

SSDA Access Report

V4

*WSU Milperra
2 and 2A Bullecourt Avenue,
Milperra NSW 2214*

Prepared for
Mirvac Residential (NSW) Pty Ltd

URB-008

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1.0 INTRODUCTION

1.1. General

This DA Access Report has been prepared by Wall to Wall Design + Consulting Pty Ltd to be submitted to Canterbury Bankstown council on behalf of Mirvac Residential (NSW) Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) for a staged residential development at 2 and 2A Bullecourt Avenue (the site).

The purpose of this report is to identify the extent to which the landscape concept plan complies with the accessibility provisions of the NCC, as are principally contained within Part D4.

This report is based upon, and limited to the information depicted in the documentation provided for assessment and does not make any assumptions regarding 'design intention' or the like.

1.2. Basis of Report

The assessment contained within this report reflects –

- (i) Disability (Access to Premises – Buildings) Standards 2010;
- (ii) The NCC, Volume 1, Edition 2022 Amendment 2;
- (iii) Australian Standards – AS1428.1-2009 and AS/NZS1428.4.1;
- (iv) The landscape concept design documentation prepared by Urbis (received 22 August 2025).

1.3. Limitations of Report

The content of this report relates only to the accessibility provisions of the landscape design in general.

The study will be undertaken based upon the information made available by the design team. No liability is accepted for the accuracy of the information provided.

It is conveyed that this report should not be construed to infer that an assessment for compliance with the following has been undertaken –

- (i) Any parts of the NCC, or any standards other than those directly referenced in this report;
- (ii) Occupational Health & Safety Act and Regulations;
- (iii) WorkCover Authority requirements; and
- (iv) Structural and Services Design Documentation.

2.0 DEVELOPMENT DESCRIPTION

2.1. Background

The site is currently owned by Western Sydney University and is located within the Canterbury Bankstown LGA at 2 and 2A Bullecourt Avenue, Milperra, being legally described as Lot 2 in DP1291984 and Lot 1 in DP101147.

The total site has an area of approximately 19.64ha and is the subject of numerous easements affecting the site, including two easements to drain water, easements for electricity and other purposes, and a right of carriageway.

The purpose of this report is to review the public parks, with parks provided as follows –

- Stage 2: Central Park
- Stage 4: Southern Park
- Stage 6: Northern Park

The site is bound by the M5 Motorway to the south, Ashford Avenue / existing residential dwellings to the west, Bullecourt Avenue / existing industrial development to the north, and Horsley Road / existing industrial development to the east. Adjoining the site along the southeastern boundary is Mount St Joseph Catholic College –



Figure 1 – Sitewide Landscape Masterplan identifying Stage 2, 4 and 6

2.2. The Proposed Development

The project will be delivered in stages and across two separate SSDA Projects, and comprises the construction of up to 430 dwellings, three (3) public parks, new roads and shared paths, civil infrastructure, a car park, and the management of conservation land.

Specifically, across the two SSDAs, consent is sought for:

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- Tree removal
- Site remediation (excluding works carried out as category 2 remediation works)
- Construction of bulk earthworks, public roads and landscaping, and services
- Augmentation of existing services and road infrastructure
- Construction of three (3) public parks
- Construction of up to 430 dwelling houses
- Construction of a carpark to service the existing childcare centre and E1 Local Centre zoned land
- Subdivision resulting in up to 430 residential lots, infrastructure lots, and the creation of a community title lot for land zoned C2 Environmental Conservation and E1 Local Centre
- Conservation works including the management of >2Ha Cumberland Plain Woodland Species.

This SSDA comprises of all Civil works across the entirety of the site as well as the construction of all 62 dwellings in Stages 1 and 2 only, which are as follows:

