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Disability Access Report for SEPP Seniors Housing - Hostel

Prepared for
Mike Norrie

Project name
Jubilee

Location
20 Jubilee Ave, Mullumbimby NSW 2482

Stage
RFI's during DA application

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Prepared by:



Christine Cheung
Managing Director | Access Consultant
Accredited ACA Member No. 158

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Executive Summary

Revised development application documentation for the Proposed SEPP Senior Housing Hostel located at 20 Jubilee Ave, Mullumbimby, has been reviewed against current and applicable accessibility legislation.

The following table summarises our findings.

Item No. - Description	Compliance Status
<u>SEPP Schedule 4 Part 1</u>	
1 -Application of Part 1	Applicable
2 -Siting Standards	To be addressed in detailed design.
3 -Letterboxes	To be addressed in detailed design.
4 -Car parking	Compliant configuration
5 -Accessible Entry	Capable of compliance
6 -Interior	Compliant configuration
7 -Main Bedroom	Compliant configuration
8- Bathroom	Compliant configuration
9- Toilet	Compliant configuration
10 -Surface Finishes	To be addressed in detailed design.
11 -Door Hardware	To be addressed in detailed design.
12 -Switches and power points	To be addressed in detailed design.
13 -Private passenger lifts	Not applicable

We consider that the drawings presented for assessment, for the purposes of a development application, generally comply with current statutory requirements.

SEPP Housing requirements are included in Section 3.1 this report and general accessibility requirements within Section 3.2 , to guide the detailed design. The recommendations throughout this report reflect the professional opinion and interpretation of Inclusive Places. This may differ from that of other consultants.

1 Introduction

1.1 Report Background

Inclusive Places has been engaged to provide a disability access report in response to Byron Shire council's request for information as part of the Development Application for the proposed construction of a hostel at 20 Jubilee Ave, Mullumbimby NSW.

Project Description

The projects comprises two buildings, Building A and Building B. Each building has been designed over two levels with kerbside carparking. A total of twenty six (26) Hostel Units will be provided and includes three (3) SEPP Seniors Housing units.

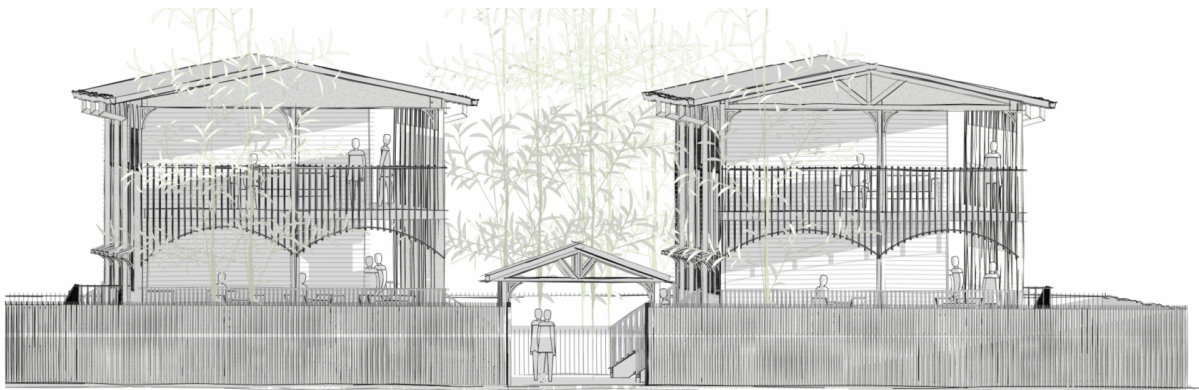


Figure 1 - Proposed Development

Accessible paths of travel are provided on the ground level from Jubilee Avenue. There are accessible paths leading to ramps which connect to the elevated ground level for both Building and Building B. This report assesses the accessibility requirements of the proposed development and identifies strategies to minimise the risk of disability discrimination.

