



STATE SIGNIFICANT DEVELOPMENT ASSESSMENT

ACCESSIBILITY REPORT

AMOEBA ACCESS PTY LTD

Project: 2A Llewellyn Street, Rhodes NSW 2138
Document Type: State Significant Development Assessment
Our Reference: P2024_2807-3 (SSDA) YW & DC

The following report reflects the review of the SSDA architectural documentation of the proposed development and issue(s) of report(s) undertaken by [Amoeba Access Pty Ltd](#).

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Revision History—

OUR REFERENCE	REMARKS	ISSUE DATE
P2024_0205 -1 (SSDA) YW & DC	Draft report issued to client	2 May 2025
P2024_0907-2 (SSDA) YW & DC	Final report issued to client	9 July 2025
P2024_2807-3 (SSDA) YW & DC	Revised final report to incorporate additional amendments	28 July 2025

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EXECUTIVE SUMMARY

This Accessibility Assessment Report has been prepared by **Amoeba Access** to accompany a detailed State Significant Development Assessment (SSDA) for the in-fill affordable housing development at 43 – 57 Blaxland Road, 2A, 2B and 2D Cavell Avenue, 448-458 Concord Road and 2A Llewellyn Street, Rhodes. The site is made up of multiple lots. The legal description is outlined in Table 1.

Table 1 - Legal Description of the Site

Property Address	Title Description
43B – 57 Blaxland Road, Rhodes 2A, 2B and 2D Cavell Avenue, Rhodes 448-458 Concord Road, Rhodes 2A Llewellyn Street, Rhodes	Blaxland Road - Lot A in DP 348494, Lot A in DP 350757, Lot B in DP 350757, Lot C in DP 350757, Lot 29 in DP 5923, Lot 1 in DP 874487, Lot 2 in DP 874487, Lot 2 in DP 218467, Lot 1 in DP 218467, Lot A in DP 339030, Lot 25 in DP 5923 Cavell Ave - Lot 3 in DP 310311, Lot 480 in DP 816840, Lot 481 in DP 816840 Concord Road - Lot 3 in DP 805684, Lot 2 in DP 805684, Lot 12 in DP 792101, Lot 13 in DP 792101, Lot 14 in DP 792101, Lot 15 in DP 792101, Lot 16 in DP 792101, Lot 2 in DP 310311 Llewellyn Street - Lot B in DP 348494
Site Area	14.380 sqm

This report addresses the Secretary's Environmental Assessment Requirements (SEARs) issued for the project ([SSD-67508739](#)).

It concludes that the proposed development is suitable and warrants approval, satisfies and complies with accessibility provisions outlined in the Disability (Access to Premises - Buildings) Standards 2010 (Premises Standards), the National Construction Code – Building Code of Australia Volume 1, Edition 2022 (referred to as NCC 2022), the State Environment Planning Policy (Housing) 2021 (Housing SEPP), and the Apartment Design Guide (ADG). The report also recommends implementation of the following mitigation measures.

Table 2 - Mitigation Measures

In addition to a detailed assessment of the design against the NCC requirements, a preliminary performance-based assessment has been conducted. The adoption of a performance-based approach instead of compliance with the deemed-to-satisfy (DtS) provisions of the NCC will be communicated to relevant stakeholders and is subject to approval by the certifying authority.

The table below outlines scenarios where the implementation of a performance design may enhance the development, as an alternative to complying with prescriptive (DtS) provisions—

ITEM	PROPOSED PERFORMANCE SOLUTION	NCC DIS CLAUSE
1	The omission of latch-side clearance for a limited number of doorways may be addressed through a performance-based solution, such as compensating with a wider corridor width, or by referencing the reduced clearance provisions permitted under AS 1428.1:2001.	D4D2 (4)
2	A performance solution may be considered for the landscaped stairway in place of AS 1428.1:2009-stipulated stair provisions, subject to further details being provided and assessed.	D4D4 (a)(ii)
3	The provision of accessible parking bays and associated shared areas for the residential component of the development are in accordance with AS4299:1995, in lieu of the parking provisions stipulated under AS2890.6:2009.	D4D6
4	Where spatial limitations are a concern, a Performance Solution may be considered by installing domed buttons on the handrail extension in lieu of tactile ground surface indicators. This approach may be appropriate given the provision of 100% Livable Housing, where tactile indicators could pose a trip hazard for the ageing population and, in some cases, may also be considered an aesthetic concern.	D4D9
5	Due to a significant level difference along the south-eastern allotment boundary of the development site, particularly between South-East Concord and East Concord, where a stairway is currently proposed, a platform lift will be required. This will be delivered as a performance solution, as permitted under the National Construction Code (NCC) where Deemed-to-Satisfy provisions are limited.	E3D7

With respect to the assessment undertaken, the following items shall be reviewed further as the project advances to Building Approval stage.

ITEM	DESCRIPTION	RESPONSIBILITY
1	As design progresses, further details shall be provided to ensure compliance with the requirements of the NCC 2022 / AS1428.1-2009 is achieved, includes (but not limited to): - Accessible sanitary facilities detail - Ramp details - Accessible entry and exit to the communal swimming pool - Commercial passenger lifts details and specifications - Communication stairways/fire-isolated stairways detail - Slip-resistance rating details in the public / common areas within the development - Review as to how the existing public council footpath merges with the new pedestrian footpath of the development in regards to levels. Details are to be addressed as the development progresses to Building Approval stage noting that 1:20 gradient and crossfall of 1:40 shall be achieved.	Project Architect / Civil / Principal Contractor

1.0 INTRODUCTION

1.1 SSDA Submission

The application seeks consent for the development of an infill affordable housing project, which is the result of an Architectural Design Competition held in mid-2024. The competition yielded a high-quality urban design outcome that aligns with the desired future character of the Rhodes Precinct.