- Stage 1 – Commencement of site-wide tree removal and land remediation, creation of two (2) super lots and total of 22 residential lots, and construction of 22 dwelling houses fronting Ashford Avenue. This will be the first stage to be delivered and will connect into the existing infrastructure that located within Ashford Avenue.
- Stage 2 – Creation of four (4) super lots, a new lot (Lot 25) across the RE1 Public Recreation zoned land, and 40 residential lots. This stage also involves the construction of 40 dwellings within Stage 2, and the construction of new roads and the new public park referred to in the Civil Plans as the 'Central Park'.
- Stage 3a – Creation of a new super lot, and the construction of perimeter roads surrounding the existing childcare centre, construction of a new car park to service the childcare centre and C2 Environmental Conservation zoned land. It is proposed all associated civil works required to enable the operation of the existing childcare centre will be delivered under this stage. The new traffic intersections at both Bullecourt Avenue and Horsley Road will be constructed.
- Stage 3b – Creation of three (3) lots to be delivered under a Community Title Scheme for the E1 Local Centre zoned land.
- Stage 4 – Creation of eight (8) super lots, a new lot (Lot 50) across the RE1 Public Recreation zoned land, and a new lot (Lot 49) across the SP2 Infrastructure zoned land. This stage also involves the construction of new roads, the stormwater infrastructure Basin 1 and Basin 2, and the new public park referred to in the Civil Plans as the 'Southern Park', all to be dedicated to Council.
- Stage 5 – Creation of six (6) super lots and construction of new roads and civil works.
- Stage 6 – Creation of nine (9) super lots and a new lot (70) across the RE1 Public Recreation zoned land. This stage also involves the construction of new roads and civil works, and the new public park referred to in the Civil Plans as the 'Northern Park', all to be dedicated to Council.
- Stage 7 – Creation of six (6) super lots and construction of road and civil works.

The second SSDA will seek consent for all outstanding works in stages 3 to 7, which are as follows:

- Stage 3 – Construction of the Childcare Alterations and Additions and Construction of a permanent structure for Commercial use.
- Stage 4, 5, 6 & 7 – Creation of the subsequent subdivision into residential lots and construction of dwellings.

- Stage 7 – Creation of the subsequent subdivision into residential lots and construction of dwellings.

2.3. National Construction Code (NCC)

The NCC is a performance-based code that sets the minimum requirements for buildings in Australia. Buildings are classified into 10 categories, representing use or occupancy.

Public parks are not considered a building, however may include non-habitable buildings or structures under Class 10. In accordance with the NCC, a Class 10a non-habitable building located in an accessible area intended for use by the public and containing a shelter, access is required to and within the public shelter or the like.

2.4. Disability (Access to Premises – Buildings) Standards

Section 23 of the Australian Disability Discrimination Act 1992 (DDA) makes it unlawful to discriminate against a person with a disability by refusing them access to, or use of, premises, facilities, or services that the public or a section of the public is entitled to use. The Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards) is a legislative instrument made under the DDA in response to Section 23 of the Act. The Premises Standards provides technical requirements to ensure equal access to public buildings for people with disability.

Infrastructure such as public footpaths, outdoor areas such as parks and playgrounds, landscaping and road crossings are not covered by the Premises Standards. As noted under the Guideline on the application of the Premises Standards, version 2 – 2013, the Premises Standards are either not triggered or do not apply to public footpaths, parks and recreation areas.

It shall be noted that access issues not addressed in the Premises Standards may be subject to possible discrimination complaints by people with disability. If a person with disability experiences discrimination because the building or feature is not accessible, or because of discriminatory treatment, a complaint can be made directly under the provisions of the DDA.

For the purposes of this review, reference will be made to the Advisory Note on streetscape, public outdoor areas, fixtures fittings and furniture – 8 February 2013 published by the Australia Human Rights Commission.

3.0 DETAILED DESIGN ASSESSMENT

3.1. General

The following detailed analysis and commentary is provided to enable the design progression for the purpose of evidencing the attainment of compliance with the relevant accessibility provisions of the NCC and Premises Standards, where relevant.

3.2. Part D4 – Access for people with disabilities

D4D2 General building access requirements

In accordance with D4D2, access is required to and within the public shelters. In general, the three parks – Northern Park, Southern Park and Central Park – are public open spaces, and do not constitute as buildings. However, within Central Park, it is proposed that picnic and seating nooks with shelter structures be provided within the park.

As such, access is required to and within the shelter areas provided within the park. This will be further assessed below.

As the parks are not considered to be buildings, generally the NCC does not apply. Further review will reference the recommendations provided by the Advisory Note on streetscape, public outdoor areas, fixtures fittings and furniture – 8 February 2013.

3.3. Advisory Note Review

Continuous Accessible Path of Travel

All parts of the public park to which the public is entitled to enter or use should be connected by a network of continuous accessible paths of travel. The continuous accessible path of travel should be the most commonly used and direct path of travel.