It has been prepared to support the lodgement of a Development Application (DA) with Byron Shire Council. Our scope of work has included a desktop review of the architectural plans against the accessibility provisions of:

- National Construction Code (NCC) / Building Code of Australia 2022 Amdt 2 (BCA 2022 Amdt 2)
- State Environmental Planning Policy (Housing) 2021
- Byron Shire Development Control Plan (DCP)
- Applicable Australian Standards

Feedback has been provided on draft iterations of the plans, and this final report is based on the drawings listed in **Appendix A**.

1.2 Legislation

The primary objectives of this report are to:

Assess the proposed development against the relevant accessibility provisions, including:

National Construction Code (NCC) / Building Code of Australia Amdt 2 (BCA 2022 Amdt 2), Volume 1:

- Part D4 – Access for people with a disability
- Part F4D5 - Accessible sanitary facilities
- Part F4D6 - Accessible unisex sanitary compartments
- Part F4D7 - Accessible unisex showers

Relevant Australian Standards listed in BCA2022 Amdt 2, as follows:

- AS1428.1 Design for Access and Mobility: General requirements for Access – New Building Work (2021)
- AS1428.4.1 Design for Access and Mobility: Means to assist the orientation of people with vision impairment – Tactile ground surface indicators (2009)
- AS2890.6 Parking facilities Off-street parking for people with disabilities (2009)
- AS4586 Slip resistance classification of new pedestrian surface materials (2013)

The Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards)

State Environmental Planning Policy (Housing) 2021

- Schedule 4 Standards concerning accessibility and usability for hostels and independent living units
 - Part 1 Standards applying to hostels and independent living units
- Relevant Australian Standards listed in State Environmental Planning Policy (Housing) 2021
 - AS1428.1 Design for Access and Mobility: General requirements for Access – New Building Work (2021)
 - AS1735.12 Lifts, escalators and moving walks, Part 12: Facilities for persons with disabilities (2020)

Review local planning and accessibility requirements, including:

- Byron Shire Development Control Plan (DCP) 2014 Chapter B13.2.3 Objectives Boarding Houses, Group Homes, and Hostels (10% adaptable)
- Identify any compliance departures that require resolution/attention for the proposed development by way of design change or Performance Solutions for the next stage of design prior to submission of a Construction Certificate (CC).

- Verify that the referenced documentation has been reviewed by an appropriately qualified Accredited Access Consultant ensuring that compliance with the BCA and Premises Standards and the SEPP Housing (2021) is achievable.

SEPP Housing 2021

Housing SEPP incentivises the supply of affordable and diverse housing in the right places and for every stage of life and ensures that the home building sector is well-placed to assist the economic recovery of NSW following the COVID-19 pandemic.

It consolidates five housing-related policies being:

- State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARHSEPP);
- State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004 (Seniors SEPP)
- State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes) (SEPP 70);
- State Environmental Planning Policy No 21 – Caravan Parks; and
- State Environmental Planning Policy No 36 – Manufactured HomeEstates.

Chapter 3, Part 5 relates to Housing for Seniors and People with a Disability providing development standards for the design of seniors housing.

hostel means residential accommodation for seniors or people with a disability where—
(a) meals, laundering, cleaning and other facilities are provided on a shared basis, and
(b) at least 1 staff member is available on site 24 hours a day to provide management services.

Schedule 4 Standard concerning Accessibility and usability for hostels and independent living units, Part 1 Standards applying to hostels and independent living units needs to be implemented for the accessible hostel units.

Disability Discrimination Act 1992 (DDA)

The Federal Disability Discrimination Act 1992 (DDA) provides protection for everyone in Australia against discrimination based on disability. Section 32 of the DDA focuses on the provision of equitable and dignified access to services and facilities for people with mobility, sensory and cognitive disabilities.

Disability discrimination happens when people with a disability and their relatives, friends, carers, co-workers or associates are treated less fairly than people without a disability. Compliance with Access to Premises Standards give certainty to building certifiers, building developers and building managers that, if access to (new parts) of buildings is provided in accordance with these Standards, the provision of that access, to the extent covered by these Standards, will not be unlawful under the DDA. This however applies only to the new building or new parts of an existing building and its affected part. All areas outside the scope of these areas are still subject to the DDA. We cannot guarantee or certify for DDA compliance because DDA compliance can only be assessed by the Courts. Scope of DDA extends beyond the building fabric and also includes furniture and fittings.

