




SSDA ACCESSIBILITY REPORT
Merrylands Community Housing

Project: Merrylands Community Housing at 215, 229-239 Pitt, Merrylands NSW
 Reference No.: 240060
 Date: 3 October 2025
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AUTHORISATION

Revision	Comment/Reason for Issue	Issue Date	Approved by
03	Access Report for SSDA – Updated to address the removal of a basement level.	3 October 2025	 Seb Howe (BDC2420) Registered Building Surveyor

REVISION HISTORY

Revision	Comment/Reason for Issue	Issue Date	Prepared by
01	Access Report for SSDA - Draft	16 July 2025	 Jhoana Colorado (ACA 713) Accredited Access Consultant Senior Access Consultant
02	Access Report for SSDA – Final	24 July 2025	
03	Access Report for SSDA – Updated to address the removal of a basement level.	3 October 2025	

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1. EXECUTIVE SUMMARY

Codex Building Consultants has reviewed the State Significant Design Application (SSDA) documentation for the subject site, prepared by Fuse-Architects ([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 Cumberland 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 Design Application (SSDA) submission to confirm that the required accessibility provisions have been addressed at this stage, with full compliance achievable. A further assessment will be completed 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 2022 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) for a mixed-use residential tower incorporating affordable housing at 215 and 229–239 Pitt Street, Merrylands, NSW 2160.

Codex Building Consultants has reviewed the State Significant Design Application (SSDA) documentation prepared by Fuse 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

- Cumberland City Council Development Control Plan (DCP).
- Livable Housing Australia’s Design Guidelines (LHA) Fourth edition.

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;

- Slip resistance – specific comments regarding floor slip resistance have not been provided;
- Crossfalls and floor levels, as these details were 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 (01-04) - Various adaptable car parking bays proposed columns in shared areas, which are non-compliance with AS/NZS 2890.6:2009. These are departures from the BCA and requires to be address under a Performance Solution.	D4D6	D1P8	Capable of Compliance
2	There is a lack of 1000minimum clear circulation space within the accessible parking bay shared areas, there may be a need for the omission of bollards in multiple shared areas. These are non-compliance with AS/NZS 2890.6:2009 and are to be address under a Performance Solution.	D4D6	D1P8	Capable of Compliance
3	Basements levels (03-04) - Various accessible car parking bays shared areas are overlapping, which is not in accordance with AS/NZS 2890.6:2009, which are non-compliance with AS/NZS 2890.6:2009.	D4D6	D1P8	Capable of Compliance

	These are departure from the BCA and requires to be address under a Performance Solution.			
4	<p>Columns protrude into adaptable car parking bay. Column is to be clear of the accessible/adaptable parking bay.</p> <p>This is a departure from the BCA and requires to be address under a Performance Solution.</p>	D4D6	D1P8	Capable of Compliance
5	<p>Ground Floor – CODEX understands that the architectural intent is to establish a consistent design language throughout the building, which has resulted in the inclusion of a 1-metre clear width stair at the entry. However, it is observed that the principal pedestrian entrance to the Residential & commercial lobby, intuitively understood to be the Pitt Street frontage, does not provide an accessible path of travel.</p> <p>This is a departure from the BCA and requires to be address under a Performance Solution.</p>	D4D2	D1P1	Capable of Compliance
6	<p>Basements levels (01) - Various corridor ends in the continuous accessible path of travel lack 1540mm x 2070mm clear circulation space, which are non-compliance with AS/NZS 1428.1.</p> <p>This is a departure from the BCA and requires to be address under a Performance Solution.</p>	D4D2	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) 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 [6.8 \(SEPP\)](#) for requirements.

Item	ADG Objective 4Q.1 – Livable Housing	Action Required
1	At least 20% of all apartments are to achieve Silver Level rating in accordance with the Livable Housing Design Guidelines (LHA – Fourth Edition).	<p>238 total SOUS' s are proposed, therefore 48 SOU's are to be adaptable. Adaptable SOU's are nominated as following:</p> <p>1.03 – 1 Bedroom + Study (17 Units) 403, 503, 606, 706, 806, 906, 1006, 1106, 1206, 1306, 1406, 1506, 1606, 1706, 1806, 1906, 2006</p> <p>2.05 – 2 Bedroom + Study (10 Units) 2106, 2206, 2306, 2406, 2506, 2606, 2706, 2806, 2904, 3004</p> <p>3.02 – 3 Bedroom + Study (21 Units) 402, 502, 605, 705, 805, 905, 1005, 1105, 1205, 1305, 1405, 1505, 1605, 1705, 1805, 1905, 2005, 2105, 2205, 2305, 2405</p> <p>3.02 – 3 Bedroom + Study (4 Units) 2505, 2605, 2705, 2805</p>



