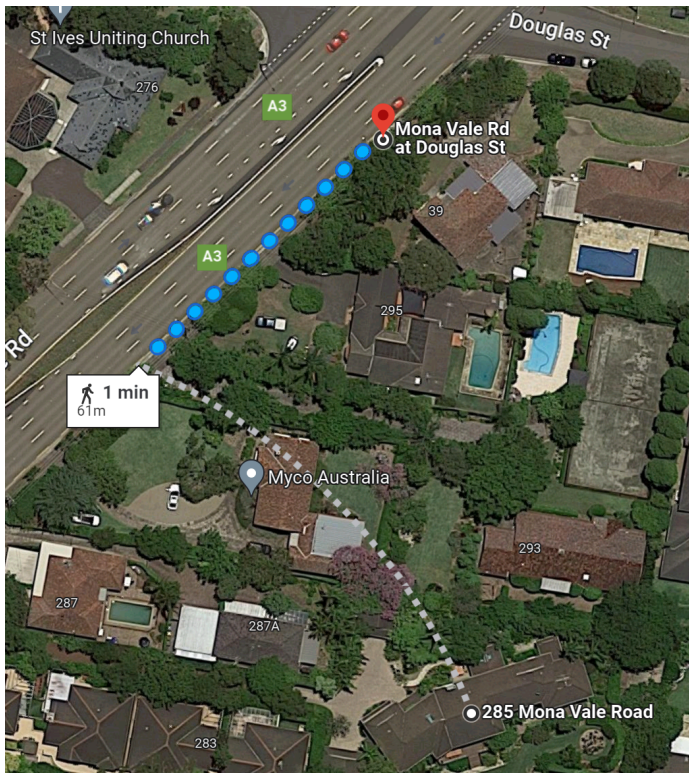
The limitations and exclusions of this report are as follows:

- ❑ The limitations and exclusions of this report are as follows:
- ❑ This report is based on a review of the referenced documentation in the Appendix A.
- ❑ This Report does not address issues in relation to the design, maintenance or operation electrical, mechanical, hydraulic or fire protection services, Utility Services Provider Requirements (Water, Gas, Telecommunications and Electricity supply authorities), Local Government Act and Regulations, Occupational Health and Safety Act and Regulations or the like.
- ❑ This assessment does not incorporate the detailed requirements of the BCA Referenced Australian Standards. It is the responsibility of design and installation contractors to demonstrate and achieve compliance for all new works.
- ❑ The commentary within this Access Assessment Report does not relieve the Principal Designer, Principal Building Contractor or the Certifying Authority from their statutory obligations under the EP&A Act, Work Health Safety Act, Building and Development Certifiers Regulation 2020 and the like and they are to be satisfied that the proposal meets their requirements prior to approval.
- ❑ It is important to note that without the written permission from Inclusive Places, no part of this report may be reproduced in any form or by any means. This report is based solely on client instructions and therefore should not be relied upon or used by any third party without prior knowledge and instructions from Inclusive Places Pty Ltd.
- ❑ All reasonable attempts have been made to identify key compliance matters pursuant to the BCA and additional issues which have been deemed an impediment to access provision and may increase Client risk of attracting a complaint under the DDA.

- ❑ Inclusive Places accepts no responsibility for any loss suffered as a result of any reliance upon such assessment or report other than providing guidance to alleviate access barriers in the built environment and reduce Client risk of attracting a complaint under the DDA.
- ❑ If there is further design development occurs including by an interior architect, then any proposed changes to the architectural drawings and other documents must ensure that the same of level of accessibility within the building is maintained

Exclusions to this Access Report:

- ❑ Inclusive Places has not reviewed, as a part of this report, the existing public domain which are outside the site allotment boundary. However it is acknowledged that the existing footpath from the site boundary is reasonably level to the closest bus stop which is 61metres in length.



The bus stop on the opposite side of Mona Vale Road is at least 500 metres from the site, however it is also mostly flat.

## 1.4 Disability Discrimination Act 1992 (DDA)

The Federal Disability Discrimination Act 1992 (DDA) provides protection for everyone in Australia against discrimination based on disability. Section 32 of the DDA focuses on the provision of equitable and dignified access to services and facilities for people with mobility, sensory and cognitive disabilities.

Disability discrimination happens when people with a disability and their relatives, friends, carers, co-workers or associates are treated less fairly than people without a disability. Compliance with Access to Premises Standards give certainty to building certifiers, building developers and building managers that, if access to (new parts) of buildings is provided in accordance with these Standards, the provision of that access, to the extent covered by these Standards, will not be unlawful under the DDA. This however applies only to the new building or new parts of an existing building and its affected part. All areas outside the scope of these areas are still subject to the DDA. We cannot guarantee or certify for

DDA compliance because DDA compliance can only be assessed by the Courts. Scope of DDA extends beyond the building fabric and also includes furniture and fittings.

From 1 May 2011, the Commonwealth’s Disability (Access to Premises - Buildings) Standards made under the Disability Discrimination Act 1992 (DDA) applies to all new building work. The Premises Standards, established requirements for access to buildings, that are incorporated into the BCA 2022 Amdt 2.

The Premises Standards contain an Access Code of construction that is mirrored in the disability access provisions of the BCA 2022 Amdt 2. New building work must comply with the Access Code in the same manner as complying with the BCA 2022 Amdt 2 by meeting deemed-to-satisfy provisions or by adopting a performance solution that achieves the relevant performance requirements.

This means if access is provided in accordance with the Premises Standards then it is not unlawful under the DDA. It also ensures that Object 1.3 (a) of the Premises Standards is met which is to: ‘Ensure that dignified, equitable, cost-effective and reasonably achievable access to buildings and facilities and services within buildings is provided for people with a disability.’

