

STOCKLAND

ACCESS DESIGN REVIEW – SSSA CONCEPT STAGE

Waterloo South Estate



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Quality management

Revision	Date	Revision description	
ADR1.7	30 March 2026	SSDA Submission Report	
		Prepared by	Reviewed by
		Michelle Dillon Accessibility Consultant Signed by:  C1F9748B86BC4F1...	Senan Mescall Vice President, Code & Accessibility DocuSigned by:  A737DD80A0DF464...

Jensen Hughes Pty Limited
ABN 29 077 183 192

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1.0 Project Introduction

This Access Design Review – SSDA Concept Stage is submitted to the Department of Planning, Housing and Infrastructure (the Department) on behalf of Stockland and NSW Land and Housing Corporation (the Applicant) in support of a concept State Significant Development Application (SSDA) for the redevelopment of the site within the Waterloo Estate (South) Precinct Area, hereby known as “Waterloo South”.

In this report reference to “Homes NSW” or “the Applicant” shall also be taken to mean “New South Wales Land and Housing Corporation (LAHC)” who is the registered owner of 93 per cent of land within the Waterloo South Precinct Area. Any reference to “Waterloo South” in this report should be read as the redevelopment of land owned by LAHC and associated public land (such as roads) throughout the Precinct Area.

The concept development is categorised as State Significant Development (SSD) as per Section 26, Schedule 1 of State Environmental Planning Policy Planning Systems 2021 (Planning Systems SEPP) as the project includes housing development carried out by or on behalf of the LAHC, with an estimated development cost (EDC) of more than \$30 million.

The concept, in summary, aims to deliver:

- + High quality mixed tenure housing in the context of a rapidly transforming area.
- + Approximately 3,300 new dwellings, of which a minimum 30% will be social housing, approximately 20% will be affordable housing, and a maximum 50% will be market housing (measured as a percentage of the total residential gross floor area).
- + Publicly accessible open space and public realm activation.
- + An authentic mixed-use precinct, with housing co-located with non-residential uses, community facilities, essential services, and access to public transport.

The concept SSDA will guide the detailed design of future buildings, open spaces, and the public realm within the Waterloo South site. The concept SSDA seeks development consent for key planning metrics, including maximum building envelopes, building heights, setbacks, vehicular access points and road network, and the distribution of floor area across different land uses and residential tenure types.

A state-assessed rezoning application has also been prepared and submitted concurrently to give effect to this concept SSDA. The state-assessed rezoning application seeks amendments to the Sydney Local Environmental Plan 2012 (SLEP 2012) and the Waterloo Estate (South): Design Guide 2022 (2022 Design Guide) to align with the maximum building envelopes sought in this concept SSDA. Notably no additional gross floor area (GFA) or density is sought under the state-assessed rezoning application than is currently permissible on the site under the SLEP 2012.

1.1 Site Context

The suburb of Waterloo is located within the City of Sydney Local Government Area (LGA) and is located 3km south of Sydney CBD. The site is part of the broader Waterloo Estate, which comprises the northern, central, and southern precincts and accommodates a significant community residing in social housing.

The Waterloo South Precinct Area is predominantly owned by LAHC, however, as outlined in Table 1, the site, the subject of this report, excludes several privately owned lots located within the boundary of the

broader Waterloo South precinct outlined in Figure 2. The privately owned lots are currently used for residential, office, light industrial, and infrastructure uses. The LAHC owned sites are currently used almost exclusively for the provision of social housing, with ancillary offices and community facilities. Overall, Waterloo South currently contains a total of 750 social housing dwellings and 120 private dwellings.

As shown in Figure 1, surrounding suburbs include Redfern to the north, Green Square to the south, Alexandria to the west and Zetland to the east. This broader area has been subject to significant change over the last 10 years with projects such as South Eveleigh, Redfern North Eveleigh Precinct Renewal, Waterloo Metro Quarter and Over Station Development (OSD) all contributing to the changing character of the area.

These broader renewal projects are supported by proximity to a range of public transport services, including Redfern Station, Green Square Station, and Waterloo Metro Station, all of which are within walking distance of Waterloo South.

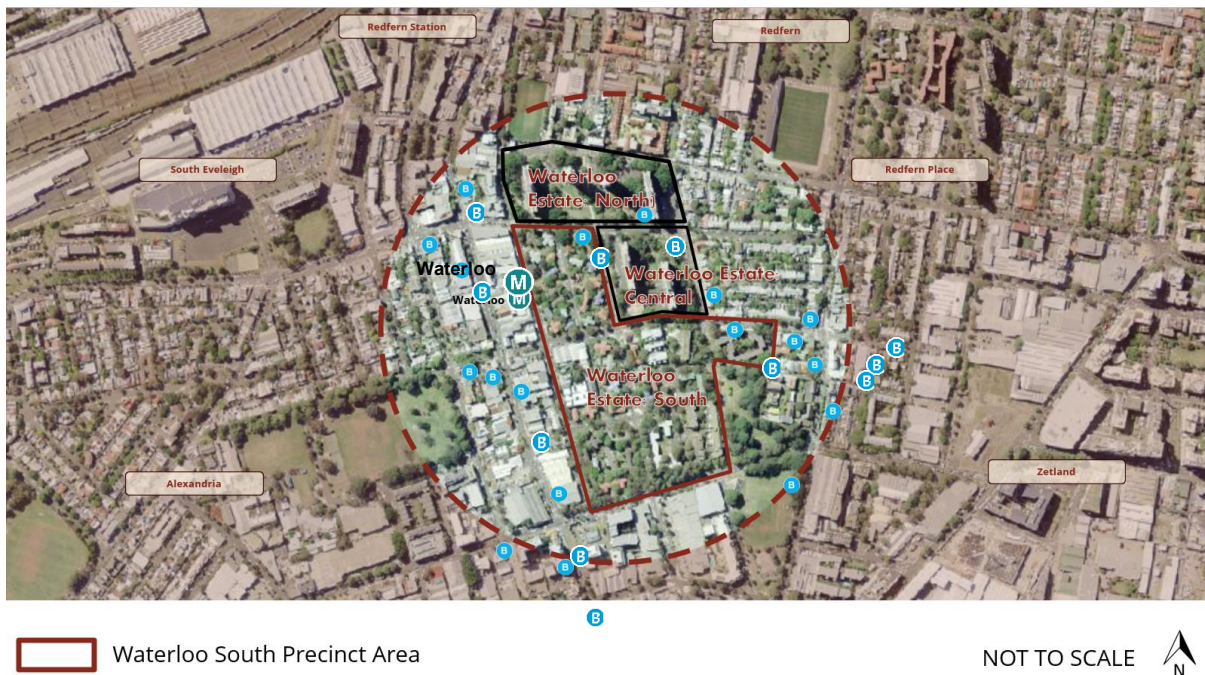


Figure 1 Aerial view of the Waterloo Estate and the Waterloo Estate (South) precinct

Source: Six Maps, modified by Beam Planning



Figure 2 Waterloo Estate (South) Project Area

Source: SJB

1.2 Title Information

The Waterloo South Precinct Area comprises approximately 123,149m² across 10 street blocks in the City of Sydney Local Government Area (LGA), generally bounded by Cope, Raglan, George, Wellington, Gibson, Kellick, Pitt and McEvoy Streets. The Waterloo South site area, excluding any privately owned properties within the Waterloo South Precinct Area, comprises approximately 114,822m², or just over 93 per cent of the land within the Precinct Area. The legal description of Waterloo South Precinct Area is detailed in Table 1.

