WILLIAM STREET RESIDENTIAL

ACCESS DESIGN REVIEW – DEVELOPMENT APPLICATION (DA)

164-172 and 174-194 William Street, Woolloomooloo, NSW

Project number: 119744
Revision: ADR 1.0
Date: 23 September 2025

JENSEN HUGHES

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Quality management

Revision	Date	Revision description	
ADR 1.0	23 September 2025	Access Design Review – Development Application Report	
		Prepared by	**Reviewed by**
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1.0 Project Overview / Summary

This Access Design Review – Development Application (DA) Report has been prepared by Jensen Hughes to accompany the proposed State Significant Development Application (SSDA) for a mixed – use infill affordable housing development at 164 – 172 and 174 – 194 William Street, Woolloomooloo. The site is made up of two (2) lots. The legal description of the site is outlined in Table 1.

Table 1 – Legal Description

Property Address	Title Description
164-172 William Street, Woolloomooloo	Lot 52 in DP1049805
174-194 William Street, Woolloomooloo	Lot 1 in DP816050

This report has been prepared to address the Secretary's Environmental Assessment Requirements (**SEARs**) issued for the project (SSD-80211463).

This report concludes that the proposed development is suitable and warrants approval subject to the implementation of the following mitigation measures.

+ The matters for further consideration in Section 7.0 Design Requirements has been addressed.
+ The Performance Solutions identified in Section 6.1 has been addressed.

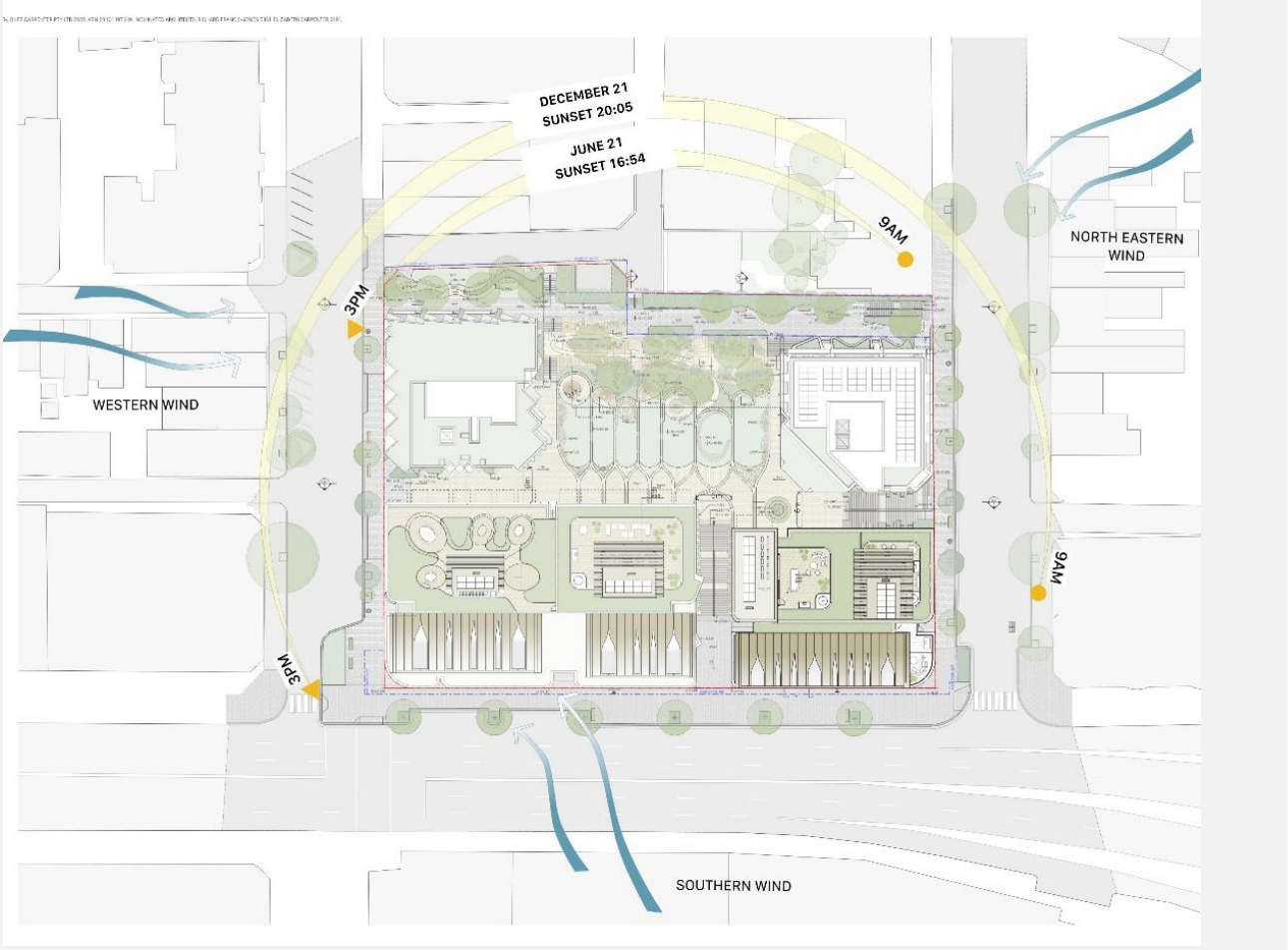
Following the implementation of the above mitigation measures, the remaining impacts are appropriate.

1.1 Site plan

The site is located at 164-172 and 174-194 William Street Woolloomooloo within the City of Sydney LGA. The site is comprised of multiple allotments and is legally described as:

+ 164-172 William Street, Woolloomooloo
  - Lot 52 in DP1049805
+ 174-194 William Street, Woolloomooloo
  - Lot 1 in DP816050

The land size totals 6,398m^2 and consists of a southern frontage to William Street, an eastern frontage to Dowling Street, a western frontage to Forbes Street and northern frontage to Judge Lane.



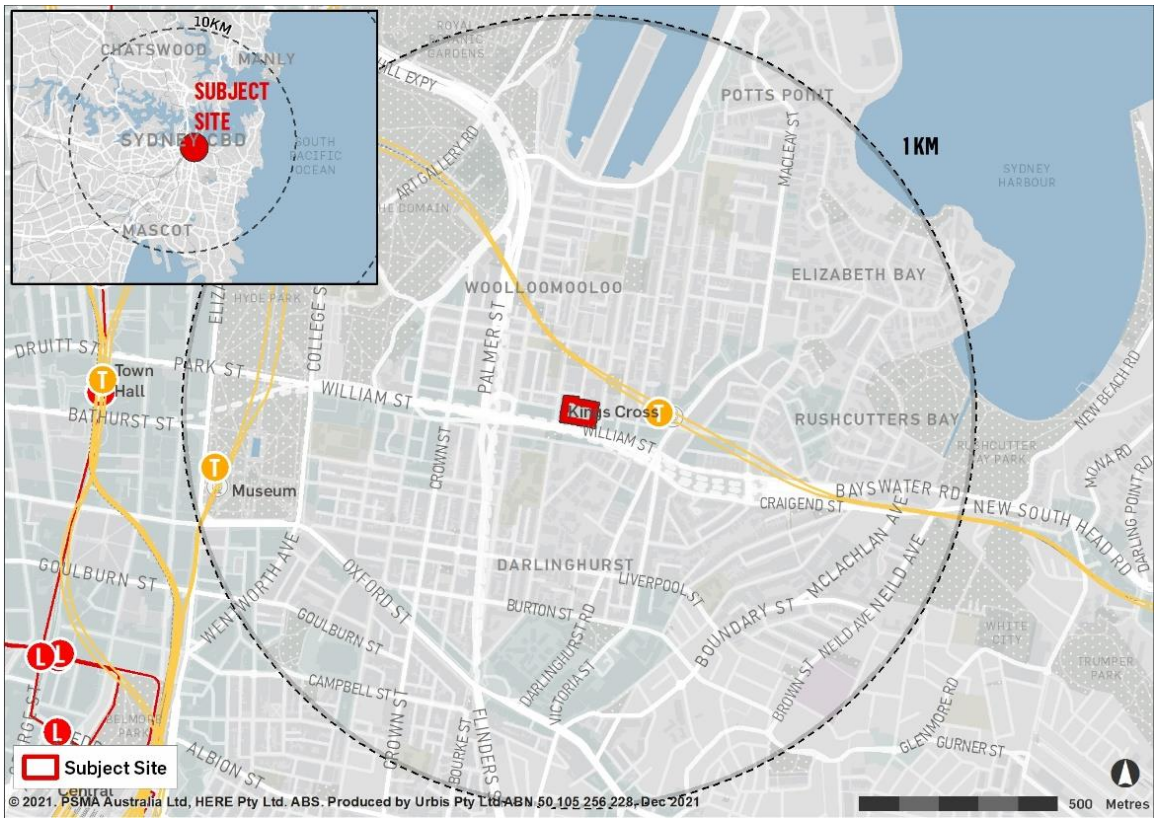
1200_Site Plan _Dated 22_08_2025 by Tribe Studio Architects | fjcstudio | Studio Bright

1.2 Building location plan

The immediate urban context surrounding the site is characterised by a mix of medium density residential, commercial, and retail uses. The site is in close proximity to Hyde Park, The Domain, and Rushcutters Bay Reserve. There are a number of educational and health services in proximity to the site, providing ample infrastructure support for the community.

William Street, to which the site fronts, is a classified road providing connection between the Eastern Suburbs of Sydney and the CBD. Vehicle access is currently provided from six points on the site from Judge Lane, Forbes Street, and Dowling Street. Pedestrian access to the site is currently available from all frontages.

The site is highly accessible to both bus and rail services, being approximately 300m away from Kings Cross Railway Station and having direct access to bus services on William Street that provide connections through the Metropolitan Transport Network.
At the time of lodgement, the site is improved by a warehouse style structure and glass office building to the site's frontage and an at-grade private carpark to the northwestern portion of the site.



Local Context

The Site

1.3 Review summary

A detailed review has been undertaken of the documentation listed within this report (refer below) against the following:

- *Disability (Access to Premises- Buildings) Standards 2010.*
- Building Code of Australia 2022 Amendment 2 (BCA2022) Volume 1 – Part D4 and Clauses E3D7 and E3D8
- Applicable Australian Standards AS1428.1:2021, AS1428.4.1:2009 and AS2890.6:2009, AS1735.12-1999.