		<p>In total there are documented 52 Adaptable SOU's, which exceeded the adaptable requirement under Cumberland Council DCP.</p> <p>Capable of Compliance</p>
2	<p>Silver Level compliance schedules are to for review in accordance with ADG Objective 4Q.1 and the LHA Guidelines (4th Edition).</p> <p>Note the 10% adaptable units can be counted in the 20% calculation if the apartment also meets the following requirements</p>	<p>Sou's Silver level has been nominated as follows:</p> <p>1.01 – 1 Bedroom (17 Units) 406, 506, 609, 709, 809, 909, 1009, 1109, 1209, 1309, 1409, 1509, 1609, 1709, 1809, 1909, 2009</p> <p>1.02 – 1 Bedroom + Utility Room (17 Units) 405, 505, 608, 708, 808, 908, 1008, 1108, 1208, 1308, 1408, 1508, 1608, 1708, 1808, 1908, 2008</p> <p>1.03 – 1 Bedroom + Study (17 Units) 403, 503, 606, 706, 806, 906, 1006, 1106, 1206, 1306, 1406, 1506, 1606, 1706, 1806, 1906, 2006</p> <p>1.04 – 1 Bedroom + Study (25 Units) 602, 702, 802, 902, 1002, 1102, 1202, 1302, 1402, 1502, 1602, 1702, 1802, 1902, 2002, 2102, 2202, 2302, 2402, 2502, 2602, 2702, 2802, 2902, 3002</p> <p>2.01 – 2 Bedroom + Study (1 Unit) 305</p> <p>2.02 – 2 Bedroom + Study (10 Units) 2108, 2208, 2308, 2408, 2508, 2608, 2708, 2808, 2906, 3006</p> <p>2.03 – 2 Bedroom + Study (17 Units) 404, 504, 607, 707, 807, 907, 1007, 1107, 1207, 1307, 1407, 1507, 1607, 1707, 1807, 1907, 2007</p> <p>2.04 – 2 Bedroom + Study (1 Unit) 303</p> <p>2.05 – 2 Bedroom + Study (10 Units) 2106, 2206, 2306, 2406, 2506, 2606, 2706, 2806, 2904, 3004</p> <p>2.06 – 2 Bedroom + Study (1 Unit) 304</p> <p>2.07 – 2 Bedroom + Study (10 Units)</p>



		<p>2107, 2207, 2307, 2407, 2507, 2607, 2707, 2807, 2905, 3005</p> <p>2.08 – 2 Bedroom + Study (1 Unit) 301</p> <p>2.09 – 2 Bedroom + Study (25 Units) 401, 501, 604, 704, 804, 904, 1004, 1104, 1204, 1304, 1404, 1504, 1604, 1704, 1804, 1904, 2004, 2104, 2204, 2304, 2404, 2504, 2604, 2704, 2804</p> <p>2.10 – 2 Bedroom + Study (25 Units) 601, 701, 801, 901, 1001, 1101, 1201, 1301, 1401, 1501, 1601, 1701, 1801, 1901, 2001, 2101, 2201, 2301, 2401, 2501, 2601, 2701, 2801, 2901, 3001</p> <p>2.11 – 2 Bedroom + Study (25 Units) 603, 703, 803, 903, 1003, 1103, 1203, 1303, 1403, 1503, 1603, 1703, 1803, 1903, 2003, 2103, 2203, 2303, 2403, 2503, 2603, 2703, 2803, 2903, 3003</p> <p>3.01 – 3 Bedroom + Study (1 Unit) 302</p> <p>3.02 – 3 Bedroom + Study (25 Units) 402, 502, 605, 705, 805, 905, 1005, 1105, 1205, 1305, 1405, 1505, 1605, 1705, 1805, 1905, 2005, 2105, 2205, 2305, 2405, 2505, 2605, 2705, 2805</p> <p>3.03 – 3 Bedroom + Utility Room (4 Units) 3101, 3102, 3201, 3202</p> <p>3.04 – 3 Bedroom + Utility Room (2 Units) 3301, 3302</p> <p>3.06 – 3 Bedroom + Utility Room (4 Units) 3401, 3402, 3501, 3502</p> <p>A total of 238 Silver Level SOUs are proposed, representing 45% of the overall 238 SOUs. This exceeds the minimum 20% requirement set by the Cumberland Council DCP.</p> <p>Capable of Compliance</p>
3	Silver level SOU's internal layout review.	<p>Refer to 6.8 (SEPP)</p> <p>Capable of Compliance</p>



3. BASIS OF ASSESSMENT

3.1. Location and Description

The site for the proposed building is located at 215, 229-239 Pitt St, Merrylands, and is made up of four separate lots across two addresses. The proposed building is located across the following Lot and DPs:

- 215 Pitt St:
 - 2/-/DP501597
- 229-239 Pitt St:
 - 1/-/DP537031
 - 2/-/DP537031
 - J/-/DP10354
 - 1/-/DP1079960

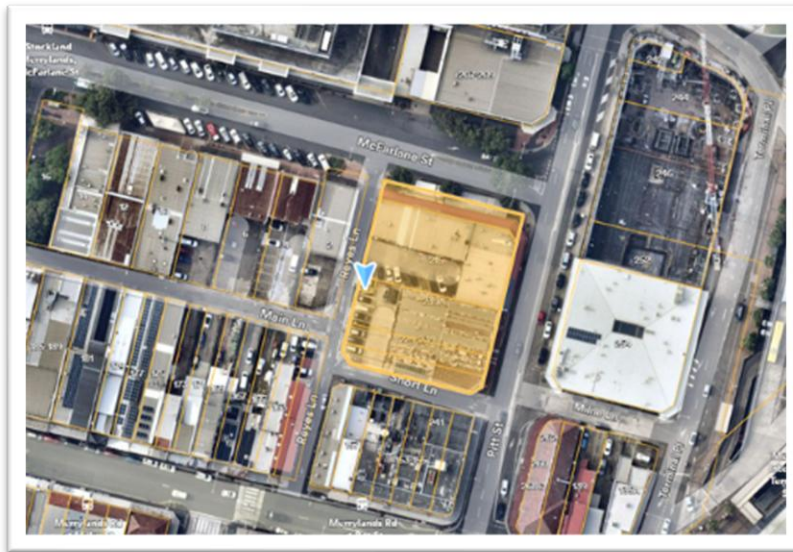


Figure 1 - Aerial Map of Subject Site

The development provides 185 car spaces across 4 basement levels, consistent with the requirements of the SEPP. This includes the DCP requirements for retail and commercial uses, the Housing SEPP for residential uses. Bicycle and motorbike parking is also provided to meet the requirements of the CDCP.