## 1.5 Proposed Development

### BCA Classification:

Class	Level	Description
9c/ 7a	Lower Ground	Residential Care Facility/ Carpark / Communal spaces/ Back of House/ Staff areas
9c	Ground	Residential Care Facility
9c/5	Level 1	Main Entry level/ Residential Care Facility/ Office areas/ Cafe/ Gym
9c/ 5	Level 2	Residential Care Facility/ Office areas/ Communal spaces
9c	Level 3	Residential Care Facility / Communal spaces

### Areas required to be accessible:

Level	Area	Description
Lower Ground, Ground Level 1 Level 2 Level 3	All areas with the exception of: an where access would be inappropriate because of the particular purpose for which the area is used; and an area that would pose a health or safety risk to a person with a disability under	To and within all areas normally used by the occupants: <ul style="list-style-type: none"> <li><input type="checkbox"/> Reception/ Waiting area</li> <li><input type="checkbox"/> Common areas</li> <li><input type="checkbox"/> Corridors</li> <li><input type="checkbox"/> Doors into common areas</li> <li><input type="checkbox"/> Accessible toilets</li> </ul>

Reference Number: P000958

Section 4.55 -Disability Access Report for Opal St. Ives Botanica

7 of 27

	<p>D3.4 Exemptions as follows:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Scullery</li> <li><input type="checkbox"/> Cleaners room,</li> <li><input type="checkbox"/> Medication store</li> <li><input type="checkbox"/> Pre aid store</li> <li><input type="checkbox"/> Store rooms</li> <li><input type="checkbox"/> Dirty Utility rooms</li> <li><input type="checkbox"/> Back of House (laundry, kitchen, waste room, maintenance, fire pump room, pool pump, switch room)</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Ambulant sanitary facilities</li> <li><input type="checkbox"/> Accessible sanitary facility with toilet and shower</li> </ul>
--	--	---

## 1.6 Report Structure

The report consists of a Summary of Key Access Elements to address provided in the table under Section 2 below, which is for the reader's ease of reference and most urgent attention. Notwithstanding the summary of issues within Section 2 must also be read in conjunction with the body of the assessment provided under Section 3 of the report which further details compliance matters needing consideration in design development and during construction.

It is also the responsibility of all design consultants to ensure compliance with relevant BCA access requirements where applicable, DCP controls, Australian Standards and Manufacturers Specifications. This report does not in any way relieve design consultants from their obligations in designing to achieve compliance with the BCA. Furthermore, this report does not relieve the PCA from their statutory obligations required to assess the drawings in detail prior to the issue of a Comply Development Certificate.

## 2 Summary of Key Access elements to check at CC

The following comprises a summary of the key access elements identified under the Disability Access Assessment in Section 3 and is to be read in conjunction with the aforementioned Sections and the Building Code of Australia Volume 1.

The following elements are to be provided and confirmed prior to the issue of the relevant Construction Certificate.

<b>Relevant BCA Clause</b>	<b>Element</b>	<b>Compliance requirements</b>
D2D9	Widths of doorway in exits or paths of travel to exits	<p>Resident use areas doorways to have a clear opening of 870mm</p> <p>Doorways from public corridor to sole occupancy units to have a minimum unobstructed width of 1070mm</p>

D3D22	Handrails in corridors of resident areas	A Performance based design brief and performance solution report by the Aged Care Operator is required by CC for not providing handrails within nominated corridors.  Otherwise handrails in corridors to be provided in accordance with the requirements of AS1428.1(2021)
D4D2	Internal areas	Areas required to be accessible to be in accordance with AS1428.1 - 2021
Table D4D2b	Accessible Sole Occupancy Units	A Performance based design brief and performance solution report by the Aged Care Operator is required by CC for not providing a minimum of 9 Accessible Sole Occupancy units in accordance with AS1428.1 (2021).
D4D3	Common area Entry doors	In accordance with the requirements of AS1428.1-2021
D4D4	Common Internal doors	In accordance with the requirements of AS1428.1 - 2021
D4D4	Flooring and paving - internal	Slip resistance rating test reports to be provided at time of OC
D4D6	Accessible car parking	Provision of accessible car spaces in accordance with AS2890.6
D4D7	Accessible signage	Accessible signage to be provided in accordance with BCA 2022 Amdt 2 and AS1428.1 - 2021 for: <ul style="list-style-type: none"> <li>• Required exit doors stating 'Exit' and 'Level' followed by floor number.</li> <li>• Accessible toilets (not required in SOUs)</li> <li>• Ambulant cubicles</li> <li>• Areas with hearing augmentation</li> </ul>
D4D8	Hearing Augmentation	Determine whether hearing augmentation will be installed within the building
D4D13	Glazing	Ensure solid visual barriers are provided with the required luminance contrast
F4D5	Accessible / Ambulant sanitary facilities	Accessible Toilets and Accessible Toilets with Showers and Ambulant cubicles to be provided In accordance with BCA and AS1428.1 - 2021
F4D5	Accessible WC's	Transfer directions  Ensure as equal as possible distribution of right and left hand transfers are provided in the <ul style="list-style-type: none"> <li>• Common area</li> <li>• Staff area</li> </ul>

## 3 Disability Access Assessment

Section of Report	Design Criteria
3.1	Overview of Accessible building features 3.1.1 Compliance with BCA Part D4
3.2	BCA Part D4 – Access For People with Disabilities

### 3.1 Overview of Accessible Building Features

#### 3.1.1 Compliance with BCA Part D4

The proposed development will satisfy the prescriptive deemed to satisfy provisions of Part D4, E3D7 and F4D5 of the BCA 2022 Amdt 2 as follows:

- One Accessible pathway from the Mona Vale Road site allotment boundary to the main level entrance.
- 3 accessible car parking spaces to comply with AS2890.6 (2009) within the lower ground car parking
- Access to and within common areas such as common internal areas and communal open space on every level of each building.
- Access to the entrance doorway of sole occupancy units, where there is a lift installed.
- Accessible toilets on each level for visitors, residents and staff

Performance Solutions may be required for the following design elements if it is not able to meet the deemed to satisfy provisions;

- Provision of handrails within corridors
- Provision of Accessible Sole Occupancy Units (SOU)

### 3.2 BCA Part D4 – Access For People with Disability

The following is a clause-by-clause assessment of the architectural drawings against BCA Part D4 – Access For People with a Disability.

For more detail on each requirement, please refer to *Appendix B: BCA Part D4 – Access For People with a Disability*.