The design review includes general areas of the proposed development including but not limited to items as noted below:

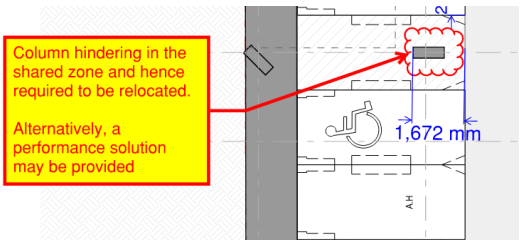
- Accessways (continuous accessible path of travel) from the allotment boundary and any accessible parking bay within the allotment associated with the building.
- Building entrances.
- Provision of vertical transport
- Doors (hinged/sliding) and doorway circulation space.
- Stairs, ramps, and walkway/pathway requirements.
- Car parking.
- Landscaping.
- Adaptable housing provisions AS 4299

Subject to addressing the actions identified as necessary within the future design stages of the project, Jensen Hughes confirm that the project documentation provides accessibility capable of complying with the Disability (Access to Premises – Buildings) Standards 2010 (APS), National Construction Code (BCA) and City of Sydney Development Control Plan (DCP) requirements.

1.4 Performance based solution summary.

The assessment of the design documentation has revealed that the following areas require assessment against the relevant performance requirements of the BCA:

Item	BCA Clause	Relevant Performance Requirement	Technical Requirement	Technical Departure
1.	D4D6	D1P8 Car parking for people with disability Provide, to the degree necessary, to give equitable access for carparking	The bollards in the shared zone to be in accordance with 2890.6:2009. A structural column has been provided in lieu of a bollard.	A structural column in located in front of the shared accessible parking space shared zone.

Item	BCA Clause	Relevant Performance Requirement	Technical Requirement	Technical Departure
				

2.0 Introduction

William Street Residential, for the mixed – use infill affordable housing development at 164 – 172 and 174 – 194 William Street, Woolloomooloo have engaged the services of Jensen Hughes as access consultants to conduct a review of project documentation to ensure that functional and compliant accessibility has been applied to the design. Further, as members of the Access Consultants Association (ACA), Jensen Hughes staff use our experience and expertise in the provisions of access to ensure the project team considers the objects of the *Disability Discrimination Act* (DDA) which are far reaching, extending beyond the minimums of building legislation.

3.0 Project description

This Access Design Review – Development Application (DA) Report has been prepared by Jensen Hughes to accompany the proposed State Significant Development Application (SSDA) for a mixed – use infill affordable housing development at 164 – 172 and 174 – 194 William Street, Woolloomooloo. The site is made up of two (2) lots. The legal description of the site is outlined in Table 1.

Table 1 – Legal Description

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This report has been prepared to address the Secretary's Environmental Assessment Requirements (**SEARs**) issued for the project (SSD-80211463).

The subject building is a mixed – use infill affordable housing development consisting of:

- Basement Car Parking
- Ground Floor & Podium retail shops.
- Residential Sole-Occupancy Units (SOUs)
- Communal areas
- Associated facilities.

The subject building has multiple pedestrian entrances from Forbes, Dowling and William Street. Vehicular entrance is appurtenant from Forbes Street.

4.0 Legislative requirements

The minimum legislative requirements for this project comprise both Federal and State legislation. These are outlined below.

Federal

The Federal *Disability Discrimination Act 1992* (DDA) was enacted in 1993. The objects of the DDA are to eliminate as far as possible, discrimination against persons on the basis of their disabilities, in particular access to premises (as defined under the DDA); work; accommodation; the provisions of facilities, services; and land; to ensure, as far as practicable, that persons with disabilities have the same rights to equality before the law as the rest of the community; and to promote recognition and acceptance within the community of the principle that persons with disabilities have the same fundamental rights as the rest of the community.

The DDA is complaints-based legislation administered by the Australian Human Rights Commission (AHRC).

The DDA utilises legislative instruments known as Disability Standards to specify how the objects of the DDA are to be achieved. These standards include:

- *Disability (Access to Premises – Buildings) Standards 2010,*
- *Disability Standards for Education 2005; and*
- *Disability Standards for Accessible Public Transport 2002.*

Where relevant, these Standards reference the Australian Standards for access and mobility (and others), including parts of the AS1428 series, primarily AS1428.1-2009, AS1428.4.1-2009 and others such as AS2890.6 2009.

This review has considered the requirements of the *Disability (Access to Premises – Buildings) Standards 2010.*

State

With the introduction of the *Disability (Access to Premises – Buildings) Standards 2010*, the Building Code of Australia 2011 was modified to align with the federal legislation. The aim of this alignment/inclusion was to ensure that where a building complies with the relevant sections of the BCA, it is deemed to comply with the 'premises' component of the DDA relevant to buildings. However, it is to be noted that compliance with the BCA alone does not necessarily mean compliance with the Disability Discrimination Act, provisions of which extend beyond the building itself.

4.1 Referenced legislation and standards.

The design review has been undertaken against the following:

- *Disability (Access to Premises – Buildings) Standards 2010.*
- National Construction Code (BCA) - Building Code of Australia (BCA) 2022 Volume 1 Amendment 2 and referenced Australian Standards including:
  - AS1428.1 2021 Part 1: General Requirements for access – new building work.

- AS1428.4.1 2009 Part 4.1: Means to assist the orientation of people with vision impairment – Tactile Ground Surface Indicators (TGSIs).
- AS2890.6 2009 Part 6: Off-street parking for people with disabilities.
- AS1735.12 1999 Lift facilities for people with disabilities.

4.2 Council development approval / development control plans (DCPs)

Federal and State based legislative considerations, adherence to the City of Sydney Development Control Plan, Section 3, dated December 2012 is required.

The proposed development must not be inconsistent with the endorsed drawings, and all relevant conditions will need to be satisfied and accurately reflect the construction issue drawings.

5.0 Documentation reviewed.

This report is specific to the following key stage drawings.

Architectural Plans Prepared by Tribe Studio Architects, fjcstudio and Studio Bright			
Drawing Number	**Revision**	**Date**	**Title**
2000	1	22/08/2025	General Arrangement Plans Basement 01
2019	1	22/08/2025	General Arrangement Plans Basement 02
2020	1	22/08/2025	General Arrangement Plans Basement 03
2021	1	22/08/2025	General Arrangement Plans Basement 04
1200	1	22/08/2025	Site Plan
8100	1	13/08/2025	Landscape General Arrangement Plan
2001	1	22/08/2025	General Arrangement Plans - Plaza Level - Forbes Street
2002	1	22/08/2025	General Arrangement Plans - Retail Laneway - Dowling Street
2003	1	22/08/2025	General Arrangement Plans - Upper Ground Floor - William Street
2004	1	22/08/2025	General Arrangement Plans - Mezzanine Level
2005	1	22/08/2025	General Arrangement Plans - Level 01 - 02
2006	1	22/08/2025	General Arrangement Plans - Level 03
2007	1	22/08/2025	General Arrangement Plans - Level 04
2008	1	22/08/2025	General Arrangement Plans - Level 05 - 06
2009	1	22/08/2025	General Arrangement Plans - Level 07
2010	1	22/08/2025	General Arrangement Plans - Level 08
2011	1	22/08/2025	General Arrangement Plans - Level 09
2012	1	22/08/2025	General Arrangement Plans - Level 10
2013	1	22/08/2025	General Arrangement Plans - Level 11 - 13
2014	1	22/08/2025	General Arrangement Plans - Level 14
2015	1	22/08/2025	General Arrangement Plans - Level 15
2016	1	22/08/2025	General Arrangement Plans - Level 16

Architectural Plans Prepared by Tribe Studio Architects, fjcstudio and Studio Bright			
2017	1	22/08/2025	General Arrangement Plans - Level 17
8104	1	13/08/2025	Landscape Plans Communal Terrace

6.0 Exemptions and performance-based solutions

6.1 Exemptions

Based on the use of some areas within a building, it is reasonable not to provide access to some spaces. These areas include:

- An area where access would be inappropriate because of the particular purpose for which the area is used.
- An area that would pose a health or safety risk for people with a disability.
- Any path of travel providing access only to an area exempted by (a) or (b).

Examples of these rooms/spaces as outlined within the Guideline on the Application of The Premises Standards, Version 2, February 2013, developed by the Australian Human Rights Commission could include: cleaners store rooms, commercial kitchens, staff serving areas behind bars, cool rooms, rigging lofts, waste-containment areas, foundry floors, abattoir animal process areas, railway shunting yards, electrical switch rooms, chemical and hazardous material store areas, loading docks, fire lookouts, plant and equipment rooms and other similar areas.

6.1.1 Subject site – exemptions from the requirements of access

It is expected that based on the use of some spaces within the building, it is reasonable not to provide access to some spaces based on the information provided above.

Assessment of application of this general exemption to specific areas will need to be made on a case-by-case basis. **Any decision to document this clause should be documented with information from the building owner or manager** about the role of personnel to be admitted to the areas, security arrangements for independent movement of non-authorised personnel, activities of workers using the spaces, and work health and safety (WH & S) restraints.

6.2 Performance based solutions.

Where compliance via the current Deemed to Satisfy (DtS) building legislation cannot be met, these departures are to be addressed via the Performance Based Solution (PBS) Assessment process. This assessment when utilised, will be unique to each building and/or site, combining an understanding of the principles of access with alternative methods to assist the design team, building owners/operators and occupants to achieve an effective solution.

Item	BCA Clause	Relevant Performance Requirement	Technical Requirement	Technical Departure
1.	D4D6	D1P8 Car parking for people with disability Provide, to the degree necessary, to give equitable access for carparking	The bollards in the shared zone to be in accordance with 2890.6:2009. A structural column has been provided in lieu of a bollard.	A structural column in located in front of the shared accessible parking space shared zone.

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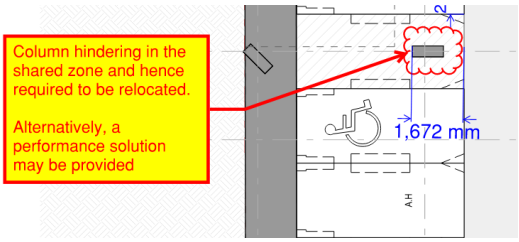
				

7.0 Design requirements

The following highlights the key accessibility features that are to be addressed as the design progresses. It should be noted that for technical specifications, relevant Australian Standards are to be utilised.