Vehicular access to the development is separated from pedestrian access to provide clear and legible access to the site. A consolidated carpark entry/exit point from Reyes Lane provides internal access to the basement parking. Separate access to the ground level loading, waste and service area is provided from Milner Lane.

Proposed Parking - 185 spaces (approximate)

- 10 x Retail (inc. 1 accessible spaces)
- 46 x Commercial (inc. 1 accessible spaces)
- 129 x Residential spaces (inc. 48 accessible spaces)

Proposed Motorbike Parking - 9 spaces (approximate)

- 9 Motorbike spaces
- Proposed Bicycle Parking - 195 spaces (approximate)
- 80 Resident spaces
- 79 Resident visitor spaces
- 31 commercial/retail tenant spaces
- 5 commercial/retail visitor spaces

The purpose of this report is to assess the current design proposal against the Deemed-to-Satisfy Provisions of BCA 2022 (Amendment 2), and to clearly outline those areas (if any) where compliance is not achieved, where areas may warrant redesign to achieve strict BCA compliance or where areas may be able to be assessed against the relevant performance criteria of BCA 2022 (Amendment 2). Such assessment against relevant performance criteria will need to be addressed by means of a separate Performance-based Assessment (Performance Solution) Report to be prepared under separate cover.

3.2. Building Data Summary

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
All levels other than roof	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 and 4.	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



Part of the Development	Use	Class	Access Requirement	Comment
Underground basement 1, 2, 3 and 4.	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 Capable of Compliance
Ground floor	Commercial lobby	5	Access must be provided -To and within all areas normally used by the occupants.	Access ramp is provided to residential and commercial lobby, however there is a retail facing Pitt St. provide platform lift. Capable of Compliance
Ground floor	Retail	6	Access must be provided -To and within all areas normally used by the occupants.	Access ramp is provided to residential and commercial lobby, however. It is observed that the principal pedestrian entrance to the Residential and commercial lobby are intuitively understood to be the Pitt Street frontage and Reyes Lane, does not provide an accessible path of travel from the street frontage. Codex is to support the use of directional signage via Performance Solution which will indicate the location of the continuous accessible path of travel. This is to be endorsed by the PCA and detailed at a later stage. It will include provision for overhead cover to the ramps to protect users from weather conditions. Capable of Compliance
Level 1, Level 2	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
GF, Level 3-35	Residential Lobby 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 settings.

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.



No.	Principal	Description	Example
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 | RL Mace Universal Design Institute \(udinstitute.org\)](https://www.udinstitute.org/)



5. SEARS

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 20 December 2024 issued for the SSDA). Specifically, this report has been prepared to respond to the SEARS requirement issued below.

Development	Supporting Documents
<p>4. Built Form and Urban Design</p> <ul style="list-style-type: none"> Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface, and articulation) addresses and responds to the context, site characteristics, streetscape, and existing and future character of the locality. Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, materials, finishes, colours, any signage, and integration of services. <p>Assess how the development complies with the relevant accessibility requirements.</p>	<ul style="list-style-type: none"> Architectural drawings (Refer to Item Appendix A) Building Code of Australia Compliance Report Access Provisions (Refer to Item 6 below) Accessibility Report Review (Refer to Item 6 below)

6. COMPLIANCE ASSESSMENT

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

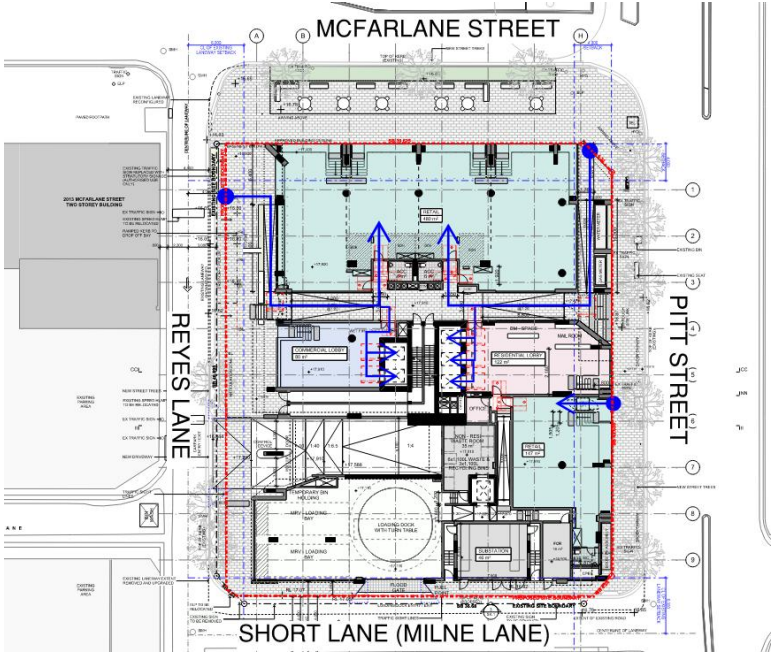
Key	Notes / Required Follow Up
Capable of Compliance	Design aligns with the Deemed-to-Satisfy (DTS).
Does Not Comply	The design does not meet the Deemed-to-Satisfy (DTS) provisions; revision and rectification are required.
Not Applicable	Clause does not apply to the proposed design.
Note for Information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