Specifically, the State Significant Development Application (SSDA) seeks consent for:

- Site preparation works, including demolition and removal of existing structures, as well as tree and vegetation removal.
- Bulk excavation to accommodate the basement structure and site remediation.
- Construction of seven (7) residential buildings, comprising:
 - Two (2) townhouse buildings ranging from four (4) to five (5) storeys (plus roof terraces), and
 - Five (5) residential flat buildings ranging from eight (8) to 29 storeys.
- Collectively, these buildings will include:
 - Nine (9) townhouses and 640 apartments, of which 15% will be dedicated to affordable housing.
 - Basement parking for private vehicles, visitors, and service vehicles.
 - Storage areas and building services.
 - Communal open spaces.
- Construction of a new public road connecting Blaxland Road and Cavell Avenue.
- Associated landscaping and public domain improvements.

The purpose of the project is to facilitate the growth of residential and affordable housing within the Rhodes Precinct, consistent with the Rhodes Precinct Plan.

This report has been prepared in response to the Secretary's Environmental Assessment Requirements (SEARs), dated 14 February 2025, issued for SSDA ([SSD-67508739](#)).

1.2 Site Location and Context

The site is located at 43–57 Blaxland Road, 2A, 2B and 2D Cavell Avenue, 448–458 Concord Road, and 2A Llewellyn Street, Rhodes, within the City of Canada Bay Local Government Area (LGA). The site is legally described in Table 1 above and is currently owned by Leeds Investment Pty Ltd.

The site has frontages to Blaxland Road, Cavell Avenue, Llewellyn Street, and Concord Road, and it is highly accessible by public transport, with Rhodes Train Station and multiple bus services located within easy walking distance.

Currently, the site accommodates multiple one and two-storey detached dwellings, which will be demolished to allow for the construction of the proposed residential flat buildings and terraces. The surrounding context is described below:

North: Directly north of the site is the St Mary & St Merkorious Coptic Orthodox Church and the Rhodes Community Centre, along with additional low-density, detached residential buildings.

East: To the east is Concord Road, and beyond that, residential development comprising detached dwellings and townhouses.

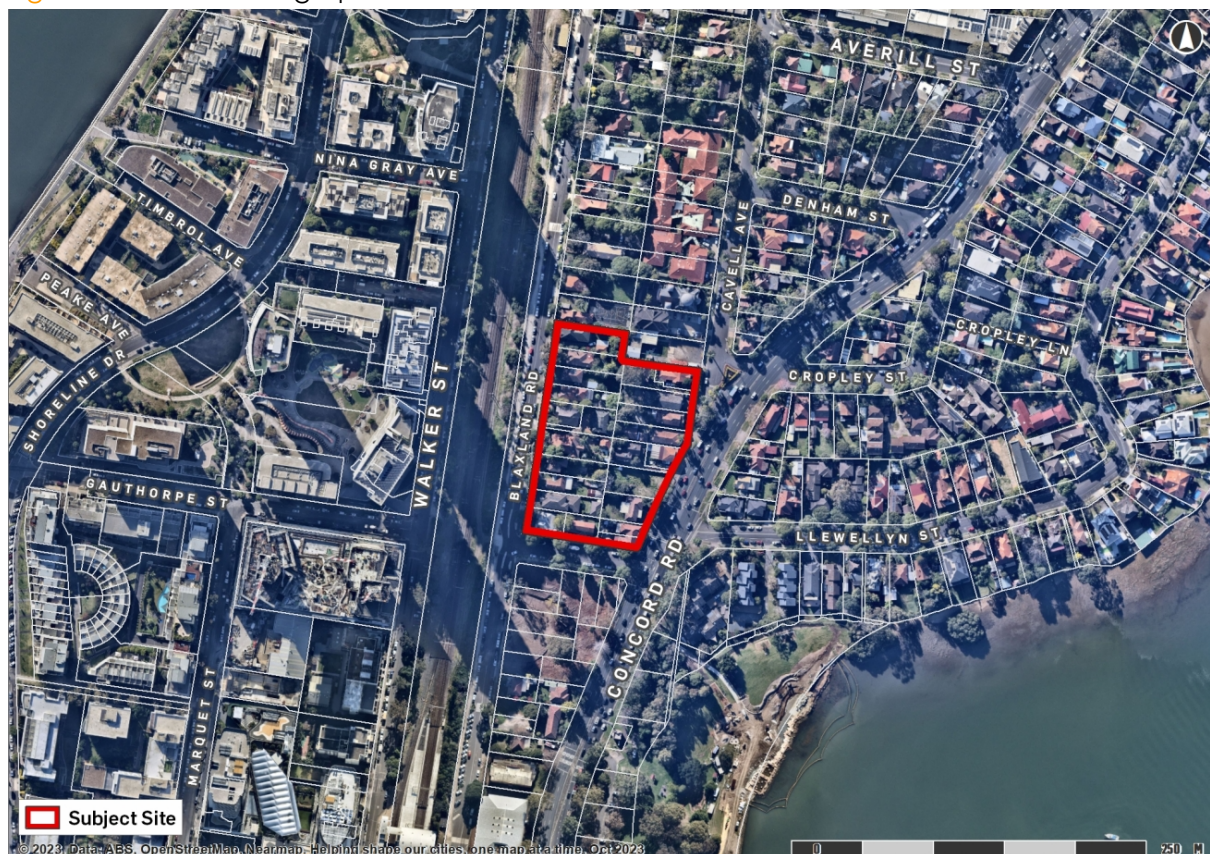
South: Immediately south of the site is a recently demolished property, where basement construction is underway. This site has an active development application (DA) with Canada Bay Council for a mixed-use development.

West: To the west is the T9 Northern rail line. Further west, across the railway line, lies the Rhodes West mixed-use precinct.

The site is located within Rhodes, which has been identified as an important Strategic Centre in the Eastern City District Plan, offering significant opportunities for the creation of new jobs and housing. Rhodes is situated approximately 12 km north-west of the Sydney CBD and about 7.5 km east of the Parramatta CBD. To the south of Rhodes is the Concord Health District, which includes a major public teaching hospital and various other health services.

The site benefits from excellent access to the arterial road network via Concord Road, which connects to key centres across Greater Sydney. Additionally, Rhodes Train Station, located nearby, is served by the T9 Northern Line, which runs from Hornsby through Rhodes to the Sydney CBD and north toward Gordon.