Table 1 Legal Description of Waterloo South

Address	Lot/DP
Lots owned by NSW Land and Housing Corporation (land is subject to both the rezoning and the concept SSDA)	
209-219 Cope Street, Waterloo	Lot 1 DP 217386
238-246 George Street, Waterloo	Lot 1 DP 225159
229-231 Cope Street Waterloo	Lot 3 DP 10721
6 John Street, Waterloo	Lot 1 DP 533762
97-109 Cooper Street, Waterloo	Lot A DP 105916, Lot B DP 105916, Lot C DP 105916, Lot 14 DP 10721,
248-254 George Street, Waterloo	Lot 2 DP 533678
232 Pitt Street, Waterloo	Lot 11 DP 635663, Lot 10 DP 635663
74-76 Wellington Street, Waterloo	Lot 1 DP 224728

Address	Lot/DP
331-337 George Street, Waterloo	Lot 3 DP 533680
247-251 Cope Street, Waterloo	Lot 1 DP 533679
339-341 George Street, Waterloo	Lot 1 DP 77168
250 Pitt Street, Waterloo	Lot 313 DP 606576
Cooper Street, Waterloo	Lot 3 DP 217386
Lots owned by others (land that does <u>not</u> form a part of the concept SSDA)	
221-223 Cope Street, Waterloo	Lot 6 DP 10721, Lot 7 DP 10721, Lot 9 DP 10721, Lot 8 DP 1147179
225-227 Cope Street, Waterloo	Lot 5 DP 10721, Lot 4 DP 10721
233 Cope Street, Waterloo	Lot 12 DP 1099410, Lots 1-41 SP 79210
116 Wellington Street, Waterloo	Lot 10 DP 10721, Lot 11 DP 10721
111 Cooper Street, Waterloo	Lot 15 DP 10721
291 George Street, Waterloo	Lot 10 DP 1238631, Lots 1-20 SP 96906
110 Wellington Street, Waterloo	Lot 101 DP 1044801, Lots 1-58 SP 69476
336 George Street, Waterloo	Lot 3 DP 10686
213-215 Cope Street, Waterloo	Lot 2 DP 217386

1.3 Project Vision and Intended Outcomes

The vision for the site is to create a unique and vibrant mixed-tenure housing precinct that supports the needs of the community and delivers much needed housing in response to National and State Government priorities.

The vision is:

To create a new and unique urban village on the Project Land (Gadigal Land) which: delivers new homes, community places and green spaces with diverse housing choice and amenity; prioritises the health and wellbeing of residents; and offers an authentic sense of place and mixed and more sustainable local and mixed communities.

The proposed redevelopment seeks to respond to this Vision by creating a unique and vibrant neighbourhood that can deliver significant social benefits to residents, visitors, and workers in the Waterloo area and broader City of Sydney LGA. The co-location of community uses with housing and employment will ensure the redevelopment is an integrated, accessible and connected precinct that supports the social needs of community.

1.4 Proposed Concept SSDA

The concept SSDA seeks concept approval in accordance with section 4.22 of the Environmental Planning and Assessment Act 1979 (EP&A Act) for the comprehensive redevelopment of the Waterloo South site.

The concept proposal, if approved, will guide the detailed design of future buildings, public open spaces, and the public realm within Waterloo South. It will seek concept development consent for key planning metrics for the precinct as generally described in Table 2 (indicative figures).

Table 2 Key development metrics

Descriptor	Project Details
Project Area	<ul style="list-style-type: none"> Waterloo South has a developable site area of 114,822sqm / 11.5ha The broader Waterloo South Precinct Area, which includes all LAHC owned and privately owned properties and roads within the precinct, has a site area of 123,149sqm / 12.3ha
Project Description	<ul style="list-style-type: none"> Maximum building envelopes, including maximum building heights, street-wall heights and setbacks. Distribution of gross floor area (GFA) across the Waterloo South development blocks. Indicative allocation of floor space between social, affordable and market housing, as well as non-residential and community uses across the Waterloo South Precinct Area. Loading, vehicular, pedestrian, and active transport access arrangements. Public domain upgrades and new public domain and publicly accessible areas. Indicative subdivision plan, staging plan and delivery sequencing for development. Approval of the following management plans and strategies to inform future stages of the development: <ul style="list-style-type: none"> Updated Design Excellence Strategy Design with Country Strategy Preliminary Public Art Strategy Contamination Strategy Flood Management Strategy Stormwater Management and Drainage Strategy ESD Strategy Strategies for utilities and service provision including service infrastructure lead-in enabling works Tree Retention Strategy
Land Uses	<p>Residential</p> <ul style="list-style-type: none"> Social housing: no less than 30% of residential GFA Affordable housing: ~20% of residential GFA (balance between the delivery of minimum 30% social housing and the maximum 50% market housing) Market housing: no greater than 50% of residential GFA <p>Non-residential</p> <ul style="list-style-type: none"> A total of 15,000m² of GFA, of which at least 5,000m² of GFA is to be delivered as 'Community Uses' (which can include childcare, health, education or community facilities).
Gross Floor Area	Up to 282,485m ²
Building Heights	Between 2 and 33 storeys
Car Parking	Approximately 1,500 spaces (across all land uses), excluding on-street car parking spaces
Staging/ Phasing	It is expected that the redevelopment will occur in seven (7) stages (inclusive of the delivery of the large park on Block 1), however this staging remains indicative.

2.0 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 AS1428.1-2021, 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.

2.1 Referenced legislation and standards

The design review has been undertaken 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 Volume 1 and referenced Australian Standards including:
 - AS1428.1 2021 Part 1: General Requirements for access – new building work.

- AS1428.2 1992 Part 2: Enhanced and additional requirements – Buildings and facilities.
- 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.

2.2 Relevant SEARs

This Access Design Review – SSDA Concept Stage addresses the following relevant Secretary’s Environmental Assessment Requirements (SEARs) as set out within the Planning Secretary’s Environmental Assessment Requirements (8 October 2025).

Table 3 SEARs Compliance Table

SEARS Request	Response / Location in Report
<p>1. Statutory Context</p> <ul style="list-style-type: none"> + Address all relevant legislation, EPIs (including drafts), plans, policies, guidelines and planning circulars. + Identify compliance with applicable development standards and provide a detailed justification for any non-compliances. + Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences. + Provide an explanation of the consistency of the proposal with any future planning proposals or other strategic documentation that applies to the site (including any future plans or rezonings led by Council/State). + Address the requirements of any approvals applying to the site, including any concept approval, any endorsed or draft master plan, precinct plan or any recommendation from Gateway determination. + Provide an accurate summary of the detailed assessment of the impacts of the project and integrate the findings and recommendations of technical reports into the justification and evaluation of the project as a whole. 	<p>Sections 5 & 6</p>
<p>6. Built Form and Urban Design</p> <ul style="list-style-type: none"> + Demonstrate how the proposed concept built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, access, open space, streetscape and existing and future character of the locality. 	<p>Sections 5 & 6</p>
<p>20. Public Space</p> <p>Demonstrate how the development:</p>	<p>Sections 5 & 6</p>

SEARS Request	Response / Location in Report
<ul style="list-style-type: none"> + maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department + provides accessible public space 	

2.3 Waterloo Estate South Design Guide & Development control plans (DCPs)

In addition to the Federal and State legislative considerations outlined above, assessment against the Waterloo Estate South Design Guide (2022 Design Guide) is required. Where the Design Guide references the Sydney Development Control Plan (DCP) 2012, these provisions must also be considered.

Item No.	Control	Compliance
Sydney Development Control Plan (DCP) 2012		
3.11.9	<p>Accessible Parking</p> <p>(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.</p> <p>(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.</p> <p>(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.</p>	Capable of complying
3.12.1	<p>Accessible Design</p> <p>(1) All development must comply with the following: all Australian Standards relevant to accessibility; the Building Code of Australia access requirements; and Disability Discrimination Act 1992. Complex developments where compliance is proposed through alternative solutions must be accompanied by an Access report prepared by a suitably qualified access professional.</p> <p>(2) The provision of equitable access is to have minimal impact on the significant fabric and setting of heritage items and of contributory buildings within heritage conservation areas; and be reversible.</p>	Capable of complying

Item No.	Control	Compliance
	<p>(3) Where heritage impact is used as a reason for not providing equitable access in accordance with this Section, evidence is to be provided that no suitable alternatives for access are available.</p> <p>(4) Encroachment onto public land to achieve access requirements is generally not permitted except when:</p> <p>(a) access by other means will result in a substantial loss of original fabric of a heritage-listed property impacting on the heritage significance of the place, and that the provision of equitable access is highly desirable, with no alternative access options available; or</p> <p>(b) the proposal involves a significant public building where equitable access is highly desirable and there are no alternative access options available.</p> <p>(5) Access for pedestrians and vehicles are to be separated.</p> <p>(6) Access arrangements are to be:</p> <p>(a) integral with the overall building and landscape design and not appear as 'add-on' elements or as of secondary importance;</p> <p>(b) as direct as possible; and</p> <p>(c) designed so that a person does not need to summon help.</p> <p>(7) Required egress routes in residential development are to allow for safe escape for persons with a disability including, but not limited to, waiting space on landings within fire stairs and provision of accessible egress paths from ground floor apartments.</p>	
<p>3.12.2</p>	<p>Adaptable dwelling mix</p> <p>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.</p> <p>(1) Adaptable dwellings are to be spread amongst all unit sizes to accommodate various household sizes.</p> <p>(2) Adaptable dwellings are to be provided in all new development in accordance with the following rates:</p> <p>+ 30 or more 15% of total dwellings</p>	<p>Capable of complying</p>
<p>2022 Design Guide</p>		