Northern Park

It is proposed that the Northern Park be designed to preserve the natural topography of the site with primary purpose to retain mature existing trees. The proposed works are to support and enhance local biodiversity. The park includes a Discovery Trail. Given the natural topography of the site, only the perimeter of the park is able to be designed as accessible by persons using a wheelchair, in particular area adjacent the Basins (Basin 3A and Basin 3B). Notwithstanding, it is noted that those with non-mobility-based disabilities will be able to enjoy the Discovery Trail that navigates through the park. For those using a wheelchair or other mobility devices, it is proposed that alternative parks be provided within the master planned community that provides accessible features.

Central Park

Located at the heart of the proposed development the Central Park. The park is ringed by a primary perimeter circulation path with an internal, secondary circulation. This is then further supported by informal trails throughout with some stairways primarily located on the south-west of the site to provide access to the open lawn area.

The primary perimeter pathways achieve a continuous loop of minimum 1800mm width to allow suitable wheelchair passing, compliant with AS1428.1-2009.

Continuous Accessible Path of Travel

However, due to the existing topography, there are areas along the pathway which has naturally steeper gradients.

The park provides a mix of programs, including an open lawn area, picnic and seating, bush tucker garden, nature play, active play, a feature play structure and informal trails. A continuous accessible path of travel to these areas are proposed.

Linking these experiences, a Discovery Trail has been proposed throughout the site –



Figure 2 – Discovery Trail proposed through Central Park

As with Northern Park, Central Park has been designed to enhance the existing tree canopy, retaining existing native trees and vegetation, working with the existing topography and sustainable water management practices. The proposed Discovery Trail weaves through the park with an accessible path with gradients no greater than 1:20.

Southern Park

The Southern Park has been designed for physical activity and social interaction. Allowing for an a large turf area, outdoor fitness zone, amphitheatre lawn, multi-purpose hardstand sports court and seating areas the park is formed through concentration of the basin and Water Sensitive Urban Design.

The main circulation of the park is focused on a north-south pathway with the main traverse pathway on the northern boundary of the park, and a secondary pathway along the permeable pavement path above the overflow turf area.

There are a number of stairways and terraced areas towards the overflow turf. Suitable alternative pathways have been provided.

Continuous Accessible Path of Travel

The Southern Park achieves generally level accessways with a suitable continuous accessible paths of travel across the park.

Recommendations

- (i) Ensure a minimum 1000mm clear width path of travel along informal trails. Other paths to maintain minimum 1800mm clear width;
- (ii) Where possible, ensure gradients achieve no greater than 1:40 grade, or walkway sections of 1:20 with landings at intervals no greater than 15m;
- (iii) Ensure a continuous accessible path of travel have a slip-resistant surface suitable for wheelchair users, or those with a mobility device, in accordance with HB197/AS4586;
- (iv) The texture of the surface of the pathways shall be traversable by wheelchair users and those with ambulant or sensory disability –
 - Abutment of surfaces shall have a smooth transition. Design transition shall be 0mm, however, construction tolerances are as follows -0 ± 3 mm vertical change in level; and
 - 0 ± 5 mm change in level provided the edges have a beveled or rounded edge to reduce the likelihood of tripping.
- (v) Grates shall comply with the following –
 - Circular openings shall be not greater than 13mm in diameter; and
 - Slotted openings shall be not greater than 13mm wide and be oriented so that the long dimension is transverse to the dominant direction of travel.
- (vi) Ensure a suitable accessible path of travel from the Central Park Discovery Trail to the Open Lawn area. Where required, a maximum 1:10 step ramp, with a maximum 190mm rise and barriers provided on both sides may allow suitable access.
- (vii) Consider identifying the accessible Central Park Discovery Trail with a contrasting flooring that helps support ease of access throughout the park for persons using a wheelchair.

Carparks

On-street parking should contain car parking space(s) designed for vehicles used by people with disability.

Whilst the primary focus on the parks are to enhance pedestrian access and active connections, the park allows for on-street parking adjacent to the park.

There are suitable clearances and areas to allow for accessible on-street parking adjacent to the primary accessible entrances to each park as follows –

- Northern Park – designated car parking area adjacent the proposed entry pathway near Basin 3A. Provide a shared zone with accessible kerb onto the pathway;
- Central Park – on-street kerbside parking adjacent the south-east or north-west corners of the site; and
- Southern Park – on-street kerbside parking along the northern perimeter of the park.

Accessible parking is achievable near the designated parks.

Recommendations

Carparks

- (i) Provide no less than one accessible car bay adjacent the entries compliant with AS/NZS2890.6-2009.

Approaches, Entrances and Doorways

Entrances to public spaces should be accessible to all users.