7.1 General building access requirements

Buildings and parts of buildings must be accessible in accordance with D4D2 of **BCA 2022 Amendment 2.** Unless subject to an exemption, access is required as follows:

Building Classification	Access Requirements
Class 2 – Residential Common areas	Access is required: From a pedestrian entrance required to be accessible to at least one floor containing sole-occupancy units (SOUs) and to the entrance of each SOU located on that level. To and within not less than one of each type of room or space for use in common by the residents, including a cooking facility, sauna, gymnasium, swimming pool, common laundry, games room, individual shop, eating area of the like. Where a ramp complying with AS 1428.1 or a passenger lift is installed: a. To the entrance doorway of each SOU, and b. To and within rooms or spaces for use in common by the residents, located on the levels served by the lift or ramp.
Class 6 – shop or other building for the same of goods by retail, or supply of services direct to the public	Access is required to and within all areas used by occupants
Class 7a – a car park	Access is required to and within any level containing accessible carparking spaces
Class 7b – storage, goods or produce for wholesale sale	Access is required to and within all areas used by occupants

Note: The building classifications outlined in this report have been assumed based on the best available knowledge. However, the design team is advised to confirm these clarifications and ensure they align with the final design intent and relevant project documentation.

7.1.1 BCA Clauses and referenced Australian Standards reviewed:

BCA Clauses – BCA 2022 references	
D4D2 General building access requirements	Applicable
D4D3 Access to buildings	Applicable
D4D4 Parts of buildings to be accessible	Applicable
D4D5 Exemptions	Applicable
D4D6 Accessible car parking	Applicable
D4D7 Signage	Applicable

BCA Clauses – BCA 2022 references	
D4D8 Hearing augmentation	Not applicable
D4D9 Tactile indicators	Applicable
D4D10 Wheelchair seating spaces in a Class 9b assembly building	Not applicable
D4D11 Swimming Pools	Not applicable
D4D12 Ramps	Not applicable
D4D13 Glazing on an accessway	Applicable
E3D7 Passenger lift types and their limitations	Applicable
E3D8 Accessible features required for passenger lifts	Applicable
F4D5 Accessible sanitary facilities	Applicable
Australian Standard references	
AS1428.1-2021	
AS 2890.6-2009	
AS1428.4.1-2009	
AS1428.2-1992	
AS1735.12-1999	
AS 4299 -1995	

7.2 External approaches to buildings – accessways, walkways, kerb ramps

7.2.1 Access requirements

An accessway (continuous accessible path) is required to the new buildings:

- from the main points of a pedestrian entry at the allotment boundary; and
- from another accessible building connected by a pedestrian link; and
- from any required accessible car parking space on the allotment.

Accessways are required to incorporate a minimum width of 1000mm, 1500mm x 1500mm at locations where a 90deg turn is required, and 1540mm (W) x 2070mm (L) where it is not possible to continue, within 2m of the end of the accessway. Passing spaces are also required at maximum 20m intervals, where a direct line of sight is not available within an accessway. Where the accessway incorporates a linear grade between 1:20 and 1:40, it is to meet the requirements of AS 1428.1-2009 relevant to walkways.

Crossfalls and gradients of the external pathways are not to exceed 1:40 and be constructed of a firm, hardstand surface in accordance with AS1428.1-2009 requirements.

Ground surfaces are required to incorporate finishes which are slip resistant, including the abutment of surfaces that don’t limit the movement of a person with disability, with the orientation and placement of elements such as drains also important considerations.

Doorways and gates within accessways are to meet the provisions of AS1428.1-2009 including circulation space to both sides of the gate/door, luminance contrast, and the provision of appropriate door controls.

Where there is no environmental cue available for people with vision loss e.g., level transition at a road crossing point, the incorporation of tactile ground surface indicators (TGSIs) in accordance with the requirements of AS1428.4.1-2009 is necessary.

Where a kerb ramp is installed, it is to meet the provisions of AS1428.1-2009, including transitions, surface abutments and landing depth and width, according to the direction of travel and/or any required change of direction.

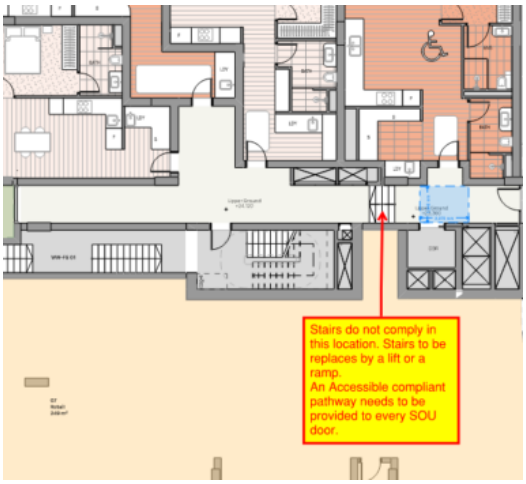
7.2.2 Subject site – access assessment

Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements. Based on the current level of detail, some access requirements, relevant to access to the main entry of the building to the allotment boundary do not fully meet compliance.

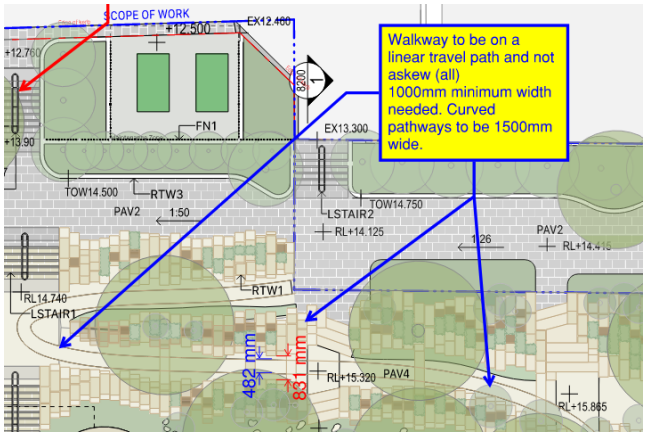
As the topography of the site presents mobility limitations to some users with disability, the approach applied by the design team to access the site from Dowling Street is through a Lift in the Dowling Lift building. From the William Street, access to the site is provided from the Lift on William Street East Building.

However, it seems that access to the rest of the buildings on the site is through stairs only. None the less, since the nearest accessible entry points are under a 50 m distance, they are acceptable under the premises standards.

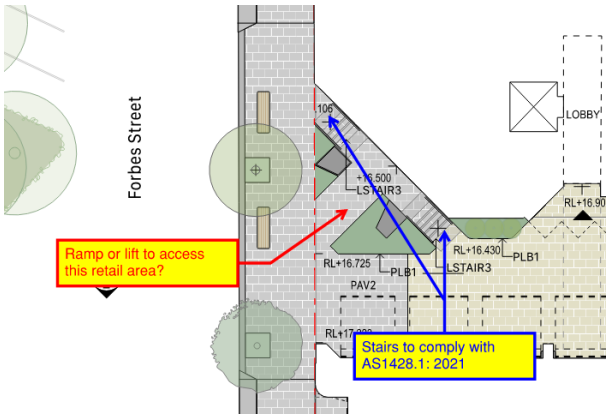
Under the BCA D4D2 (4), at least one floor containing sole-occupancy units and to the entrance doorways of each sole-occupancy unit located on that level should be accessible. **Based on the current design, the SOUs on the Upper ground floor level of William Street West Building do not comply with this requirement, as access is only provided via stairs, with no alterative accessible path of travel such as a ramp or a lift.**

Location	Non - compliances	References to Australian Standards
Upper Floor Level- William Street Building		Refer Table D3.1- Requirements for access for people with disability. Class 2 – Disability (Access to Premise-Buildings) Standards BCA D4D2(4)

The walkways in the central landscape space on the landscape general arrangement plan required a linear travel path of 1000mm and a 1500mm wide path along curves, and is currently non- compliant

Location	Non - compliances	References to Australian Standards
Landscape General Arrangement Plan		Refer to Clause 3.3 of AS1428.1

A ramp is required as an alternate path of travel to enter the Forbes Street building as only stairs are provided currently.

Location	Non - compliances	References to Australian Standards
Landscape General Arrangement Plan		Refer Table D3.1- Requirements for access for people with disability. Class 2 – Disability (Access to Premise-Buildings) Standards

Apart from the above, major of the accessways, have a minimum width of 1000mm, 1500mm x 1500mm at locations where a 90-degree turn is required, and 1540mm (W) x 2070mm (L) at end of an accessway.

As, the design develops, **further assessment on gradients of external pathways, kerb ramps, and slip resistance of ground surfaces can be assessed to ensure compliant outcomes are achieved.**

Access matters to be addressed: Ongoing review of alternative paths of travel, accessway widths, kerb ramps and ground surfaces as the design continues to develop.

7.3 Vehicle and bicycle access into the site

7.3.1 Access requirements

Carparking

Accessible carparking spaces

For each class of building to which the carpark or car parking area is associated, the number of accessible car parking spaces required is as follows.
Class 6 buildings-

(i) With up to 1000 carparking spaces – 1 accessible space for every 50 carparking spaces or part thereof, and
(ii) for each additional 100 carparking spaces or part thereof in excess of 1000 carparking spaces – 1 accessible space

There are no requirements for car parking relevant to this class of building (Class 2) under the BCA. If car parking is provided for use by the retail/hospitality spaces, then one (1) accessible parking space is required for every fifth (50) parking space, or part thereof.

Accessible car parking space requirement as stated in **the City of Sydney Development Control Plans, dated December 2012** is as follows.

A_ **Under Section 3- General Provisions dated December 2012** is as follows.
(1) Accessible car parking spaces for people with a mobility impairment are to be included in the allocation of car parking for a development and provided in accordance with the rates specified in Schedule 7 Transport, parking and access.
(2) Accessible parking is not required in car parking areas where a parking service is provided and direct access to any of the car parking spaces is not available to the general public or occupants.
(3) For residential development, accessible car parking spaces are to be allocated to adaptable units, or as visitor parking. Accessible car parking spaces allocated to adaptable dwelling units are to form part of the lot of the associated adaptable unit in the strata plan.

B_ **Under Schedule 7 dated December 2012.**

(1) One accessible car parking space is to be provided for every adaptable residential unit.
(2) One space for every 20 car parking spaces or part thereof is to be allocated as accessible visitor parking.
(3) Accessible parking is not required in a car parking areas where a parking service is provided and direct access to any of the car parking spaces is not available to the general public or occupants.
(4) For residential development, accessible car parking spaces are to be allocated to adaptable units, or as visitor parking. Accessible car parking spaces allocated to adaptable dwelling units are to be a part lot to an adaptable unit in the strata plan.
(5) Accessible parking is to be designed in accordance with the requirements of relevant Australian Standards.

7.3.2 Subject site – access assessment

Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements. Based on the current level of detail relevant to vehicular access onto the site and accessible parking requirements, both appear capable of achieving compliance.