Item No.	Control	Compliance
4.1	<p>Staging and implementation</p> <p>4) All building lots are to have frontage to, and be accessible from, a public road.</p>	Capable of complying
7.1	<p>Public space</p> <p>Public space is to address in the design and execution any significant changes in level caused by the natural topography to ensure accessibility is maximised.</p>	Capable of complying
8.9	<p>Adaptable design</p> <p>(1) Provisions relating to 'Adaptable design' in Sydney DCP 2012 apply to Waterloo Estate (South).</p> <p>(2) Residential and mixed-use buildings are to meet the following accessibility and adaptability standards of the Liveable Housing Design Guidelines:</p> <ul style="list-style-type: none"> a) 100 per cent of new Class 1a dwellings (houses) to silver standard; b) 85 per cent of dwellings in each new Class 2 (apartment) building to silver standard; and c) 15 per cent of dwellings in each new Class 2 (apartment) building to gold standard. 	Capable of complying (see Section 6.13 of this report for further comment)

3.0 Review Summary

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

- + Principles of Universal Design
- + Objects of the *Disability Discrimination Act 1992*
- + *Disability (Access to Premises- Buildings) Standards 2010*.
- + Building Code of Australia 2022 Amendment 2 (BCA2022) Volume 1 – Part D4 and Clauses E3D7 and F4D5
- + Applicable Australian Standards AS1428.1:2009, 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 (where relevant)
- + Doors (hinged/sliding) and doorway circulation space.
- + Stairs, ramps, and walkway/pathway requirements.
- + Car parking.
- + Sanitary Facilities including Unisex accessible toilets and ambulant facilities.
- + 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 DCP 2012 and the 2022 Design Guide.

4.0 Documentation reviewed

This report is specific to the following key stage drawings.

Architectural Plans Prepared by SJB Architects		
Drawing Number	Revision	Title
3AB1-AR-1002	P1	3AB1 - LEVEL 2-6
3AB1-AR-1007	P1	3AB1 - LEVEL 7
3AB1-AR-1008	P1	3AB1 - LEVEL 8-10
3AB1-AR-1011	P1	3AB1 - LEVEL 11-19
3AB1-AR-1020	P1	3AB1 - LEVEL 20-21
3AB1-AR-2001	P1	3AB1 - AREAS - SHEET 1
3AB1-AR-2002	P1	3AB1 - AREAS - SHEET 2
3BB1-AR-1002	P1	3BB1 - LEVEL 2-6
3BB1-AR-1007	P1	3BB1 - LEVEL 7
3BB1-AR-1008	P1	3BB1 - LEVEL 8-13
3BB1-AR-1014	P1	3BB1 - LEVEL 14
3BB1-AR-2001	P1	3BB1 - AREAS - SHEET 1
3BB1-AR-2002	P1	3BB1 - AREAS - SHEET 2
BL03-AR-0301	P1	BLOCK 03 - BASEMENT 1
BL03-AR-0302	P1	BLOCK 03 - GROUND
BL03-AR-0303	P1	BLOCK 03 - LEVEL 2
BL03-AR-1102	P1	BLOCK 03 - SECTION 2 & 3
BL03-AR-8005	P1	BLOCK 03 - SOLAR ANALYSIS
4BB1-AR-1002	P1	4BB1 - LEVEL 2-5
4BB1-AR-1006	P1	4BB1 - LEVEL 6-7
4BB1-AR-2001	P1	4BB1 - AREAS
4CB1-AR-1002	P1	4CB1 - LEVEL 2-6
4CB1-AR-1007	P1	4CB1 - LEVEL 7
4CB1-AR-1008	P1	4CB1 - LEVEL 8-13
4CB1-AR-1014	P1	4CB1 - LEVEL 14-18
4CB1-AR-2001	P1	4CB1 - AREAS - SHEET 1
4CB1-AR-2002	P1	4CB1 - AREAS - SHEET 2
4CB2-AR-1002	P1	4CB2 - LEVEL 2-3
4CB2-AR-1004	P1	4CB2 - LEVEL 4-6
4CB2-AR-1009	P1	4CB2 - LEVEL 7-9
4CB2-AR-2001	P1	4CB2 - AREAS
BL04-AR-0301	P1	BLOCK 04 - BASEMENT 1
BL04-AR-0302	P1	BLOCK 04 - GROUND
BL04-AR-1101	P1	BLOCK 04 - SECTION 1
BL04-AR-1102	P1	BLOCK 04 - SECTION 2
BL04-AR-1103	P1	BLOCK 04 - SOLAR ANALYSIS
4BB1-AR-1002	P1	4BB1 - LEVEL 2-5

Architectural Plans Prepared by SJB Architects		
5AB1-AR-1002	P1	5AB1 - LEVEL 2
5AB1-AR-1003	P1	5AB1 - LEVEL 3
5AB1-AR-1004	P1	5AB1 - LEVEL 4-6
5AB1-AR-1007	P1	5AB1 - LEVEL 7
5AB1-AR-1008	P1	5AB1 - LEVEL 8-17
5AB1-AR-1018	P1	5AB1 - LEVEL 18-19
5AB1-AR-2001	P1	5AB1 - AREAS - SHEET 1
5AB1-AR-2002	P1	5AB1 - AREAS - SHEET 2
5AB1-AR-2003	P1	5AB1 - AREAS - SHEET 3
5BB1-AR-1001	P1	5BB1 - GROUND
5BB1-AR-1002	P1	5BB1 - LEVEL 2-4
5BB1-AR-1005	P1	5BB1 - LEVEL 5-6
5BB1-AR-2001	P1	5BB1 - AREAS
BL05-AR-0301	P1	BLOCK 05 - BASEMENT 1
BL05-AR-0302	P1	BLOCK 05 - GROUND
BL05-AR-0303	P1	BLOCK 05 - LEVEL 02
BL05-AR-1101	P1	BLOCK 05 - SECTION 1 & 2
BL05-AR-1102	P1	BLOCK 05 - SECTION 3
BL05-AR-1103	P1	BLOCK 05 - SOLAR ANALYSIS
8AB1-AR-1002	P1	8AB1 - LEVEL 2-6
8AB1-AR-1007	P1	8AB1 - LEVEL 7-9
8AB1-AR-1010	P1	8AB1 - LEVEL 10-22
8AB1-AR-1023	P1	8AB1 - LEVEL 23-33
8AB1-AR-2001	P1	8AB1 - AREAS
8AB2-AR-1002	P1	8AB2 - LEVEL 2-4
8AB2-AR-1005	P1	8AB2 - LEVEL 5-8
8AB2-AR-2001	P1	8AB2 - AREAS
8AB3-AR-1002	P1	8AB3 - LEVEL 2-3
8AB3-AR-1004	P1	8AB3 - LEVEL 4-6
8AB3-AR-1007	P1	8AB3 - LEVEL 7
8AB3-AR-1008	P1	8AB3 - LEVEL 8-14
8AB3-AR-1015	P1	8AB3 - LEVEL 15-16
8AB3-AR-2001	P1	8AB3 - AREAS
8BB1-AR-1002	P1	8BB1 - LEVEL 2-3
8BB1-AR-1004	P1	8BB1 - LEVEL 4-6
8BB1-AR-1024	P1	8BB1 - LEVEL 9-11
8BB1-AR-2001	P1	8BB1 - AREAS
8CB1-AR-1002	P1	8CB1 - LEVEL 2-3
8CB1-AR-1004	P1	8CB1 - LEVEL 4-8
8CB1-AR-1009	P1	8CB1 - LEVEL 9
8CB1-AR-2001	P1	8CB1 - AREAS
BL08-AR-0301	P1	BLOCK 8 BASEMENT 3

