

Principal Author:	Issue.	Revision	Date
Michael Moutrie	-	Original for SSDA	21-08-2025



**Statement of Compliance
Access for People with a Disability**

**Proposed Residential
Development**

12-16 Florence St Tweed Heads

Accessible Building Solutions

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Report

Report Type: Statement of Compliance - BCA Access Provisions

Development: 12-16 Florence St Tweed Heads

Proponent: The Trustee ATF Wafi Property Trust

Introduction:

This report has been prepared to accompany a State Significant Development Application and has been based on the following drawings prepared by Benson McCormack Architecture:

DA 110-006	Basement 2 Plan
DA 110-007	Basement 1 Plan
DA 110-008	Ground Floor Plan
DA 110-010	Level 1 Plan
DA 110-020	Level 2 Plan
DA 110-030	Level 3 Plan
DA 110-040	Level 4 Plan
DA 110-050	Level 5 Plan
DA 110-060	Level 6 Plan
DA 110-080	Level 7 Plan
DA 110-090	Level 8 Plan
DA 110-100	Level 9 Plan
DA 110-110	Level 10 Plan
DA 110-120	Level 11 Plan
DA 110-130	Level 12 Plan
DA 110-140	Roof Plan
DA 612-301	Adaptable Unit Plan

Limitations and Copyright information:

This report is not to be used for any other purpose than its original intention. The assessment is based on the provided drawings and compliance relies upon the implementation of all the recommendations listed in this report and the works constructed in accordance with AS1428.1-2021 and other latest, relevant standards and regulations applicable at the time of construction.

Assessment is based on the classification/use of the building. If the Class of the building changes to any other building Class, this access report will have to be updated accordingly.

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ABS gives no warranty or guarantee that this report is correct or complete and will not be liable for any loss arising from the use of this report. We are not to be held responsible if LHA comes to a different conclusion about compliance with the Livable Housing Guidelines. At this point of time only LHA is able to confirm whether a project has met all the requirements needed to be awarded a particular Quality Mark.

A report issued for DA (development application) is not suitable for use for CC (construction certificate application).

Assessment:

Assessment Criteria SSSDA

This assessment has been undertaken to the extent necessary to issue development consent under the Environmental Planning and Assessment Act. Generally, assessment has been in regard to the capability of the proposal to achieve compliance where there is insufficient information to fully assess if compliance has been achieved. The project documentation should incorporate the requirements as listed in this report to ensure compliance.

Note: At design/drawing stage there is not enough information provided to ensure full compliance as a lot of access requirements depend on fittings and finishes. In this report “complies” means that, based on the drawings reviewed, the design is capable of compliance provided that dimensions, fittings and finishes are completed to the relevant standard.

Compliance is required with the following:

- The Access provisions of the BCA 2022
- The Access To Premises Standard
- AS1428 suite of Standards
- AS2890.6 for car parking
- AS1735.12 for lifts
- AS4299 Adaptable Housing
- Council’s DCP relating to Access for People with a Disability

Assessment

The building work comprises of residential units over basement carparking

Under the BCA the building is classified as follows,

- Class 2 (building containing more than 2 SOUs i.e. sole-occupancy units)
- Class 7a (car park)

The following tables assess compliance with the relevant parts of the BCA and Standards
BCA Assessment

BCA Part D4 Access for People with a Disability
BCA D4D2 Requirements for Access for people with a disability
 SOU refers to Sole Occupancy Unit

<i>Requirement</i>	Class 2
<i>Compliance</i>	Complies.
<i>Comments</i>	Access has been provided from the main pedestrian entry to the entry doors of all SOUs on all levels by means of a lift. Access has been provided to communal open space on Level 1 & Level 12. Details to be verified at CC stage of works.
<i>Requirement</i>	Class 7a
<i>Compliance</i>	Complies.
<i>Comments</i>	Access has been provided to the basement level containing the accessible car parking spaces by means of a lift. Details to be verified at CC stage of works.
<i>Requirement</i>	In areas required to be accessible, the following is to be provided:
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	All of the above listed requirements are achievable and to be assessed for compliance at verified at CC stage of works.

