

ACCESSIBILITY CAPABILITY STATEMENT

3-5 HELP STREET, CHASTWOOD NSW

HELP STREET OIA

260058

Project: 3-5 Help Street, Chatswood, NSW 2067
 Reference No.: 240058
 Date: 18 May 2026
 Client: Impact Group
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AUTHORISATION

Revision	Comment/Reason for Issue	Issue Date	Approved by
02	Accessibility Capability Statement – SSDA (S4.55) Modification for Submission	18 May 2026	 Seb Howe (BDC2420) Registered Building Surveyor

REVISION HISTORY

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01	Accessibility Capability Statement – SSDA (S4.55) Modification Submission, Draft	12 May 2026	Jhoana Colorado (ACA 713) Accredited Access Consultant Associate I Accessibility & DDA
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TABLE OF CONTENTS

1. EXECUTIVE SUMMARY	5
2. INTRODUCTION.....	6
2.1. Purpose	6
2.2. Methodology and Statutory Requirements.....	6
Reference and Guidelines	7
2.3. Limitations.....	7
2.4. Access Performance-Based Solutions Summary	8
2.5. State Environmental Planning Policy (Housing) 2021, Chapter 4	9
3. BASIS OF ASSESSMENT.....	11
3.1. Proposed Development.....	11
3.2. Location and Description	11
3.3. Building Data Summary BCA 2022 (Amdt2) D4D2	12
4. ASSESSMENT	13
4.1. Relevant Legislation Framework.....	13
4.1.1. Disability Discrimination Act 1992 (Cth) (DDA).....	13
4.1.2. Disability (Access to Premises – Buildings) Standards 2010 (Cth) (Premises Standards)	13
4.1.3. NCC - Building Code of Australia BCA 2022 (<i>amendment 2</i>) Edition.....	14
4.1.4. Australian Standards for Access and Mobility (and others)	14
4.1.5. Industry Guidelines	15
4.2. Universal Design (UD) – Seven Principals.....	16
5. COMPLIANCE ASSESSMENT	17
5.1. Access to Premises Standards	17
5.2. BCA Part D4 – Access for People with a Disability.....	18
5.3. BCA Part E3 – Passenger Lift	24
5.4. BCA Part F4 - Sanitary Facilities and Other Facilities	25
5.5. Adaptable Units Provision.....	28

5.6.	Adaptable Housing Requirements AS4299-1995 (Class C)	29
5.7.	The State Environmental Planning Policy (Housing) 2021 Former SEPP 65 (Silver SOU's) Requirements	32
6.	CONCLUSION	33
7.	APPENDIX A – ARCHITECTURAL PLANS REVIEWED	34

1. EXECUTIVE SUMMARY

Codex Building Consultants has reviewed the SSDA (S4.55) Modification documentation for the subject site, prepared by EM BE CE ([Appendix A](#)), for compliance with the National Construction Code – Building Code of Australia, Volume One BCA 2022 (*amendment 2*) and all relevant access codes.

This report demonstrates that the proposal can satisfy the access provisions of the BCA 2022 (*amendment 2*), the Disability (Access to Premises – Buildings) Standards 2010, the AS 1428 suite, and align with Willoughby City Council Development Control Plan (DCP). It gives the Consent Authority confidence that the design can achieve compliance without major amendments.

This report accompanies the State Significant Development Application (SSDA) S4.55 Modification submission and confirms that the required accessibility provisions have been addressed at this stage, with full compliance considered achievable. A further assessment will be undertaken once detailed documentation is provided at the Construction Certificate stage.

2. INTRODUCTION

2.1. Purpose

This accessibility report outlines all known areas of compliance and any potential non-compliances with the National Construction Code Building Code of Australia, Volume One/BCA 2022 (*amendment 2*). Any remaining minor issues that do not require design alterations will be addressed prior to the issuance of the Construction Certificate.

This report is to accompany a State Significant Development Application (SSDA) S4.55 Modification for a mixed-use residential tower incorporating affordable housing at 3-5 Help Street, Chatswood NSW.

Codex Building Consultants has reviewed the SSDA (S4.55) Modification documentation prepared by EM BE CE Architects ([Appendix A](#)) and confirms that the proposal at this stage can meet the access requirements of the BCA 2022 (*amendment 2*) access provisions, the Disability (Access to Premises – Buildings) Standards 2010, AS 1428 Suite. This conclusion provides the Consent Authority with confidence that the design can achieve full compliance without major amendments.

2.2. Methodology and Statutory Requirements

The methodology adopted in undertaking this assessment included the following:

- A desktop review and markup of the architectural plans, as listed in ([Appendix A](#));
- An assessment of the architectural plans against the following relevant statutory and design compliance documents:
 - Disability Discrimination Act 1992 (Cth) – Federal anti-discrimination legislation.
 - The Disability (Access to Premises – Buildings) Standards 2010 (Access Code);
 - The Disability (Access to Premises – Buildings) Amendment (2024 Measures No. 1) Standards 2024;
 - National Construction Code (NCC) Series – Volume 1 (2022 Edition *amendment 2*), specifically:
 - Part D4 – Access for People with a Disability;
 - Part E3 – Lift installations and
 - Part F4 – Sanitary and other facilities;
 - AS 1428.1–2021 – Design for Access and Mobility, Part 1: General Requirements for Access – New Building Work;

- AS 1428.4.1–2009 – Means to Assist the Orientation of People with Vision Impairment – Tactile Ground Surface Indicators;
- AS 1735.12–1999 – Lifts, Escalators and Moving Walks, Part 12: Facilities for Persons with Disabilities;
- AS 4299–1995 – Adaptable Housing;
- AS/NZS 2890.6–2009 – Parking Facilities – Off-street Parking for People with Disabilities;
- State Environmental Planning Policy (Housing) 2021, Chapter 4.

Reference and Guidelines

- Willoughby City Council Development Control Plan (DCP).
- Livable Housing Australia's Design Guidelines (LHA) Fourth edition.
- Apartment Design guidelines (ADG)

Consultation with the design development team was also undertaken to gain a comprehensive understanding of the proposed development and, where required, to provide advice supporting compliance with relevant access requirements.