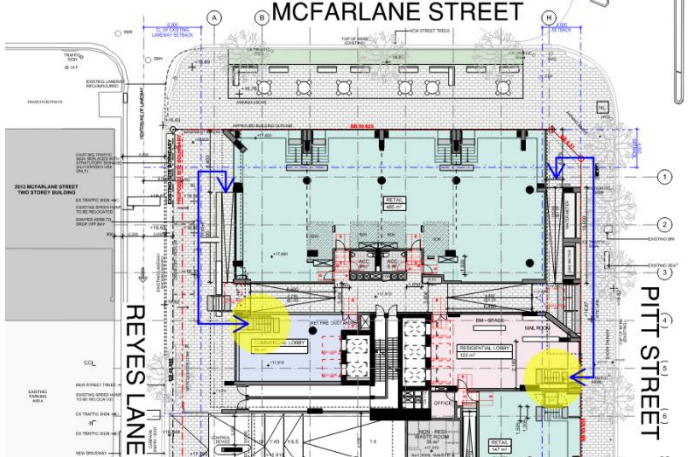
Below is a summary of the key compliance issues that must be resolved before the Construction Certificate can be issued:

6.1. 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.	Capable of Compliance

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

Clause	Title	Assessment and Comment	Status
D4D2	<p>General Building Access Requirements – Classes:</p> <ul style="list-style-type: none"> • 7b (Storage units), • 2 (Residential) buildings • 5 (Commercial) • 6 (Retail) <p>Access must be provided to and within all areas normally used by the occupants.</p>	<p>Class 2 (Residential Lobby), Class 5 (Commercial Lobby)</p> <ul style="list-style-type: none"> • Access is provided via two walkways facing Pitt Street and Reyes Lane respectively then passenger lifts link all levels of the building via internal corridor.  <p>Figure 2. Proposed Ground Floor Plan</p> <ul style="list-style-type: none"> • Retail at the corner of Pitt Street and Short Lane access has been proposed via platform lift. 	<p>Capable of Compliance</p>

Clause	Title	Assessment and Comment	Status
	<p>Access must be provided to and within any level containing accessible carparking spaces.</p>	<p>Access to four (4) 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.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	<p>Capable of Compliance</p>
<p>D4D3(a)</p>	<p>Access to buildings</p>	<p>CODEX understands that the architectural intent is to establish a consistent design language throughout the building, which has resulted in the inclusion of a 1-metre clear width stair at the entry. However, it is observed that the principal pedestrian entrance to the residential and commercial lobby, intuitively understood to be the Pitt Street frontage, does not provide an accessible path of travel.</p>  <p><i>Figure 3. Proposed accessible path of travel for residential and commercial lobbies</i></p> <p>Access to the principal pedestrian entrance may be required to be address under a Performance Solution via directional signage and ramps overhead cover from weather, to be detailed at a later stage.</p>	<p>Capable of Compliance</p>

Clause	Title	Assessment and Comment	Status
D4D3(b)	Entrances	<ul style="list-style-type: none"> 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
D4D4(a)(i)	Parts of buildings to be accessible - Internal / External Ramps & walkways	<p>Proposed 1:20 walkways are to ensure gradient aligned with direction of travel, kerb to be provided in accordance with AS1428.1 at a later stage along with 1:40 max. gradient landing and cross fall is to ensure compliance.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
D4D4(a)(i)	Parts of buildings to be accessible - Internal / External Stairway - common use.	<p>Ground floor –</p> <ul style="list-style-type: none"> All stairs leading to retail lack 900mm clear landing exclusive of the door swing (allow suitable space to provide handrail extensions at a later stage), width lack 1200mm overall (Allow suitable space to prove handrails on both sides to be incorporated at a later stage). <p>There is sufficient space to relocate the stair away from the entry door and increase its overall width to a minimum of 1200 mm. This adjustment can be addressed during the design development stage.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
D4D4(a)(iii)	Parts of buildings to be accessible - Fire-Isolated Stairway.	<p>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.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
D4D4(c)(d)	Parts of buildings to be accessible - Internal /External Paths of Travel	<p><i>90 degrees turns:</i> 1500mm x 1500mm clear circulation spaces are required to achieve (90-degrees turn) have been provided.</p>	Capable of Compliance
		<p><i>Passing Bays:</i> 2000mm x 1800mm clear circulation space to allow two wheelchairs to pass each other have been provided.</p>	Capable of Compliance

Clause	Title	Assessment and Comment	Status
		<p><i>Corridor ends:</i> End Corridors: 1540mm x 2070mm end corridor clear circulation spaces have been provided at storage units for SOU's.</p>	Capable of Compliance
		<p><i>Paths of travel:</i> 1000mm wide clear paths of travel has been provided.</p>	Capable of Compliance
		<p><i>Ramp and walkway landings</i> at the interface with gates provide suitable circulation spaces in accordance with AS 1428.1. It is understood that the gates will be operated by security staff and maintained in the open position during regular operation. However, the side gates may require a Performance Solution due to the absence of a compliant 1450mm level landing. This will be addressed in further design development. Detailed resolution will be required to ensure that door hinges and leaf movement remain clear of any slope and do not obstruct compliant access.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
		<p><i>General Comment – Door Threshold:</i></p> <ul style="list-style-type: none"> Level differences at doorways not documented, it understood all commonly used doors will provide threshold level. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance

Clause	Title	Assessment and Comment	Status
		<p><i>General Comment – Door latch side clearance in the continuous accessible path of travel (CAPT):</i></p> <ul style="list-style-type: none"> Retail (478m²) lack 510mm latch side clearance. There is sufficient space to adjust door. This adjustment can be addressed during the design development stage. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
		<p><i>General Comment – Double doors:</i></p> <ul style="list-style-type: none"> When double doors are provided at least one door (active leaf) is to be 850mm clear width opening. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
		<p><i>General Comment – Doors 850mm min. clear width opening:</i></p> <ul style="list-style-type: none"> Unisex accessible WC doors lack 850mm clear circulation space <p>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.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance

Clause	Title	Assessment and Comment	Status
		<p><i>General Comment – Bi-folding doors circulation in the (CAPT):</i></p> <ul style="list-style-type: none"> The two retail tenancies facing MacFarland Street have a 510 mm drop, requiring edge treatment to be addressed during the detailed design phase. This represents a safety-in-design matter, with final details to be resolved in subsequent stages. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
D4D5	Exemptions	<ul style="list-style-type: none"> Basement 01 (Pumps, grease interceptor, communication rooms and main switch rooms. Ground floor (Substation, fire control room, bins, driveway, Back-of-house (BOH) Ground floor -Mezzanine (Fire tank, OSD, Waste, rainwater tank & water pump) Level 3 (Mechanic plant room). Levels 4 to 30 (Condenser farm & Com, elec. and gas) Levels 31 to 35 (Com, elec. and gas) <p>Rooms other than services will be subject to consultation and approval by relevant stakeholders as part of the CC process (certifier to confirm acceptance).</p>	Note for Information
D4D6	<p>Accessible Carparking: Class 5, 7 buildings</p> <ul style="list-style-type: none"> Provide 1x accessible space for every 100 carparking spaces or part thereof. 	<ul style="list-style-type: none"> Basement 02 – Commercial level proposes 1 accessible car parking bay compliant with BCA. Ensure 2.5m min. height clearance, compliant with AS2890.6:2009 of the proposed car parking bay. Accessible car bays require 2.4 metre with 2.4 metre shared area. Note: Overhead height is 2.5mm have been documented as per AS2890.6:2009. <p>Accessible parking bay allocates for commercial use proposed columns in shared areas, which are non-compliance with AS/NZS 2890.6:2009. This departure can be address under Performance Solution to be detailed at a later stage (For detail refer to item 2.4 above).</p>	Capable of Compliance

Clause	Title	Assessment and Comment	Status
	<p>Class 6 buildings</p> <ul style="list-style-type: none"> Provide 1x accessible space for every 50 carparking spaces or part thereof (for up to 1000 car parking spaces). <p>For each additional 100 carparking spaces or part thereof in excess of 1000 carparking spaces — Provide 1x accessible space.</p>	<ul style="list-style-type: none"> Basement 01– Retail level proposes 1 accessible car parking bay compliant with BCA. Ensure 2.5m min. height clearance, compliant with AS2890.6:2009 of the proposed car parking bay. Accessible car bays require 2.4 metre with 2.4 metre shared area. Note: Overhead height is 2.5mm have been documented as per AS2890.6:2009. <p>Accessible parking bay allocates for retail use proposed columns in shared areas, which are non-compliance with AS/NZS 2890.6:2009. This departure can be address under Performance Solution to be detailed at a later stage. (For detail refer to item 2.4 above).</p>	Capable of Compliance
	<p>Class 2 buildings</p> <ul style="list-style-type: none"> An adaptable unit car bay is to be provided for each adaptable unit. Bays may be designed as either a single 3.8 m wide space or a 2.4 m wide bay with a 2.4 m wide shared zone, both with a minimum length of 5.4 m. in accordance with AS2890.6-2009. 	<ul style="list-style-type: none"> Basement 03,04 &05 – Residential parking levels proposes 48 adaptable parking bays in which will be 20% of 238 total SOU's. Ensure 2.5m min. height clearance, compliant with AS2890.6:2009 of the proposed car parking bay. Accessible car bays require 2.4 metre with 2.4 metre shared area. Note: Overhead height is 2.5mm have been documented as per AS2890.6:2009. <p>The following are departures found in the proposed adaptable bays:</p> <ul style="list-style-type: none"> Various adaptable car parking bays proposed columns in shared areas, which are non-compliance with AS/NZS 2890.6:2009. Various shared areas lack bollards in multiple shared areas within the adaptable car parking bays. Various shared areas are overlapping, which constitutes a non-compliance under the current standard AS/NZS 2890.6:2009. Various adaptable car parking bays provide columns outside of the car envelop, which constitutes a non-compliance under the current standard AS/NZS 2890.6:2009. These departures can be address under Performance Solution to be detailed at a later stage. (For detail refer to item 2.4 above). 	Capable of Compliance