Architectural Plans Prepared by SJB Architects		
BL08-AR-0302	P1	BLOCK 8 BASEMENT 2
BL08-AR-0303	P1	BLOCK 8 BASEMENT 1
BL08-AR-0304	P1	BLOCK 8 - GROUND
BL08-AR-0306	P1	BLOCK 8 - LEVEL 08
BL08-AR-1101	P1	BLOCK 08 - SECTION 1
BL08-AR-1102	P1	BLOCK 08 - SECTION 2
9AB1-AR-1003	P1	9AB1 - LEVEL 3-6
9AB1-AR-1007	P1	9AB1 - LEVEL 7-10
9AB1-AR-1011	P1	9AB1 - LEVEL 11-12
9AB1-AR-1012	P1	9AB1 - LEVEL 13-27
9AB1-AR-1028	P1	9AB1 - LEVEL 28-31
9AB1-AR-1032	P1	9AB1 - LEVEL 32-33
9AB1-AR-2001	P1	9AB1 - AREAS - SHEET 1
9AB1-AR-2002	P1	9AB1 - AREAS - SHEET 2
9BB1-AR-1003	P1	9BB1 - LEVEL 3-6
9BB1-AR-1007	P1	9BB1 - LEVEL 7-9
9BB1-AR-1010	P1	9BB1 - LEVEL 10-11
9BB1-AR-1012	P1	9BB1 - LEVEL 12-14
9BB1-AR-2001	P1	9BB1 - AREAS
BL09-AR-0301	P1	BLOCK 09 - BASEMENT 2
BL09-AR-0302	P1	BLOCK 09 - BASEMENT 1
BL09-AR-0303	P1	BLOCK 09 - GROUND
BL09-AR-0304	P1	BLOCK 09 - LEVEL 02
BL09-AR-1101	P1	BLOCK 09 - SECTION 1
BL09-AR-1102	P1	BLOCK 09 - SECTION 2
BL09-AR-1103	P1	BLOCK 09 - PODIUM SECTIONS
BL09-AR-1104	P1	BLOCK 09 - PODIUM SECTIONS

5.0 Exemptions and performance based solutions

5.1 Exemptions

Clause D4D5 of the BCA permits certain areas within a building to be exempt from access provisions, provided they meet one or more of the following criteria:

- + The nature or function of the area makes accessibility inappropriate.
- + The area presents a potential health or safety risk to individuals with a disability.
- + The area forms part of a path of travel that leads exclusively to other exempt areas as described above.

The Guide to the BCA offers examples of spaces that typically qualify for exemption under these provisions, including:

- + Loading docks
- + Plant and equipment rooms
- + Electrical substations

The Australian Human Rights Commission has provided guidance that exemptions applied under BCA Cl. D4D5 must not be based on assumptions regarding the abilities or limitations of people with disabilities. Instead, any exemption must be:

- + Functionally justified, based on the specific use and operational nature of the space.
- + Clearly documented, with a rationale that supports why access provisions are inappropriate or pose a safety risk.
- + Free from bias, ensuring decisions are not influenced by perceived limitations of potential users.

5.1.1 Subject site – exemptions from the requirements of access

It is expected that exemptions may be sought for areas that meet the parameters of exemption as outlined above. Ultimately, the determination of whether an area qualifies for exemption under Clause D4D5 rests with the building operator and certifying authority, who must exercise informed discretion and ensure compliance with both the BCA and the Premises Standards. This position will be further confirmed and refined during future detailed applications.

5.2 Performance based solutions

Where compliance via the current Deemed to Satisfy (DtS) building legislation cannot be met, departures may 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.

6.0 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.

6.1 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 1a – Dwellings	No access provisions.
Class 2 – Residential Common areas	<p>Access is required:</p> <p>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.</p> <p>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.</p> <p>Where a ramp complying with AS 1428.1 or a passenger lift is installed:</p> <ol style="list-style-type: none"> To the entrance doorway of each SOU, and 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 sale 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
Class 9b – an assembly building	Access is required to and within all areas used by occupants

6.1.1 BCA Clauses and references 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

BCA Clauses – BCA 2022 references	
D4D7 Signage	Applicable
D4D8 Hearing augmentation	Applicable
D4D9 Tactile indicators	Applicable
D4D10 Wheelchair seating spaces in a Class 9b assembly building	Not applicable
D4D11 Swimming Pools	Not applicable
D4D12 Ramps	Applicable
D4D13 Glazing on an accessway	Applicable
E3D7 Passenger lift types and their limitations	Applicable
F4D5 Accessible sanitary facilities	Applicable
Australian Standard references	
AS1428.1-2021	Applicable
AS1428.4.1-2009	Applicable
AS 2890.6-2009	Applicable
AS1735.12-1999	Applicable

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

6.2.1 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 to not exceed 1:40 and be constructed of a firm, hardstand surface in accordance with AS1428.1-2021 requirements.

Ground surfaces are required to incorporate finishes which are slip resistant, including the abutment of surfaces which 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 AS1428.1-2021 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 AS1428.1-2021, including transitions, surface abutments and landing depth and width, according to the direction of travel and/or any required change of direction.

6.2.2 Subject site – access assessment

The following preliminary observations are noted:

- + The requirement for a continuous accessible path of travel from the allotment boundary, between accessible buildings, and from accessible car parking spaces is evident in the concept but will need to be confirmed during future detailed applications.
- + Key elements such as pathway gradients, crossfalls, surface finishes, tactile indicators, and circulation spaces at doorways and gates cannot be fully verified at this stage and will be monitored as documentation develops.
- + A comprehensive review will follow during future detailed applications and topographical information become available.

Disclaimer: This assessment is based on preliminary documentation and is indicative only. Compliance will need to be confirmed during subsequent design phases.

6.3 Vehicle and bicycle access into the site

6.3.1 Access requirements

Carparking

There are no requirements for car parking relevant to this class of building (Class 2) under the BCA.

Bicycle

Bicycle parking where provided should consider the approach, entry, and circulation space available within any secure bicycle parking area e.g., space for a 180deg turn if necessary, and the layout of any bike racks to ensure that bicycles when in-situ, don't impact the use of any associated/adjacent accessways. For example, a recumbent bike which extends over an accessway when parked.

6.3.2 Subject site – access assessment

The Guide to the BCA indicates that where parking spaces serve multi-classified buildings, the number of required accessible parking spaces must be calculated based on the number of spaces dedicated to each classification. Accordingly, the design team must clearly identify the number of parking spaces allocated to the Class 6 and Class 9b portions of the buildings.

While Class 2 buildings are not required under the prescriptive provisions of the BCA to provide accessible car parking, where visitor parking is proposed, at least one accessible parking bay must be provided in accordance with AS2890.6.

In addition to BCA requirements, Development Control Plan (DCP) 3.13.2 mandates that a minimum of 15% of dwellings be adaptable in accordance with AS4299-1995. Each adaptable dwelling must be provided with either:

- + an accessible parking space and a 2.4 m wide shared zone (per AS2890.6), or
- + a single combined space measuring 3.8 m in width

Note, Jensen Hughes's recommendation to negate the 'shared zone ownership' issue that arises in an AS2890.6-2009 arrangement is to provide the 3.8m width requirement.

6.4 Entrances

6.4.1 Access requirements

Doors/gates within paths of travel common to building users, require the following to meet the provision of AS1428.1-2021 Clause 10:

- + 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 swing door).
- + Controls including after-hours swipe cards, key locks, auto door controls etc. located on a level landing, in an accessible location.
- + Circulation spaces which 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%.

6.4.2 Subject site – access assessment

At this stage, the design documentation is preliminary, and therefore a detailed assessment of door and gate compliance cannot be undertaken. Based on the limited information available, the following preliminary observations are noted:

- + Door and gate locations within common paths of travel have been identified; however, detailed dimensions, circulation spaces, and hardware specifications are not yet provided.
- + Compliance with AS1428.1-2021 Clause 10 requirements, including minimum clear opening widths, circulation spaces, operational forces, luminance contrast, and accessible control placement, will need to be confirmed during future detailed applications.
- + It is recommended that the design team incorporate these requirements early to ensure accessibility for all users.

Further review will be undertaken once detailed door schedules and hardware specifications are available during future detailed applications.

6.5 Stairs and Ramps

6.5.1 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 AS1428.1-2021 Clause 9.

6.5.2 Subject site – access assessment

Based on the information available, the following observations are noted:

- + Stairs and ramps within individual units are not subject to the requirements of the Disability (Access to Premises – Buildings) Standards 2010 or the BCA, as these apply only to common areas.
- + Common-use stairs and ramps within the site will be required to comply with AS1428.1-2021 and AS1428.4.1-2021, including provisions for:
 - Continuous handrails to both sides.
 - Luminance contrast on nosings and tactile ground surface indicators (TGSIs) at top and bottom landings.
 - Ramp gradients, landings, kerb rails, and circulation spaces.
- + Fire-isolated stairs must meet AS1428.1-2021 Clause 9 for handrails and incorporate compliant nosing strips.