2.3. Limitations

This report does not include or imply a detailed assessment of design, compliance, or upgrading in relation to the following:

- The Disability Discrimination Act 1992 (DDA) applies; however, this determination has been made at the applicant's request and does not exempt either the applicant or the owner from their obligations under the Act.;
- BCA provisions unrelated to access – including NCC (Volume 1) Sections B, C, G, H, I, J, and Parts D1 and D2, which are excluded from this assessment and addressed in a separate BCA Compliance Report.;
- The Work Health and Safety Act 2011.;
- Architectural drawings not listed in [Appendix A](#).;
- Section 62 of the Environmental Planning and Assessment Regulation 2021, which is the responsibility of the Consent Authority and includes all Construction Certificate (CC) requirements.;
- Any Construction Certificate application, which must be assessed under the Environmental Planning and Assessment Act 1979 (as amended) and the Environmental Planning and Assessment Regulation 2021.;

- Fit-out layouts and internal fixtures and fittings, which are outside the scope of this review;
- Where slip resistance has not been documented, specific of floor slip resistance therefore not been assessed.;
- Where crossfalls and floor levels, have not been documented or not included in the submitted documentation and have therefore not been assessed.

2.4. Access Performance-Based Solutions Summary

Where compliance with the Deemed-to-Satisfy (DtS) provisions of the National Construction Code (NCC) Volume 1 – 2022 (*amendment 2*) is not achievable due to site constraints or design intent, Performance Solutions will be developed to demonstrate compliance with the relevant Performance Requirements.

At this stage, Performance Solutions are anticipated for the following items. Note these can be removed by meeting Deemed-to-Satisfy (DtS) provisions (*preferred*) otherwise these are to be address, detail and endorse by PCA and project stakeholder at a later stage:

Item	DTS- Departure	BCA Clause	BCA Performance Requirement	Comment
1	Basements levels (02 to 05) - Corridor ends in the continuous accessible path of travel leading to the storages lack 1540mm x 2070mm clear circulation space, which are non-compliance with AS/NZS 1428.1-2021. This is a departure from the BCA and requires to be address under a Performance Solution. This is to be detailed at a later stage.	D4D2	D1P1	Capable of Compliance
2	LG, UG, mezzanine, L01 doorways exceed 300mm maximum reveal required under AS1428.1-20 This is a departure from the BCA and requires to be address under a Performance Solution via automation. This is to be detailed at a later stage.	D4D3	D1P1	Capable of Compliance
3	External stairs lack handrail on both sides. This is to be address for DTS compliance. Alternatively, CODEX is to support a central handrail only. This is to be detailed at a later stage.	D4D4	D1P1	Capable of Compliance

Identified Performance Solutions will be further developed and documented during the detailed design and construction documentation phases in accordance with Section A2G2(4) of the NCC, referencing the appropriate Assessment Methods such as expert judgement, comparison to DtS, and qualitative analysis.

The Principal Certifying Authority (PCA) and relevant project stakeholders are to review and endorse the above during the detailed design stage, prior to the performance solutions being documented. In cases where the departures noted above have been addressed.

Performance solutions are to be finalised and submitted for review prior to the issuance of the Construction Certificate (CC).

All Performance Solutions must continue to satisfy the overarching Performance Requirements (e.g., D1P1, D1P2, D1P8, etc) and support equitable, dignified, and safe access for all building users.

2.5. State Environmental Planning Policy (Housing) 2021, Chapter 4

SEPP (Housing) 2021 Replaces and consolidates SEPP 65 (now repealed as of 14 December 2023). Applies to residential flat buildings, mixed-use developments, and shop-top housing that are three or more storeys and contain four or more dwellings. For internal design refer to Item [5.7 \(SEPP\)](#) for requirements.

Item	ADG Objective 4Q.1 – Livable Housing	Action Required
1	Adaptable SOUs are nominated at 20%. This aligns with the SSD consent and the Livable Housing Silver Level intent. The number of adaptable apartments is to be updated to reflect the revised apartment mix.	A total of 143 SOUs is proposed. Based on a 20% requirement, a minimum of 29 adaptable SOUs is required, rounded up from 28.6. The design nominates 30 adaptable SOUs, as follows: - Apartment Type R* (x15): 17.02, 18.02, 19.02, 20.02, 21.02, 22.02, 23.02, 24.02, 25.02, 26.02, 27.02, 28.02, 29.02, 30.02, 31.02. - Apartment Type S* (x15): 17.03, 18.03, 19.03, 20.03, 21.03, 22.03, 23.03, 24.03, 25.03, 26.03, 27.03, 28.03, 29.03, 30.03, 31.03 A total of 30 adaptable SOUs has been documented, exceeding the minimum 20% (29) requirement and aligning with the Willoughby City Council DCP requirements applicable to Chatswood. Capable of Compliance

2	At least 20% of all apartments are to achieve a Silver Level rating in accordance with the Livable Housing Design Guidelines, Fourth Edition. Silver Level compliance schedules are to be provided for review against ADG Objective 4Q.1 and the Livable Housing Design Guidelines. There are 20% adaptable units proposed that may be counted towards the 20% Silver Level requirement where those apartments also satisfy the relevant Silver Level criteria.	A total of 143 SOUs is proposed. The nominated 30 adaptable SOUs are proposed to contribute to the Silver Level provision, subject to detailed review and confirmation against the Livable Housing Design Guidelines. • Apartment Type R* (x15): 17.02, 18.02, 19.02, 20.02, 21.02, 22.02, 23.02, 24.02, 25.02, 26.02, 27.02, 28.02, 29.02, 30.02, 31.02. • Apartment Type S* (x15): 17.03, 18.03, 19.03, 20.03, 21.03, 22.03, 23.03, 24.03, 25.03, 26.03, 27.03, 28.03, 29.03, 30.03, 31.03 A total of 30 SOUs has been nominated, exceeding the minimum 20% requirement (29). Silver Level compliance schedules are to be provided for detailed review, Note: Adaptable apartments are the 20% that achieve silver level. Capable of Compliance
3	Silver level SOU's internal layout review.	Refer to 5.7 (SEPP) Capable of Compliance

3. BASIS OF ASSESSMENT

3.1. Proposed Development

The proposed development comprises of the construction of a mixed-use development and comprises of retail, commercial, residential, basement parking and storage areas. The building consists of 5 levels of underground carpark with a combination of residential and commercial parking, a ground floor consisting of retail, storage areas, ancillary areas and the commercial and residential lift lobbies, a mezzanine and first floor for commercial purposes, a second floor for apartment units and communal open space, and 31 storeys for apartment units with a roof plant area.