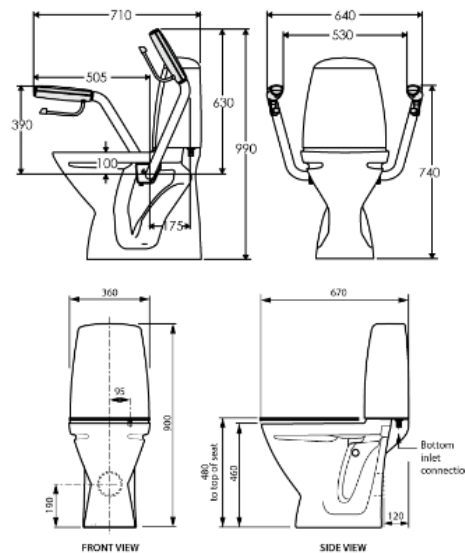
Deemed to Satisfy Provision	Capacity to Comply	Comments
D2D9 Widths of doorway in exits or paths of travel to exits	✓	Resident use areas doorways are required to have minimum unobstructed width of 870mm  Doorways from public corridor to sole occupancy units to have a minimum unobstructed width of 1070mm

		<p><b>Recommended Action</b></p> <p>During the Design detail stage to ensure that</p> <ul style="list-style-type: none"> <li>• Resident use areas doorways have a minimum clear opening of 870mm</li> <li>• Sole occupancy unit doors to have a minimum unobstructed with of 1070mm</li> </ul>
D3D22 (3)(b) Handrails	<p><b>Capacity to meet the Performance requirements</b></p>	<p><b>Provision of handrails in corridors of Class 9c buildings</b></p> <p>Following investigations of the current design practices in providing handrails in residential care facilities, the client will not be providing handrails on both sides of the corridor.</p> <p>From the information provided, the design intent of this residential care facility is to provide a welcoming homely environment, which does not include handrails on the nominated corridors.</p> <p><b>Recommended Action</b></p> <p>All other handrails as required by BCA Part D3D22 be provided as required including Fire stairs,</p> <p>A Performance based design brief and performance solution report by the Aged Care Operator is required by CC for not providing handrails within corridors.</p>
D4D2 General building access requirements Class 9c	✓	<p>The drawings demonstrate access will be provided to the maximum extent possible to and within all areas of the fit out, with the exception of areas which are exempt from access (Refer to Section D4D5)</p> <p>Circulation spaces and passing spaces have been provided at the end of most corridors and doorways into areas required to be accessible to comply with AS1428.1 (2021). Those areas that are not shown to be accessible are proposed to be accessible during ongoing design and construction.</p> <p>Corridor widths at RCF Sole Occupancy units achieve the 1.8 metres required by BCA Part D2D8 (c)(iii) at SOU entries.</p> <p>The furniture layouts proposed show that there are reasonable circulation clearances for a person using a wheelchair.</p>

		<p>The ground, level 1, level 2 and level 3 arrangement plan shows compliance with AS1428.1 (2021) with respect to door clear openings and circulation space at both sides of common area doors.</p> <p>Compliant access pathways are provided to common areas such as:</p> <ul style="list-style-type: none"> <li>● Lower Ground - Residential Care Facility, Carpark, Communal spaces, Back of House, Staff areas</li> <li>● Ground floor - Communal areas, seating areas, dining, lounge and activity, Lobby to Lift, Sanitary facilities</li> <li>● Level 1 - Communal courtyard and communal areas, seating areas</li> <li>● Common area seating areas, Sanitary facilities</li> <li>● Level 2 - Main entrance, reception, town centre, communal areas, Wellness areas, resident common lounge and activity areas.</li> <li>● Level 3 - resident common lounge and activity areas</li> </ul> <p>It is noted that some RCF store rooms on levels are not accessible, but alternate accessible store rooms are provided, which can meet the intent of the DDA.</p> <p><b>Access to entrance doorway of each RCF SOU</b></p> <p>The drawings demonstrate an accessible pathway to all of the RCF SOU entrance doorways from the principal pedestrian entrance as well as other parts of the building required to be accessible.</p> <p>The entrance doorways of each sole occupancy unit have a clear opening of 1070mm to comply with BCA D2D9 (d)(ii)m through the provision of one large door.</p> <p>The corridors on all RCF levels leading to SOU's provide sufficient corridor width to allow a person using a wheelchair to do a 180 degree turn (within 2m at the end of a corridor).</p> <p><b>Accessible Sole Occupancy Units</b></p> <p>Although there is a clear opening of 1070mm to the doorway entries there is no latch side space of 510mm to comply with AS1428.1 (2021). The drawings also do not show nominated accessible units.</p>
--	--	--

The sanitary compartment ensuites within the sole occupancy units have been designed to meet the performance requirements of the BCA. Which means the SOU ensuites fixtures and fittings do not meet the design requirements of AS1428.1 (2021). The toilet will be installed more than 450mm from the side wall, with no wall mounted grabrails.

The ensuites have all been designed to assist high-care residents who require significant assistance with daily health care and individual personal hygiene. It is proposed that the Enware IFO pans which have support arms will increase the residents ability for independent movement and aide the care team in assisting residents to sit and stand on both sides, which is the common need in aged care.



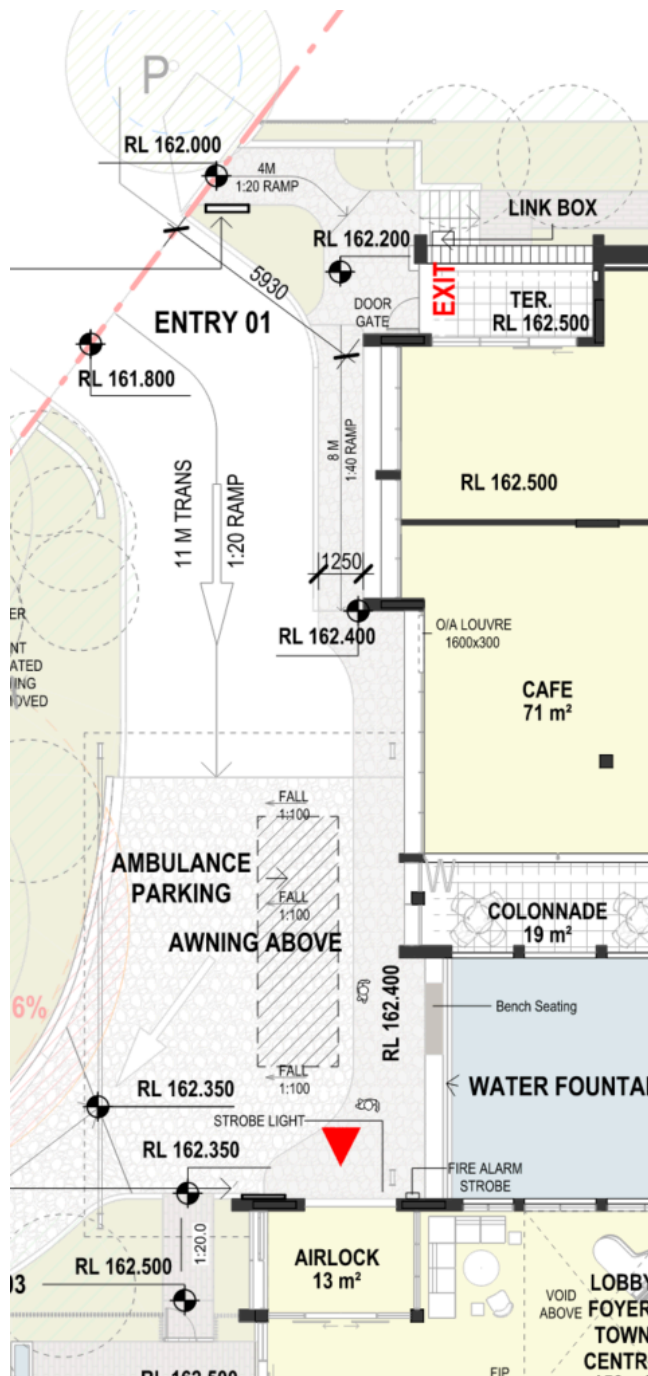
Enware IFO toilet - Screenshot from the enware.com.au