<i>Requirement</i>	BCA Part D4D3 Access to buildings Accessway is required from;
	<ul style="list-style-type: none"> • Main pedestrian entry at the site boundary for new buildings • Main pedestrian entry door for existing buildings • Any other accessible building connected by a pedestrian link • Accessible car parking spaces
<i>Compliance</i>	Complies.
<i>Comments</i>	<p>Access has been provided from the main pedestrian entry at the site boundary by means of a pathway / ramp.</p> <p>Access has been provided from accessible car parking spaces by means of a lift. Details to be verified at CC stage of works.</p>
<i>Requirement</i>	Accessway is required through:
	<ul style="list-style-type: none"> • Main entry and • Not less than 50% of all pedestrian entrances and in building with floor area over 500m², non-accessible entry and accessible entry to be not more than 50M apart.
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	The development has only 1 main entry which has been designed to be accessible. Details to be verified at CC stage of works.
<i>Requirement</i>	Where Accessible pedestrian entry has multiple doorways
	<ul style="list-style-type: none"> • At least 1 to be accessible if 3 provided • At least 50% to be accessible, if more than 3 provided <p>Where doorway has multiple leaves, at least 1 leaf is to have clear opening of 850mm (excluding automatic doors).</p>
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	<p>Where multiple leaf doorways have been used, at least 1 operable leaf is required to provide a clear opening of 850mm with the door circulations spaces as per AS1428.1. Where single hinged doors have been used, the door leaf is required to provide a clear opening of 850mm with the door circulations spaces as per AS1428.1.</p> <p>This is achievable and the door selections are to be verified at CC stage of works.</p>
<i>Requirement</i>	BCA Part D4D4 Parts of buildings required to be accessible
	Every Ramp (excluding fire-isolated ramp) to be compliant with AS1428.1 and slip resistance of ramp and landings compliant with BCA Table D3D15
<i>Compliance</i>	N/A
<i>Comments</i>	No ramps have been identified in the development.
<i>Requirement</i>	Every Walkway to be compliant with AS1428.1
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	<p>Detailed features of the walkways will be assessed with the requirements of AS1428.1 at the CC stage of works.</p> <p>Note: all walkways shall have a barrier or continue for a further 600mm in a different material on each side of the walkway.</p>

<i>Requirement</i>	Step / Kerb ramp if provided is to be compliant with AS1428.1 and Slip resistance of ramp and landings compliant with BCA Table D3D15
<i>Compliance</i>	N/A
<i>Comments</i>	No step / kerb ramps have been identified in the development.
<i>Requirement</i>	Every Stairway (excluding fire-isolated stairway) is to be compliant with AS1428.1 and slip resistance of treads, landings and nosing strips compliant with BCA Table D3D15
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	Where non-fire-isolated stairways have been provided, the features of the stairway will be assessed with the requirements of AS1428.1 at the CC stage of works.
<i>Requirement</i>	Every Fire-isolated Stairway is to be compliant with the relevant sections of AS1428.1 & slip resistance of treads, landings and nosing strips compliant with BCA Table D3D15
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	Where fire-isolated stairways have been provided, the features of the stairway will be assessed with the relevant requirements of AS1428.1 at the CC stage of works.
<i>Requirement</i>	Passing spaces requirement It is a requirement to provide passing spaces in accessways complying with AS1428.1 at maximum 20 M intervals, where a direct line of sight is not available. Space required is width of 1800mmx2800mm (in the direction of travel). Chamfer of 400x400mm is permitted at corners.
<i>Compliance</i>	N/A
<i>Comments</i>	There are no accessways over 20 M lengths in the development where a direct line of sight is not available.
<i>Requirement</i>	Turning spaces requirement It is a requirement to provide turning spaces in accessways complying with AS1428.1 within 2M of the end of accessways where it is not possible to continue travelling and at every 20M intervals. Space required is width of 1540mm x 2070mm (in the direction of travel).
<i>Compliance</i>	Complies.
<i>Comments</i>	Adequate turning spaces have been provided. Details to be verified at CC stage of works.
<i>Requirement</i>	Carpet specifications Carpet if used in areas required to be accessible are to be provided with pile height or thickness not more than 11mm and carpet backing not more than 4mm bringing the total height to a maximum of 15mm.
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	Only applies to carpets provided in the common use areas. Carpet selections generally take place at CC stage of works. Selection of carpets as specified above will lead to compliance and these selection details are to be verified at CC stage of works.