Clause	Title	Assessment and Comment	Status
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
D4.8(b)	Hearing Augmentation - Supplementary Visual Information		Not Applicable
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
D4D10	Wheelchair seating spaces Class 9b assembly buildings	This clause is not applicable to this project.	Not Applicable
D4D11	Swimming Pools	This clause is not applicable to this project.	Not Applicable
D4D12(a)	Ramps 3.6m max. Height	Ramps/walkways proposed not exceed 3.6m heigh.	Capable of Compliance
D4D12(b)	Consecutive (1:10) Step ramp	Ramps have not been documented.	Not Applicable
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

6.3. BCA Part E3 – Passenger Lift

Clause	Title	Assessment and Comment	Status
E3D7	Passenger Lifts, types and limitations	<ul style="list-style-type: none"> Passenger lifts provide access to all levels required to be accessible residential, retail, commercial etc. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance

E3D8	Accessible features required for passenger lifts	<ul style="list-style-type: none"> Passenger lifts provide suitable internal clear floor circulation space. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
AS 1735.15 and AS1735.16	Goods lift to function as passenger lift is to comply with AS 1735.15 and AS1735.16.	<p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance

6.4. BCA Part F4 - Sanitary Facilities and Other Facilities

Clause	Title	Assessment and Comment	Status
F4D4	<p>Unisex Accessible Toilets</p> <ul style="list-style-type: none"> Provide 1x accessible unisex sanitary compartment on every storey containing sanitary compartments in accordance with Clause F4D6; 	<ul style="list-style-type: none"> Ground floor (Retail) provides 2 unisex accessible WC; these provide suitable Overall dimensions (2120mm W x 2600mm L in lieu of 2630mm L) this is 30mm are to be address at a later stage to meet AS1428.1-2009. L01- (Commercial) provides unisex 1 accessible WC; these provide suitable Overall dimensions (1900mm W x 2700mm L) this is compliant with AS1428.1. L03- (Communal open space) provides 2 unisex accessible WC; these provide suitable Overall dimensions (2120mm W x 3930mm L) this is compliant with AS1428.1. L31- (Communal open space) provides unisex 1 accessible WC; these provide suitable Overall dimensions (1900mm W x 2300mm L) this is compliant with AS1428.1. 	Capable of Compliance

Clause	Title	Assessment and Comment	Status
	<ul style="list-style-type: none"> 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. 	<p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p> <ul style="list-style-type: none"> Currently, proposed compartment size is suitable to accommodate a unisex accessible in accordance with AS1428.1. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	<p>Capable of Compliance</p>
	<ul style="list-style-type: none"> Accessible WC requires 2300mm x 1900mm around the pan with the basin to sit outside this area in accordance with AS1428.1. 	<ul style="list-style-type: none"> Majority of proposed compartment size is suitable to accommodate a unisex accessible in accordance with AS1428.1. However, Ground floor unisex accessible WC adjacent to retail is short 30mm. this can be gain adjusting corridor, ensure 1540mm min. wide corridors. This can be address at a later stage during detail design. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	<p>Capable of Compliance</p>
F4D5(g)	<ul style="list-style-type: none"> 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 subsequent level is the most appropriate and inclusive approach. 	<ul style="list-style-type: none"> Ground floor provides unisex accessible WC; these are RH & LH in accordance with BCA. <p>Unisex accessible pan transfers are proposed as following for commercial levels:</p> <ul style="list-style-type: none"> L3- LH Transfer proposed, L2 -RH Transfer proposed and L1 -RH Transfer proposed to be left (LH) to meet balance required by BCA. 	<p>Capable of Compliance</p>

Clause	Title	Assessment and Comment	Status
		<p>There is sufficient space to relocate pan in Level 1. This adjustment can be addressed during the design development stage.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	
F4D4 requires 1 or more showers)	<p>Accessible Showers:</p> <ul style="list-style-type: none"> Provide 1x accessible shower for every 10 showers or part thereof. 	<p>No accessible shower compartment is documented, so the clause does not apply to this project.</p>	Not Applicable
F4D7(c)	<p>Ambulant Toilets –</p> <ul style="list-style-type: none"> required within every standard toilet bank adjacent to an accessible toilet under DDA Access Code Part F2.4 compliant with AS1428.1:2009. 	<ul style="list-style-type: none"> L01& 02- (Commercial) provides 1 bank of toilets female and male and there are male and female ambulant cubicles are proposed. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
F4D12	Adult Change Facilities	This clause is not applicable to this project.	Not Applicable

6.5. Adaptable Units Provision

Cumberland DCP – Part B – Development in Residential Zones

Part	Title	Assessment and Comment	Status
B5	Adaptable Housing and Housing Mix	238 total SOUS' s are provided	Capable of Compliance
	2.1 Adaptable Housing C1.	48 Adaptable SOU's are provided, 20% as required under Cumberland Council.	
	Adaptable housing complying with AS 4299 is to be provided in multi-dwelling housing, residential flat buildings, and the residential component of mixed-use developments in accordance with the following: For more than 20 SOU's proposed 20% adaptable units are to be provided (unless justification is provided for Council	20% adaptable SOUs are required based on Cumberland Council DCP The adaptable units are to be designed in accordance with AS4299 Class C	
		48 - Nominated SOUs are provided. Refer to Item 2.5 (SEPP) for further information.	