Under the BCA's prescriptive provisions, a Class 2 building does not require any car parking spaces. However, the City of Sydney DCP requires residential developments to have one (1) accessible car parking spaces allocated to every adaptable dwelling unit. One car parking space for every twenty (20) car parking spaces are to be allocated as accessible visitor parking.

For Class 6 buildings, one accessible space is required for every 50 car parking spaces, up to 1,000 spaces.

The total number of car parking that are currently provided are 340, out of which forty-six (46) are accessible

The car parking as currently detailed appears capable of meeting the provisions of access as prescribed by the Australian Standards. The documentation and **parking allocation will be further reviewed as the design progresses to determine number of accessible car parking bays provided for residents, retail spaces and visitors separately.**

Access matters to be addressed: Further review of parking allocations to confirm the provisions of accessible car parking bays provided for residents, retail spaces and visitors individually.

7.4 Entrances

7.4.1 Access requirements

Doors/gates within paths of travel common to building users, require the following to meet the provision of AS1428.1-2009 Clause 13:

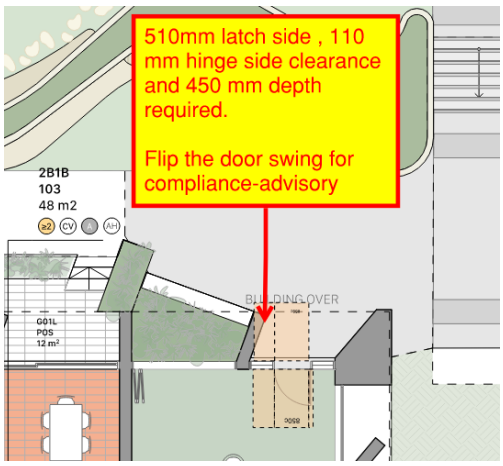
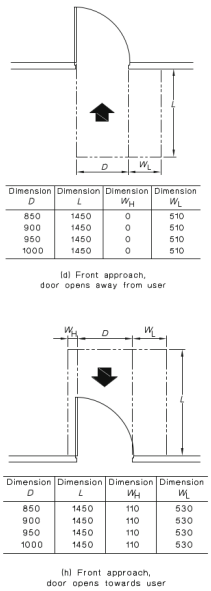
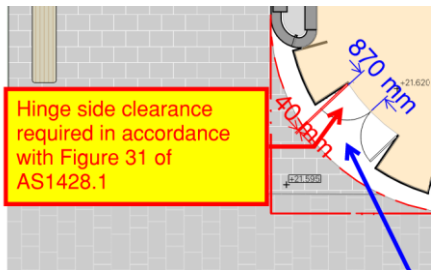
- Unobstructed clear opening widths to be a minimum of 850mm (a 920mm door leaf is required for a hinged swing door; 1020mm required for a sliding door.
- Controls including after-hours swipe cards, key locks, auto door controls etc. located on a level landing, in an accessible location.
- Circulation spaces that consider the angle of approach and direction of swing/slide at both sides of the entrance door.
- Light operational forces (less than 20 N).
- Appropriately procured and installed door/gate controls and hardware.
- Luminance contrast which is measured at not less than 30%.

7.4.2 Subject site – access assessment

Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements. Based on the current level of detail, all entrance doors in the building have an unobstructed clear width of 850mm and hence meet compliance.

A few entrance doors however do, not meet compliance in terms of adequate door circulation.

See below list of door locations that do not meet compliance with door circulation as per Figure 31 and 32 of AS1428.1:2021.

Location	Non - compliances	References to Australian Standards
Basement 1 – Meeting Room		 Refer Figure 31 of AS1428.1
Upper Ground Floor 07 Retail		Same as above

Please ensure that **adaptable unit doors need to have a door with 850mm clear opening width along with adequate latch and hinge side clearance** in accordance with AS1428.1

The design will further be assessed during the design development stage to ensure appropriate outcomes are achieved in terms of door controls, hardware and luminance contrasts.

Access matters to be addressed: Assessment of adequate door circulation space of doors references above, along with a review of door compliance with adaptable units.

7.5 Stairs and Ramps

7.5.1 Access requirements

Stairs within the site are to incorporate (excluding fire isolated stairs):

+ Handrails to both sides which are continuous, consistent, and incorporate a diameter of 30-50mm, extensions and terminations at the top and base, a clear unobstructed width of no less than 1000mm between them.

- Opaque risers.
- Nosing strips which provide a luminance contrast of no less than 30%.
- Tactile ground surface indicators (TGSIs) at the top and base which incorporate a luminance contrast of 30-60% dependent upon the installation type.

Ramps within the site are to incorporate (excluding fire isolated ramps):

- A gradient of not more than 1:14.
- Landings which are incorporated at the intervals required based upon the gradient of the ramp and which do not exceed 1:40, taking into consideration the direction of travel, and adjusting the landing depth/width, as necessary.
- Handrails to both sides which are continuous, consistent, and incorporate a diameter of 30-50mm, extensions and terminations at the top and base, a clear unobstructed width of no less than 1000mm between them.
- Kerb rails installed to both sides of the ramp.
- Tactile ground surface indicators (TGSIs) at the top and base which incorporate a luminance contrast of 30-60% dependent upon the installation type.

A set back is required from transverse paths of travel, typically 700mm from an internal corner and 900mm from the allotment boundary.

Fire-isolated Stairs (FIS)

All fire isolated stairs are to incorporate:

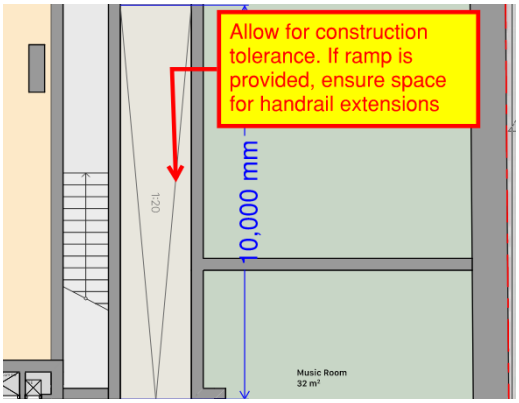
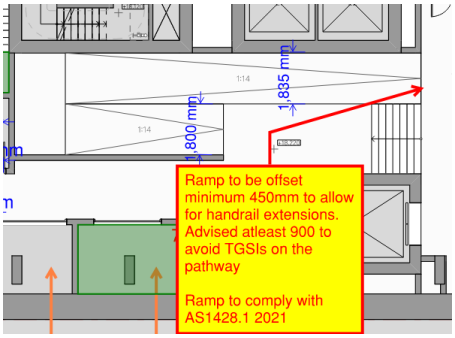
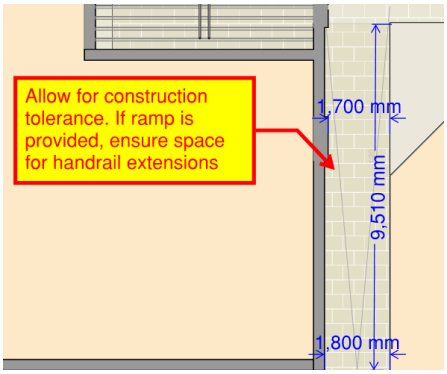
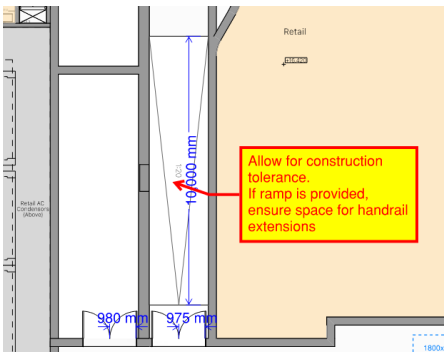
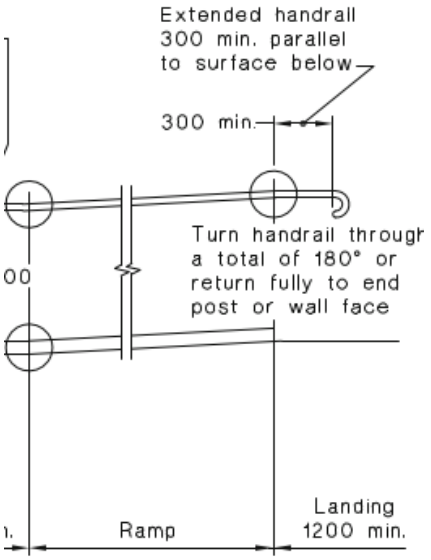
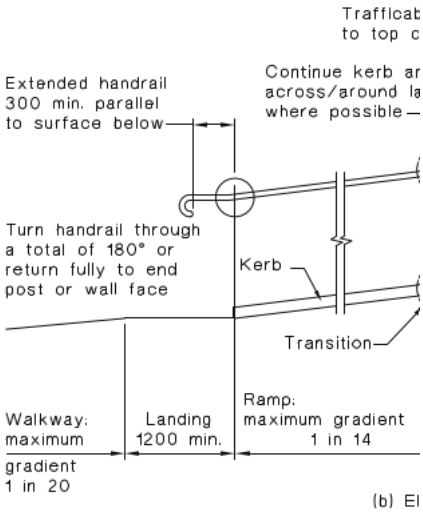
- Nosing strips which provide a luminance contrast of no less than 30%.
- Handrails which meet the provisions of AS1428.1-2009 Clause 12.

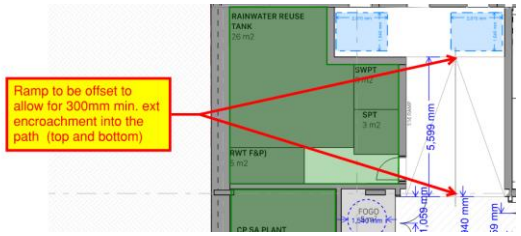
7.5.2 Subject site – access assessment

Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements. Based on the current level of detail, all common use staircases and ramps can achieve compliance in terms of having space to accommodate handrails and tactiles.

Common use staircases and ramps will be required to meet the provisions of AS1428.1: 2021 and AS1428.4.1 :2009 as the design progresses, particularly with respect to handrail height, handrail termination, provision and luminance contrast of nosing strips and TGSIs.