	BCA Part D4D5 Exemptions
<i>Requirement</i>	Access is not required to be provided in the following areas : <ul style="list-style-type: none"> • where access would be inappropriate because of the use of the area • where area would pose a health and safety risk • any path which exclusively provides access to an exempted area
<i>Compliance</i>	For information only.
<i>Comments</i>	Areas such as lift machine rooms, fire services room, and mechanical rooms in the development are exempted from providing access under this clause due to WHS concerns.
	BCA Part D4D6 Accessible Carparking
<i>Requirement</i>	Parking Service Accessible carparking space need not be provided when a parking service is provided and direct access to any of the carparking spaces is not available to the public.
<i>Compliance</i>	N/A
<i>Comments</i>	
<i>Requirement</i>	Accessible car parking spaces shall have pavement marking in accordance with AS 2890.6.
<i>Compliance</i>	Complies.
<i>Comments</i>	Note: the pavement marking shall have the appropriate slip resistance for the location.
<i>Requirement</i>	In situations where not more than 5 carparking spaces have been provided The car parking space need not be designated, so as to restrict the use of the carparking space only for people with a disability.
<i>Compliance</i>	N/A
<i>Comments</i>	
<i>Requirement</i>	Class 2 There are no carparking requirements for a Class 2 under the BCA. If adaptable housing has been mandated by the Council, carparking spaces will be required under the requirements of AS4299- Adaptable housing
<i>Compliance</i>	N/A
<i>Comments</i>	The parking for the adaptable units is assessed later in this report.
	BCA Part D4D7 Signage
<i>Requirement</i>	Braille and Tactile signage is required to identify Accessible & Ambulant Sanitary facilities, Fire Exits, areas with Hearing Augmentation and the location of Accessible entrances and toilets
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	

<i>Requirement</i>	<p>BCA Part D4D9 Tactile indicators (TGSIs)</p> <p>TGSIs are required when approaching;</p> <ul style="list-style-type: none"> - Stairways other than fire-isolated stairways and stairways within a SOU of a Class 2 building or a non-accessible SOU of a Class 3 building - Escalators / passenger conveyor / moving walk - Ramp (other than fire-isolated ramps / kerb or step or swimming pool ramps) - Under an overhead obstruction of <2M if no barrier is provided - When accessway meets a vehicular way adjacent to a pedestrian entry (if no kerb / kerb ramp provided at the location) <p>Compliance is required with AS1428.4.1 including Luminance contrast and slip resistance requirements for all TGSIs.</p> <p>TGSIs are not required in areas not required to be accessible</p>
<i>Compliance</i>	Capable of compliance.
<i>Comments</i>	<p>In the proposal, TGSIs are required in the following locations:</p> <ul style="list-style-type: none"> • At <u>top and bottom landings</u> of stairways and 1:14 ramps, <u>600-800mm</u> depth or min 12 discrete cones are required at 300+/-10mm from edge of hazard • At <u>mid landings</u> of stairway and 1:14 ramp, <u>300-400mm</u> depth or min 6 discrete cones are required <u>only where handrails are not continuous</u> or landing is more than 3M • Where accessway meets a vehicular way, 600-800mm depth or min 12 discrete cones are required at 300+/-10mm from edge of hazard. • Under the stairway to warn of overhead obstruction, 600-800mm depth or min 12 discrete cones are required at 300+/-10mm from edge of hazard <p>Details to be verified at CC stage of works.</p>
<i>Requirement</i>	<p>BCA Part D4D12 Limitations on Ramps</p> <ul style="list-style-type: none"> • A series of connecting ramps cannot have a vertical height of 3.6M • A landing for a step ramp cannot overlap a landing for another ramp
<i>Compliance</i>	N/A
<i>Comments</i>	No ramps have been provided in the development.
<i>Requirement</i>	<p>BCA Part D4D13 Glazing on Accessways</p> <p>Glazing requirements- Where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening are required to have a glazing strip as per requirements of AS1428.1</p>
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	<p>Applies to full length glazing used in common use areas such as lift lobbies and common passageways.</p> <p>Glazing strip selections are to be verified at CC stage of works.</p>

BCA Part F Accessible Sanitary Facilities
BCA F4D5 Accessible sanitary facilities