Figure 1 – Aerial Photograph



Source: Urbis

1.3 Development Particulars

This State Significant Development Assessment Report has been prepared by Amoeba Access at the request of the client and applicant, Leeds Investment Pty Ltd. It relates to the proposed large-scale residential development as described at [Section 1.1](#) above.

For the proposed development, 95% of the residential units & townhouses are designed to achieve the Livable Housing Silver Category, while 5% (32 units) are designed to achieve the Livable Housing Platinum Category, in accordance with the Livable Housing Guidelines. This provision exceeds the requirements mandated by the Housing SEPP (Apartment Design Guide) 2021.

The classification and use of the building(s) under the National Construction Code – Building Code of Australia Volume 1, Edition 2022 (hereinafter referred to as the NCC 2022) can be described as follows—

CLASSIFICATION	DESCRIPTION
Class 2	Multi-unit residential building
Class 7a	Parking
Class 7b	Storage
Class 10a	Accessible sanitary facility
Class 10b	Swimming pool

STOREYS CONTAINED (INCLUDING BASEMENT LEVELS)	
Eight (8) to 29 storeys and 4 basement levels	Multi-unit residential development
Four (4) to five (5) - storey townhouse	Multi-unit residential development

1.4 Purpose of Report

The purpose of this report is to identify the extent to which the architectural SSDA documentation complies with the accessibility provisions of the NCC 2022. These provisions are principally contained within Parts D4, E3D8, F4D5, State Environment Planning Policy (Housing) 2021 (Housing SEPP) and the Apartment Design Guide, the City of Canada Bay Development Control Plan 2023, and relevant Australian Standards.

1.5 Limitations

This report is based on, and limited to, the information depicted in the documentation provided for assessment and does not make any assumptions regarding design intentions or the like.

Furthermore, this assessment does not include comments on detailed design issues such as (but not limited to) luminance contrast, slip resistance, handrail design, door schedule and door hardware specification, location of fittings within sanitary compartments, and lift specification.

1.6 Report Exclusions

It is conveyed that this report should not be construed to infer that an assessment for compliance with the following has been undertaken—

- (i) Work Health & Safety Act and Regulations; and
- (ii) Work Cover Authority requirements; and
- (iii) Structural and Services Design Documentation; and
- (iv) Livable Housing Assessment (State Environment Planning Policy (Housing) 2021 (Housing SEPP) and Apartment Design Guide
- (v) Any parts of the NCC or any standards other than those directly referenced in this report.

1.7 Disability Discrimination Act 1992 (DDA)

The accessibility assessment process encompasses all aspects of the infrastructure (premises) necessary to meet the objectives of the Disability Discrimination Act 1992 (Cth). This includes, but is not limited to, Section 23, which pertains to access to premises and facilities that the public may enter or use.

The Act is primarily enforced through a complaint's mechanism, which enables individuals who have experienced unlawful discrimination, whether directly or indirectly, to seek a conciliated resolution through the Australian Human Rights Commission. In cases where conciliation is unsuccessful, individuals have the option to pursue legal action in the Federal Magistrates Court or the Federal Court of Australia.

In contrast to building regulations, the DDA is not prescriptive, and historically, there was a lack of uniformity between the building regulations in each State and Territory and the DDA. It became apparent that compliance with the National Construction Code – Building Code of Australia was insufficient to meet the objectives of the DDA.

However, subsection 31(1) of the DDA permits for the development of Disability Standards. This led to the implementation of the Disability (Access to Premises - Buildings) Standards 2010 (Premises Standards) and Disability Standards for Accessible Public Transport 2002 (DSAPT). It is unlawful to contravene the Disability Standards. However, if the Disability Standards are met, those responsible for the building cannot be subject to a successful complaint for the matters covered by the Standards.

The implementation of the Premises Standards, along with corresponding changes to the NCC, represents a significant step toward achieving equal access to premises and is crucial for promoting justice and social inclusion for people with disabilities. These standards will contribute to the creation of a more sustainable built environment that responds to the evolving needs of the broader Australian community.

It is important to note that the Premises Standards have a limited scope, focusing on aspects of building compliance governed by the NCC. While they address certain accessibility issues,

such as building design and construction, they do not cover all aspects, such as interior fit-out and fixtures. Consequently, features beyond the scope of the Standards may be subject to the general complaint's provisions of the DDA.

In this assessment, Amoeba Access will refer not only to the Disability (Access to Premises - Buildings) Standards 2010 (Premises Standards) but also to additional Accessibility Standards, both in draft and current Australian Standards. This approach aims to align with the spirit and intent of the DDA and ensure that best practice principles are applied for this project. A full list of references for this report is available upon request.

1.8 Report Structure

The report includes a Summary of Compliance Departures provided in the table under Section 2 below, for the reader's ease of reference and immediate attention. The issues summarized in Section 2 should be reviewed alongside the detailed assessment provided in Section 3 of the report, which further elaborates on compliance matters requiring consideration in design development and construction.

It is the responsibility of all design consultants to ensure compliance with relevant NCC access requirements, the [City of Canada Bay Development Control Plan 2023](#), Australian Standards, and Manufacturers Specifications. This report does not absolve the design consultants of their obligations to achieve compliance with the NCC. Furthermore, it does not relieve the certification authority of their statutory obligations to thoroughly assess the drawings before issuing Building Approval.

1.9 Documentation Provided for Assessment

This assessment is based upon the architectural SSDA documentation prepared by [fjstudio](#) and listed within [Appendix 1](#).

1.10 Assessment Overview and Interpretation

To provide the reader with additional context the following information regarding assessment methodology used in this report is provided below—

- (i) The following rooms / areas and associated accessways have been afforded the concession under D3.4 and access for people with disabilities need not be provided to these areas—
 - a. Plant and equipment rooms;
 - b. Fire control room;
 - c. Fire pump room
 - d. Services meters;
 - e. AC Condensers

- (ii) The building is a new development, therefore this report applies to new works only, as defined by the Disability (Access to Premises – Buildings) Standards 2010, hereinafter referred to as the Premises Standards;
- (iii) Loose furniture is the ongoing responsibility of the occupants who should maintain appropriate circulation spaces between and around furnishings;
- (iv) The internal fit out of the retail tenancy has not been included in this assessment;
- (v) For an assessment of the Livable Housing (Housing SEPP) provisions, refer to the report prepared by Amoeba Access [[reference P2024_2807-3 \(LHA\) YW & DC](#)].