3.2. Location and Description

The existing site spans 2 lots, located on 3 Help St and 5 Help Street, with the lots expected to be consolidated. The current site is situated on Help St, with McIntosh Street to the North and Cambridge Lane to the West bordering the site. The current Lots are SP134 (3 Help St), and SP52320 (5 Help St).

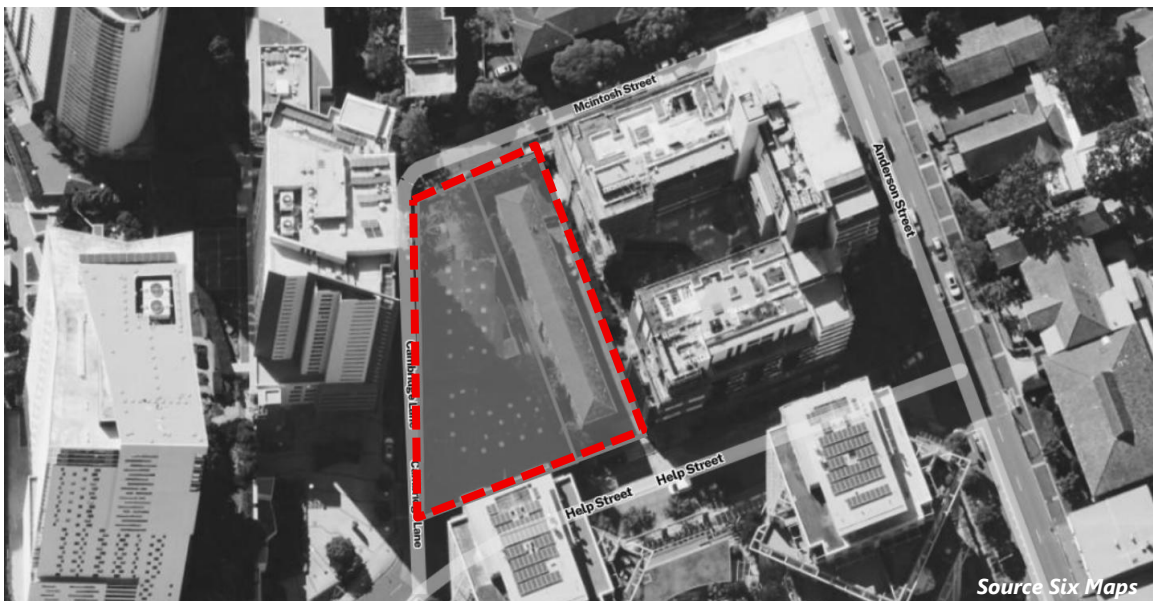


Figure 1. Site Location

3.3. Building Data Summary BCA 2022 (Amdt2) D4D2

The subject development comprises of a proposed mixed-use building. The proposed use of the development is designated with the main use classification (or part) of:

Part of the Development	Use	Class	Access Requirement	Comment
Mezzanine (roof garden) L01(roof garden) L02(residential communal garden/ areas, gym, etc)	Communal Areas	9b	Access must be provided -To and within all areas normally used by the occupants.	Floor is linked by passenger lift Capable of Compliance
Underground basement 1, 2, 3, 4 and 5	Carpark	7a	Access must be provided -To and within all areas normally used by the occupants.	Floor is linked by passenger lift Capable of Compliance
Underground basement 2, 3 4 and 5	Storage units	7b	Access must be provided -To and within all areas normally used by the occupants.	1540mm x 2070mm clear circulation space has been provided or CODEX is to support Performance solution where 1540mmx2070mm is no provided. Refer to item 2.4 for details. Capable of Compliance
Basement level (B01)	Commercial lobby	5	Access must be provided -To and within all areas normally used by the occupants.	Access passenger lift linkage this floor with the upper commercial floors. Capable of Compliance
Lower Ground/ UG Level	Retail	6	Access must be provided -To and within all areas normally used by the occupants.	All retail spaces are to provide threshold level access; floor finish transition do not provide major level changes at entryways. Capable of Compliance
Mezzanine and Level 1	Commercial	6	Access must be provided -To and within all areas normally used by the occupants.	These levels are linked by passenger lift. Capable of Compliance
Lower ground And levels 2-33	Residential Lobby/Mail room and SOU'S Levels	2	Access must be provided -To and within all areas normally used by the occupants.	These levels are linked by passenger lift. Capable of Compliance

4. ASSESSMENT

4.1. Relevant Legislation Framework

This section outlines the key legislation, codes, and standards applicable to the proposed development, with a particular focus on accessibility and compliance requirements. It summarises the primary regulatory frameworks that must be adhered to throughout the design, approval, and construction phases. Each item identified below provides critical guidance on meeting minimum building performance standards, ensuring equitable access, and mitigating the risk of non-compliance with statutory obligations. This assessment references the most current editions and assumes that the Construction Certificate (CC) application will be lodged after 1 May 2023.

4.1.1. Disability Discrimination Act 1992 (Cth) (DDA)

The DDA is a Commonwealth Act that prohibits discrimination on the basis of disability across goods, services, education, and the built environment.

This assessment will identify any design elements that, while technically compliant, may still disadvantage users (e.g., unnecessary detours, inequitable amenities) and will recommend reasonable adjustments where appropriate.