The Disability (Access to Premises) Standards

From 1 May 2011, the Commonwealth's Disability (Access to Premises - Buildings) Standards made under the Disability Discrimination Act 1992 (DDA) applies to all new building work. The Premises Standards, established requirements for access to buildings, that are incorporated into the BCA 2022 Amdt 2.

The Premises Standards contain an Access Code of construction that is mirrored in the disability access provisions of the BCA 2022 Amdt 2. New building work must comply with the Access Code in the same manner as complying with the BCA 2022 Amdt 2 by meeting deemed-to-satisfy provisions or by adopting a performance solution that achieves the relevant performance requirements.

This means if access is provided in accordance with the Premises Standards then it is not unlawful under the DDA. It also ensures that Object 1.3 (a) of the Premises Standards is met which is to:

'Ensure that dignified, equitable, cost-effective and reasonably achievable access to buildings and facilities and services within buildings is provided for people with a disability.'

The National Construction Code / Building Code of Australia (Volume 1)

The Building Code of Australia (BCA) is contained within the National Construction Code (NCC) and provides the minimum necessary requirements for safety, health, amenity and sustainability in the design and construction of new buildings (and new building work in existing buildings) throughout Australia.

The BCA for Class 3 buildings, being a hostel, has specific accessibility requirements as set out in Part D4D2 General Building access requirements.

1.3 Report Limitations & Exclusions

- ❑ This report is based solely on review of the documentation listed in **Appendix A**.
- ❑ This Report does not address issues in relation to the design, maintenance or operation electrical, mechanical, hydraulic or fire protection services, Utility Services Provider Requirements (Water, Gas, Telecommunications and Electricity supply

authorities), Local Government Act and Regulations, Occupational Health and Safety Act and Regulations or the like.

- ❑ This assessment does not incorporate the detailed requirements of the BCA Referenced Australian Standards and it's the responsibility of design and installation contractors to demonstrate and achieve compliance for all new works.
- ❑ The commentary within this Access Assessment Report does not relieve the Principal Designer, Principal Building Contractor or the Principal Certifier from their statutory obligations under the EP&A Act, Work Health Safety Act, BDC Regulation and the like and they are to be satisfied that the proposal meets their requirements prior to approval.
- ❑ It is important to note that without the written permission from Inclusive Places (trading as Cheung Access Pty Ltd), no part of this report may be reproduced in any form or by any means. This report is based solely on client instructions and therefore should not be relied upon or used by any third party without prior knowledge and instructions from Inclusive Places.
- ❑ All reasonable attempts have been made to identify key compliance matters pursuant to the BCA and additional issues which have been deemed an impediment to access provision and may increase Client risk of attracting a complaint under the DDA.
- ❑ Inclusive Places accepts no responsibility for any loss suffered as a result of any reliance upon such assessment or report other than providing guidance to alleviate access barriers in the built environment and reduce Client risk of attracting a complaint under the DDA.
- ❑ If the layouts or specified fixtures and fittings of the accessible building elements are modified by the Client from the date of issue of this access report, then Inclusive Places accepts no responsibility for any variations to required access design specifications.

Exclusions and limitation to the access report:

- ❑ External public domain areas (footpaths, bus stops, etc.) outside the site boundary were not assessed.
- ❑ Universal Housing provisions (SEPP 65 – ADG 2015 Part 4Q-1) and Livable Housing Design Guidelines (LHDG – Silver Level) are not included.

1.4 Proposed Development

Building overview:

Level	Building Features
Entry Floor Level	Pedestrian access from the allotment boundary adjacent to the vehicular access.