#### Recommended Action

Ensure during ongoing design and construction::

1. At time of the CC, determine whether a performance solution is required for not providing nine (9) accessible sole occupancy units in accordance with AS1428.1 (2021).
2. External and internal pathways comply with AS1428.1 (2021).
3. At time of CC common area doors and gates have compliance with AS1428.1 (2021) and D2D9 with respect to clear opening widths, luminance contrast on doors, door hardware, and door force is 20N including where a door closer is fitted.

		<p>4. At time of CC, provide slip resistance certification for common area paving, flooring, ramp surfaces and stairs, to show testing under wet surface conditions in accordance with AS4586 – 2013 to confirm areas required to be accessible have slip resistant surfaces in accordance with the requirements of AS1428.1.</p> <p>5. To meet the intent of the DDA, ensure that internal and external accessible sitting area facilities are provided including:</p> <ul style="list-style-type: none"> <li>a. Seating</li> <li>b. Table seating - one table to have an area that has either a suitable height or is height adjustable so that the table can be approached and used by a person using a wheelchair</li> </ul>
D4D3 Access to buildings	✓	<p>The development is located on a steep slope, with street level at Level 1 on the western side. There is one connecting path from the street on the northwestern aspect of the site. The proposed pathways are designed to comply with AS1428.1 (2021) and will be refined for width, gradient, and crossfall during the detailed design stage</p>



Screenshot of pedestrian entry from Mona Vale Road level 1 west

On-site accessible parking is available on the Lower Ground Floor, featuring three designated accessible parking bays. An accessible path of travel leads from the car park to the lift lobby on the Lower ground level, with a lift providing access to all upper levels.

The gradients of all accessible pathways from the allotment boundary and connections to each building area, including the on-site parking, are designed to comply with AS1428.1 (2021).

On Level 1, the building includes a double leaf sliding automatic entry door. Drawings indicate that all common area doors will achieve a minimum clear opening width of 850 mm.

		<p><u>Recommended Action</u></p> <p>At time of Construction Certificate:</p> <ol style="list-style-type: none"> <li>1. Ensure external pathways comply with AS1428.1 (2021) including but not limited to: <ol style="list-style-type: none"> <li>a. Sides of walkways have level abutment or barriers as required</li> <li>b. Gradients</li> <li>c. Crossfalls</li> <li>d. Handrails and kerbrails where required</li> </ol> </li> <li>2. Ensure during ongoing design and construction that all materials used on accessible paths of travel have slip resistance certifications for external and internal areas. To show testing under wet surface conditions as a pendulum classification (AS4586 – 2013)</li> <li>3. Ensure door and gate schedule is in compliance with AS1428.1 (2021) with respect to clear openings of at least 850mm (1000mm clear preferred), circulation space, door force and luminance contrast of doors and gates for all entry and common areas on all levels.</li> <li>4. Ensure thresholds of building entrances and common area doors and gates are level.</li> </ol>
<p>D4D4 Parts of building to be accessible</p>	<p>✓ Provide detail at CC</p>	<p><b>Accessible walkways</b></p> <p>The RCF building is shown to have an accessible path of travel to all shared communal facilities.</p> <p>Paths of travel to the entries of the individual SOU's are shown to have dimensions that are in accordance with the BCA. <i>See also section D3D22 of this report</i></p> <p><u>Recommended Action</u></p> <p>Accessible pathways to comply with AS1428.1 - 2021:</p> <ul style="list-style-type: none"> <li>● dimensions</li> <li>● slip resistance (AS/NZS 4586)</li> <li>● construction tolerances between abutment of surfaces</li> <li>● gradients, crossfalls and landings</li> <li>● barriers or edges of walkways and/or ramps</li> <li>● where there are stairs</li> <li>● where there are doors or gates</li> </ul> <p><b>Stairs - fire-isolated</b></p> <p>Stairs providing egress are shown on the plans within the building.</p>

### Recommended Action

Fire isolated stairs to have

- Handrails on inner side, where fire-isolated, with minimum width between handrail and wall opposite of 1000mm
- Handrails on both sides where egress stairs, with minimum width between handrails of 1000mm
- Single solid contrast strip to edge on stair nosings 50-75mm deep (30% contrast) to comply with AS1428.1
- handrail at 865mm to 1000mm above step nosing on at least one side of the stairs to comply with AS1428.1 (2021)
- Handrail extensions at landings, where handrail does not continue
- Handrails that have no vertical sections
- Complying diameter and clearance between handrail and wall

### **Lifts**

The building contains four lift cars providing vertical access from the Lower Ground Floor up to Level 3.

Lift 1 starts at the Lower Ground Floor, connects to Level 1, 2 and Level 3.

Lift 2 connects lower ground, Ground, level 1 and 2.

Lift 3 and 4 goes from Lower Ground Floor to Level 2.