6.6. 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. 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). <ul style="list-style-type: none"> • 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	<p>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.</p> <ul style="list-style-type: none"> Toilet dimensions are currently in accordance with AS1428.1. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
4.6	Toilet & Shower Location	<p>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.</p> <ul style="list-style-type: none"> Pan location is in the same location in pre & post layout. This is to be adjusted for compliance. Refer to CODEX markups for guidance and implement necessary adjustments for compliance. <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
4.7	Living room	<p>2250mm min diameter after furniture placement has been provided.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
4.6.1	Bedroom (x1)	<p>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.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
4.4.4(h)	Structural Reinforcement	<p>Walls around toilets, showers, and baths must be structurally reinforced for future installation of grabrails.</p>	Capable of Compliance

Reference	Design Element	Requirements at pre-adaptable stage	Status
		All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).	
4.5.2	Kitchen Layout	<p>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.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
4.8	Laundry	<p>1500mm is to be provided in front of the appliances has been provided.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
4.3.4	Doors and Hardware	<p>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.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
4.5.3	General Circulation Spaces	<p>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.</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance
3.7.2	Carparking	<p>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 (For details refer to Item D4D6 above).</p> <p>All details are to be provided and reviewed in the detailed-development phase, prior to final construction docs and the (CC).</p>	Capable of Compliance

6.7. 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 – <ul style="list-style-type: none"> • 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. Refer to Item 2.4 for further information.	Capable of Compliance

7. CONCLUSION

This Accessibility Report has been prepared by CODEX Building Consultants in support of the State Significant Design Application (SSDA) for the proposed mixed-use development located at 215, 229–239 Pitt Street, Merrylands 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);
- Cumberland City Council Development Control Plan (DCP);
- 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
Senior Access Consultant
Codex Building Consultants

8. APPENDIX A – ARCHITECTURAL PLANS REVIEWED

Architectural Plans prepared by Fuse-Architects – Dated : 3/07/2025

Drawing Number	Revision	Title
SSDA 001	A	COVER SHEET
SSDA 002	A	DEVELOPMENT SUMMARY
SSDA 003	A	CONTEXT ANALYSIS
SSDA 004	A	SITE ANALYSIS
SSDA 005	A	SITE PLAN
SSDA 006	A	DEMOLITION PLAN
SSDA 101	A	BASEMENT 04 PLAN
SSDA 102	A	BASEMENT 03 PLAN
SSDA 103	A	BASEMENT 02 PLAN
SSDA 104	A	BASEMENT 01 PLAN
SSDA 105	A	GROUND LEVEL PLAN
SSDA 106	A	GROUND LEVEL PLAN - MEZZANINE
SSDA 107	A	LEVEL 01 PLAN
SSDA 108	A	LEVEL 02 PLAN
SSDA 109	A	LEVEL 03 PLAN - COS
SSDA 110	A	LEVEL 04-05 PLAN
SSDA 111	A	LEVEL 06-20 PLAN
SSDA 112	A	LEVEL 21 PLAN
SSDA 113	A	LEVEL 22-28 PLAN
SSDA 114	A	LEVEL 29 PLAN - COS
SSDA 115	A	LEVEL 30 PLAN
SSDA 116	A	LEVEL 31 PLAN - COS



SSDA 117	A	LEVEL 32 PLAN
SSDA 118	A	LEVEL 33 PLAN
SSDA 119	A	LEVEL 34 PLAN
SSDA 120	A	LEVEL 35 PLAN
SSDA 121	A	ROOF PLAN
SSDA 201	A	NORTH ELEVATION (MCFARLANE STREET)
SSDA 202	A	SOUTH ELEVATION (SHORT LANE)
SSDA 203	A	EAST ELEVATION (PITT STREET)
SSDA 204	A	WEST ELEVATION (REYES LANE)
SSDA 205	A	SECTION A
SSDA 206	A	SECTION B
SSDA 207	A	SECTION C
SSDA 208	A	SECTION H (PODIUM COS)
SSDA 209	A	SECTION J (ROOF COS)
SSDA 210	A	DRIVEWAY SECTION
SSDA 211	A	THROUGH SITE LINK SECTION
SSDA 212	A	RESIDENTIAL LOBBY INTERFACE SECTION
SSDA 213	A	FIRE EXIT STAIRS SECTION
SSDA 214	A	EAT STREET SECTION
SSDA 215	A	COMMERCIAL LOBBY INTERFACE SECTION
SSDA 301	A	UNIT TYPES SHEET 01
SSDA 302	A	UNIT TYPES SHEET 02
SSDA 303	A	UNIT TYPE_ADAPTABLE SHEET 01
SSDA 304	A	UNIT TYPE_ADAPTABLE SHEET 02
SSDA 305	A	UNIT TYPE_ADAPTABLE SHEET 03
SSDA 401	A	SHADOW DIAGRAMS SHEET 01