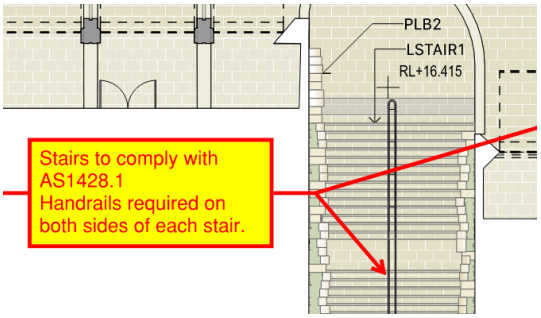
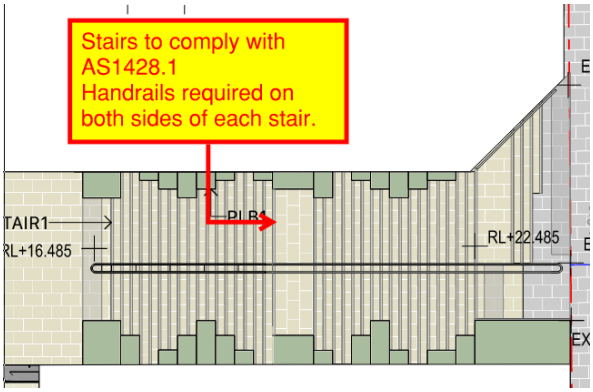
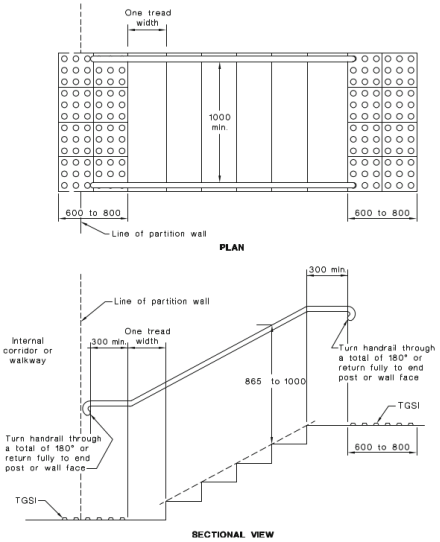
A few ramps and staircases, as listed below require to be offset a minimum 450mm – 600mm to allow for handrail extensions (Jensen Hughes advice a minimum of 900mm, to avoid TGSIs on the pathway)

Location	Non - compliances	References to Australian Standards
Plaza Level- Forbes Street	   	Refer Figure 14 of AS1428.1  

Basement 1		Refer Figure 14 of AS1428.1

Refer to Jensen Hughes mark-ups.

Some staircases as listed below do not seem to meet compliance in terms of provision of handrails on both sides as shown on Landscape General Arrangement Plan

Location	Non - compliances	References to Australian Standards
Landscape General Arrangement Plan	Staircase west to William Street East building  Staircase north to William Street East building 	Refer Figure 26(B) of AS1428.1 

Refer to Jensen Hughes mark-ups.

The above-mentioned details will further be reviewed as the design progresses during the design development stage to confirm that appropriate accessible outcomes are achieved.

Access matters to be addressed: Assessment of staircase and handrails to comply with AS1428.1, including handrail details, nosing strips, TGSIs and required offsets for handrail extensions.

7.6 Access to and within lifts

7.6.1 Access requirements

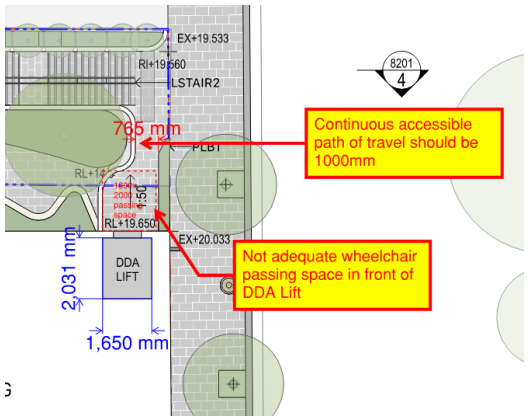
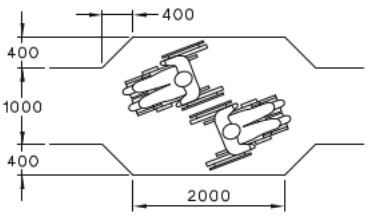
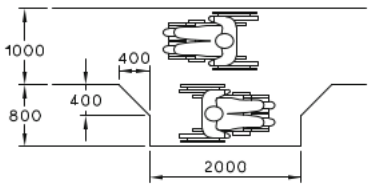
An accessway is required to any passenger lift where available within a building. Where a passenger lift travels greater than 12m a minimum car size of 1400mm wide x 2000mm depth is required, if travelling less than 12m a minimum car size of 1100mm wide x 1400mm depth is accepted. Where stretcher use is indicated on a lift travelling greater than 12m, a 2000mm depth is necessary. The clear opening width of the door of the lift car must be no less than 900mm.

Internal fit out of the lift is required to comply with AS1735.12 including:

- Handrails which incorporate a minimum length of 600mm, installed 850mm – 950mm above the finished floor within the lift car.
- Control buttons and panels which are correctly located within the car (from internal corner and floor) which incorporate tactile and Braille information.
- An audible announcement where the lift travels more than 2 floor levels.

7.6.2 Subject site – access assessment

Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements. Based on the current level of detail, access to and within the lifts is capable of achieving compliance at all locations except the entry to the Lift in Dowling Street Building. **The lift does not have adequate passing space of 1800 x 2000mm at its entry as visible on the landscape general arrangement plan.**

Location	Non - compliances	References to Australian Standards
Landscape General Arrangement Plan		Refer Figure 3 of AS1428.1  

Refer back to Jensen Hughes markups.

As the design progressed, compliance will be assured and checked at the time of procurement, engagement of lift supplier/contractor. This would be required prior to issue of the construction certificate.

Access matters to be addressed: Further assessment of lift in Dowling Street building as the design develops further.

7.7 Doors and Doorways

7.7.1 Access requirements

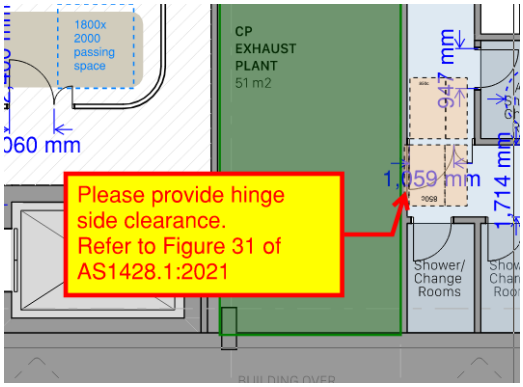
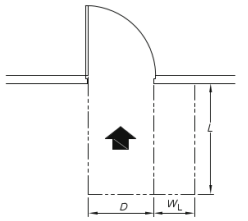
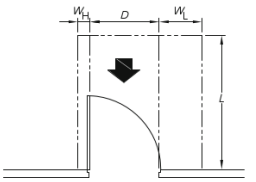
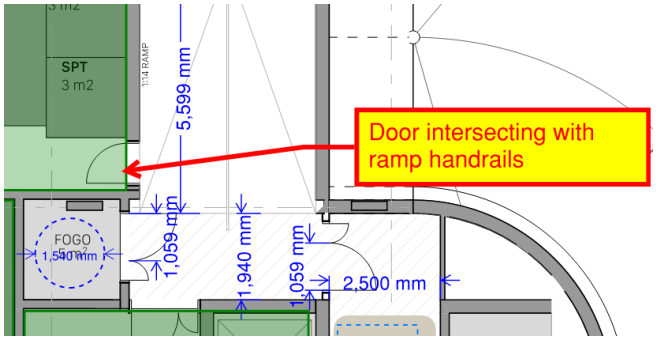
Doors and doorways within paths of travel required to be accessible, require the following to meet the provisions of AS1428.1-2021 Clause 10.2:

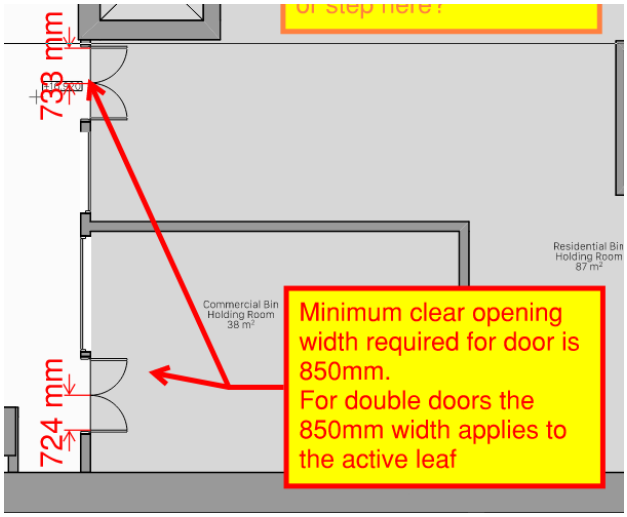
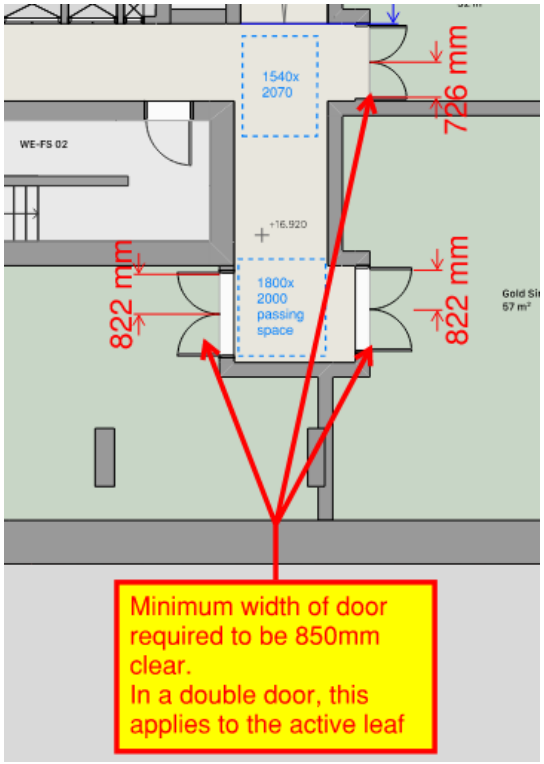
- Unobstructed clear opening widths to be a minimum of 850mm (a 920mm door leaf is required for a hinge swing door; 1020mm required for a sliding door).
- Controls including after-hours swipe cards, key locks, auto door controls etc. located on a level landing, in an accessible location.
- Circulation spaces that consider the angle of approach and direction of swing/slide at both sides of the entrance.
- Light operational forces (less than 20 N).
- Appropriately procured and installed door controls and hardware.
- Fully glazed doors or sidelights to incorporate a visual contrast strip no less than 75mm wide for the full width of the glazing, with the lowest edge at 900-1000mm above the finished floor.
- Luminance contrast which is measured at not less than 30%.
- A level transition shall be provided to all entrances and external areas e.g. bike storage, which will be achieved via provision of threshold ramps where required in accordance with AS1428.1-2021 requirements.