Northern Park

From the car parking area, there is a hardstand path of travel to the south boundary of the park providing an accessway through the Discovery Trail. From the car park, there are suitable clearances to provide a kerb ramp compliant with AS1428.1-2009 to the pathway with a suitable accessible grade.

Central Park

As an open public park, there are a number of primary and secondary entries into the park and along the arrival garden which forms part of the primary perimeter circulation around the park. The south-east corner is proposed to be the Entry Space through the Bush Tucker Garden.

Where entries are inaccessible, consider providing directional signage to the nearest accessible entry.

Southern Park

The primary accessible entries into Southern Park are via the northern boundary of the site. A suitable level accessible entry is achievable with kerb ramps provided where required.

There are additional entries which are inaccessible with stairways located adjacent. Consider providing directional signage to identify accessible entries.

Recommendation

- (i) Consider providing accessible signage at the main accessible entries. Signage to provide details regarding the accessible pathway, where relevant;
- (ii) Consider providing directional signage to the accessible entries at the relevant parks; and
- (iii) All signage is to comply with the BCA and Specification D4D7.

Stairways along Footpaths and in Outdoor Areas

Stairways should have accessible features to ensure safe use for all people who use them.

There are stairways provided within Central and Southern Park. Compliance with AS1428.1-2009 features are achievable.

Recommendation

- (i) All stairs to have closed risers with handrails on both sides of the stairs;
- (ii) Handrails to be circular/elliptical in design of 30-50mm diameter with 270° clearance around the top of the handrail;
- (iii) Handrail to be installed at a consistent height between 865-1000mm AFFL with a minimum 600mm clearance above the handrail;
- (iv) Handrails to be installed no less than 50mm away from the adjacent wall;

Stairways along Footpaths and in Outdoor Areas

- (v) Stair handrails to extend diagonally (in-line with stair nosings) an extra tread at the base of the stair before a 300mm horizontal extension. At the top of the stair, handrail is to extend 300mm horizontally from the top nosing. Handrail to turn 180° or return to post / wall / floor;
- (vi) Ensure all stairs have a nosing strip of 50-75mm width located within 15mm from the front of the stair nosing. Nosing strip to have minimum 30% luminance contrast to surrounding background;

Controls

Any controls provided such as door handles, power switches, keypads and buttons should be accessible by all users. This will be further reviewed at design development stage. Compliance is achievable.

Streetscape

Elements in the streetscape should be designed for equitable use by all within the public park.

Where provided, ensure that the pathway has been designed to allow suitable clear widths, gradients and materials that allows suitable accessibility.

Provide TGSIs as tactile warnings where there are stairways and where a pedestrian accessway meets a vehicular way with no kerb ramp.

Recommendation

- (i) TGSIs are to be slip-resistant with the minimum luminance contrast values against a background surface as follows –
 - Integrated (tile) TGSIs – minimum 30% luminance contrast;
 - Discrete (button) TGSIs – minimum 45% luminance contrast; and
 - Composite TGSIs – minimum 60% luminance contrast.
- (ii) TGSIs are to extend the full width of the path of travel and commence 300mm from the edge of the hazard;
- (iii) TGSIs are to have 600-800mm depths at open areas with greater than 3m in length, or when handrails are discontinuous; and
- (iv) TGSIs are to have 300-400mm depths within enclosed landings of less than 3m depth.

Public Outdoor Areas

All users should be able to access public outdoor areas including programmed activities.

Consider providing equipment and facilities that provides suitable engagement for those with disability. This will be further reviewed at design development stage. Compliance is achievable.

Fixtures, Fittings and Furniture

All users should be able to access and use fixtures, fittings and furniture provided within the parks. This includes:

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Fixtures, Fittings and Furniture

- Drinking fountains,
- Bins,
- Seating areas
- Picnic tables
- Lighting, and
- Signage.

Consider providing amenities and facilities that can be used by a person with a disability. Compliance with AS1428.2-1992 may be considered. This will be further reviewed at design development stage. Compliance is achievable.

4.0 CONCLUSION

Wall to Wall Design & Consulting has prepared the Access Report to provide advice and strategies to enable the design progression for the purpose of evidencing the attainment of compliance with the relevant accessibility provisions.

A design assessment has been undertaken of the proposed design and is shown to be capable of complying with the relevant performance requirements of the NCC.

The recommendations within this report are to be further developed at design development to ensure compliance with regulatory requirements.

Report By



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