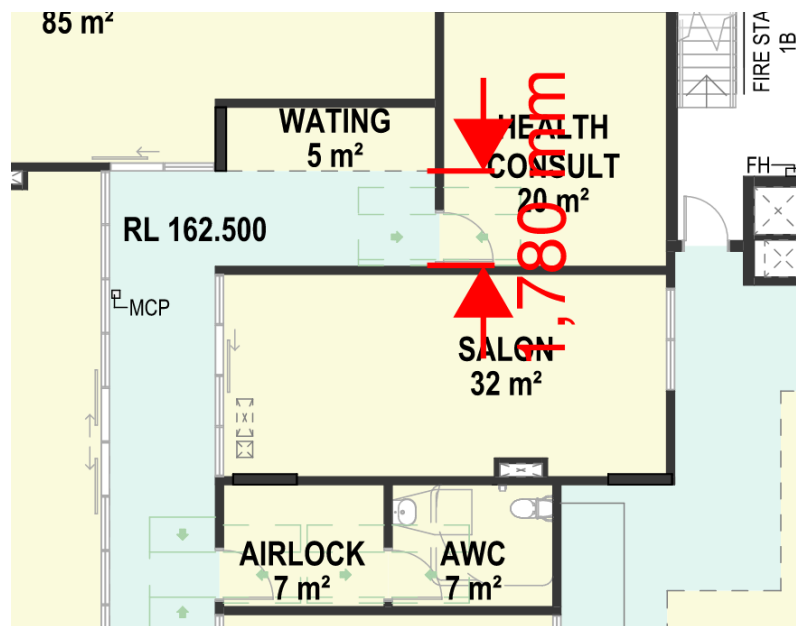
See also section E3D8 of this report.

### Recommended Action

At time of Construction Certificate, ensure compliance with accessible features of AS1735.12 as required by BCA2022 Part E3D8.

### **Turning spaces**

The corridor widths in all accessible areas of the building generally exceed 1540 mm. This design allows for turning spaces of at least 1540 mm x 2070 mm, in accordance with AS1428.1 (2021), to be provided along the majority of the corridors as indicated in the plans.



Screenshot of corridor Level 01 from DWG DA2003 Issue 1

Recommended Action

At time of Construction Certificate, ensure turning areas are provided at the end of all corridors, where there are rooms or facilities that are required to be accessible.

**Doors**

Capacity for independent use has been provided at common area doors, through provision of door circulation areas and doors able to meet the minimum clear door opening width of 850mm

**Residential Care Facility (RCF).**

All doors into SOU's are shown on the plans to have a clear door opening width of 1070mm in accordance with the requirements of BCA Part D2D9 if the corridor width is greater than 2.2m. This will need to be verified at the Construction Certificate stage.

However, should the SOU doorways not provide compliant wheelchair circulation space to the latch sides a performance solution is required to meet the performance requirements of the BCA.

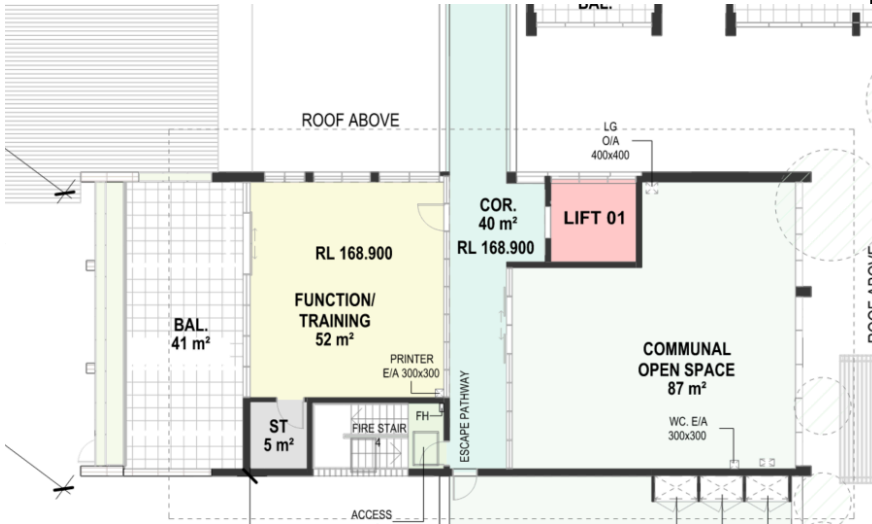
Recommended Action

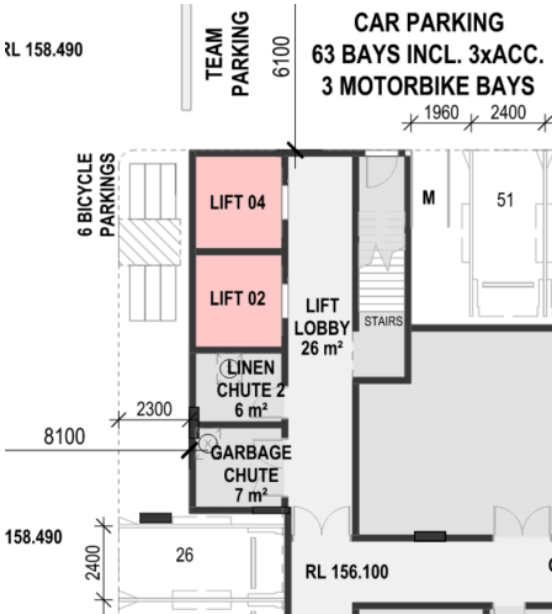
During ongoing design and construction, doors required to be accessible to be compliant with BCA 2022 Amdt 2 and AS1428.1 (2021) including but not limited to:

- Minimum clear openings

		<ul style="list-style-type: none"> <li>● Circulation space</li> <li>● Level landings either side of door (note level landings to be same size as required door circulation area where associated with a ramp)</li> <li>● Luminance contrast between doorway elements</li> <li>● Opening force is maximum 20N including where a closer is fitted</li> <li>● Level threshold</li> <li>● Controls in accessible location</li> <li>● Door hardware</li> </ul>
D4D5 Exemptions	✓	<p>All service areas for this development are deemed exempt due to the nature of the work required to be performed in these areas. This includes</p> <ul style="list-style-type: none"> <li>● Pump rooms</li> <li>● Service areas</li> <li>● Fire control rooms</li> <li>● Loading docks</li> <li>● Plant areas</li> <li>● Rooftops</li> <li>● Kitchens, sculleries</li> <li>● Utility areas (Clean and dirty)</li> <li>● Store rooms on RCF levels</li> <li>● Maintenance, Waste management</li> </ul> <p><u>Laundry, and Dirty Utility, Office/clean utility rooms</u></p> <p>These exemptions are in line with requirements for workers in care roles as defined by Work Cover NSW as detailed below.</p> <p><i>According to worker cover NSW, integral to the job requirements as a residential care worker, are the following tasks:</i></p> <p>(a) <i>Patient Manual Handling.</i></p> <p>(b) <i>Maintain a safe, clean, appealing environment.</i></p> <p>(c) <i>Spend long periods on your feet and frequently lifting and carry and move equipment/furniture.</i></p> <p><i>The expectation of staff is to be able to carry out tasks, which may pose a safety and health risk for a person with a disability such as cleaning and laundry work.</i></p>