Reference: P000961

RFI as part of the Development Application - Disability Access Report on a SEPP Seniors Housing - Hostel
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	Mail Boxes
External Ground Level	7 Car parking spaces includes 4 Accessible car spaces and ambulance space Bin storage area
Ground Level	Communal Spaces on the Ground Floor Meals Area Building A Laundry Building A Laundry Building B Building A - 5 Units - includes 1 Accessible (adaptable) Building B - 7 Units - includes 1 Accessible (adaptable) Two Stairs (non fire-isolated)
Level 1	Building A - 6 Units and Managers Office Building B = 8 Units
Total Units	26 Units

BCA Classification:

Class	Description
3	Hostel with associated parking

BCA Areas required to be Accessible

BCA D4D2 General building access requirements

(5) For a Class 3 building, access requirements are as follows:

(a) Common areas:

- (i) From a pedestrian entrance required to be accessible to at least 1 floor containing sole-occupancy units and to the entrance doorway of each sole-occupancy unit located on that level.
- (ii) To and within not less than 1 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, TV room, individual shop, dining room, public viewing area, ticket purchasing service, lunch room, lounge room, or the like.

- (iii) Where a ramp complying with AS 1428.1 or a passenger lift is installed—
 - (iv) to the entrance doorway of each sole-occupancy unit; and
 - (v) to and within rooms or spaces for use in common by the residents.
 - (vi) The requirements of (iii) only apply where the space referred to in (A) and (B) are located on the levels served by the lift or ramp.
- (b) To and within sole-occupancy units — in accordance with Table D4D2b

Proposed Seniors Living Hostel Units

Under the BCA, a minimum of two units are required to be accessible, and the Byron Shire DCP requires 10% of units to be adaptable. This proposal includes three accessible units, which also serve as Seniors Living Hostel units, therefore exceeding the minimum requirements. The proposed Seniors Living development comprises one unit type/layout across the site.

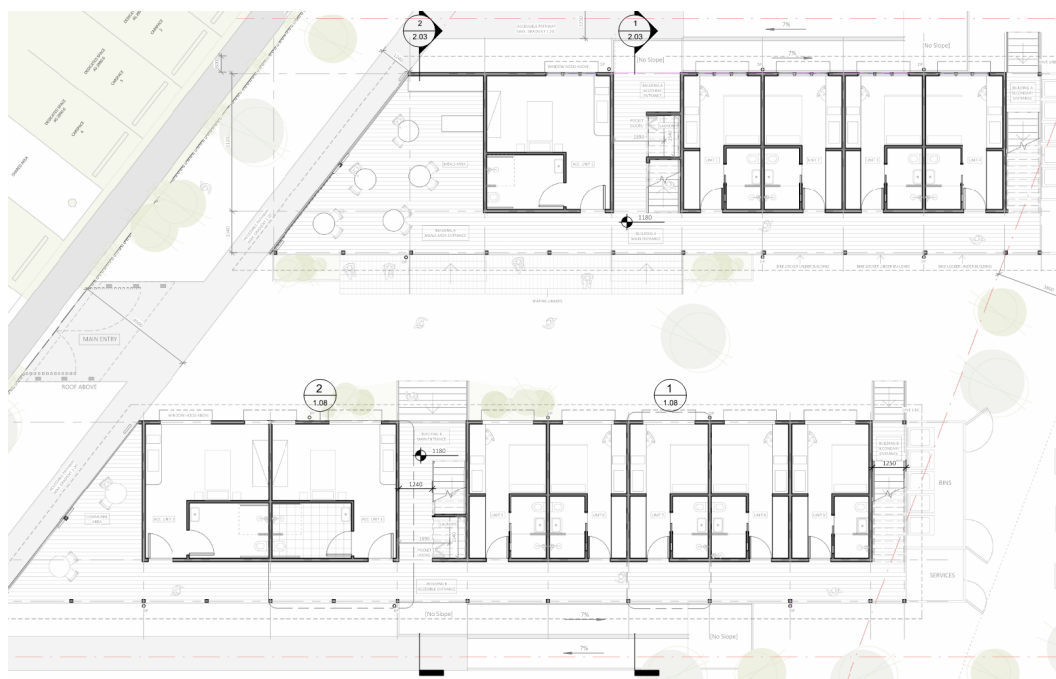


Figure 2 - Screenshot of Ground Plan from DFT Design, shows three (3) Seniors living hostel units on the ground floor.