4.1.2. Disability (Access to Premises – Buildings) Standards 2010 (Cth) (Premises Standards)

The Premises Standards are federal standards made under the Disability Discrimination Act 1992 (DDA). They mirror BCA accessibility provisions and establish compliance dates for new buildings and "affected parts" of existing buildings.

The Premises Standards apply to all new buildings and building works, including upgrades to existing buildings. Their purpose is to provide certainty to the building industry regarding compliance with the DDA's access requirements. The Premises Standards align closely with the BCA and specify detailed requirements for compliance with various Australian Standards related to access and mobility.

Designing and constructing a building in accordance with both the BCA and the Premises Standards provides a higher degree of assurance that the building complies with the DDA.

The BCA and DDA jointly apply to all new buildings, new work within existing buildings, and significant refurbishments or alterations.

4.1.3. NCC - Building Code of Australia BCA 2022 (*amendment 2*) Edition

The proposed development must comply with the version of the BCA 2022 (*amendment 2*) in force at the time the Construction Certificate (CC) application is lodged. If the BCA is amended prior to the issue of the CC, this statement will be updated to reflect any new requirements.

For the purposes of this assessment, it is assumed that the CC application will be lodged after 1 May 2023. Accordingly, this statement is based on the Deemed-to-Satisfy (DtS) provisions of the BCA 2022 (*amendment 2*).

The BCA 2022 (*amendment 2*) is Australia's compulsory building code. Volume One regulates Class 2–9 buildings; specifically, Parts D4, E3 and F4 set the minimum DtS accessibility requirements applicable to this project.

Relevant Parts for Access / DDA Compliance:

- Part D4 - Access for People with a Disability
- Part D4D9 - Tactile Indicators
- Part E3 - Lift Access Provisions
- Part F4 - Accessible Sanitary Facilities
- Specification 15 - Signage

This assessment will highlight any departures from (DtS) provisions. Where departures occur, they will trigger a Performance Solution which must still satisfy the overarching Performance Requirements (e.g., D1P1, D1P2), to be detailed at a later stage. Refer also to Item 1.4.

4.1.4. Australian Standards for Access and Mobility (and others)

The AS 1428 suite comprises Australian Standards detailing the dimensioned design requirements for access and mobility, such as circulation spaces, tactile indicators, kerb ramps, signage, and hearing augmentation systems.

This assessment will identify any departures from the AS 1428 suite, as mandated and referenced by the BCA.

- AS/AZS 1428.1:2021 – Design for Access and Mobility – General Requirements for Access – New Building Work
- AS/NZS 1428.4.1:2009 – Means to assist the orientation of people with vision impairment—Tactile Ground Surface Indicators
- AS 4299:1995 – Adaptable Housing (for some housing policies or best practice guidance),
- AS/NZS 2890.6:2009 – Parking Facilities – Off-street Parking for People with Disabilities,

- AS 1735.12:1999 – Lifts, Escalators and Moving Walks – Facilities for Persons with Disabilities,

4.1.5. Industry Guidelines

These documents are not included into the BCA 2022 (*amendment 2*) or DDA Premises standards and are considered as relevant to promote equality and aspirations for under the objectives and promotion of DDA aspirational objectives:

- Guideline on the Application of The Premises Standards, 2013, Australian Human Rights Commission (AHRC),
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture – Australian Human Rights Commission (AHRC),
- AS 1428.5:2010 – Communication for People who are Deaf or Hearing Impaired,
- AS1428.1: 2021 – Design for Access and Mobility, Part 1: General requirements for access – New Building Work,
- AS2890.6:2022 Parking Facilities. Part 6: Off-street parking for people with disabilities.
- AS1735.12:2020 Lift, escalators and moving walks Part 12: Facilities for persons with disabilities (EN 81-70:2018, MOD)
- Design for Dignity Guidelines – Principles for 'Beyond compliance' accessibility in urban regeneration.

4.2. Universal Design (UD) – Seven Principals

Universal Design in residential development focuses on creating environments that are inclusive, adaptable, and accessible to people of all ages, abilities, and life stages. These principles support equitable participation, safety, and dignity in daily living by embedding usability and flexibility into the built environment from the outset. The table below outlines the seven core principles of Universal Design, along with their key features and practical examples relevant to residential setting.

No.	Principal	Description	Example
1	Equitable Use	Design should be usable and appealing to residents and visitors of all abilities. Avoid segregation and ensure privacy, safety, and access are equally provided.	A step-free, wide, and gently sloped path connects the street to the main entrance, blending into the landscape and providing dignified access for wheelchair users, prams, or trolleys.
2	Flexibility in Use	Accommodate a wide range of preferences, abilities, and needs. Support adaptable use over time and allow for different methods of operation.	Bedrooms or studies are designed to be easily converted into a home office, guest room, or carer's room without structural changes.
3	Simple and Intuitive Use	Spaces and features should be easy to understand regardless of the user's experience, language, or cognitive ability. Provide clear, consistent cues and reduce complexity.	Switches, appliances, and intercom systems are labelled with icons and plain text. Wayfinding and controls are intuitive and user-friendly.
4	Perceptible Information	Communicate essential information effectively using multiple modes (visual, tactile, auditory). Ensure signage and alerts are legible and accessible in different conditions.	Doorbells and smoke alarms provide both visual (flashing lights) and auditory alerts, ensuring messages are received by all residents, including those with sensory impairments.
5	Perceptible Information	Minimise risks and hazards through design. Ensure frequently used features are accessible and safe. Provide fail-safe elements and reduce dependence on memory or high vigilance.	Kitchens are free of clutter and tripping hazards; cooktops cool rapidly when turned off. Bathroom fittings feature anti-scald temperature-limited taps.
6	Low Physical Effort	Features should require minimal strength or dexterity to operate. Support comfort and reduce fatigue by enabling automation and neutral body posture in use.	Sensor-activated taps, automated lighting, motorised window furnishings, and smartphone-based control systems allow residents to manage the environment with ease.
7	Size and Space for Use	Provide sufficient space for approach, movement, and use of features for residents with diverse body sizes, mobility devices, or assistive equipment.	Kitchens and bathrooms include under-bench clearance, accessible benchtop heights, and wide doorways with adequate turning circles to accommodate wheelchair users.