- + Detailed compliance review will be undertaken once construction drawings and specifications are available.

Recommendation: The design team should integrate these requirements early in the detailed design phase to ensure compliance.

6.6 Access to and within lifts

6.6.1 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 correctly located within the car – from internal corner and floor) which incorporate tactile and Braille.
- + An audible announcement where the lift travels more than 2 floor levels.

6.6.2 Subject site – access assessment

Lifts are provided within each building to facilitate access from parking facilities to ground-level amenities and residential apartments. As the lifts travel more than 12 metres, a minimum internal car size of 1400 mm width x 2000 mm depth is required in accordance with the BCA and AS1735.12. All lifts must be certified to AS1735.12. Where a lift is to be installed, compliance will be verified at the time of procurement and engagement of a lift supplier/contractor. This process must occur prior to the issue of a Construction Certificate to ensure full compliance with accessibility requirements.

6.7 Doors and Doorways

6.7.1 Access requirements

Doors and doorways within paths of travel required to be accessible, require the following to meet the provision of AS1428.1-2021 Clause 10:

- + 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 swing door).
- + Controls including after-hours swipe cards, key locks, auto door controls etc. located on a level landing, in an accessible location.
- + Circulation spaces which 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.

6.7.2 Subject site – access assessment

Doors and doorways located on accessible paths of travel within common-use areas, where required to be accessible, will undergo further review as the design progresses. This review will confirm compliance with relevant provisions of the BCA and AS1428.1, including clear opening widths, circulation spaces, and hardware requirements. Any necessary adjustments will be incorporated during future detailed applications and documentation stages to ensure accessibility is maintained.

6.8 Internal accessways – corridors, rooms

6.8.1 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

6.8.2 Subject site – access assessment

At this stage, the design documentation is preliminary, and therefore a detailed review of internal accessways cannot be undertaken. Based on the limited information available, the following observations are noted:

- + Internal accessways within common use areas will need to comply with AS1428.1-2021, including:
 - Minimum clear width of 1000mm, adjusted as necessary for door circulation spaces.
 - Doorways with compliant controls, circulation spaces, luminance contrast, and visual glazing strips where required.
 - Ground surfaces and abutments that are firm, slip-resistant, and meet the provisions of AS1428.1-2021
 - Ramps, steps, and thresholds designed in accordance with AS1428.1-2021

- Passing and turning spaces incorporated as prescribed by the Standard.
- + Detailed compliance review will be undertaken once floor plans, door schedules, and internal layout details are available during future detailed applications.

6.9 Sanitary facilities

6.9.1 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 AS1428.1-2021 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.

6.9.2 Subject site – access assessment

At this stage, the design documentation is preliminary, and therefore a detailed compliance assessment cannot be undertaken. Based on the limited information available, the following points are noted:

- + The proposed design intent appears to align with the relevant access provisions; however, detailed dimensions, specifications, and layouts are not yet provided.
- + Compliance with AS1428.4.1-2021 and the Disability (Access to Premises – Buildings) Standards 2010 will need to be confirmed during future detailed applications.
- + Further review will be undertaken once construction drawings, schedules, and specifications are available.

6.10 Wayfinding (Signage Component) – Common Use Areas

6.10.1 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.

6.10.2 Subject site – access assessment

Signage documentation is not included within the scope of the Concept, as this will be addressed in future detailed applications.

6.11 Hearing Augmentation

6.11.1 Access requirements

Hearing augmentation is to be provided where an inbuilt amplification system is installed (Other than one used only for emergency warning):

- + In a room in a Class 9b building.
- + In an auditorium, conference room, meeting room or room for judicatory purposes; or
- + At any ticket office, teller's booth, reception area or the like, where the public is screened from the service provider.

The area covered within the room/area that the system is provided must extend across 80-95% of the floor area, dependent upon the type of system utilised. Receivers where required must accommodate the number of anticipated users, based upon the number of people the room or space accommodates.

Screens or scoreboards associated with a Class 9b building, capable of displaying public announcements must be capable of supplementing any public address system, other than a public address system used for emergency warning purposes only.

6.11.2 Subject site – access assessment

Hearing augmentation is to be provided wherever an inbuilt amplification system is installed (excluding systems used solely for emergency warning). This requirement will be monitored and confirmed as the design develops to ensure compliance, particularly within Class 9b Community areas, as required by the BCA and the Premises Standards.

6.12 Livable Housing Design Guidelines

6.12.1 Accessibility Requirement

The prescribed dwelling requirements outlined in this report are drawn from the Liveable Housing Design Guidelines and reinforced through the 2022 Design Guide, adopted in accordance with section 3.43(3) of the Act. These provisions are to be read alongside the Waterloo Estate (South) Public Domain Plan and the relevant policies adopted by the City of Sydney Council, ensuring that accessibility and adaptability standards are consistently applied across residential and mixed-use developments.

While the Building Code of Australia (BCA) does not mandate accessible or liveable units within Class 2 buildings in NSW, the 2022 Design Guide currently requires all Class 1a dwellings to achieve the Silver Standard, and for Class 2 dwellings, at least 85% to achieve the Silver Standard and a minimum of 15% to achieve the Gold Standard.

The proposed Design Guide updates refine and expand these requirements by introducing distinctions across housing typologies and adjusting accessibility targets accordingly. Under the proposed amendments, the application of the Liveable Housing Design Guidelines would require:

- + 100 per cent of new Class 1a dwellings (houses) to achieve the Silver Standard;
- + 85 per cent of social housing Class 2 dwellings (apartments) to achieve the Silver Standard;
- + 15 per cent of social housing Class 2 dwellings (apartments) to achieve the Gold Standard; and
- + 20 per cent of affordable housing and market housing Class 2 dwellings (apartments) to achieve the Silver Standard.

These proposed changes introduce a more nuanced approach to accessibility obligations, broadening the scope beyond the 2022 framework by explicitly applying differentiated accessibility targets to social, affordable, and market housing Class 2 dwellings.

LHDG Clause Number	Room/Item	Current Status
Performance Criteria		
<u>1 Dwelling access</u>		
There is a safe and continuous pathway from the street entrance and/or parking areas to a dwelling entrance that is level.		
Note: Section 1 of the LHDG only applies to Class 1a dwellings, access to the Class 2 apartments will be assessed to Part D4 of the BCA.		
Silver		
1	Provide a safe and continuous pathway from:	
1 a (i)	the front boundary of the allotment; or	Capable of complying
1 a (ii)	a car parking space, where provided, which may include the driveway on the allotment, to an entrance that is level (step-free) as specified in Element 2.	Capable of complying
1 b	The path of travel as referred to in 1.a should have a minimum clear width of 1000mm; and	Capable of complying
1 b (i)	an even, firm, slip resistant surface; and	Capable of complying
1 b (ii)	a crossfall of not more than 1:40; and	Capable of complying
1 b (iii)	a maximum pathway slope of 1:14, with landings provided at no greater than 9m for a 1:14 ramp and no greater than 15m for ramps steeper than 1:20. Landings should be no less than 1200mm in length, and	Capable of complying
1 b (iv)	be step-free.	Capable of complying
1 c	A step ramp* may be incorporated at an entrance doorway where there is a change in height of 190mm or less. The step ramp should provide:	Capable of complying
1 c (i)	a maximum gradient of 1:10; and	Capable of complying
1 c (ii)	a minimum clear width of 1000mm (please note width should reflect the pathway width); and	Capable of complying

LHDG Clause Number	Room/Item	Current Status
1 c (iii)	a maximum length of 1900mm.	Capable of complying
Gold		
1 d	As for silver level except replace 1.b with a minimum clear pathway width of 1100mm	Not applicable
Platinum		
1 e	As for silver level except replace 1.b with a minimum clear pathway width of 1200mm provided from:	Not applicable
1 e (i)	the front boundary of the allotment; and	Not applicable
1 e (ii)	any car parking space, where provided, which may include the driveway on the allotment to an entrance that is level (step-free) as specified in Element 2.	Not applicable
Performance Criteria		
<u>2 Dwelling entrance</u>		
There is a safe and continuous pathway from the street entrance and/or parking areas to a dwelling entrance that is level.		
Silver		
2 a	The dwelling should provide an entrance door with -	
2 a (i)	a minimum clear opening width of 820mm - See Figure 2(a); and	Capable of complying
2 a (ii)	a level (step-free) transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or bevelled); and	Capable of complying
2 a (iii)	reasonable shelter from the weather.	Capable of complying
2 b	A level landing area of 1200mm x 1200mm should be provided at the level (step-free) entrance door.	Capable of complying
2 c	Where the threshold at the entrance exceeds 5mm and is less than 56mm, a ramped threshold may be provided. See Figure 1(b).	Capable of complying
2 d	The level (step- free) entrance should be connected to the safe and continuous pathway as specified in Element 1.	Capable of complying
Gold		
2 e	As for silver level except replace 2.b with a level landing area of 1350mm x 1350mm and replace 2.a(i) with minimum clear door opening width of 850mm. See Figure 2(b)	Capable of complying
Platinum		
2 f	As for silver level except replace 2.b with a level landing area 1500mm x 1500mm and replace 2.a(i) with a minimum clear door opening width of 900mm. See Figure 2(c)	Not applicable