See further details in section 3 of this report.

2 BCA and Seniors Living Compliance

Summary and Key matters requiring further refinement

The proposed seniors housing portion of the development has the capacity to satisfy the prescriptive deemed to satisfy (DTS) provisions of Part D4 and F4D5-D6 of BCA2022 Amdt 2, subject to further refinement during the detailed design and prior to the issue of the Construction Certificate (CC) as outlined in Section 3 - Disability Access Assessment below in Section 3.

DTS access provisions addressed in the reviewed documentation include:

- Accessible path of travel from the allotment boundary, to and through the principal pedestrian entries
- Provision of, and accessible paths of travel to, compliant accessible car parking spaces
- Access to and within all parts of the building that are required to be accessible (to be detailed at CC)
- Access to common areas and facilities such as the Meals areas (Building A), Laundries (Buildings A and B), Bin storage area, Letterboxes
- Provision of accessible walkways, ramps and stairs
- Access to the entrance doorway of each unit
- Provision of three Accessible units which will also serve as Senior Living units

Additional accessibility requirements that have been identified:

- Provision of a lift to the first floor to meet Section 2 Siting standards (1) wheelchair access, in Schedule 4 of the SEPP (Housing) 2021.

Items requiring (to be resolved prior to or at CC stage):

Confirmation of detailed design documentation for the three nominated Seniors Living units, including:

Design details of each of the three nominated Seniors Housing Units, as follows:

- Letterbox location
- Senior units Bathroom fixtures and fittings.
- Kitchen specifications
- Door schedules

- Floor schedules to check slip resistance
- Electrical drawings and schedules for light and control switches, power points and GPO.

To ensure compliance at occupation, the design and documentation process leading up to and including CC should:

- Incorporate Schedule 4 Part 1 and AS1428.1 design features within plans, elevations, specifications, and FF&E schedules.
- Ensure detailed design and construction align with the approved 1:50 DA plans and key access requirements.

3 Disability Access Assessment

Section of Report	Design Criteria
3.1	Overview of Accessible building features 3.1.1 Compliance with SEPP Seniors Living - Overall 3.1.2 Compliance with SEPP Seniors Living - Clause 93 Location and access to facilities and services— independent living units 3.1.3 Compliance with SEPP Seniors Living - Accessibility and useability of hostels and Independent Living Units
3.2	BCA2022 Amdt 2 Part D4 – Access For People with a Disability, as well as Parts E3D7-8
3.3	Compliance with Byron Shire Development Control Plan 2014- Section B13.2.3 Objectives Boarding Houses, Group Homes, and Hostels

3.1 Overview of Seniors Living building features

3.1.1 Compliance with SEPP Seniors Living - Overall summary

Three hostel units have been designed to comply with the accessibility and usability provisions of SEPP (Housing) 2021 – Schedule 4, Part 1: Standards Concerning Accessibility and Usability for Hostels and Independent Living Units.

The nominated accessible units are as follows:

Ground Level, Building A – Accessible Unit 1

Ground Level, Building B – Accessible Unit 2

Ground Level, Building B – Accessible Unit 3

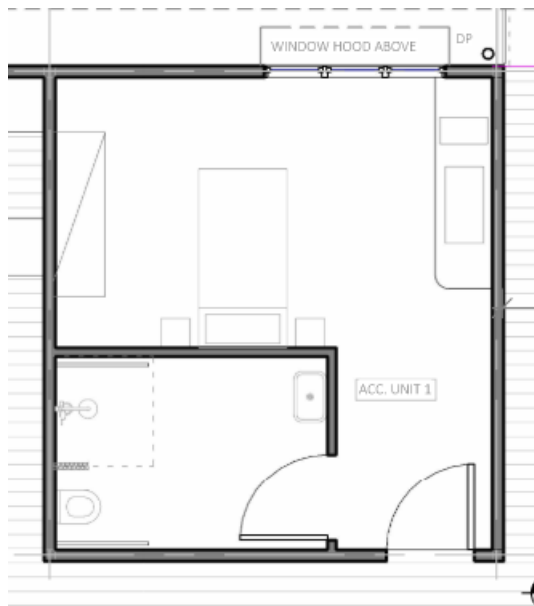


Figure 2 - Acc. Unit 1 Building A



Figure 3 - Building B Acc. Unit 2 and 3.