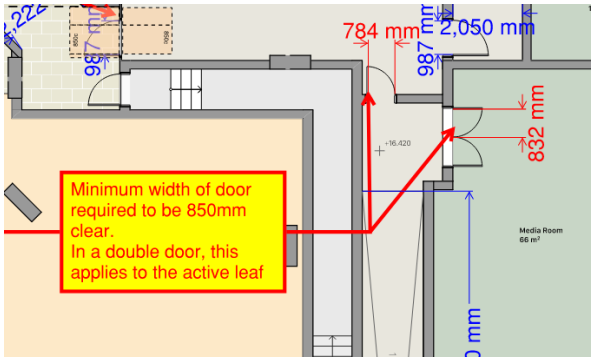
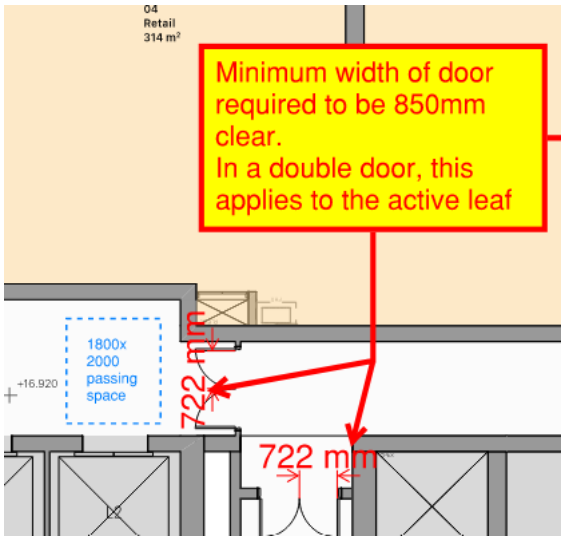
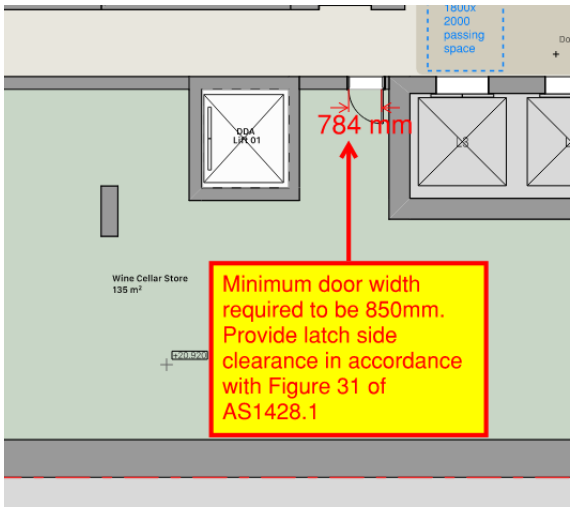
7.7.2 Subject site – access assessment

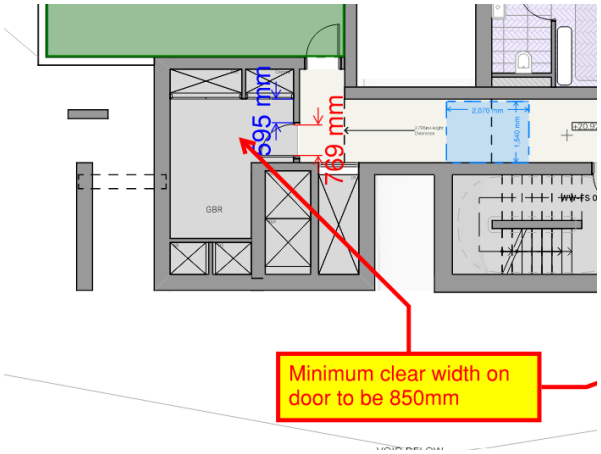
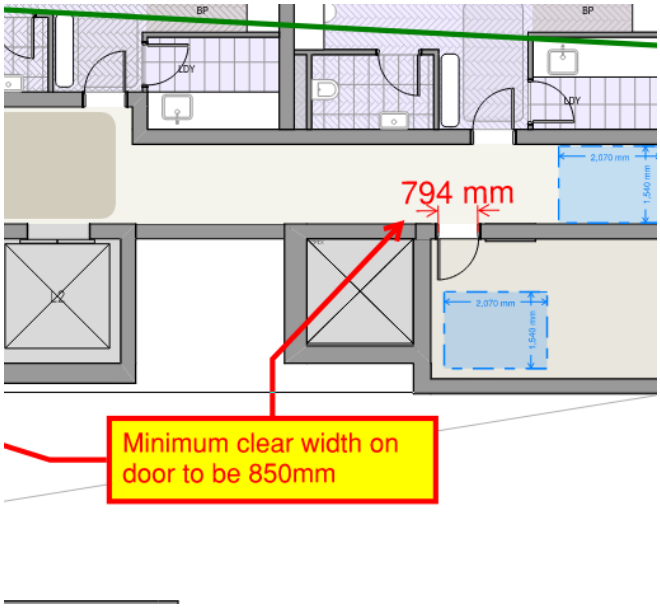
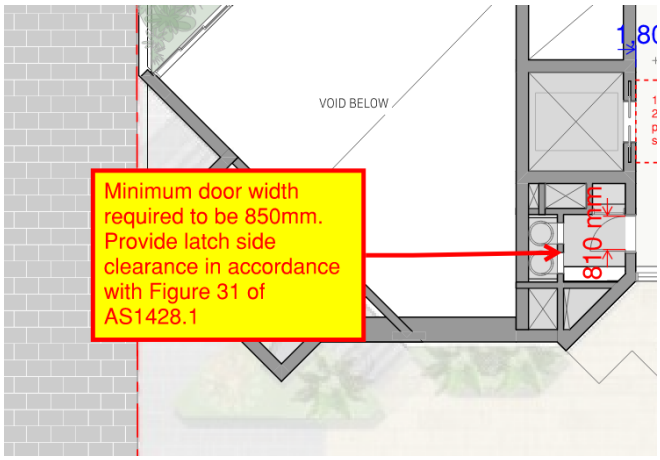
Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements. Based on the current level of detail, **some doors in the building do not currently have an unobstructed clear width of 850mm and hence do not meet compliance.**

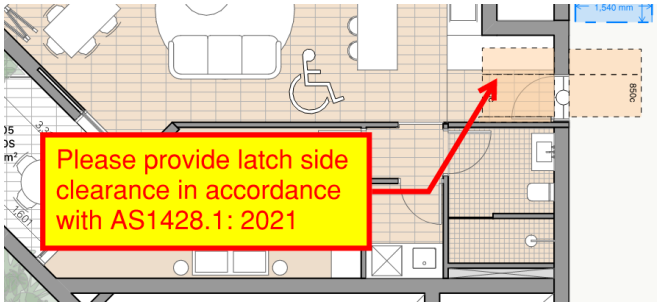
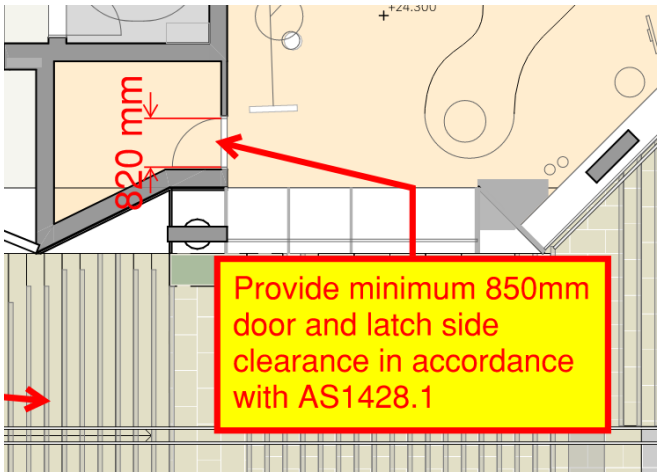
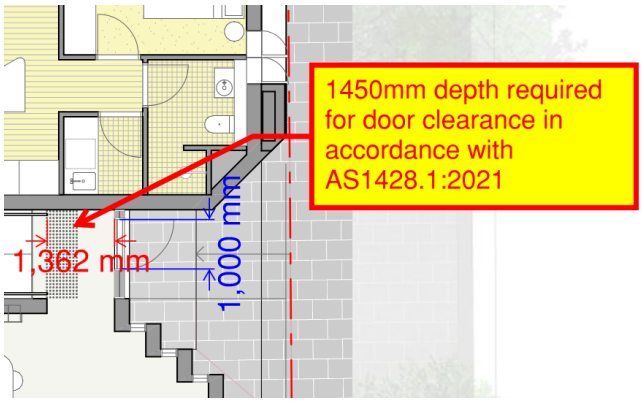
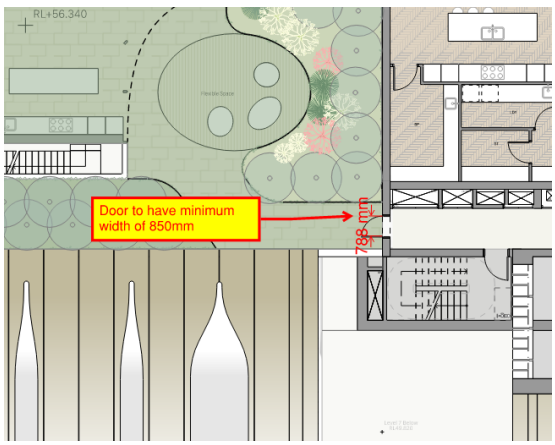
Please see below list of door locations that do not meet compliance in accordance with AS1428.1:2021 in terms of minimum width of 850mm as per Clause 10.2 and door circulation as per Figure 31 and 32 of AS1428.1:2021

Location	Non - compliances	References to Australian Standards
Basement 1		Refer Figure 31 of AS1428.1  Dimension D / Dimension L / Dimension W_H / Dimension W_L 850 / 1450 / 0 / 510 900 / 1450 / 0 / 510 950 / 1450 / 0 / 510 1000 / 1450 / 0 / 510 (d) Front approach, door opens away from user  Dimension D / Dimension L / Dimension W_H / Dimension W_L 850 / 1450 / 110 / 530 900 / 1450 / 110 / 530 950 / 1450 / 110 / 530 1000 / 1450 / 110 / 530 (h) Front approach, door opens towards user
Basement 1		

Plaza Level- Forbes Street		Refer Clause 10.2 of AS1428.1
Plaza Level- Forbes Street		Refer Clause 10.2 of AS1428.1

Plaza Level- Forbes Street		Refer Clause 10.2 of AS1428.1
Plaza Level- Forbes Street		Refer Clause 10.2 of AS1428.1
Retail Laneway - Dowling Street		Refer Clause 10.2 of AS1428.1

Retail Laneway - Dowling Street		Refer Clause 10.2 of AS1428.1
Retail Laneway - Dowling Street		Refer Clause 10.2 of AS1428.1
Retail Laneway - Dowling Street		Refer Clause 10.2 and Figure 31 of AS1428.1

Retail Laneway - Dowling Street		Refer Figure 31 of AS1428.1
Retail Laneway - Dowling Street		Refer Clause 10.2 and Figure 31 of AS1428.1
Retail Laneway - Dowling Street		Refer Clause 10.2 and Figure 31 of AS1428.1
Level 09		Refer Clause 10.2 and Figure 31 of AS1428.1

Please ensure that adaptable unit doors need to have a door with 850mm clear opening width along with adequate latch and hinge side clearance in accordance with AS1428.1

The design will further be assessed during the design development stage to ensure appropriate outcomes are achieved in terms of door controls, hardware and luminance contrasts.