Base Extracted from [Universal Design Principles](https://www.udinstitute.org/) | RL Mace Universal Design Institute ([udinstitute.org](https://www.udinstitute.org/))

5. COMPLIANCE ASSESSMENT

The abbreviations used to rate each clause in the assessment are explained in Table 1 below –Compliance Status Key below. These key outlines the meaning of each rating and identifies any follow up action required before the Construction Certificate is issue.

Key	Notes / Required Follow Up
Capable of Compliance	Design aligns with the Deemed-to-Satisfy (DTS).
Does Not Comply	The design does not meet the Deemed-to-Satisfy (DTS) provisions; revision and rectification are required.
Not Applicable	Clause does not apply to the proposed design.
Note for Information	These notes are for guidance or information only and will be reviewed at detail design stage.

Below is a summary of the key compliance issues that must be resolved before the Construction Certificate can be issued:

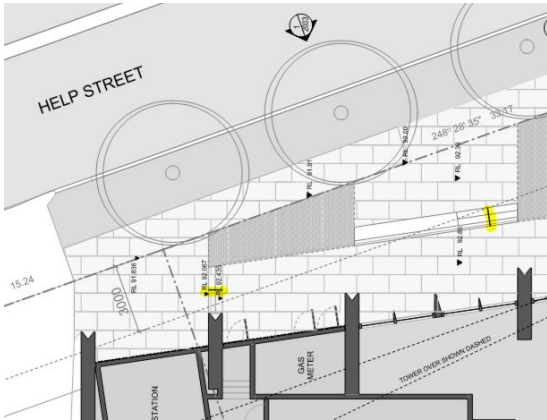
5.1. Access to Premises Standards

Clause	Title	Assessment and Comment	Status
DSAP – Part 2 (3,4)-D3.1	The Disability (Access to Premises-Buildings) Standards 2010 requires the building to comply with the Access Code (BCA Part D3 & AS 1428.1-2009). New buildings or building work (per permit) after 1 May 2011 are to comply with AS 1428.1 (2009 or 2021 depending on parliamentary confirmation); AS 2890.6; AS 1428.4.1; AS 1428.5 were referenced under BCA I NCC.	All commonly use areas are documented to be accessible in accordance with AS1428.1-2021. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

5.2. BCA Part D4 – Access for People with a Disability

Clause	Title	Assessment and Comment	Status
D4D2	General Building Access Requirements – Classes: 7b (Storage units), 2 (Residential) buildings 5 (Commercial) 6 (Retail) Access must be provided to and within all areas normally used by the occupants.	Class 2 (Residential Lobby), Class 5 (Commercial Lobby) - Access from allotment boundary to retails (x2) and residential lobby provided via Cambridge Lane then passenger lifts link all levels of the building.  Figure 1. Proposed Upper Ground (UG) Floor Plan - Retail at the corner of McIntosh Street and Cambridge Lane access has been proposed on grade in accordance with AS1428.1-2021. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

Clause	Title	Assessment and Comment	Status
	Access must be provided to and within any level containing accessible carparking spaces.	- Access to five (5) carparking basement level is provided via passenger lifts commercial, retail and residential. Lift lobbies provide suitable 1800mm x 2000mm clear circulation space, required due to the lack of line of sight. - Level 01 commercial Lift lobby provides 1650mm depth suitable for a wheelchair 90-degrees turn. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
D4D3(a)	Access to buildings	Access will be provided to the building via the pedestrian entry doorway in accordance with AS 1428.1:2021. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
		- Where door reveals exceed 300 mm in depth, a Performance Solution is proposed to address this through door automation, supporting the design intent while satisfying the intent of AS 1428.1:2021 and the Disability (Access to Premises- Buildings) Standards 2010 (new works), to provide equitable access. Refer to item 2.4 for details. - All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Performance Solution
D4D3(b)	Entrances	- Entrances are proposed to provide threshold level in accordance with AS1428.1. threshold level. - Gradients including cross falls are proposed leading to entries are designed to be 1:40 maximum in accordance with AS1428.1.	Capable of Compliance

Clause	Title	Assessment and Comment	Status
D4D4(a)(i)	Parts of buildings to be accessible - Internal / External Stairway - common use.	Lower Ground (LG) floor: Both stairways provide over 900mm to allotment boundary as required under AS1428.1. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
		- There is a lack of handrail on both sides to be incorporated at a later stage or - CODEX is to support compliance under a Performance solution. Refer to item 2.4 for details.  Figure 3. Proposed stairs at external Upper Ground (UG) Floor All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Performance Solution

Clause	Title	Assessment and Comment	Status
D4D4(a)(iii)	Parts of buildings to be accessible - Fire-Isolated Stairway.	Middle-landings (off-tread landings) have been provided on stairs in accordance with AS 1428.1 to ensure that the handrail height is maintained consistently throughout the stair flight, including across intermediate landings. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
D4D4(c)(d)	Parts of buildings to be accessible - Internal /External Paths of Travel	<i>90 degrees turns:</i> 1500mm x 1500mm clear circulation spaces are required to achieve (90-degrees turn) have been provided. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
		<i>Passing Bays:</i> 2000mm x 1800mm clear circulation space to allow two wheelchairs to pass each other have been provided. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
		<i>Corridor ends:</i> End Corridors: 1540mm x 2070mm end corridor clear circulation spaces have been provided at storage units for SOU's. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
		<i>Paths of travel:</i> 1000mm wide clear paths of travel has been provided. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