Reference: P000961

RFI as part of the Development Application - Disability Access Report on a SEPP Seniors Housing - Hostel
Jubilee, 20 Jubilee Ave, Mullumbimby NSW 2482

Assessment Summary

In my professional opinion, this development has the capacity to satisfy the Seniors Living Hostel Unit design requirements for three accessible units, as outlined below:

Drawings – Layouts are consistent with the requirements of **SEPP (Housing) 2021 – Schedule 4, Part 1** for Seniors Housing.

Siting – The site provides an accessible pedestrian path from the street frontage and car parking areas to the ground-level entries of **Buildings A and B**, as well as to common-use facilities.

Letterboxes – Centrally located near the street entrance, consistent with Schedule 4 requirements.

Car Parking – Street-level kerbside car parking is provided in proximity to the accessible units.

Accessible Entry – Each accessible unit provides a **minimum 850 mm clear door opening** at the principal entry.

Interiors –

- Minimum doorway width: **850 mm**
Internal corridors: **minimum 1000 mm wide**
- Compliant main bedroom circulation spaces and power outlet locations (GPOs) (to be detailed at CC)
- Accessible bathrooms and toilets designed in accordance with **AS 1428.1:2021** (to be detailed at CC)
- Non-slip floor coverings to balconies and external paved areas (to be detailed at CC)
- Door hardware positioned between **900 mm and 1100 mm** above floor level (to be detailed at CC)
- Light switches and power points positioned for accessibility (to be detailed at CC)

Car parking

A total of seven (7) car parking spaces are proposed within the kerbside car park.

Of these, four (4) car parking spaces comply with the spatial requirements of **AS 2890.6:2009 – Off-Street Parking for People with Disabilities**.

In accordance with Clause (2)(b)(ii) of Schedule 4 – Standards Concerning Accessibility and Usability for Hostels and Independent Living Units under SEPP (Housing) 2021, at least 50% of car parking spaces are required to comply with AS 2890.6.

The remaining car spaces have standard widths of 2400 mm.