2.0 NCC COMPLIANCE SUMMARY (METHODOLOGY)

2.1 NCC Overview and Interpretation

The following tables summaries the compliance status of the architectural design in terms of each *applicable* prescriptive provision of the NCC and indicates a **capability for compliance** ('COMPLIES') with the accessibility provisions of the NCC.

A detailed analysis and commentary are provided in **Section 3.0** of this report in the instance that prescriptive non-compliance occurs ('DOES NOT COMPLY') or further 'DESIGN DETAIL' is required. Such instances should not necessarily be considered NCC deficiencies, but rather matters which need to be considered by the design team, the certifying authority and all other relevant stakeholders as design progresses.

2.2 Part D4 – Access for People with a Disability

	NCC CLAUSE	SATISFACTORY	DOES NOT COMPLY	DESIGN DETAIL
D4D2	General building access requirements	✓		
D4D3	Access to buildings	✓		
D4D4	Parts of buildings to be accessible		Performance Solution	
D4D6	Accessible carparking		Performance Solution	
D4D7	Signage			✓
D4D8	Hearing augmentation		N/A	
D4D9	Tactile indicators		Performance Solution	
D4D10	Wheelchair seating spaces in Class 9b assembly buildings		N/A	
D4D11	Swimming pools			✓
D4D12	Ramps			✓
D4D13	Glazing on an accessway			✓

2.3 Part E3 – Lifts Installations

	NCC CLAUSE	SATISFACTORY	DOES NOT COMPLY	DESIGN DETAIL
E3D7	Passenger lift types and their limitation		Performance Solution	
E3D8	Accessible feature required for passenger lifts			✓

2.4 Part F4 – Sanitary and Other Facilities

NCC CLAUSE		SATISFACTORY	DOES NOT COMPLY	DESIGN DETAIL
F4D5	Accessible sanitary facilities			✓
	Sanitary facilities for people with ambulant disabilities		N/A	
F4D12	Accessible adult change facilities		N/A	

2.5 Part G7 – Livable Housing Design

NCC CLAUSE		SATISFACTORY	DOES NOT COMPLY	DESIGN DETAIL
G7D2	Livable housing design	100%		
	Each sole-occupancy unit in a Class 2 building must comply with the ABCB Standard for Livable Housing Design, except for Part 1	100% (ADG)		

3.0 NCC ASSESSMENT AND FINDINGS

3.1 General

With reference to the Design Assessment Summary contained in [Section 2.0](#) above, the following analysis and commentary is provided.

In all instances, reference is also made to [Appendix 2](#), which contains design guidance and other items which shall be coordinated by the relevant stakeholders as design progresses to Building Approval stage to ensure compliance with the deemed-to-satisfy (DtS) accessibility provisions of the NCC is achieved.

3.2 Part D4 – Access for People with a Disability

3.2.1 Clause D4D2 – General building access requirements

BUILDING CLASS	ACCESSIBILITY REQUIREMENTS
Class 2	For a Class 2 building, common areas are to be accessible as follows: a) From a pedestrian entrance required to be accessible to at least 1 floor containing sole-occupancy units and to the entrance doorway of each sole-occupancy unit located on that level. b) To and within not less than 1 of each type of room or space for use in common by the residents, including a cooking facility, sauna, gymnasium, swimming pool, common laundry, games room, individual shop, eating area, or the like. c) Where a ramp complying with AS 1428.1 or a passenger lift is installed— to the entrance doorway of each sole-occupancy unit; and to and within rooms or spaces for use in common by the residents. d) The requirements of (c) only apply where the space referred to in (c)(i) or (ii) is located on the levels served by the lift or ramp.
Class 7a	Access must be provided to and within any level containing accessible carparking spaces.
Class 7b	Access is required to and within all areas normally used by the occupants.
Class 10b	Access is required to and into swimming pools with a total perimeter greater than 40 m, associated with a Class 2, 5, 6, 7a or 9b building that is required to be accessible.

Access to and into swimming pools for the exclusive use of occupants of a sole-occupancy unit in a Class 2 building is not required to be provided.

3.2.2 Clause D4D2 – Access to buildings

The site enjoys proximity to Concord Road (A3) which facilitates easy access to the M4 Motorway and Victoria Road, connecting Rhodes to strategic locations across Greater Sydney, including Sydney Olympic Park, Parramatta, Macquarie Park, Drummoyne and the Sydney CBD.

It is also close to commercial zones, such as the retail areas around Rhodes Waterside, a shopping center with a variety of retail and dining options, and Homebush Bay Drive, which is home to office buildings, retail outlets, and services. The Rhodes Peninsula development further enhances the area's appeal with its mixed-use spaces, creating a vibrant environment for both residential and business purposes.

The area surrounding the site also has notable environmental considerations due to its proximity to the Parramatta River, an essential feature within the broader Sydney Harbour Catchment. This close proximity requires flood management considerations, especially during storm surges or extreme weather events. Additionally, the area's relatively flat topography reduces the risk of landslides or steep terrain-related hazards but still necessitates effective drainage infrastructure to manage rainfall runoff. The information provided is considered adequate for the purposes of the SSDA.