Clause	Title	Assessment and Comment	Status
		<i>General Comment – Door Threshold:</i> Level differences at doorways not documented, it understood all commonly used doors will provide threshold level. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
		<i>General Comment – Double doors:</i> When double doors are provided at least one door (active leaf) is to be 850mm clear width opening. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
		<i>General Comment – Doors 850mm min. clear width opening:</i> Unisex accessible WC doors lack 850mm clear circulation space There is sufficient space to adjust the door and increase its width to a minimum of 850mm. This adjustment can be addressed during the design development stage. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
		(B01 to B05) – Residential lobby and commercial car park and (B01) – Residential lobby and bicycle storage (Door Circulation within the CAPT): Sliding doors with insufficient latch-side clearance have been confirmed as automated doors, to satisfy the intent of AS 1428.1:2021. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

Clause	Title	Assessment and Comment	Status
D4D5	Exemptions	All level provides services areas this fall under BCA D4D5 exemptions. If the space is used for more than just maintenance or services, the client needs to provide an operational and OHS statement explaining why access is not required. Statement details re to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Note for Information
D4D6	Accessible Carparking: Class 5, 7 buildings Provide 1x accessible space for every 100 carparking spaces or part thereof.	- Basement 01 – Commercial level proposes 9 parking bays and 2 accessible car parking bays compliant with BCA. - Size of the accessible bays are designed with 2500mm min. height clearance, compliant with AS2890.6:2009 of the proposed car parking bay and suitable accessible car bays provide 2400mm x 2400mm shared area. - Overhead height is 2500mm have been documented as per AS2890.6:2009. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
	Class 6 buildings Provide 1x accessible space for every 50 carparking spaces or part thereof (for up to 1000 car parking spaces). For each additional 100 carparking spaces or part thereof in excess of 1000 carparking spaces — Provide 1x accessible space.	There is carparking bays for retail.	Not applicable

Clause	Title	Assessment and Comment	Status
	Class 2 buildings - An adaptable unit car bay is to be provided for each adaptable unit. - Bays may be designed as either a single 3.8m wide space or a 2400mm wide bay with a 2400mm wide shared zone, both with a minimum length of 5400mm. in accordance with AS2890.6-2009.	- Basement 02,03,04 and 05 – Residential parking levels proposes 30 adaptable parking bays in which will be 20% of 143 total SOU's. - Size of the accessible bays are designed with 2500mm min. height clearance, compliant with AS2890.6:2009 of the proposed car parking bay and suitable accessible car bays provide 2400mm x 2400mm shared area. - Overhead height is 2500mm have been documented as per AS2890.6:2009. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
D4.7	Accessible Signage	All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
D4D9	Tactile Ground Surface Indicators	All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
D4D13	Glazing Visual Indicators to comply with AS1428.1 Clause 6.6.	All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

5.3. BCA Part E3 – Passenger Lift

Clause	Title	Assessment and Comment	Status
E3D7	Passenger Lifts, types and limitations	Passenger lifts provide access to all levels required to be accessible residential, retail, commercial etc. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
E3D8	Accessible features required for passenger lifts	Passenger lifts provide suitable internal clear floor circulation space.	Capable of Compliance

All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).

5.4. BCA Part F4 - Sanitary Facilities and Other Facilities

Clause	Title	Assessment and Comment	Status
F4D4	Unisex Accessible Toilets Provide 1x accessible unisex sanitary compartment on every storey containing sanitary compartments in accordance with Clause F4D6;	- Basement 01 staff (Retail) - Provides 1 ambulant (female), 1 ambulant (male) and a unisex accessible WC; these provide suitable overall internal and external dimensions to meet AS1428.1-2021. Entrance provide 1540mmx2070mm clear circulation space in front of the unisex accessible to performed a "U" (exclusive of the doors swing as per AS1428.1-2021. - UG (upper Ground) Retail/public - Provides 1 ambulant (female), 1 ambulant (male) and a unisex accessible WC; these provide suitable overall internal and external dimensions to meet AS1428.1-2021. Entrance provide 1540mmx2070mm clear circulation space in front of the unisex accessible to performed a "U" turn (exclusive of the doors swing as per AS1428.1-2021. - Mezzanine (Commercial) - Provides 1 ambulant (female), 1 ambulant (male) and Showers (2) a unisex accessible WC with shower providing equal facilities in accordance with Access to premises standards and BCA. These compartments are designed compliant with size and circulation spaces in accordance with AS1428.1-2021. Right hand (RH) transfer in accordance with AS1428.1 balance in consecutive floors. - L01 (Commercial) - Provides 1 ambulant (female), 1 ambulant (male) and Showers (2) a unisex accessible WC with shower providing equal facilities in accordance with Access to premises standards and BCA. These compartments	Capable of Compliance

Clause	Title	Assessment and Comment	Status
		are designed compliant with size and circulation spaces in accordance with AS1428.1-2021. Left hand (LH) transfer in accordance with AS1428.1 balance in consecutive floors. L02 - (Residential communal area) provides unisex 1 accessible WC with size 2675mm Lx 1900mm W compliant with AS1428.1-2021. External door circulation space is compliant with AS1428.1. Right hand (RH) transfer in accordance with AS1428.1 balance in consecutive floors. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	
	Where a storey has more than 1 bank of sanitary compartments containing male and female sanitary compartments, at not less than 50% of those banks.	Currently, proposed compartment size is suitable to accommodate a unisex accessible in accordance with AS1428.1-2021. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
	Accessible WC requires 2300mm x 1900mm around the pan with the basin to sit outside this area in accordance with AS1428.1.	Levels B01, UG, Mezzanine, L01 and L02 each provide one bank of male and female toilets, with proposed compartment with suitable size to accommodate a unisex accessible in accordance with AS1428.1-2021. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
F4D5(g)	Accessible WC - An even number of left hand (LH) and right hand (RH) transfer WC pans (accessible toilets) is required within the building. Alternating LH/RH layouts on each	Unisex accessible pan transfers are proposed as following for consecutive commercial levels: - Mezzanine - RH Transfer proposed, - L1 -LH Transfer proposed meets balance required by BCA.	Capable of Compliance