Access matters to be addressed: Assessment of non-compliant doors in relation to the required clear opening widths.

7.8 Internal accessways – corridors, rooms

7.8.1 Access requirements

An accessway is required within all common use areas of a building normally used by occupants, unless subject to the exemption provisions of the BCA.

Where provided and relevant, internal accessways are required to ensure:

- a minimum clear width of 1000mm is available, adjusting as necessary to address door circulation space.
- Doors/doorways are provided with appropriate controls, circulation spaces and contrasts, with visual glazing strips installed, as necessary.
- Ground surfaces and abutments meet the provisions of AS1428.1-2021.
- Ramps i.e. step and threshold meet the provisions of AS1428.1-2021.
- Passing and turning spaces where provided meet the provisions of access as prescribed by AS1428.1-2021.

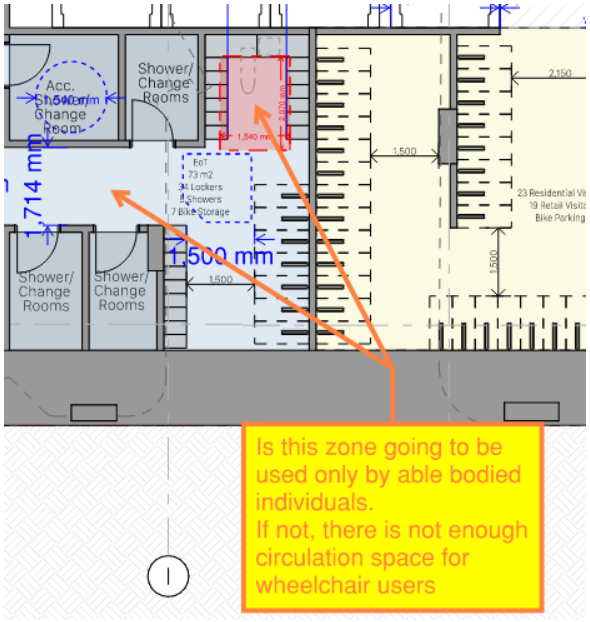
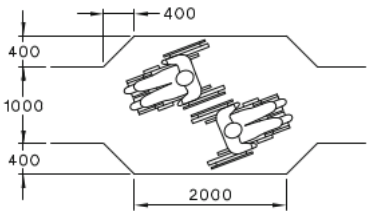
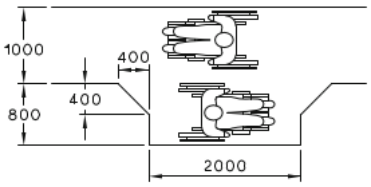
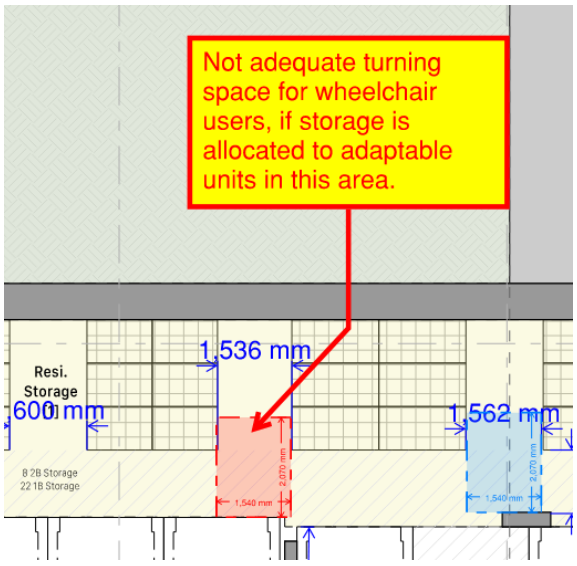
7.8.2 Subject site – access assessment

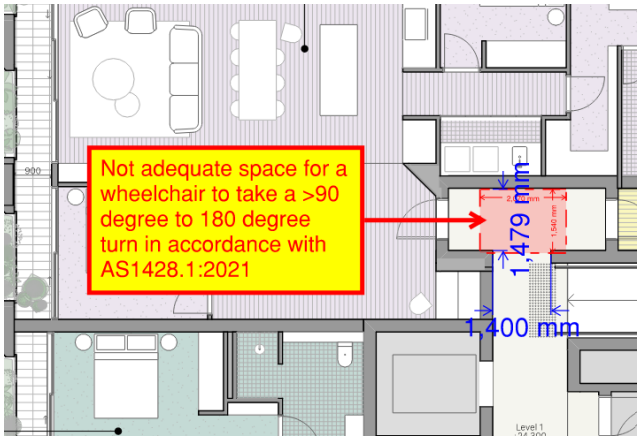
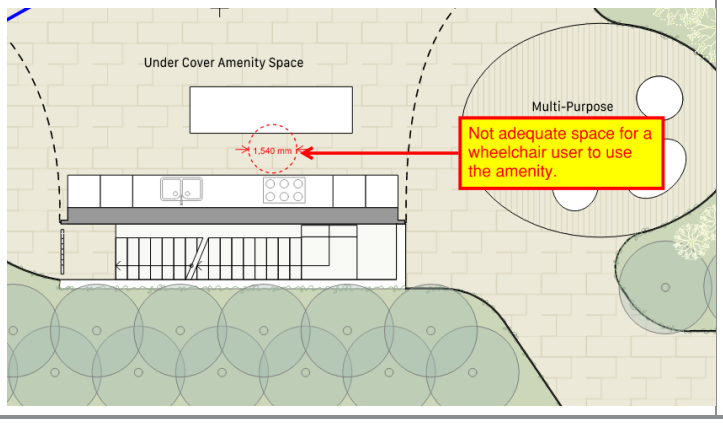
Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements, A 1000mm clear width passage is available connecting most of the communal use spaces in the building.

Passing and turning spaces on lift lobbies and residential lobbies are capable of achieving compliance.

The lift lobby in Forbes street building has an 1800 x 2000mm passing space in front of it, which is compliant. However, Jensen Hughes still recommends allowing for construction tolerance as the design progresses.

Apart from these, there are **a few internal pathways that lack adequate passing spaces as shown below,**

Location	Non - compliances	References to Australian Standards
Basement 01		Refer Figure 3 of AS1428.1  
Basement 01		Refer Figure 3 of AS1428.1

Upper Ground Floor – William Street		Refer Figure 3 of AS1428.1
Level 9		Refer to AS4299.1995

Further details shall be assessed during the design development stage to ensure appropriate outcomes are achieved.

Access matters to be addressed: Further assessment of pathways that lack sufficient parking spaces.

7.9 Sanitary facilities

7.9.1 Access requirements

Unisex accessible sanitary facilities are required on each floor level where sanitary facilities are available within common areas. An equal distribution of right hand (RH) and left hand (LH) configured unisex accessible sanitary facilities are to be provided, where there is more than one available within a building.

The pan circulation space and fit out of these facilities are to meet the provisions of AS1428.1-2009 Clause 15. Where one or more toilets are provided in addition to a unisex accessible sanitary facility, an ambulant cubicle for male and female use is required within each bank.

Raised tactile and Braille signage is required to identify each of the sanitary facilities and provide direction where a bank of sanitary facilities does not incorporate an accessible facility, directing the user to the location of the nearest accessible facility. Where gendered shower facilities are available, an accessible shower facility is required.

7.9.2 Subject site – access assessment

Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements. All unisex accessible sanitary facilities provided for retail on Plaza Level Forbes Street seem capable of achieving compliance in terms of sizes allocated.

Further details shall be assessed during the design development stage to ensure appropriate outcomes are achieved.

Access matters to be addressed: Assessment of unisex sanitary facilities as the design is further detailed during the design development stage.

7.10 Wayfinding (Signage Component) – Common Use Areas

7.10.1 Access requirements

Where a pedestrian entrance is not accessible, raised tactile and Braille directional signage incorporating the international symbol of access is required to direct a person to the location of the nearest accessible pedestrian entrance.

Further raised tactile and Braille signage is required to be installed at accessible sanitary facilities, identifying the configuration of the facility, ambulant sanitary facilities (where available), spaces which incorporate hearing augmentation, including information about the type of system in use and the availability/location of receivers. Signage is also required at exit doors identifying the location.

A signage and wayfinding strategy should be created to ensure key accessible transition points are identified and captured around a building and/or site e.g., highlighting the location of accessible sanitary facilities, parking bays etc.

7.10.2 Subject site – access assessment

A signage package has not yet been provided for review. Based on main pedestrian entrance to the site and following the 50 m minimum travel distance to accessible path of travel directional signages are required to ensure clear continuous navigation.

The design will be further assessed during the design development stage to ensure appropriate outcomes are achieved.

Access matters to be addressed: Assessment of the signage package during the design development stage.

7.11 Class 2 adaptable housing (AS 4299)

7.11.1 Accessibility Requirement

In accordance with the BCA, a Class 2 building has no minimum requirement for the provision of accessible units.

However, City of Sydney Development Control Plan (DCP) Section 3: General Provisions, dated December 2012, provisions outline the minimum number of accessible units or adaptable units to be provided:

The current DCP requires 15% of the apartments in new developments to be built to the Adaptable Housing Codes AS4299. Town planner to confirm any deviation to the DCP Assessed.