LHDG Clause Number	Room/Item	Current Status
Performance Criteria		
<u>3 Internal doors and corridors</u>		
Internal doors and corridors facilitate comfortable and unimpeded movement between spaces.		
Silver		
3 a	Doorways to rooms on the entry level used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes should provide:	Capable of complying
3 a (i)	a minimum clear opening width of 820mm; and	Capable of complying
3 a (ii)	a level transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or bevelled).	Capable of complying
3 b	Internal corridors/passageways to the doorways referred to in 4.a should provide a minimum clear width of 1000mm.	Capable of complying
Gold		
3 c	As for the silver level except replace 4.a(i) with a minimum clear opening width of 850mm and 4.b with a minimum corridor/passageway width of 1200mm.	Capable of complying
Platinum		
3 d	As for the silver level except replace 4.a(i) with a minimum clear opening width of 900mm and 4.b with a minimum corridor/passageway width of 1200mm.	Not applicable
Performance Criteria		
<u>4 Toilet</u>		
The ground (or entry) level has a toilet to support easy access for home occupants and visitors.		
Silver		
4 a	Dwellings should have a toilet on the ground (or entry) level that provides:	
4 a (i)	a minimum clear width of 900mm between the walls of the bathroom if located in a separate room; and	Capable of complying
4 a (ii)	a minimum 1200mm clear circulation space forward of the toilet pan exclusive of the swing of the door in accordance with Figure 3(a).	Capable of complying
4 b	If the toilet is located within the ground (or entry) level bathroom, the toilet pan should be located in the corner of the room to enable the installation of grabrails.	Capable of complying
Gold		
4 c	As for silver level except replace 5.a(i) with a minimum clear width of 1200mm between the walls of the bathroom if located in a separate room, or between amenities if located in a combined bathroom.	Capable of complying
Platinum		
4 d	As for the gold level with the following features added:	

LHDG Clause Number	Room/Item	Current Status
4 d (i)	a toilet pan positioned between 450mm – 460mm from the nearest wall as measured from the centre line of the toilet; and	Not applicable
4 d (ii)	600mm minimum clearance forward of the cistern measured from the front of the cistern to the front of the toilet pan. 800mm (+/-10mm) clearance is required if the cistern is recessed; and	Not applicable
4 d (iii)	a height for the pan of between 460mm - 480mm above the finished floor level as detailed in Figure 4.	Not applicable
Performance Criteria		
5 Shower		
The bathroom and shower are designed for easy and independent access for all home occupants.		
Silver		
5 a	One bathroom should feature a slip resistant, hobless (step-free) shower recess. Shower screens are permitted provided they can be removed at a later date.	Capable of complying
5 b	The shower recess should be located in the corner of the room to enable the installation of grabrails at a future date.	Capable of complying
Gold		
5 c	As for silver level except the hobless (step-free) shower recess described in 6.a should -	
5 c (i)	be located in a bathroom on the ground (or entry) level; and	Capable of complying
5 c (ii)	provide dimensions of 900mm x 900mm; and	Capable of complying
5 c (iii)	provide a clear space of 1200mm x 1200mm forward of the shower recess entry as detailed in Figure 5 (a).	Capable of complying
Platinum		
5 d	As for gold level except that the hobless (step-free) shower recess should -	
5 d (i)	provide dimensions of 1160mm x 1100mm; and	Not applicable
5 d (ii)	provide a clear space 1600mm x 1400mm forward of the shower recess entry as detailed in Figure 5(b)	Not applicable
Performance Criteria		
6 Reinforcement of bathroom and toilet walls		
The bathroom and toilet walls are built to enable grabrails to be safely and economically installed.		
Silver		
6 a	Except for walls constructed of solid masonry or concrete, the walls around the shower, bath (if provided) and toilet should be reinforced to provide a fixing surface for the safe installation of grabrails.	Capable of complying

LHDG Clause Number	Room/Item	Current Status
6 b	The fastenings, wall reinforcement and grabrails combined must be able to withstand 1100N of force applied in any position and in any direction.	Capable of complying
6 c	The walls around the toilet are to be reinforced by installing-	
6 c (i)	noggings with a thickness of at least 25mm in accordance with Figure 6a; or	Capable of complying
6 c (ii)	sheeting with a thickness of at least 12mm in accordance with Figure 6b.	Capable of complying
6 d	The walls around the bath are to be reinforced by installing	Capable of complying
6 d (i)	noggings with a thickness of at least 25mm in accordance with Figure 7a; or	Capable of complying
6 d (ii)	sheeting with a thickness of at least 12mm in accordance with Figure 7b.	Capable of complying
6 e	The walls around the hobless (step-free) shower recess are to be reinforced by installing -	
6 e (i)	noggings with a thickness of at least 25mm in accordance with Figure 8a; or	Capable of complying
6 e (ii)	sheeting with a thickness of at least 12mm in accordance with Figure 8b.	Capable of complying
Gold		
	Silver level requirements apply.	Capable of complying
Platinum		
	Silver level requirements apply.	Not applicable
Performance Criteria		
<u>7 Internal stairways</u>		
Where installed, stairways are designed to reduce the likelihood of injury and also enable future adaptation. If there are NO internal stairways then this section is NA. Note: Handrails on both sides of the stairway are preferred		
Silver		
7 a	Stairways in dwellings must feature:	
7 a (i)	a continuous handrail on one side of the stairway where there is a rise of more than 1m	Capable of complying
Gold		
	As for the silver level with the following additional features:	Capable of complying

LHDG Clause Number	Room/Item	Current Status
7 a (ii)	a minimum clear width of 1000mm; and	Capable of complying
7 a (iii)	be straight in design; and	Capable of complying
7 a (iv)	be positioned adjoining a load-bearing wall.	Capable of complying
Platinum		
	As for the Gold level with the following additional features:	
7 a (v)	closed risers; and	Not applicable
7 a (vi)	continuous handrails on both sides of the stairway; and	Not applicable
7 a (vii)	minimum landing areas of 1200mm x 1200mm at the top and base of the stairway.	Not applicable
Performance Criteria		
8 Kitchen		
The kitchen space is designed to support ease of movement between fixed benches and to support easy adaptation.		
Silver		
	No Requirements	Not applicable
Gold		
8 a	The kitchen space should be designed to support ease of movement and adaptation with –	
8 a (i)	at least 1200mm clearance provided in front of fixed benches and appliances; and	Capable of complying
8 a (ii)	Slip resistance flooring	Capable of complying
8 b	Where practicable, floor finishes should extend under kitchen cabinetry to enable cupboards to be moved without affecting the flooring.	Capable of complying
Platinum		
8 c	As for the gold level except that the kitchen space described in 9.a should be designed to support ease of movement and adaptation with -	
8 c (i)	at least 1550mm clearance should be provided in front of fixed benches and appliances; and	Not applicable
8 c (ii)	slip resistant flooring; and	Not applicable
8 c (iii)	task lighting installed above workspaces.	Not applicable
Performance Criteria		
9 Laundry		