Clause	Title	Assessment and Comment	Status
	subsequent level is the most appropriate and inclusive approach.	All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	
F4D4 (requires 1 or more showers)	Accessible Showers: Provide 1x accessible shower for every 10 showers or part thereof.	There are accessible showers in commercial levels: Mezzanine and L1 at unisex accessible compartments this is in accordance with BCA, AS1428.1-2021 and DDA Access to premises standards. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
F4D7(c)	Ambulant Toilets: required within every standard toilet bank adjacent to an accessible toilet under DDA Access Code Part F2.4 compliant with AS1428.1:2021.	Levels B01, UG, Mezzanine, L01 and L02 each provide one bank of male and female toilets, with male and female ambulant cubicles proposed. These appear to be designed generally these are in accordance with AS 1428.1. A clear circulation space of 900 mm x 900 mm is provided in front of the pan, at the entry door, and within the cubicles in both directions, exclusive of door swings and basins. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

5.5. Adaptable Units Provision

Willoughby City Council Development Control Plan (DCP)

Part	Title	Assessment and Comment	Status
A59	<i>Develop Consent Section 4.38 mandates:</i> ADAPTABLE UNITS Prior to the issue of the Construction Certificate for above ground works, the Applicant must submit to the Certifier a Report demonstrating that: (a) 30 adaptable dwellings have been provided within the Development; and (b) any adaptable dwellings specified in the approved plans or supporting documentation comply with the applicable Australian Standards.	• 143 total SOUS' s are provided • 30 Adaptable SOU's are provided (20%) 30 Adaptable SOU's are nominated to be provided: • Apartment Type R* (x15): 17.02, 18.02, 19.02, 20.02, 21.02, 22.02, 23.02, 24.02, 25.02, 26.02, 27.02, 28.02, 29.02, 30.02, 31.02. • Apartment Type S* (x15): 17.03, 18.03, 19.03, 20.03, 21.03, 22.03, 23.03, 24.03, 25.03, 26.03, 27.03, 28.03, 29.03, 30.03, 31.03. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

5.6. Adaptable Housing Requirements AS4299-1995 (Class C)

The following table outlines the key design features that must be achieved in the pre-adaptation stage of adaptable units, in accordance with AS 4299:1995 – Adaptable Housing and relevant planning policy requirements. These provisions ensure that future modifications can be implemented efficiently to support occupants with varying access needs.

Reference	Design Element	Requirements at pre-adaptable stage	Status
1	Documentation	Proposed Pre and Post layouts provision have been provided. These are suitable at this stage. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.2	Continuous Accessible Pathway	Step-free path of travel from the principal entrance to the adaptable unit entry, including common circulation areas. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.3.2	Entry Doorway Width and latch side (530mm/510mm)	Minimum 850 mm opening clear width; door thresholds must be level or have minimal gradient transition (≤ 5 mm lip) and 530mm latch side is to be provided (Internally 530mm and 510mm externally as per AS1428.1). - Study & balcony provides suitable internal& external latch side. - Internal will meet 850mm clear circulation space. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.5	Corridor Widths	Minimum 1,000 mm clear width to allow future wheelchair circulation. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

Reference	Design Element	Requirements at pre-adaptable stage	Status
4.1.4	Bathroom Configuration	Designed to enable future installation of a hobless shower, grab rails, and circulation space for a wheelchair. Configuration is to fit a compliant AS1428.1 compartment 2630mm x 2300mm minimum floor space. Toilet dimensions are currently in accordance with AS1428.1. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.6	Toilet & Shower Location	Positioned on the ground (entry) level and capable of future modification for wheelchair access. Same corner location in pre-and post-location. Basin can cap off service can be provided for the relocation of basin at post adaptation. Pan location is in the same location in pre & post layout. This is to be adjusted for compliance. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.7	Living room	2250mm min diameter after furniture placement has been provided. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.6.1	Bedroom (x1)	The bedroom provides <i>1-metre at both sides</i> of the bed queen size bed (allow 1530mm x 2030mm) and <i>1540 x 2070mm at the base</i> of bed or similar configuration. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.4.4(h)	Structural Reinforcement	Walls around toilets, showers, and baths must be structurally reinforced for future installation of grabrails. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

Reference	Design Element	Requirements at pre-adaptable stage	Status
4.5.2	Kitchen Layout	Space and layout must allow for future modification (e.g., open under-bench areas, adjustable benchtop height) and 1550mm clearance between cabinets, appliances, and walls. This has been provided. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.8	Laundry	1500mm is to be provided in front of the appliances has been provided. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.3.4	Doors and Hardware	Lever-type handles to be provided; located 900–1,100 mm above floor level. All doors need to achieve 850mm clear opening width from the outset and easily achievable latch side clearances at post adaptation, compliant with AS1428.1:2009. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
4.5.3	General Circulation Spaces	Internal spaces must allow suitable circulation spaces as required under AS1428.1, this is to include balconies and terraces (where applicable), this has been provided. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance
3.7.2	Carparking	Provide an adaptable unit car bay for each adaptable unit. These car bays can have 3.8 metre width or 2.4 m with 2.4 metre shared zone. All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	Capable of Compliance

5.7. The State Environmental Planning Policy (Housing) 2021 Former SEPP 65 (Silver SOU's) Requirements

Reference	Design Element	Requirements at pre-adaptable stage	Status
1a	Dwelling Access	Provide a safe, continuous step-free pathway from the front boundary of the property to an entry door to the dwelling.	Capable of Compliance
2a	Entry Door	The dwelling shall provide an entrance door with – - a minimum clear opening width of 820mm; - a level (step free) transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or bevelled); reasonable shelter from the weather.	Capable of Compliance
2b	Landing at entry (external)	A level landing area of at least 1200mm x 1200mm should be provided at the level (step free) entrance door.	Capable of Compliance
3b	Corridors	From the SOU's entry door 1m clearances throughout the unit to allow suitable accessible paths of travel within has been provided.	Capable of Compliance
4a	Bathroom	- Is to ensure 900mm wide by 1200mm long clear visitable toilet circulation space in front of the leading edge of the pan a minimum 1200mm clear circulation space forward of the toilet pan exclusive of the swing of the door.	Capable of Compliance
5a	Shower	One bathroom should feature a slip resistant, hobless (step-free) shower recess. Shower screens are permitted provided they can be easily removed later if/when required.	Capable of Compliance
6a	Structural Reinforcement	Provision of walls surrounding the shower and toilet pan require sufficient reinforcements for the provision of grab rails in the future when required.	Capable of Compliance
4.3.4	Doors and Hardware	Lever-type handles to be provided; located 900–1,100 mm above floor level. All doors need to achieve 850mm clear opening width from the outset and easily achievable latch side clearances at post adaptation, compliant with AS1428.1:2009.	Capable of Compliance
4.5.3	General Circulation Spaces	Internal spaces must allow suitable circulation spaces as required under AS1428.1, this is to include balconies and terraces (where applicable)	Capable of Compliance
3.7.2	Carparking	Provide an adaptable unit car bay for each adaptable unit. These car bays can have 3.8 metre width or 2.4 m with 2.4 metre shared zone.	Capable of Compliance