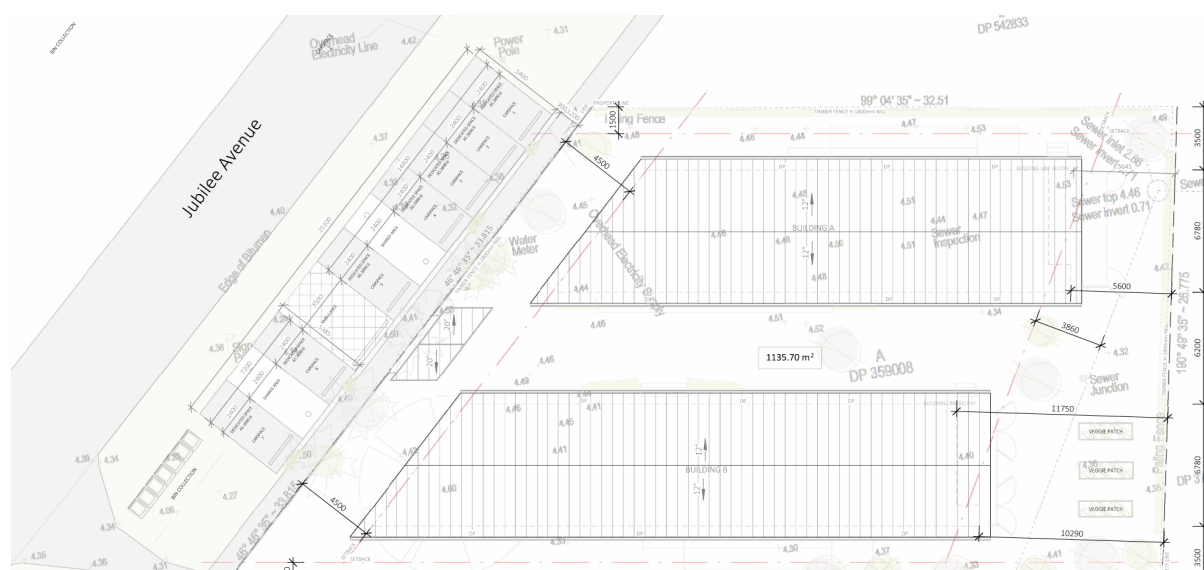


Figure 14, Screenshot of proposed car parking proposed

3.1.2 Compliance with SEPP Seniors Living - Clause 93 Location and access to facilities and services— independent living units

Assessment under Clause 93 – Location and Access to Facilities and Services (Independent Living Units) is not required for this Development Application. The requirements of Clause 93 specifically apply to independent living units and therefore do not extend to Seniors Living Hostel developments.

It is acknowledged, however, that new accessible pathways are proposed to provide safe and equitable connections from the site to nearby local amenities, including the Mullumbimby Rural Co-operative, ensuring reasonable access to community facilities and services.

3.1.3 Compliance with SEPP Seniors Living - Accessibility and useability of hostels and Independent Living Units

Schedule 4 Standards concerning accessibility and usability for hostels and independent living units - Part 1 Standards applying to hostels and independent living units

1 Application of standards in this Part

The standards set out in this Part apply to any seniors housing that consists of hostels

Comment:

The standards set out in the table below apply only to the three 3 identified Accessible units

- Ground Level Building A (Acc. Unit 1)
- Ground Level Building B (Acc. Unit 2)
- Ground Level Building B (Acc. Unit 3)

Jubilee <i>Applies to the Ground level nominated 3 accessible units</i>	Commentary
2 Siting standards	
(1) Wheelchair access	
If the whole of the site has a gradient of less than 1:10, 100% of the dwellings must have wheelchair access by a continuous accessible path of travel to an adjoining public road.	A lift can be detailed at the Construction Certificate stage to satisfy this standard. . The proposal remains consistent with the intent of the SEPP, as all of the ground-level accessible units and accessible paths to key communal areas are provided.
(2) If the whole of the site does not have a gradient of less than 1:10:	N/A
(a) the percentage of dwellings that must have wheelchair access must equal the proportion of the site that has a gradient of less than 1:10, or 50%, whichever is the greater, and	N/A
(b) the wheelchair access provided must be by a continuous accessible path of travel to an adjoining public road or an internal road or a driveway that is accessible to all residents. Note—	N/A

Note. For example, if 70% of the site has a gradient of less than 1:10, then 70% of the dwellings must have wheelchair access as required by this subsection. If more than 50% of the site has a gradient greater than 1:10, development for the purposes of seniors housing is likely to be unable to meet these requirements.	
(3) Common areas	
Access must be provided in accordance with AS 1428.1 so that a person using a wheelchair can use common areas and common facilities associated with the development.	Capacity to comply
3 Letterboxes	
(1) Letterboxes -	
(a) must be located on a hard standing area, and (b) must have wheelchair access by a continuous accessible path of travel from the letterbox to the relevant dwelling, and (c) must be lockable by a lock that faces a wheelchair accessible path.	Capacity to comply An internal mailbox area is to be shown on the plans at CC. This is to be located adjacent to the pedestrian entrance. Ensure the area includes a level 1540mm x 2070mm turning area in front of the letter boxes
(2) If a structure contains multiple letterboxes, the structure must be in a prominent location.	Capacity to comply
(3) At least 20% of the letterboxes on the site must be more than 600mm and less than 1,200mm above ground level (finished).	Capacity to comply
4 Carparking	
(1) If parking spaces attached to or integrated with a class 1 building under the Building Code of Australia are provided for use by occupants who are seniors or people with a disability, at least 1 parking space must— (a) be at least 3.2m wide, and (b) be at least 2.5m high, and	N/A