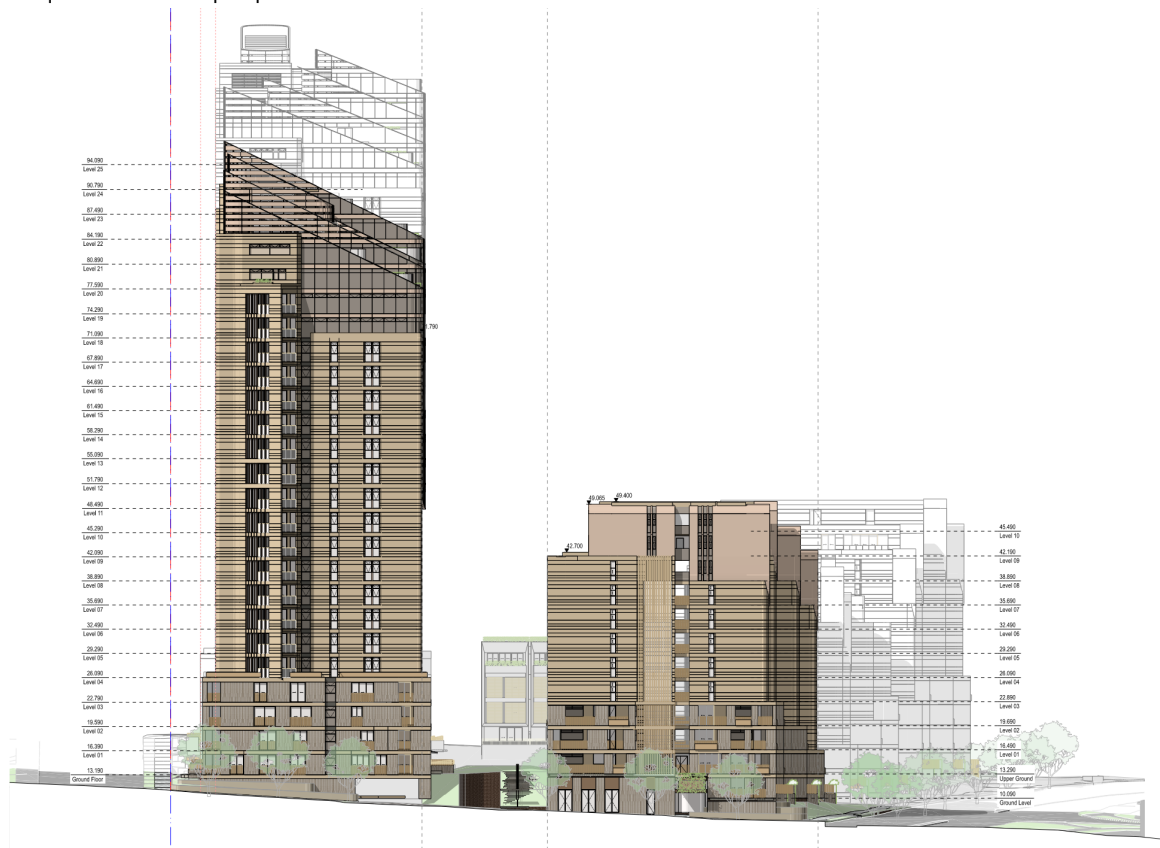


Figure 4 – Proposed principal pedestrian access routes from Llewellyn St

The proposed development comprises the construction of seven (7) residential buildings, including two (2) four (4) to five (5)-storey townhouse buildings (plus roof terraces) and five (5) residential flat buildings ranging in height from eight (8) to 29 storeys.

The development includes a total of nine (9) townhouses and 640 apartments, with 15% designated as affordable housing. It features communal open spaces with amenities such as swimming pool(s), communal playground, and garden areas. Access to these communal spaces is restricted to residents and provided via commercial-grade passenger lifts.

All residential units are accessible directly from both the basement and ground levels via commercial-grade lifts serving the respective entrances.

Given the substantial size of the site, the travel distance between all pedestrian site entries exceeds 50 metres. Therefore, all paths of travel must be fully accessible in accordance with relevant standards.

The information provided is considered adequate for the purposes of the SSDA.

3.2.3 Clause D4D4 – Parts of the building to be accessible

The overall provision is capable of meeting the code requirements. The following comments are provided in regards the requirements of Clause D4D4 of the NCC—

DESCRIPTION	COMPLIANCE DEPARTURE	RESOLUTION
Stairway between South-East Concord and East Concord	There is a significant level difference from the south-east allotment boundary into the development site, particularly between South-East Concord and East Concord, where a stairway is currently proposed.	Stairway to comply with Clause 11 of AS1428.1:2009.

Refer to [Appendix 2](#) below for further design guidance

The subject development shall satisfy the provision as specified above as the project progresses.

3.2.4 Clause D4D5 – Exemptions

Refer to [Section 1.8](#) above for areas afforded the concession under D4D5.

3.2.5 Clause D4D6 – Accessible carparking

All Classifications of the premises, particularly the commercial component relevant to the development, shall be provided with accessible parking bays and shared areas in accordance with the ratio mandated under NCC D4D6.

The following comments are provided in regards the requirements of Clause D4D6 of the NCC—

DESCRIPTION	COMPLIANCE DEPARTURE	RESOLUTION
Headroom height of the accessible parking bays	Information provided is adequate for SSDA submission.	As design progresses to BA stage, review is required for the headroom height provision, details are as below: - A head height clearance of a minimum 2500mm is required to accessible car spaces and shared areas. This may be reduced to 2200mm within 1000mm of the front of the space, and to 1800mm within 500 mm of the front of the space.
Accessible parking provisions	A 3800mm-wide accessible parking bay is proposed for each of the 5% (32bays) Livable Housing Platinum Category dwellings as a performance-based solution.	A Performance-Based Design Brief and Performance Solution Report will be prepared to justify the proposed departure.

Refer to [Appendix 2](#) below for further design guidance

3.2.6 Clause D4D7 – Signage

Signage details have not yet been provided for assessment.

Wayfinding signage, including directional signage, is to be incorporated as the design progresses to the Building Approval (BA) stage, to ensure compliance with the signage requirements of the Canada Bay DCP prior to BA lodgement.

The following comments are provided in regards the requirements of Clause D4D7 of the NCC—

DESCRIPTION	COMPLIANCE DEPARTURE	RESOLUTION
Signage	Information in relation to signage is required and shall be provided prior to the Building Approval.	Braille and tactile signage complying with NCC Specification D4D7 and incorporating the international symbol for access or

		deafness as appropriate, must be provided to identify the following: - Each sanitary facility; - Accessible unisex facilities and indicate whether the facility is suitable for left or right-handed use; - Each door required by NCC Clause E4D5 to be provided with an exit sign and state "EXIT" and the floor level number.
Wayfinding signage	Information in relation to wayfinding signage is required and shall be provided prior to the Building Approval.	As per the Canada Bay DCP, developments near the Parramatta River must contribute to improved access to the river and ferry wharves by providing publicly accessible through-site links for pedestrian access, along with appropriate wayfinding signage.