6. CONCLUSION

This Accessibility Report has been prepared by CODEX Building Consultants in support of the State Significant Design Application (SSDA) S4.55 modification for the proposed mixed-use development located at EM BE CE Architects NSW.

The review was conducted in accordance with the following statutory frameworks and standards:

- National Construction Code (NCC) 2022 – Volume 1: including Parts D4, E3, and F4;
- Disability (Access to Premises – Buildings) Standards 2010 (and Amendment Standards 2020);
- Australian Standards, including:
 - AS 1428.1:2021,
 - AS 1428.4.1:2009,
 - AS 4299:1995,
 - AS 1735.12–1999.
 - AS/NZS 2890.6:2009,
- Livable Housing Australia Guidelines (LHA);
- Willoughby City Council Development Control Plan (DCP);
- Willoughby City Council Develop Consent Section 4.38 and
- SEPP (Housing) 2021 – Formerly SEPP 65.

The outcome of this assessment confirms that the fundamental aspects of the current design are capable of achieving compliance, either by direct application of Deemed-to-Satisfy (DtS) provisions or through the development of Performance Solutions where departures from DtS. While the design generally demonstrates alignment with the relevant access requirements, detailed compliance items will require further resolution during the Construction Certificate (CC) stage and/or throughout the construction documentation phase.

Best regards,



Jhoana Colorado
Associate | Accessibility & DDA
Codex Building Consultants



7. APPENDIX A – ARCHITECTURAL PLANS REVIEWED

Architectural Plans prepared by EMBECE		
Drawing Number	Revision	Title
SSDA-0000	E	COVER SHEET
SSDA-0100	B	Existing Site Plan
SSDA-0101	B	Site and Context Analysis
SSDA-0102	B	Site Demolition Plan
SSDA-0110	C	Proposed Site Plan
SSDA-0111	E	Public Domain Plan
SSDA-0900	B	B06 Plan
SSDA-1000	D	B05 Plan
SSDA-1001	D	B04 Plan
SSDA-1002	D	B03 Plan
SSDA-1003	E	B02 Plan
SSDA-1004	F	B01 Plan
SSDA-1010	H	LG Plan
SSDA-1011	G	UG Plan
SSDA-1100	D	Mezzanine Plan
SSDA-1101	D	L01 Plan
SSDA-1102	E	L02 Plan
SSDA-1103	E	L03-05 Plan
SSDA-1106	C	L06 Plan
SSDA-1107	C	L07 Plan
SSDA-1114	C	L08-16 Plan
SSDA-1115	B	L17-21 Plan
SSDA-1116	C	L22-23 Plan



SSDA-1117	B	L24-31 Plan
SSDA-1122	C	L32 Plan
SSDA-1123	C	L33 Plan
SSDA-1126	D	Roof Plan
SSDA-2000	D	West Elevation Cambridge Lane
SSDA-2001	D	North Elevation McIntosh Street
SSDA-2002	C	East Elevation
SSDA-2003	C	South Elevation Help Street
SSDA-3000	C	Section North-South
SSDA-3001	C	Section East-West
SSDA-4004	B	Adaptable Apartment S
SSDA-4005	A	Adaptable Apartment R
SSDA-4100	C	ADG Compliance Plan - Typical Level 02
SSDA-4102	C	ADG Compliance Plan - Typical Level 03-05
SSDA-4103	C	ADG Compliance Plan - Typical Level 06-07
SSDA-4104	C	ADG Compliance Plan - Typical Level 08-16
SSDA-4105	C	ADG Compliance Plan - Typical Level 17-31
SSDA-4106	C	ADG Compliance Plan - Typical Level 32
SSDA-4107	C	ADG Compliance Plan - Typical Level 33
SSDA-4500	B	Driveway Ramp Plan
SSDA-4501	C	Driveway Ramp Sections
SSDA-5001	B	Shadow Diagram Winter Solstice – 0900
SSDA-5002	B	Shadow Diagram Winter Solstice – 1000
SSDA-5003	B	Shadow Diagram Winter Solstice – 1100





SSDA-5004	B	Shadow Diagram Winter Solstice – 1200
SSDA-5005	B	Shadow Diagram Winter Solstice – 1300
SSDA-5006	B	Shadow Diagram Winter Solstice – 1400
SSDA-5007	B	Shadow Diagram Winter Solstice – 1500
5100	C	View from the Sun June 22 – 0900
5101	C	View from the Sun June 22 – 1000
5102	C	View from the Sun June 22 – 1100
5103	C	View from the Sun June 22 – 1200
5107	C	View from the Sun June 22 – 1300
5111	C	View from the Sun June 22 – 1400
5115	C	View from the Sun June 22 – 1500
SSDA-9001	D	GFA Plans
SSDA-9003	D	Affordable Housing GFA
SSDA-9100	E	Housing SEPP Compliance Plans
SSDA-9101	C	Housing SEPP Storage Schedule
SSDA-9102	B	Housing SEPP Compliance Plans- Future Conditions
SSDA-9200	B	Housing SEPP Visual Privacy
SSDA-9900	C	Material Palette