SSDA 402	A	SUN EYE VIEW DIAGRAMS SHEET 01
SSDA 403	A	COS SUN EYE VIEW DIAGRAMS SHEET 01
SSDA 404	A	COS SHADOW DIAGRAMS SHEET 01
SSDA 405	A	COS SHADOW DIAGRAMS SHEET 02
SSDA 406	A	PUBLIC DOMAIN SHADOW DIAGRAMS SHEET 01
SSDA 501	A	GFA DIAGRAMS
SSDA 502	A	OPEN AREA DIAGRAMS
SSDA 503	A	SOLAR ACCESS DIAGRAMS 01
SSDA 504	A	SOLAR ACCESS DIAGRAMS 02
SSDA 505	A	SOLAR ACCESS DIAGRAMS 03
SSDA 506	A	NO DIRECT SUNLIGHT DIAGRAMS
SSDA 507	A	NATURAL CROSS VENTILATION DIAGRAMS
SSDA 508	A	LEP HEIGHT PLANE DIAGRAM
SSDA 509	A	BUILDING SEPARATION PLAN GROUND
SSDA 510	A	BUILDING SEPARATION PLAN PODIUM
SSDA 511	A	BUILDING SEPARATION PLAN TOWER
SSDA 601	A	MATERIALS AND FINISHES SCHEDULE
SSDA 701	A	PHOTOMONTAGE SHEET 01
SSDA 702	A	PHOTOMONTAGE SHEET 02
SSDA 703	A	PHOTOMONTAGE SHEET 03
SSDA 704	A	PHOTOMONTAGE SHEET 04
SSDA 705	A	PHOTOMONTAGE SHEET 05
SSDA 706	A	PHOTOMONTAGE SHEET 06
SSDA 707	A	PHOTOMONTAGE SHEET 07



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Drawing No.	Title	Revision
SSDA 001	COVER SHEET	A
SSDA 002	DEVELOPMENT SUMMARY	A
SSDA 003	CONTEXT ANALYSIS	A
SSDA 004	SITE ANALYSIS	A
SSDA 005	SITE PLAN	A
SSDA 006	DEMOLITION PLAN	A
SSDA 101	BASEMENT 05 PLAN	A
SSDA 102	BASEMENT 04 PLAN	A
SSDA 103	BASEMENT 03 PLAN	A
SSDA 104	BASEMENT 02 PLAN	A
SSDA 105	BASEMENT 01 PLAN	A
SSDA 106	GROUND LEVEL PLAN	A
SSDA 107	GROUND LEVEL PLAN - MEZZANINE	A
SSDA 108	LEVEL 01 PLAN	A
SSDA 109	LEVEL 02 PLAN	A
SSDA 110	LEVEL 03 PLAN - COS	A
SSDA 111	LEVEL 04-05 PLAN	A
SSDA 112	LEVEL 06-20 PLAN	A
SSDA 113	LEVEL 21 PLAN	A
SSDA 114	LEVEL 22-28 PLAN	A
SSDA 115	LEVEL 29 PLAN - COS	A
SSDA 116	LEVEL 30 PLAN	A
SSDA 117	LEVEL 31 PLAN - COS	A
SSDA 118	LEVEL 32 PLAN	A



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Drawing No.	Title	Revision
SSDA 119	LEVEL 33 PLAN	A
SSDA 120	LEVEL 34 PLAN	A
SSDA 121	LEVEL 35 PLAN	A
SSDA 122	ROOF PLAN	A
SSDA 201	NORTH ELEVATION (MCFARLANE STREET)	A
SSDA 202	SOUTH ELEVATION (SHORT LANE)	A
SSDA 203	EAST ELEVATION (PITT STREET)	A
SSDA 204	WEST ELEVATION (REYES LANE)	A
SSDA 205	SECTION A	A
SSDA 206	SECTION B	A
SSDA 207	SECTION C	A
SSDA 208	SECTION H (PODIUM COS)	A
SSDA 209	SECTION J (ROOF COS)	A
SSDA 210	DRIVEWAY SECTION	A
SSDA 211	THROUGH SITE LINK SECTION	A
SSDA 212	RESIDENTIAL LOBBY INTERFACE SECTION	A
SSDA 213	FIRE EXIT STAIRS SECTION	A
SSDA 214	EAT STREET SECTION	A
SSDA 215	COMMERCIAL LOBBY INTERFACE SECTION	A
SSDA 301	UNIT TYPES SHEET 01	A
SSDA 302	UNIT TYPES SHEET 02	A
SSDA 303	UNIT TYPE_ADAPTABLE SHEET 01	A
SSDA 304	UNIT TYPE_ADAPTABLE SHEET 02	A
SSDA 305	UNIT TYPE_ADAPTABLE SHEET 03	A





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Drawing No.	Title	Revision
SSDA 401	SHADOW DIAGRAMS SHEET 01	A
SSDA 402	SUN EYE VIEW DIAGRAMS SHEET 01	A
SSDA 403	COS SUN EYE VIEW DIAGRAMS SHEET 01	A
SSDA 404	COS SHADOW DIAGRAMS SHEET 01	A
SSDA 405	COS SHADOW DIAGRAMS SHEET 02	A
SSDA 406	PUBLIC DOMAIN SHADOW DIAGRAMS SHEET 01	A
SSDA 501	GFA DIAGRAMS	A
SSDA 502	OPEN AREA DIAGRAMS	A
SSDA 503	SOLAR ACCESS DIAGRAMS 01	A
SSDA 504	SOLAR ACCESS DIAGRAMS 02	A
SSDA 505	SOLAR ACCESS DIAGRAMS 03	A
SSDA 506	NO DIRECT SUNLIGHT DIAGRAMS	A
SSDA 507	NATURAL CROSS VENTILATION DIAGRAMS	A
SSDA 508	LEP HEIGHT PLANE DIAGRAM	A
SSDA 509	BUILDING SEPARATION PLAN GROUND	A
SSDA 510	BUILDING SEPARATION PLAN PODIUM	A
SSDA 511	BUILDING SEPARATION PLAN TOWER	A
SSDA 601	MATERIALS AND FINISHES SCHEDULE	A
SSDA 701	PHOTOMONTAGE SHEET 01	A
SSDA 702	PHOTOMONTAGE SHEET 02	A