Refer to [Appendix 2](#) below for further design guidance

3.2.7 Clause D4D8 – Hearing augmentation

Not applicable to the subject development.

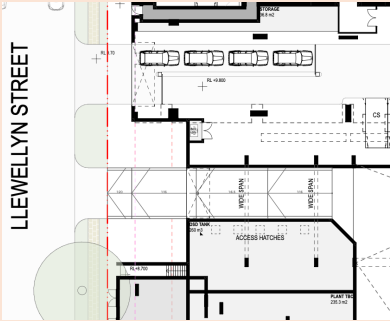
3.2.8 Clause D4D9 – Tactile indicators

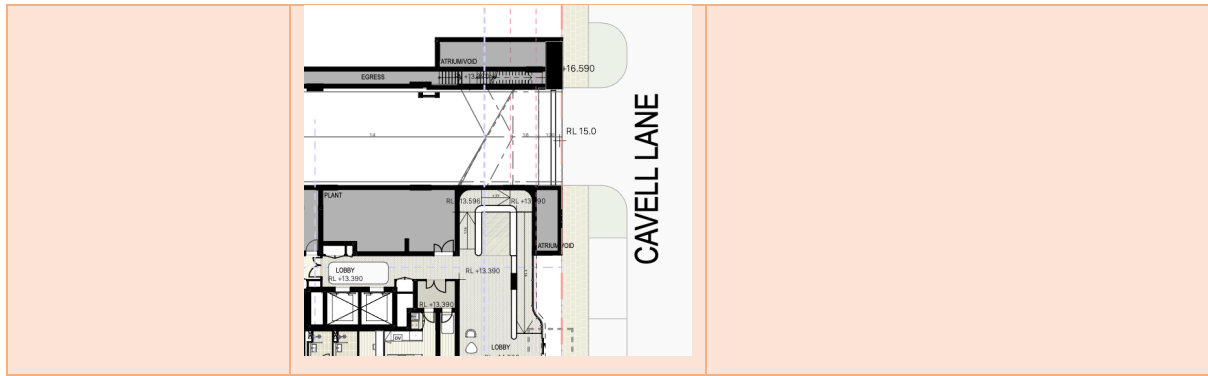
The provision of tactile indicators is not yet documented on the SSDA plans; further details are to be finalised as the as the design progresses to the Building Approval stage.

Warning tactile indicators are also required where a pedestrian accessway intersects with a vehicular access point, such as a waste collection vehicle route, particularly where the pedestrian path and carriageway are at the same level.

The following comments are provided in regards the requirements of Clause D4D9 of the NCC—

DESCRIPTION	COMPLIANCE DEPARTURE	RESOLUTION
Northeast building entrance ramp	Tactiles indicators are required at the handrails of the ramp. Alternatively, where spatial limitations are a concern, a Performance Solution may be	A performance solution may be considered for the installation of a domed button. Other alternatives may also be considered in lieu of tactile indicators for Universal Design and

	considered by installing domed buttons on the handrail extension in lieu of tactile ground surface indicators. This approach may be appropriate given the provision of 100% Livable Housing, where tactile indicators could pose a trip hazard for the ageing population and, in some cases, may also be considered an aesthetic concern.	aesthetic purposes, such as the use of braille on handrails to identify destinations as a performance-based solution.
Northeast building entrance stairway	Tactile indicators are required at the handrails of the stairway.	A performance solution may be considered for the installation of a domed button. This approach may be appropriate given the provision of 100% Livable Housing, where tactile indicators could pose a trip hazard for the ageing population and, in some cases, may also be considered an aesthetic concern.
Llewellyn Street and Cavell Lane vehicular access - Warning tactile indicators	Warning tactile indicators are also required where a pedestrian accessway intersects with vehicular access, such as waste collection vehicles routes or basement parking access, particularly where the pedestrian path and carriageway appear to be at the same level. 	As the design progresses, warning tactile indicators should be documented in the Building Approval documentation.



3.2.9 Clause D4D10 – Wheelchair seating spaces in Class 9b assembly buildings

Not applicable to the subject development.

3.2.10 Clause D4D11 – Swimming pools

A communal swimming pool is located on Level 6 of COS Terrace. It appears that the perimeter of the pool, excluding the shallow kids' pool, is under 40 metres, in which case an accessible means of water entry and exit is not required.

3.2.11 Clause D4D12 – Ramps

A ramped access is provided and located on the ground floor entrance of the Northeast building.

The information provided is considered adequate for the purposes of the SSDA.

3.2.12 Clause D4D13 – Glazing on an accessway

Visual indicators have not yet been detailed within the design documentation.

Details such as the glazing schedule can be provided as the project develops and be reviewed to establish whether compliance can be established prior to Building Approval.

3.3 Part E3 – Lift Installations

3.3.1 Clause E3D7 – Lift access for people with a disability

Twelve (12) passenger lifts are proposed to serve the residential component of the development. The southwest and east towers are each proposed to be serviced by three (3) lifts, while the remaining buildings will be provided with two (2) lifts each.

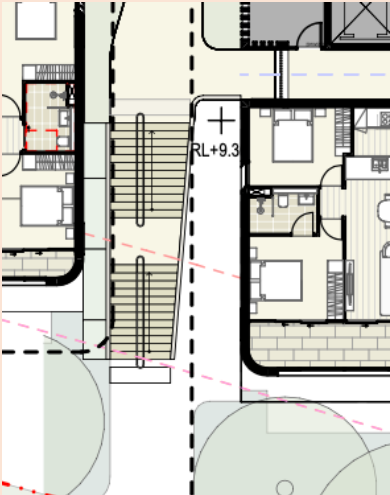
All proposed lifts will be commercial-grade passenger lifts with a minimum internal car size of 1400 mm (W) x 1600 mm (L). These lifts will form part of a continuous accessible path of travel

from the basement parking areas throughout the development site, supporting accessibility in accordance with NCC 2022 and the City of Canada Bay Development Control Plan (DCP) 2023.