		Note that the area and any path of travel required solely to an exempt area is not required to be accessible.
D4D6 Accessible carparking	✓ Provide detail at CC	<p>There are 63 car spaces including 3 accessible car spaces shown on the drawings with sufficient space for the shared areas and the car space to comply with AS2890.6</p> <p><u>Recommended Action</u></p> <p>Ensure at time of Construction Certificate, parking is:</p> <ul style="list-style-type: none"> <li>● Accessible Parking bays to be in accordance with AS2890.6 including: <ul style="list-style-type: none"> <li>○ Bay dimensions</li> <li>○ Shared zones</li> <li>○ Overhead clearance to be clear of services to achieve clearances of: <ul style="list-style-type: none"> <li>■ At bay - 2500mm</li> <li>■ On path to bay - 2200mm</li> </ul> </li> </ul> </li> <li>● Markings as required</li> <li>● Shared zones to have bollards in accordance with AS2890.6</li> </ul>
D4D7 Signage	✓ Provide detail at CC	<p>Signage schedules will be developed prior to OC.</p> <p><u>Recommended Action</u></p> <p>At time of Construction Certificate, accessible signage schedule in accordance with BCA 2022 Amdt 2 and AS1428.1 - 2021 will be required.</p> <ul style="list-style-type: none"> <li>● Required exit doors stating 'Exit' and 'Level' followed by floor number.</li> <li>● Common area accessible sanitary facilities</li> <li>● Areas or rooms with hearing augmentation</li> </ul>
D4D8 Hearing augmentation	✓ Provide detail at CC	Hearing augmentation will be required to be detailed at CC for the Function training room on Level 03 West.

		 <p>Screenshot of a portion of Level 03 Dwg DA2007, Issue 1</p> <p><u>Recommended Action</u></p> <p>Further assessment prior to the Construction Certificate is required. Hearing augmentation to be in accordance with BCA Part D4D8 and AS1428.5. Ensure Signage to be in accordance with BCA Part D4D7 and Specification 15 Braille and tactile signs</p>
<p>D4D9 Tactile indicators</p>	<p>✓</p> <p>Provide detail at CC</p>	<p><b>Tactile indicators within Class 9c buildings</b></p> <p>Tactile indicators are not required within a Class 9c Residential Aged care building however where there are handrails on a stairway or ramp a raised dome button in accordance with AS/NZS 1428.4.1 is to be provided to warn people who are blind or have a vision impairment that they are approaching a stairway or ramp</p> <p><u>Recommended Action</u></p> <ul style="list-style-type: none"> <li>In detailed design drawings for CC, show a raised dome button in accordance with AS/NZS 1428.4.1 on stair or ramps handrails within the Class 9c building.</li> </ul> <p><b>Back of house and Car Park Ground floor</b></p> <p>Where there are stairs within the lower ground floor back of house and car park areas, tactiles indicators are required as per the BCA.</p>

		 <p>Screenshot of lower ground floor back of house DWG DA2001 Issue 1</p> <p><b>Pedestrian entry/ vehicular paths</b></p> <p>Where there is a porte cochere at the main entry, this is a vehicular way adjacent and on the same grade as the pedestrian entrance to the building is required to be delineated by tactile indicators.</p> <p><u>Recommended Action</u></p> <ul style="list-style-type: none"> <li>• Show tactiles indicators within the staff car park areas and the back of house areas where there are stairs and ramps to comply with AS1428.4.1.</li> <li>• At time of the CC, a performance solution is required for an alternative design response to tactile indicators where pedestrian paths and vehicular paths meet at the main entry.</li> </ul>
D4D13 Glazing on an accessway	✓ Provide detail at CC	Visual barriers on glazing details have not been detailed so that the required luminance contrasts can be ensured with the flooring against which they will be viewed.
E3D8 Accessible features required for passenger lifts	✓ Provide detail at CC	Lift Four Passenger lifts are proposed within the building, to provide access to all levels of the development.  The proposed Lift car dimension will achieve the minimum lift car dimensions of BCA 2022 Amdt 2. Lift car doors will also meet these requirements

		<p><u>Recommended Action</u></p> <p>The lifts require accessible dimensions and features to be in accordance with E3D8 BCA 2022 Amdt 2</p> <p>To be assessed prior to issuing of Construction Certificate.</p>
<p>F4D5 Accessible sanitary facilities</p>	<p>✓ Provide detail at CC</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>Common area sanitary facilities are provided throughout the building in the common areas of the RCF on levels as follows.</p> <p><b>Unisex Accessible Toilets for staff, visitors and residents;</b> A staff Unisex Accessible toilet and shower on the lower ground level adjacent to the staff amenities room - Right hand transfer</p> <p>Level 2 Accessible toilet on level 2 adjacent to the admin and hotdesks - left hand transfer</p> <p>Unisex accessible toilets for residents are proposed in the following areas</p> <ul style="list-style-type: none"> <li>● Lower Ground near lounge - Left hand transfer</li> <li>● Ground Floor near Lift Lobby 3 and lounge - Right hand transfer</li> <li>● Level 1 near the Town centre - left hand transfer</li> <li>● Level 1 near the dining and lounge - left hand transfer</li> <li>● Level 1 near the cafe and gym area - Right hand transfer</li> <li>● Level 1 in Home - Right hand transfer</li> <li>● Level 2 adjacent to the Dining room areas - Right hand transfer</li> <li>● Level 3 within the dining area -Right hand transfer</li> </ul> <p>The dimensions and layouts of the rooms containing the accessible toilets are to comply with AS1428.1 (2021).</p> <p>To meet the intent of the DDA, it is recommended that an emergency call button, which complies with AS1428.2, will be installed in the accessible WC rooms.</p> <p><b>Combined unisex accessible shower and toilet</b> At least one combined unisex accessible shower and toilet for staff use has been provided on the lower Ground level.</p> <p><b>Ambulant Cubicles</b> Cubicles to suit the needs of people with reduced mobility have not yet been shown on the plans.</p> <p>Ambulant cubicles are to be provided within both male and female toilets.</p>