LHDG Clause Number	Room/Item	Current Status
The laundry space is designed to support ease of movement between fixed benches and to support easy adaptation.		
Silver		
	No Requirements	Not applicable
Gold		
9 a	The laundry space should be designed to support ease of movement and adaptation with -	
9 a (i)	at least 1200mm clearance provided in front of fixed benches and appliances; and	Capable of complying
9 a (ii)	slip resistant flooring (As per the NCC).	Capable of complying
9 b	Where practicable, floor finishes should extend under laundry cabinetry to enable cupboards to be moved without affecting the flooring.	Capable of complying
Platinum		
9 c	As for the gold level except that in laundry space described in 10.a should be designed to support ease of movement and adaptation with:	Not applicable
9 c (i)	at least 1550mm clearance should be provided in front of fixed benches and appliances; and	Not applicable
9 c (ii)	slip resistant flooring; and	Not applicable
9 c (iii)	task lighting installed above workspaces.	Not applicable
Performance Criteria		
<u>10 Ground (or entry bedroom space)</u>		
There is a space on the ground (or entry) level that can be used as a bedroom		
Silver		
	No Requirements	Not applicable
Gold		
10 a	The dwelling should feature a space (or room) on the ground (or entry) level that:	
10 a (i)	is of at least 10m ² with one wall a minimum length of 3m; and	Capable of complying
10 a (ii)	provides for a minimum path of travel of at least 1000mm on at least one side of the bed. See Figure 9	Capable of complying
Platinum		
10 b	As for the gold level, but it also:	Not applicable
10 b (i)	provides a space 1540mm (width) x 2070mm (in the direction of travel) on the side on the bed that is closest to the door approach; and	Not applicable

LHDG Clause Number	Room/Item	Current Status
10 b (ii)	provides for a minimum path of travel of 1000mm on the remaining side of the bed.	Not applicable
Performance Criteria		
11 Switches and powerpoints		
Light switches and powerpoints are located at heights that are easy to reach for all home occupants		
Silver		
	No Requirements	Not applicable
Gold		
11 a	Light switches should be positioned in a consistent location -	
11 a (i)	between 900mm – 1100mm above the finished floor level; and	Capable of complying
11 a (ii)	horizontally aligned with the door handle at the entrance to a room.	Capable of complying
11 a (iii)	Powerpoints should be installed not lower than 300mm above the finished floor level.	Capable of complying
Platinum		
11 c	As for gold level with the following feature: Light and powerpoint switches should be rocker action, toggle or push pad in design with a recommended width of 35mm.	Not applicable
Performance Criteria		
12 Door and tapware		
Home occupants are able to easily and independently open and close doors and safely use tap hardware.		
Silver		
	No Requirements	Not applicable
Gold		
12 a	Doorways should feature door hardware installed at between 900mm -1100mm above the finished floor.	Capable of complying
Platinum		
	As for gold level with the following features -	
12 b	Doorways should feature lever or D-pull style door hardware; and	Not applicable
12 c	Basins, sinks and tubs should feature lever or capstan style tap hardware with a central spout.	Not applicable
Performance Criteria		
13 Family/Living space		
The family/living room features clear space to enable the home occupant to move in and around the room with ease.		

LHDG Clause Number	Room/Item	Current Status
Silver		
	No Requirements	Not applicable
Gold		
	No Requirements	Not applicable
Platinum		
13 a	The family/living room should accommodate a free space, 2250mm in diameter, to enable ease of movement clear of furniture. See Figure 10	Not applicable
Performance Criteria		
<u>14 Window sills</u>		
Windows sills are installed at a height that enables home occupants to view the outdoor space from either a seated or standing position.		
Silver		
	No Requirements	Not applicable
Gold		
	No Requirements	Not applicable
Platinum		
14 a	Window sills on the ground (or entry) level in living areas and bedroom spaces should be positioned no higher than 1000mm above the finished floor level to facilitate natural surveillance.	Not applicable
14 b	Window controls should be able to be easy to operate with one hand and located within easy reach from either a seated or standing position.	Not applicable
Performance Criteria		
<u>15 Flooring</u>		
Floor covering are slip resistant to reduce the likelihood of flips, trips and falls in the home.		
Silver		
	No Requirements	Not applicable
Gold		
	No Requirements	Not applicable
Flooring		
15 a	All floor coverings should:	Not applicable
15 a (i)	be firm, even and slip resistant; and	Not applicable
15 a (ii)	feature a level transition between abutting surfaces (a maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or beveled).	Not applicable

6.12.2 Subject site – access assessment

Based on the preliminary documentation reviewed, all elements of the concept design are considered capable of achieving compliance with the proposed Design Guide updates. This assessment is supported by the following factors:

The concept is currently high-level, providing the necessary flexibility for the incorporation of accessibility requirements as the scheme progresses into detailed design stages.

Early design intent discussions demonstrate a clear commitment to meeting the revised accessibility benchmarks outlined in the Liveable Housing Design Guidelines (LHDG) and reflected in the proposed Design Guide updates, including:

- + 100% of Class 1a dwellings achieving the Silver Standard;
- + 85% of social housing Class 2 dwellings achieving the Silver Standard;
- + 15% of social housing Class 2 dwellings achieving the Gold Standard; and
- + 20% of affordable and market housing Class 2 dwellings achieving the Silver Standard.

As part of the rezoning proposal, the applicant seeks to amend the existing Design Guide provisions by removing the current Clause 8.9(2)(b) and (c), which require LHDG Silver and Gold Standard ratios to be applied universally across all Class 2 dwellings. Under the proposed changes, accessibility requirements would instead be tied to the updated proportional requirements for social, affordable, and market housing as outlined above.

The proposed amendments introduce a more refined and proportionate accessibility framework. Support for these changes is based on several key considerations:

- + The proposed ratios introduce tailored accessibility requirements for social, affordable, and market housing. This reflects contemporary policy direction and ensures that the highest accessibility targets are applied where community need is greatest, specifically within the social housing component.
- + The proposed distribution (85% Silver + 15% Gold within social housing; 20% Silver within affordable and market housing) better aligns with anticipated occupancy patterns and the functional needs of future residents. This ensures that accessible dwellings are provided in meaningful proportions without mandating universal application across all Class 2 stock.
- + The proposed changes do not diminish compliance with the Disability Discrimination Act 1992 (DDA) or other legislative requirements. All public, communal, and shared spaces, including entries, circulation routes, amenities, and public domain interfaces, must continue to comply with relevant Australian Standards and the BCA.
- + Importantly, the proposed ratios still exceed typical baseline planning requirements (e.g., ADG Objective 4Q-1), ensuring that accessibility remains a central design outcome while avoiding unnecessary duplication between overlapping guidelines.

The proposed removal of Clause 8.9(2)(b) and (c) is considered reasonable given the retention of ADG Objective 4Q-1 requirements, alignment with state planning policy, and the balance achieved between accessibility, cost, and design flexibility. This approach maintains compliance with statutory obligations while supporting practical and efficient development outcomes.

It remains the responsibility of the design team to ensure that detailed documentation clearly identifies which dwellings achieve Silver and which achieve Gold, and that these requirements are maintained throughout the design and construction phases. Detailed compliance, including circulation spaces, bathroom layouts,

and adaptability features, will need to be confirmed during the next design phase when full floor plans and specifications are available.

6.13 Adaptable Housing Code Assessment Summary (AS4299-1995)

6.13.1 Accessibility Requirement

In accordance with Sydney Development Control Plan 2012 (Sydney DCP 2012), a minimum of 15% of all dwellings within the development must be designed as adaptable housing in compliance with AS4299-1995 – Adaptable Housing. These dwellings are required to incorporate Class C (All Essential Features) at the pre-adaptation stage and demonstrate the ability to accommodate future modifications at minimal cost.

As a best practice recommendation (non-mandatory under the DCP), it is advised that adaptable SOUs be evenly distributed across all buildings within the development to ensure equitable access and flexibility.