<i>Requirement</i>	Accessible unisex toilet is to be provided in accessible part of building such that; <ul style="list-style-type: none"> • It can be entered without crossing an area reserved for 1 sex only • Where male and female sanitary facilities are provided at different locations, Accessible unisex toilet is only required at one of the locations • Even distribution of LH and RH facilities If no lift is required to be provided to a level, then accessible facility is not required on that level.
<i>Compliance</i>	Complies.
<i>Comments</i>	Common use unisex accessible toilet facilities have been provided in the development. Details to be verified at CC stage of works.
<i>Requirement</i>	Accessible unisex toilets are to be designed in accordance with AS1428.1
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	The width and length requirements depend on selected fixtures. Minimum size of an accessible toilet is required to be 1.9M x 2.7M after tiling works. To be verified at CC stage of works.
<i>Requirement</i>	Ambulant use male / female toilets are to be provided if an additional toilet to the Accessible unisex toilet is provided.
<i>Compliance</i>	N/A.
<i>Comments</i>	No sanitary facilities in addition to the accessible toilet have been provided in the development.
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<i>Requirement</i>	BCA F4D6 Accessible unisex sanitary compartments Class 2
<i>Compliance</i>	At least 1 when sanitary compartments are provided in common areas.
<i>Comments</i>	Complies. To be verified at CC stage of works.
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<i>Requirement</i>	BCA F4D7 Requirements for Accessible unisex showers as per AS1428.1-2021 Class 2
<i>Compliance</i>	At least 1 when showers are provided in common areas.
<i>Comments</i>	N/A No common use shower facilities have been proposed in the development.

BCA Part E3 Lift Installations
BCA E3D7 Lift Types & Limitations

<i>Requirement</i>	The following limitations apply to the use of lifts: <ul style="list-style-type: none"> • Stairway platform lifts must not serve a space accommodating more than 100 persons ; used in high traffic areas such as theatres, auditoriums, traffic interchange, shopping centre; used where another type of lift can be installed; connect more than 2 storeys; when folded not encroach on the required width of the stair • A low-rise platform lift must not travel more than 1m • A low-rise constant pressure lift must not travel more than 2m if unenclosed or 4m if enclosed or be used in high traffic areas such as theatres, auditoriums, traffic interchange, shopping centre • A small sized, low speed automatic lift must not travel more than 12m • If the lift car is fully enclosed the lift must not rely on a constant pressure device for its operation
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	Details to be verified at CC stage of works.
BCA E3D8 Lift Installations	
<i>Requirement</i>	In an accessible building, every passenger lift must comply with Clause E3D8
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	Lift floor dimensions (excluding stairway platform lift) are listed below. <ul style="list-style-type: none"> • Lifts traveling 12M or under, floor size, 1100mm wide x 1400mm deep • Lifts travelling more than 12M, floor size 1400mm wide x 1600mm deep Details to be verified at CC stage of works.
<i>Requirement</i>	If the effective height of the building is over 12M, at least one of the lifts is required to be a stretcher lift, which is to accommodate a raised stretcher with clear space of not less than 600 x 2000mm long x 1400mm high above FFL.
<i>Compliance</i>	Capable of compliance
<i>Comments</i>	Details to be verified at CC stage of works.

DCP Requirements

Adaptable Housing

Six adaptable units are provided. The units designated as adaptable are Units 601-1101. At DA stage there is insufficient information to certify compliance with the Standard, however, in accordance with the table below, the units can comply with the spatial requirements of AS4299 for Adaptable Housing.

AS 4299 Adaptable Housing Class C requirements

<i>The Site</i>	<i>Requirement</i>	An accessible path of travel from the street, letterboxes, car park and to common facilities is provided
	<i>Compliance Comment</i>	Complies Details to be verified at CC stage of works.
<i>Carparking</i>	<i>Requirement</i>	A car space 6m x 3.8m is provided
	<i>Compliance Comment</i>	Complies The layout includes spaces based on AS2890.6 which is acceptable. Details to be verified at CC stage of works.
<i>Unit Entry</i>	<i>Requirement</i>	The entry is accessible, covered, level, has a low threshold, permits wheelchair maneuverability and has an 850 clear door with lever handles
	<i>Compliance Comment</i>	Capable of Compliance Details to be verified at CC stage of works.
<i>Interior - General</i>	<i>Requirement</i>	Access to bathroom, kitchen, laundry and living areas is provided.
	<i>Compliance Comment</i>	Complies Threshold ramps may be required in adapted state for wheelchair unless the floor of wet areas have been recessed. Details to be verified at CC stage of works.
	<i>Requirement</i>	Doors are 820mm clear (870 leaf) with corridors a min. 1000mm wide with circulation space at doors as per AS1428.1
	<i>Compliance Comment</i>	Capable of Compliance It is recommended that the door to adaptable bedroom and adaptable bathroom be 850mm clear opening. Details to be verified at CC stage of works.
<i>Living/ Dining Rms</i>	<i>Requirement</i>	Provision for circulation space of min 2250 dia,
	<i>Compliance Comment</i>	Complies Details to be verified at CC stage of works.
	<i>Requirement</i>	Provision of, a telephone point adjacent to GPO and lighting which can achieve min 300 lux
	<i>Compliance Comment</i>	Capable of Compliance Details to be verified at CC stage of works.