		<p><b>Assisted Toilets</b></p> <p>It is a client preference to provide toilets which allow for carer / nursing assistance within close proximity to the activity/ lounge/ dining areas.</p> <ul style="list-style-type: none"> <li>• Two (2) assistance toilets on the ground level.</li> <li>• One (1) assistance toilet on Level 03</li> </ul> <p><b>Paths of travel to sanitary facilities</b></p> <p>Plans show that the accessible sanitary facilities are located on a continuous accessible paths of travel in accordance with AS1428.1 (2021) including:</p> <ul style="list-style-type: none"> <li>• Width</li> <li>• Door circulation</li> <li>• Distance between successive door leaves on an accessible path of travel</li> </ul> <p><u>Recommended Action</u></p> <p>At Construction Certificate Stage ensure</p> <ol style="list-style-type: none"> <li>1. Circulation space both for facilities and on pathways to facilities is provided between finished wall surfaces</li> <li>2. Fixtures and fittings within the accessible and ambulant toilets comply with AS1428.1 (2021)</li> <li>3. Wall strengthening as required to meet force requirements of fittings such as grabrails</li> <li>4. As equal as possible distribution of right and left hand transfer accessible toilets for compliance with BCA Part F4D5(g)</li> </ol>
--	--	---

## 4 Conclusion



Based on our assessment, we confirm that the S4.55 submission plans for the Opal St Ives Botanica - Residential Care Facility, meet the Performance Requirements of the Disability (Access to Premises-Buildings) Standards 2010 and Part D4 of the Building Code of Australia 2022 Amdt 2. This compliance is achieved through a combination of deemed-to-satisfy provisions and performance solutions.

We note that further assessment will be required at the Construction Certificate stage to ensure adequate access compliance, as highlighted in the table below.

Item	Recommended Action
1	<p>Determine whether a performance solution is required for the following:</p> <ul style="list-style-type: none"> <li>• not providing handrails on one side of corridors in accordance with the requirements of BCA Part D3D22 and AS1428.1 (2021).</li> <li>• not providing nine (9) accessible sole occupancy units in accordance with Table D4D2b</li> </ul>

	<p>and AS1428.1 (2021).</p> <ul style="list-style-type: none"> <li>● For an alternative design response to tactile indicators where pedestrian paths and vehicular paths meet at the main entry.</li> </ul>
2	All internal accessible paths of travel, including to and within areas required to be accessible, comply with AS1428.1 (2021) for width, gradient, crossfall and turning spaces (as listed above)
3	<p>Doors have compliance with BCA D2D9 and AS1428.1 (2021) with respect to:</p> <ul style="list-style-type: none"> <li>● Minimum clear openings <ul style="list-style-type: none"> <li>○ Resident use areas doorways to have a clear opening of 870mm</li> <li>○ Doorways from public corridor to sole occupancy units to have a minimum unobstructed width of 1070mm</li> </ul> </li> <li>● Circulation space</li> <li>● Luminance contrast of doorway elements</li> <li>● Door force is 20N including where a door closer is fitted</li> <li>● Compliant door hardware</li> <li>● Level threshold</li> </ul>
4	<p>Visual indicators on glazing to comply with AS1428.1 - 2021 including</p> <ul style="list-style-type: none"> <li>● be 75mm wide on all glazed windows and doors</li> <li>● Solid luminance contrast of minimum 30% from when viewed against the floor surface at a height 900-1000mm.</li> </ul>
5	<p>Accessible signage to be provided in accordance with BCA 2022 Amdt 2 and AS1428.1 - 2021 for:</p> <ol style="list-style-type: none"> <li>1. Required exit doors stating 'Exit' and 'Level' followed by floor number.</li> <li>2. Common area accessible sanitary facilities</li> <li>3. Areas and rooms with hearing augmentation</li> </ol>
6	<p>Slip resistant floor surface as per AS/NZS4586</p> <p>Provide Slip resistance certificates for paving and floor surfaces which are on an accessible path of travel or in areas required to be accessible - As per Table 3B, HB198:2014 - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC does not require slip resistance</p>
7	<p>The lifts to have dimensions and accessible features in accordance with BCA 2022 Amdt 2</p> <ul style="list-style-type: none"> <li>● Design and fittings in accordance with AS1735 including: <ul style="list-style-type: none"> <li>○ Lighting</li> <li>○ Control buttons - lift landing</li> <li>○ Control buttons - lift car</li> <li>○ Audible information</li> <li>○ Emergency hands free communication</li> <li>○ Passenger protection system</li> <li>○ Handrail</li> </ul> </li> </ul>

**Statement of Qualifications**

	<b>Prepared by</b>
Full Name	Christine Boesenberg née Cheung
Position Title	Managing Director/ Disability Access Consultant
Company Name	Cheung Access Pty Ltd Trading as Inclusive Places
Company Address	GPO Box 1380, Sydney NSW 2001
Qualifications and Accreditations	<p>B. App Sc (Occupational Therapy), Masters of Environmental Studies  Registered Occupational Therapist (Occupational Therapy Board/ AHPRA)  Accredited with the Access Consultants Association</p> 
Signature	 <p><b>Declaration:</b>  I declare that I am an appropriately qualified and competent person practising in the relevant area of work. I have recognised relevant experience in the area of work assessing disability access compliance and hold appropriately current insurance policies.</p>
Date	18 November 2025

# Appendix A: Report Documentation Relied Upon

The following documentation has been reviewed, referenced, and relied upon in preparing this report: Architectural drawings provided by Group GSA Architects, as detailed in the screenshot below:

Sheet Number	Sheet Name	Current Revision
DA 0000	DRAWING SCHEDULE & SITE LOCATION PLAN	F
DA 0001	SITE PLAN	F
DA 1000	DEMOLITION PLAN	E
DA 2001	LOWER GROUND LEVEL	I
DA 2002	GROUND LEVEL	I
DA 2003	LEVEL 01	I
DA 2005	LEVEL 02	I
DA 2007	LEVEL 03	I
DA 2008	ROOF	H
DA 3000	ELEVATION - OVERALL	G
DA 3001	ELEVATION - FOH	G
DA 3010	ELEVATION - COMMUNAL COURTYARD 01	G
DA 3011	ELEVATION - COMMUNAL COURTYARD 02	G
DA 3012	ELEVATION - COMMUNAL COURTYARD 03	G
DA 3013	ELEVATION - COMMUNAL COURTYARD 04	G
DA 3014	ELEVATION - COMMUNAL COURTYARD 05	B
DA 3015	ELEVATION - COMMUNAL COURTYARD 06	B
DA 3100	SECTIONS - OVERALL	F
DA 3100A	SECTIONS - OVERALL	D
DA 3101	SECTIONS - SOUTH WEST CORNER	F
DA 3102	SECTIONS - SOUTH WEST CORNER	F
DA 3103	SECTIONS - NORTH EAST CORNER	E
DA 3104	SECTIONS - EXISTING SWIMMING POOLS	C
DA 3110	SECTIONS 01 - RAMP	D
DA 3111	SECTIONS 02 - ACOUSTIC WALL	D
DA 3120	SECTIONS 03 - NEIGHBOUR BUILDINGS	D
DA 3121	SECTIONS 03 - NEIGHBOUR BUILDINGS	D
DA 3122	SECTIONS 03 - NEIGHBOUR BUILDINGS	D
DA 3123	SECTIONS 04 - NEIGHBOUR BUILDINGS	D
DA 3124	SECTIONS 04 - NEIGHBOUR BUILDINGS	D
DA 3125	SECTIONS 04 - NEIGHBOUR BUILDINGS	D
DA 3126	SECTIONS 05 - NEIGHBOUR BUILDINGS	D
DA 3130	SECTIONS 06 - TYPICAL SECTION DETAILS	D
DA 3140	SECTIONS 07 - MAJOR TREES - TREE K	C
DA 8000	MATERIAL & FINISHES - 01	B
DA 8001	MATERIAL & FINISHES - 02	B
DA 9000	GFA	E
DA 9001	9.5M MAX HEIGHT PLANE	D
DA 9002	11.5M MAX HEIGHT PLANE	D
DA 9003	ROOF PLANT EXCEEDING 9.5M MAX HEIGHT	D
DA 9004	3RD STOREY 45 DEGREE REAR & SIDES	D
DA 9010	SHADOW ANALYSIS - 21ST JUNE	E
DA 9011	SHADOW ANALYSIS - 21ST JUNE	E
DA 9012	SHADOW ANALYSIS - 21ST JUNE	E
DA 9013	SHADOW ANALYSIS - 23RD SEP	E
DA 9014	SHADOW ANALYSIS - 23RD SEP	E
DA 9015	SHADOW ANALYSIS - 23RD SEP	E
DA 9016	SHADOW ANALYSIS - 23RD DEC	E
DA 9017	SHADOW ANALYSIS - 23RD DEC	E
DA 9018	SHADOW ANALYSIS - 23RD DEC	E
DA 9019 A	SHADOW ANALYSIS - 21ST MAR	D
DA 9019 B	SHADOW ANALYSIS - 21ST MAR	D
DA 9019 C	SHADOW ANALYSIS - 21ST MAR	D
DA 9020	SUN EYE VIEW - 21ST - MAR - 01	D
DA 9021	SUN EYE VIEW - 21ST - MAR - 02	D
DA 9022	SUN EYE VIEW - 21ST - APR - 01	D
DA 9023	SUN EYE VIEW - 21ST - APR - 02	D
DA 9024	SUN EYE VIEW - 21ST - MAY - 01	D
DA 9025	SUN EYE VIEW - 21ST - MAY - 02	D
DA 9026	SUN EYE VIEW - 21ST - JUN - 01	D
DA 9027	SUN EYE VIEW - 21ST - JUN - 02	D
DA 9027 B	SUN EYE VIEW - 21ST - JUN - WING 1	C
DA 9027 C	SUN EYE VIEW - 21ST - JUN - WING 1	C
DA 9027 D	SUN EYE VIEW - 21ST - JUN - WING 2	C
DA 9027 E	SUN EYE VIEW - 21ST - JUN - WING 2	C
DA 9027 F	SUN EYE VIEW - 21ST - JUN - WING 3	C
DA 9027 G	SUN EYE VIEW - 21ST - JUN - WING 3	C
DA 9027 H	SUN EYE VIEW - 21ST - JUN - WING 4	C
DA 9027 I	SUN EYE VIEW - 21ST - JUN - WING 4	C
DA 9028	SUN EYE VIEW - 21ST - JULY - 01	D
DA 9029	SUN EYE VIEW - 21ST - JULY - 02	D
DA 9030	SUN EYE VIEW - 21ST - AUG - 01	D
DA 9031	SUN EYE VIEW - 21ST - AUG - 02	D
DA 9032	SUN EYE VIEW - 21ST - SEP - 01	D
DA 9033	SUN EYE VIEW - 21ST - SEP - 02	D
DA 9034	SUN EYE VIEW - 21ST - DEC - 01	D
DA 9035	SUN EYE VIEW - 21ST - DEC - 02	D
DA 9036	SOLAR ACCESS - 21ST JUNE - 9AM-3PM	D
DA 9037	SOLAR ACCESS - 21ST JUNE - 9AM-3PM	C
DA 9040	TYPICAL ROOM LAYOUT - SINGLE 01 - PREMIUM	B
DA 9041	TYPICAL ROOM LAYOUT - SINGLE 02 - PREMIUM	B
DA 9042	TYPICAL ROOM LAYOUT - SINGLE 03 - PREMIUM	B
DA 9043	TYPICAL ROOM LAYOUT - SINGLE 04 - PREMIUM	A
DA 9045	TYPICAL ROOM LAYOUT - SINGLE 05 - LARGE	B
DA 9046	TYPICAL ROOM LAYOUT - SINGLE 06 - LARGE	A
DA 9047	TYPICAL ROOM LAYOUT - SUITE - 01	B
DA 9050	SITE COVERAGE	D
DA 9051	COMMUNAL OPEN SPACE	D
DA 9051 B	COMMUNAL OPEN SPACE	C
DA 9052	COMMUNAL INTERNAL SPACE	D
DA 9052 B	COMMUNAL INTERNAL SPACE	C
DA 9053	DEEP SOIL	B
DA 9060	DCP SETBACK - MONA VALE ROAD	D
DA 9061	DCP SETBACK - FLINDERS AVENUE	B
DA 9062	DCP SETBACK & BUILDING SEPARATIONS	C
DA 9080	EXTERNAL SIGNAGE DETAILS	B
DA 9090	VIEW ANALYSIS TOWARD NEIGHBOURS - HOME H	A
DA 9091	VIEW ANALYSIS TOWARD NEIGHBOURS - HOME I	A

Grand total: 98

Reference Number: P000958

Section 4.55 -Disability Access Report for Opal St. Ives Botanica