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	Capable of complying
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			
3.	Letterboxes to be on hard standing area connected to accessible pathway	3.8	Capable of complying
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 <i>820mm required to all doors – check sliding doors (60mm clearance)</i>	4.3.1	Capable of complying
10.	Door lever handles and hardware to AS 1428.1	4.3.4	Capable of complying
Interior: General			
11.	Internal doors to have 820mm min. clearance	4.3.3	Capable of complying

Item	Room/Item	AS4299 Clause	Current Phase Review
	<i>Note that the requirement is for min. clear width is 820mm. JH recommends 850mm min clear width. Pre adaption</i>		
12.	Internal corridors min. width of 1000mm	4.3.7	Capable of complying
13.	Provision for compliance with AS 1428.1 for door approaches <i>All doors need to be capable post adaption</i>	4.3.7	Capable of complying
14.	Balcony threshold to be level or dealt with in post adaption	4.3.7	Capable of complying
Living room and dining room			
15.	Provision for circulation space of min. 2250mm diameter	4.7.1	Capable of complying
16.	Telephone adjacent to GPO	4.7.4	Capable of complying
17.	Potential illumination level min. 300 lux	4.10	Capable of complying
Kitchen			
18.	Minimum width 2.7m (1550mm clear between benches) <i>1550mm post adaption between benches</i>	4.5.2	Capable of complying
19.	Provision for circulation at doors to comply with AS 1428.1	4.5.1	Capable of complying
20.	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	Capable of complying
21.	Refrigerator adjacent to work surface	4.5.5	Capable of complying
22.	Kitchen sink adjustable to heights from 750mm to 850mm or replaceable	4.5.6	Capable of complying
23.	Kitchen sink bowl max 150mm deep	4.5.6	Capable of complying
24.	Tap set capstan or lever handles or lever mixer	4.5.6 (e)	Capable of complying
25.	Tap set located within 300mm min of front of sink	4.5.6 (e)	Capable of complying
26.	Cooktops to include either front or side controls with raised cross bars	4.5.7	Capable of complying
27.	Cooktops to include isolating switch	4.5.7	Capable of complying
28.	Worksurface min. 800mm length adjacent to cooktop at same height	4.5.7	Capable of complying
29.	Oven located adjacent to an adjustable height or replaceable work surface	4.5.8	Capable of complying
30.	GPOs to comply with AS 1428.1. At least one double GPO within 300mm of front of worksurface	4.5.8	Capable of complying
31.	GPO for refrigerator to be easily reachable when the refrigerator is in its operating position	4.5.11	Capable of complying

Item	Room/Item	AS4299 Clause	Current Phase Review
32.	Slip resistant floor surface	4.5.4	Capable of complying
Main bedroom			
33.	At least one bedroom of area sufficient to accommodate queen size bed and wardrobe and circulation space requirements of AS 1428.2 <i>The bedroom needs to achieve 1 metre either side of queen size bed and 1550 x 2070mm at the base of bed or similar configuration</i> <i>Note: When combined, overall dimensions required wall to wall or wall to cupboard are min 3530mm wide x 3230mm long</i>	4.6.1	Capable of complying
Bathroom			
34.	Ensure that the bathroom is level with the apartment	4.4.1	Capable of complying
35.	Provision for bathroom area to comply with AS 1428.1 <i>AS1428.1 2009 – 2350mm x 1900 to unfolded seat. Or be visitable - a toilet which has a space of minimum 1250 mm in front of the toilet x 900 mm wide clear of door swings and fixtures.</i>	4.4.1	Capable of complying
36.	Slip-resistant floor surface	4.4.2	Capable of complying
37.	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)	Capable of complying
38.	Shower area waterproofed to AS 3740 with floor to fall to waste	4.4.4 (f)	Capable of complying
39.	Recessed soap holder	4.4.4 (f)	Capable of complying
40.	Shower tap positioned for ease of reach to access side of shower sliding track	4.4.4 (f)	Capable of complying
41.	Provision of adjustable, detachable handheld shower rose mounted on a slider grabrail or fixed hook (plumbing and wall-strengthening provision)	4.4.4 (h)	Capable of complying
42.	Provision for grabrail in shower (Refer to Figure 4.7 – AS 4299) to comply with AS 1428.1	4.4.4 (h)	Capable of complying
43.	Tap sets to be capstan or lever handles with single outlet	4.4.4 (c)	Capable of complying
44.	Provision for washbasin with clearances to comply with AS 1428.1	4.4.4 (g)	Capable of complying
45.	Double GPO beside mirror	4.4.4 (d)	Capable of complying
Toilet			
46.	Provision of either 'visitable toilet' or accessible toilet <i>Note: AS1428.1 2009 – 2350mm x 1900 to unfolded seat. Or be visitable - a toilet which has a space of minimum 1250 mm in front of the toilet x 900 mm wide clear of door swings and fixtures.</i>	4.4.3	Capable of complying
47.	Provision to comply with AS 1428.1	4.4.1	Capable of complying

Item	Room/Item	AS4299 Clause	Current Phase Review
48.	Location of WC pan at correct distance from fixed walls	4.4.3	Capable of complying
49.	Provision for grab rail zone (Refer Figure 4.6 – AS 4299)	4.4.4 (h)	Capable of complying
50.	Slip resistant floor surface (vitreous tiles or similar)	4.4.2	Capable of complying
Laundry			
51.	Circulation at doors to comply with AS 1428.1	4.8	Capable of complying
52.	Provision for adequate circulation space in front of or beside appliances (min. 1550mm depth)	4.8	Capable of complying
53.	Provision for automatic washing machine <i>Australian standard is roughly 600 x 600mm</i>	4.8 (e)	Capable of complying
54.	Where clothesline is provided, an accessible path of travel to this	4.8 (a)	Capable of complying
55.	Double GPO	4.8 (g)	Capable of complying
56.	Slip-resistant floor surface	4.9.1	Capable of complying
Door Locks			
57.	Door hardware operable with one hand, located 900-1100mm above the floor	4.3.4	Capable of complying

6.13.2 Subject site – access assessment

Based on the preliminary documentation reviewed, all elements have been marked as being capable of complying at this stage. This determination is made on the basis that:

- + The concept is high-level, allowing flexibility for the incorporation of adaptable housing requirements during detailed design.
- + The design intent demonstrates early adoption of the provisions outlined in Sydney DCP 2012, which requires a minimum of 15% of dwellings to be adaptable in accordance with AS4299-1995 (Class C – All Essential Features).

Pre and post adaption plans must be provided to demonstrate how the design would permit later alterations to suit individual requirements at minimal extra cost. The proposed adaptable SOUs must demonstrate they are capable of complying with the spatial requirements of Class C (all essential features incorporated) of AS4299-1995.

At the pre-adaptation stage, the following is required:

- + The entry door of the Adaptable SOU is required to achieve a wheelchair accessible entrance (850mm wide doorways with lobby-side circulation space complying with AS1428.1-2021).
- + A min. 1m path of travel from the entrance doorway of the adaptable SOU to the living area and visitable toilet as per A4299-1995 and all internal doorways achieving at least 820mm clear open widths and a level transition and threshold.
- + A visitable toilet with circulation space of 1250mm (long) x 900mm (wide) shall be provided as per AS4299-1995.

- + The adaptable carparking spaces allocated to each adaptable unit shall be 3800mm (wide) x 5400mm (length) as per AS4299-1995 or designed in line with AS2890.6-2009.

Note, it is recommended that cooktop/sink fixtures remain in the same location at pre and post adaptation to support the objectives of AS4299-1995 which state alteration is to be achieved at a minimal extra initial cost. Within each bathroom to be modified (moving of fixtures) and where the cooktop/oven/sink is being re-located, ensure provision for capped off services and waste outlets as required from pre-adaptation stage to support the alteration of the kitchen layout and within each adaptable bathroom (if required).

For joinery and robes that are intended on being shifted/altered at post-adaptation stage, ensure the flooring under these areas is continuous with the surrounding area and accommodated for at the pre-adaptation stage.

It is the responsibility of the architectural design team to ensure that the detailed documentation clearly identifies which dwellings are designated as adaptable housing and that these requirements are maintained throughout the design and construction phases.

Detailed compliance—including pre-adaptation layouts, circulation spaces, and essential features—will need to be confirmed during the next design phase when full floor plans and specifications are available.

6.14 Emergency egress and evacuation

6.14.1 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 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.

6.14.2 Subject site – access assessment

Note for consideration.

6.15 Landscaping, Streetscapes and Terraces

6.15.1 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.
- + Furniture and other fittings to meet AS1428.2
- + Wayfinding design integration

6.15.2 Subject site – access assessment

Note for consideration.

6.16 Lighting

6.16.1 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
Toilets and locker rooms	200lx
Counter tops	200lx
General displays	200lx

6.16.2 Subject site – access assessment

Note for consideration.

7.0 Compliance summary

In my capacity as an Access Consultant, I have reviewed the Concept documentation (refer above) against the current requirements for access and mobility, with reference to the following:

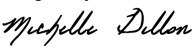
- + Objects of the Disability Discrimination Act (DDA) 1992.
- + Disability (Access to Premises – Buildings) Standards 2010.
- + National Construction Code (BCA) - Building Code of Australia (BCA) 2022 Amendment 2 – Volume One and referenced Australian Standards including:
 - AS1428.1 2021 Part 1: General 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.
- + 2022 Design Guide and the proposed amendments to the Design Guide.
- + Sydney DCP 2012

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

It is anticipated that within future detailed applications, 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:

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Michelle Dillon
Accessibility Consultant