3.12.2 Adaptable dwelling mix

Adaptable housing is designed to enable easy modification in the future for occupation and visitation by people with a disability or people who may acquire a disability gradually as they age. Design criteria for adaptable housing are set out in the relevant Australian Standards.

(1) Adaptable dwellings are to be spread amongst all unit sizes to accommodate various household sizes.

(2) Adaptable dwellings are to be provided in all new development in accordance with the following rates:

Total number of dwellings	Number of adaptable dwellings to be provided
Between 0 and 7	Nil
Between 8 and 14	1 dwelling
Between 15 and 21	2 dwellings
Between 21 and 29	3 dwellings
30 or more	15% of total dwellings

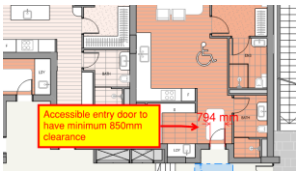
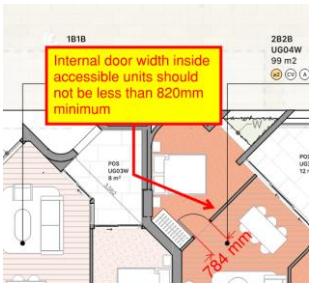
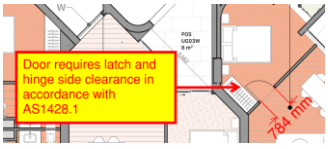
7.11.2 Subject site – access assessment

Jensen Hughes has reviewed the drawings and documentation in relation to the specified requirements. Based on the current level of detail, the site as currently documented does not demonstrate an understanding and outlines application of the principles of ‘adaptable housing’ as outlined within the foreword of AS 4299 :1995.

The design will further be assessed to demonstrate compliance with the requirements of the DCP in terms of the provision of adaptable and accessible and /or liveable housing. At this stage pre and post adaptable unit plans have not been provided for assessment.

Adaptable House Class C – all essential features incorporated.

Item	Room/Item	AS4299 Clause	Current Phase Review
Note: Item - As per Appendix A – Schedule of features for Adaptable Housing			
Drawings			
1.	Provision of drawings showing the housing unit in its pre-adaptation and post-adaptation stages	2.3	Further information required
Siting			
2.	A continuous accessible path of travel from street frontage and vehicle parking to entry complying with AS 1428.1	3.3.2	Capable of complying
Letterboxes in Estate Developments			

Item	Room/Item	AS4299 Clause	Current Phase Review
3.	Letterboxes to be on hard standing area connected to accessible pathway	3.8	Further information required
Private car accommodation			
4.	Car parking space or garage a min. area of 6.0m x 3.8m	3.7.2	Capable of complying
Accessible Entry			
5.	Accessible entry	4.3.1	Capable of complying
6.	Accessible entry to be level (i.e., max. 1:40 slope)	4.3.2	Capable of complying
7.	Threshold to be low-level	4.3.2	Capable of complying
8.	Landing to enable wheelchair manoeuvrability	4.3.2	Capable of complying
9.	Accessible entry door to have 850 mm min. clearance	4.3.1	Does not comply 
10.	Door lever handles and hardware to AS 1428.1	4.3.4	Further information required
Exterior: General			
Exterior: General			
11.	Internal doors to have 820mm min. clearance	4.3.3	Does not comply 
12.	Internal corridors min. width of 1000mm	4.3.7	Capable of complying
13.	Provision for compliance with AS 1428.1 for door approaches	4.3.7	Does not comply 
Living room and dining room			
14.	Provision for circulation space of min. 2250mm diameter	4.7.1	Capable of complying
15.	Telephone adjacent to GPO	4.7.4	Further information required

Item	Room/Item	AS4299 Clause	Current Phase Review
16.	Potential illumination level min. 300 lux	4.10	Further information required
Kitchen			
17.	Minimum width 2.7m (1550mm clear between benches)	4.5.2	To be updated post adaptation
18.	Provision for circulation at doors to comply with AS 1428.1	4.5.1	Further information required
19.	Provision for benches planned to include at least one worksurface of 800mm length, adjustable in height from 750mm to 850mm or replaceable. Refer to Figure 4.8 (AS 4299)	4.5.5	To be updated post adaptation
20.	Refrigerator adjacent to work surface	4.5.5	Further information required
21.	Kitchen sinks adjustable to heights from 750mm to 850mm or replaceable	4.5.6	Further information required
22.	Kitchen sink bowl max 150mm deep	4.5.6	Further information required
23.	Tap set capstan or lever handles or lever mixer	4.5.6 (e)	Further information required
24.	Tap set located within 300mm min of front of sink	4.5.6 (e)	Further information required
25.	Cooktops to include either front or side controls with raised cross bars	4.5.7	Further information required
26.	Cooktops to include isolating switch	4.5.7	Further information required
27.	Worksurface min. 800mm length adjacent to cooktop at same height	4.5.7	Further information required
28.	Oven located adjacent to an adjustable height or replaceable work surface	4.5.8	Further information required
29.	GPOs to comply with AS 1428.1. At least one double GPO within 300mm of front of worksurface	4.5.8	Further information required
30.	GPO for refrigerator to be easily reachable when the refrigerator is in its operating position	4.5.11	Further information required
31.	Slip resistant floor surface	4.5.4	Further information required
Main bedroom			
32.	At least one bedroom of area sufficient to accommodate queen size bed and wardrobe and circulation space requirements of AS 1428.2	4.6.1	Further information required
Bathroom			
33.	Provision for bathroom area to comply with AS 1428.1	4.4.1	Further information required
34.	Slip-resistant floor surface	4.4.2	Further information required
35.	Shower recess – no hob. Minimum size 1160 x 1100mm to comply with AS 1428.1 (refer Figures 4.6 and 4.7 – AS 4299)	4.4.4 (f)	Further information required

Item	Room/Item	AS4299 Clause	Current Phase Review
36.	Shower area waterproofed to AS 3740 with floor to fall to waste	4.4.4 (f)	Further information required
37.	Recessed soap holder	4.4.4 (f)	Further information required
38.	Shower tap positioned for each reach to access side of shower sliding track	4.4.4 (f)	Further information required
39.	Provision of adjustable, detachable handheld shower rose mounted on a slider grabrail or fixed hook (plumbing and wall-strengthening provision)	4.4.4 (h)	Further information required
40.	Provision for grabrail in shower (Refer to Figure 4.7 – AS 4299) to comply with AS 1428.1	4.4.4 (h)	Further information required
41.	Tap sets to be capstan or lever handles with single outlet	4.4.4 (c)	Further information required
42.	Provision for washbasin with clearances to comply with AS 1428.1	4.4.4 (g)	Further information required
43.	Double GPO beside mirror	4.4.4 (d)	Further information required
Toilet			
44.	Provision of either ‘visitable toilet’ or accessible toilet	4.4.3	Capable of complying
45.	Provision to comply with AS 1428.1	4.4.1	Capable of complying
46.	Location of WC pan at correct distance from fixed walls	4.4.3	Capable of complying
47.	Provision for grab rail zone (Refer Figure 4.6 – AS 4299)	4.4.4 (h)	Further information required
48.	Slip resistant floor surface (vitreous tiles or similar)	4.4.2	Further information required
Laundry			
49.	Circulation at doors to comply with AS 1428.1	4.8	Capable of complying
50.	Provision for adequate circulation space in front of or beside appliances (min. 1550mm depth)	4.8	Further information required
51.	Provision for automatic washing machine	4.8 (e)	Further information required
52.	Where clothesline is provided, an accessible path of travel to this	4.8 (a)	Further information required
53.	Double GPO	4.8 (g)	Further information required
54.	Slip-resistant floor surface	4.9.1	Further information required
Storage			
Door Locks			
55.	Door hardware operable with one hand, located 900-1100mm above the floor	4.3.4	Further information required

It is expected that at Construction Certification stage documentation will address, in finer detail, information relevant to the above requirements.

7.12 Emergency egress and evacuation

7.12.1 Access considerations

Any emergency evacuation strategy should address the operational considerations relevant to the evacuation of people with disabilities and should detail the following:

- Stair refuges, or
- Fire-isolated lift lobbies and use of lifts in emergency.

Fire evacuation plans should include the provision of management plans to assist known occupants with disability. Individuals with mobility limitations should be provided with a “fire buddy” to escort them to pre-determined areas of refuge.

AS 3745 - 2010 Planning for emergencies in facilities can be utilised as a guideline to assist in the implementation of any Emergency Plan.

7.12.2 Subject site – access assessment

Note for consideration.

7.13 Landscaping, Streetscapes and Terraces

7.13.1 Access considerations

The following are some design considerations for providing equitable access to the external public space:

Lighting installations which minimise glare.

Luminance contrast of features such as bike racks, bollards, bins etc.

7.13.2 Subject site – access assessment

Note for consideration.

7.14 Lighting

7.14.1 Access considerations

The inclusion of quality light assists people in navigating their way through an environment and assist in the effective use of a building, potentially affecting working satisfaction and productivity.

Consideration should be given to lighting as follows:

Location	Lux level
Entrances, passageways, and walkways	150lx
Stairs	150lx
Ramps	150lx

Location	Lux level
Toilets and locker rooms	200lx
Counter tops	200lx
General displays	200lx

7.14.2 Subject site – access assessment

Note for consideration.

8.0 Compliance summary

As a member of the Access Consultants Association (ACA), I have reviewed the Development Application documentation (refer above) against the current requirements for access and mobility against the following:

+ Objects of the Disability Discrimination Act (DDA) 1992.
+ *Disability (Access to Premises – Buildings) Standards 2010.*
+ National Construction Code (BCA) - Building Code of Australia (BCA) 2022 Amendment 2 – Volume One and referenced Australian Standards including:
  - AS1428.1 2021 Part 1: General Requirements for access – new building work.
  - AS1428.4.1 2009 Part 4.1: Means to assist the orientation of people with vision impairment – Tactile Ground Surface Indicators (TGSIs).
  - AS2890.6 2009 Part 6: Off-street parking for people with disabilities.
  - AS1735.12 1999 Lift facilities for people with disabilities.
  - AS 4299 – Adaptable Housing

This report provides the reader with an overview of the project with respect to achieving compliance against the above.

It is anticipated that within the next stage of the design process, additional detail will be available and reviewed.

If you've any questions in relation to this report, please contact the writer.

Review undertaken by:

Signed by:
Bhanuja Dora
B3974620F6CB424...

Bhanuja Dora

Accessibility Consultant