Details regarding stretcher accommodation within lift cars are addressed in the accompanying BCA report.

All lifts are required to comply with NCC Clause E3D8 and AS 1735.12-1999, as applicable to the specific lift type.

The following comments are provided in regards the requirements of Clause E3D7 of the NCC—

DESCRIPTION	COMPLIANCE DEPARTURE	RESOLUTION
A platform lift may be required between South-East Concord and East Concord	Due to a significant level difference along the south-eastern allotment boundary of the development site, particularly between South-East Concord and East Concord, where a stairway is currently proposed a platform lift will be required. This will be delivered as a performance solution, as permitted under the National Construction Code (NCC) where Deemed-to-Satisfy provisions are limited. 	A suitable lift access performance solution will be developed as the design progresses.

As the design progresses to the Construction Certificate stage, lift shop drawings must be submitted for review prior to the final Building Approval. Please refer to Appendix 2 for further design guidance and lift specifications.

3.4 Part F4 – Sanitary and Other Facilities

3.4.1 Clause F4D5 Accessible sanitary facilities

No accessible sanitary facility is provided in the communal common space within the development at the time of our review.

3.4.2 Sanitary compartment for people with ambulant disabilities

At the time of our review, no ambulant sanitary facility was identified within the common areas of the development.

3.4.3 Clause D4D12 – Accessible adult change facilities

Not applicable to the subject development.

3.5 Part G7 – Livable Housing Design

3.5.1 Clause G7D2 – Livable housing design

This is not applicable to the subject development, as it is located within the NSW jurisdiction.

However, the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) and the Apartment Design Guide contain a state wide mandatory provision requiring 20% of units to meet the silver level of the Livable Housing Design Guide, which is essentially equivalent to or above the G7 provisions under the NCC that came into effect on October 1, 2023.

Notwithstanding the above, the design team has proposed to provide 100% Livable Housing within the development, comprising 95% Silver category apartments and 5% Platinum level housing. This initiative aims to cater to people of all abilities, support the government's 'aging in place' policy, and help address the shortage of aged care facilities.

For assessment details related to the Livable Housing provisions, please refer to [P2024_2807-3 \(LHA\) YW & DC](#).

4.0 CONCLUSION

4.1 General

Based upon our assessment to date we are of the opinion that the subject development is capable of achieving compliance with the relevant accessibility provisions of the National Construction Code – Building Code of Australia Volume 1, Edition 2022 and the City of Canada Bay Development Control Plan 2023, subject to the comments provided in Section 3.0 and the design detail contained in Appendix 2.

Compliance can be achieved either by meeting the deemed-to-satisfy requirements of the NCC, as are principally contained within Parts D4, E3D8 and F4D5 or via a performance-based approach.

We trust that the above information is sufficient for the consent authority in assessing the merit of the architectural design from a planning perspective.

If there are any queries regarding this report, please do not hesitate to contact the undersigned.

Report By



Yolanda Wang

M Arch | Grad Dip Bld Envt (Bldg Surv)

AMOEBA ACCESS Pty Ltd

ACA Australia, Accredited Member: 600

APPENDIX 1 – Documentation Provided for Assessment

This accessibility assessment was based upon the architectural documentation prepared by **fjcstudio** namely—

DRAWING	REV	TITLE	DATE
DA-10B1	01	Overall Basement 01	11/7/2025
DA-10B2	01	Overall Basement 02	11/7/2025
DA-10B3	01	Overall Basement 03	11/7/2025
DA-10B4	01	Overall Basement 04	11/7/2025
DA-1000	01	Overall Level 00	11/7/2025
DA-1001	01	Overall Level 01	11/7/2025
DA-1002	01	Overall Level 02 (Low Typical)	11/7/2025
DA-1003	01	Overall Level 03	11/7/2025
DA-1004	01	Overall Level 04	11/7/2025
DA-1005	01	Overall Level 05	11/7/2025
DA-1006	01	Overall Level 06	11/7/2025
DA-1007	01	Overall Level 07	11/7/2025
DA-1008	01	Overall Level 08	11/7/2025
DA-1009	01	Overall Level 09	11/7/2025
DA-1010	01	Overall Level 10	11/7/2025
DA-1011	01	Overall Level 11	11/7/2025
DA-1012	01	Overall Level 12	11/7/2025
DA-1013	01	Overall Level 13	11/7/2025
DA-1014	01	Overall Level 14	11/7/2025
DA-1015	01	Overall Level 15	11/7/2025
DA-1016	01	Overall Level 16 (High Typical)	11/7/2025
DA-1017	01	Overall Level 17	11/7/2025
DA-1018	01	Overall Level 18	11/7/2025
DA-1019	01	Overall Level 19	11/7/2025
DA-1020	01	Overall Level 20	11/7/2025
DA-1021	01	Overall Level 21	11/7/2025
DA-1022	01	Overall Level 22	11/7/2025
DA-1023	01	Overall Level 23	11/7/2025
DA-1024	01	Overall Level 24	11/7/2025
DA-1025	01	Overall Level 25	11/7/2025
DA-1026	01	Overall Level 26	11/7/2025
DA-1027	01	Overall Level 27	11/7/2025
DA-1028	01	Overall Level 28	11/7/2025

APPENDIX 2 – Design Checklist – Prescriptive Requirements

The following design guidance checklist is provided for implementation and coordination during construction in order to achieve compliance with the prescriptive requirements of the NCC 2022, AS1428.1-2009, AS/NZS1428.4.1:2009, AS1735.12-1999 and AS/NZS2890.6:2009.

EXTERNAL ACCESSWAYS	
1	Provide an accessible path of travel compliant with AS1428.1 from all main pedestrian entry points at the site boundary to the principal pedestrian entrance/s of the building.
2	For multiple building entries, ensure an accessible path of travel, compliant with AS1428.1 to and through 50% of entrances. Irrespective of the above, the principal pedestrian entrance shall be in accordance with AS1428.1.
3	Ensure any direct pedestrian accessways (i.e. not public footpath) from associated accessible buildings are compliant with AS1428.1.
4	Provide an accessible path of travel, compliant with AS1428.1 from accessible car parking spaces on the site.