Kitchen	<i>Requirement</i>	Floor surface to be non-slip with 1550 clear between benches and circulation space at door to comply with AS1428.1.
	<i>Compliance</i>	Capable of Compliance
	<i>Comment</i>	Details to be verified at CC stage of works.
	<i>Requirement</i>	Provision for work benches, appliances and other services including tap type and location, GPO locations in accordance with AS 4299.
	<i>Compliance</i>	Capable of Compliance
	<i>Comment</i>	Details to be verified at CC stage of works.
Main Bedroom	<i>Requirement</i>	Can accommodate a queen size bed, wardrobe and circulation to allow a 180deg turn at the foot of the bed or in front of the robe
	<i>Compliance</i>	Complies
	<i>Comment</i>	Details to be verified at CC stage of works.
Bathroom	<i>Requirement</i>	Provision to allow bathroom to be converted to complying with AS 1428.1. The floor is slip resistant and the shower recess is hobless and can provide a compliant shower area with provision for grabrails, mirror, GPO etc.
	<i>Compliance</i>	Complies
	<i>Comment</i>	Details to be verified at CC stage of works.
Toilet	<i>Requirement</i>	An accessible toilet or an enlarged toilet with an area 1250x900w in front of pan is provided which is capable of modification to comply with AS 1428.1. The floor is slip resistant and the wall is capable of installing grabrails.
	<i>Compliance</i>	Complies
	<i>Comment</i>	Details to be verified at CC stage of works.
Laundry	<i>Requirement</i>	Circulation at doors to comply with AS 1428.1 is provided, with adequate circulation in front of appliances (min 1550mm). Provision for washing machine and drier is available and an accessible path of travel to clothes line if provided.
	<i>Compliance</i>	Complies
	<i>Comment</i>	Details to be verified at CC stage of works.
	<i>Requirement</i>	Provide a double GPO and the floor is to be slip resistant.
	<i>Compliance</i>	Capable of compliance
	<i>Comment</i>	Details to be verified at CC stage of works.
Door Hardware	<i>Requirement</i>	Lever door handles are provided, located 900-1100mm above floor
	<i>Compliance</i>	Capable of Compliance
	<i>Comment</i>	Details to be verified at CC stage of works.

Statement of Compliance

On the basis of the above assessment, I am satisfied that the proposal can achieve compliance with the access provisions of the BCA and the Access to Premises Standard.



Michael Moutrie

ACAA Accredited Access Consultant No 581

Statement of experience

Michael Moutrie Director, Accessible Building Solutions



Qualifications:

- ACAA Accredited Access Consultant No 581
- Certificate IV in Access Consulting
- Registered Changing Places assessor (No 021)
- Completed LHA Assessor training
- Completed SDA Assessor training
- OH&S Induction Training Certificate

Michael is a member of Camden Council's Access Committee

Michael started working in Access in 2015 and became a director of Accessible Building Solutions in 2018. Combining his background in fitness and travel, Michael has an interest in the application of accessibility to recreational activities and has been involved with the access award winning Wet'n' Wild Sydney, Jamberoo Action Park and numerous Leisure Centres.

Michael is experienced in the following areas:

- Building audits
- Access Reports for DA & CC
- Livable Housing assessment
- Changing Places assessment
- Expert witness in the Land & Environment Court of NSW

Michael maintains a high level of continuing professional education and has published articles in the ACAA Insight magazine.

Howard Moutrie Consultant



Qualifications:

- B. Arch (Hons) Registered Architect ARB Reg. No 4550
- ACAA Accredited Access Consultant Reg. No. 177
- Registered Assessor of Livable Housing Australia (Assessor No. LHDG046)
- Registered Changing Places assessor (No 007)

Howard has been or is a member of the following:

Standards Australia ME/64 Committee (Access Standards)
Sutherland Council Design Review Panel & Access Committee
City of Sydney Access Panel 2010
Building Professionals Board Access Advisory Panel
ACAA Management Committee

Howard Moutrie is an experienced access consultant with over 15 years' experience. Howard has contributed for over 10 years on the Standards Australia Committee ME/64, providing input into the AS 1428 suite of Standards and the Adaptable Housing Standard has acted as an expert witness in the Land & Environment Court.

Howard has presented at numerous seminars and training sessions including ACAA National Conference, ACAA State Network Seminars, RAlA Network Seminars, Building Designers Association Seminars.