ACCESS TO BUILDINGS	
1	Ensure a non-accessible entry is not more than 50 metres from an accessible entry (buildings >500m ²).
2	Provide level landing areas (1:40 max. gradient and crossfall) at doorway circulation areas and landings for changes in direction.
3	A doorway on an accessway shall achieve a minimum 850mm clear opening width and be provided with circulation spaces in accordance with Clause 13 of AS1428.1-2009.
4	Any doorways on an accessway shall comply with Clause 13 of AS1428.1-2009.
5	Any stairways at the building entry shall comply with Clause 11 of AS1428.1-2009.
6	Any ramps at the building entry shall comply with Clause 10 of AS1428.1-2009.

PATHS OF TRAVEL	
1	Provide 1000mm min. width of path of travel compliant with AS1428.1-2009.
2	An accessway shall be provided with turning spaces in accordance with AS1428.1-2009 where required.
3	Floor finishes shall be in accordance with AS1428.1-2009. Reference is also made to NCC Clause D3D15 in regards slip resistance.
4	Any doorways on an accessway shall comply with Clause 13 of AS1428.1-2009.
5	Any stairways (except a fire-isolated stairway) shall comply with Clause 11 of AS1428.1-2009.
6	A fire-isolated stairway shall comply with Clause 11.1 (f) and (g) of AS1428.1-2009, relating to the provision of luminance contrasting strip at each tread.
7	Any ramps (except a fire-isolated ramp) shall comply with Clause 10 of AS1428.1-2009.

8	Any stairways or ramps in an area required to be accessible shall be provided with handrails compliant with Clause 12 of AS1428.1-2009.
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FIRE-ISOLATED STAIRWAYS

1	Provide contrasting step nosing strips on all stair treads compliant with AS1428.1 as follows: (i) Step nosing strips to be across full width of stair, between 50-75mm wide, in a continuous colour solid strip with 30% luminance contrast to background surface. (ii) Step nosing strips to be located on edge of tread (15mm max. setback if applied) and not extend onto risers more than 10mm. (if exposed).
2	Handrails compliant with Clause 12 of AS1428.1-2009 shall be provided to at least one side of stairs. Refer to handrail section below for handrail requirements.
3	In order to achieve consistent height of the handrail along stairways, an offset tread is required at the bottom of the flight, as shown in Figure 28 of AS1428.1-2009.
4	Minimum 1m clearance required between handrail and opposite wall. Note: subject to NCC Part D2 relating to minimum requirements for exits.

ACCESSIBLE PARKING

1	Residential accessible parking spaces are subject to the requirements of AS4299-1995 as applicable.
2	Commercial accessible parking spaces are subject to the requirements of AS/NZS2890.6:2009 as applicable.
3	Vertical clearance leading to the accessible parking spaces shall be not less than 2200mm.
4	Vertical clearance at the accessible parking spaces and associated shared areas shall be not less than 2500mm.

SIGNAGE

1	Braille and tactile signage will be required to: a. Identify each sanitary facility, including an accessible sanitary facility and a sanitary compartment suitable for people with ambulant disabilities; b. Identify each space provided with hearing augmentation; c. Identify each door required by NCC Clause E4D5 to be provided with an exit sign; d. Identify a sanitary compartment suitable for people with ambulant disabilities.
2	Braille and tactile directional signage will be required at: a. A non-accessible pedestrian entrance to direct a person to the nearest accessible entrance; b. A sanitary bank which is not provided with an accessible sanitary facility to direct a person to the nearest accessible sanitary facility.

3	Signage required to comply with Clause D4D7 of the NCC shall be in accordance with NCC Spec.15 and Clause 8 of AS1428.1-2009.
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TACTILE INDICATORS

1	Tactile indicators will be required to be provided at stairways and ramps for general circulation.
2	Tactile indicators are not required to be provided at fire-isolated stairway and ramps, at a step ramp, kerb ramp or swimming pool ramp.
3	Where provided, tactile indicators shall be in accordance with sections 1 and 2 of AS/NZS1428.4.1:2009.

GLAZING ON AN ACCESSWAY

1	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.
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SWIMMING POOLS

1	Access is required to and into swimming pools with a total perimeter greater than 40m, associated with a Class 1b, 2, 3, 5, 6, 7, 8, or 9 building that is required to be accessible, but not swimming pools for the exclusive use of occupants of 1b building or a sole-occupancy unit in a Class 2 or Class 3 building. Accessible entry/exit in accordance with Part D5 of the NCC is required.
2	An accessible entry/exit must be by means of: (i) a fixed or movable ramp and an aquatic wheelchair; or (ii) a zero depth entry at a maximum gradient of 1:14 and an aquatic wheelchair; or (iii) a platform swimming pool lift and an aquatic wheelchair; or (iv) a sling-style swimming pool lift.
3	Where a swimming pool has a perimeter of more than 70 m in length, at least one accessible water entry/exit must be provided by a means specified above (16.2) (a), (b) or (c).
4	Latching devices on gates and doors forming part of a swimming pool safety barrier need not comply with AS 1428.1-2009.

PASSENGER LIFTS

1	Any passenger lift proposed shall be in accordance with one of the types identified in NCC E3D7.
2	Any passenger lift proposed shall have accessible features in accordance with NCC E3D8.
3	Any passenger lift shall not rely on a constant pressure device for its operation if the lift car is fully enclosed.
4	The lift floor dimensions shall be not less than 1400mm wide x 1600mm deep (lift travels > 12m).

ACCESSIBLE SANITARY FACILITIES	
1	The internal dimensions and locations of fixtures and fittings shall comply with Clause 15 of AS1428.1-2009.
2	The circulation spaces within the accessible sanitary facility shall be in accordance with the requirements of AS1428.1-2009.
3	The washbasin may encroach into the circulation space associated with the door, subject to a minimum 300mm from the swing of the door being achieved (hinged door).

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