(c) have a level surface with a maximum gradient of 1:40 in any direction, and (d) be capable of being widened to 3.8m without requiring structural modifications to a building.	
(2) If parking spaces associated with a class 1, 2 or 3 building under the Building Code of Australia are provided in a common area for use by occupants who are seniors or people with a disability, the following applies— (a) for a parking space not in a group—the parking space must comply with AS/NZS 2890.6, (b) for a group of 2–7 parking spaces— (i) at least 1 of the parking spaces must comply with AS/NZS 2890.6, and (ii) 50% of the parking spaces must— (A) comply with AS/NZS 2890.6, or (B) be at least 3.2m wide and have a level surface with a maximum gradient of 1:40 in any direction, (c) for a group of 8 or more parking spaces— (i) at least 15% of the parking spaces must comply with AS/NZS 2890.6, and (ii) at least 50% of the parking spaces must— (A) comply with AS/NZS 2890.6, or (B) be at least 3.2m wide and have a level surface with a maximum gradient of 1:40 in any direction.	Each seniors housing unit is shown to have a car parking space on the ground level. Four (4) spaces will have an overall width of 4.8 metres (2.4m space and 2.4 m shared space) to comply with AS/NZS 2890.6. The remaining 3 car spaces are 2.4m in width. Over 50% of car spaces can comply with AS2890.6 in accordance with Clause (2)(b)(ii) within the 7 car parking spaces.
(3) To avoid doubt, a parking space that complies with AS/NZS 2890.6 is only counted toward 1 of the requirements in subsection (2)(b)(i) or (ii) or (c)(i) or (ii).	Noted
(4) At least 5% of any visitor parking spaces must comply with AS/NZS 2890.6.	There is capacity to nominate an Accessible Visitors parking space. To be detailed at CC.



(5) A parking space required by this section to comply with AS/NZS 2890.6, other than a visitor parking space, is not required to include the international symbol of access.	To be noted on the CC drawings
(6) If multiple parking spaces are accessible by a common access point, the access point must be secured by a power-operated garage door, vehicle gate, vehicle barrier or similar device.	To be noted on the CC drawings
(7) A parking space, other than a parking space under subsection (6), must be— (a) secured by a power-operated door, or (b) capable of accommodating the installation of a power-operated door, including by having— (i) access to a power point, and (ii) an area for motor or control rods for a power-operated door.	N/A
(8) A requirement in this section for a parking space to comply with AS/NZS 2890.6 extends to the associated shared area within the meaning of AS/NZS 2890.6.	Complies for the nominated seniors housing parking spaces.
(9) In this section, a parking space is in a common area if it is not attached to or integrated with a hostel or independent living unit.	Parking spaces are located on council land.
5 Accessible entry	
(1) The main entrance to a dwelling must have— (a) a clear opening that complies with AS 1428.1, and (b) a circulation space in front of the door and behind the door that complies with AS 1428.1.	The three seniors housing units have direct access into the unit with AS1428.1-2021 compliant door circulation
(2) This section does not apply to an entry for employees.	N/A
6 Interior: general	



(1) An internal doorway must have an unobstructed opening that complies with AS 1428.1.	Capacity to comply All internal doors into areas are required to be accessible by Seniors Housing to provide 850mm clear opening width for each unit layout. <i>For the CC stage, ensure that all internal doors show 850mm clear openings.</i>
(2) An internal corridor must have an unobstructed width of at least 1,000mm.	Plans for all of the 3 accessible units include 1000mm minimum width internal corridors.
(3) The circulation spaces in front of and behind an internal doorway in the following areas must comply with AS 1428.1 — (a) a kitchen, (b) a laundry, (c) a bathroom, (d) a toilet, (e) a bedroom, (f) a living area, (g) the main area of private open space.	All the units have circulation space to all rooms required by SEPP Seniors to be accessible to comply with AS1428.1 (2009).
(4) To avoid doubt, subsection (3)(b) does not apply to laundry facilities in a cupboard.	There are two common shared Laundry facilities which are located in a cupboard with pocket doors
7 Bedroom	
At least one bedroom in a dwelling must have the following—	
(a) a clear area, not including a circulation space, sufficient to accommodate— (i) for a hostel—a wardrobe and a single-size bed, or (ii) for an independent living unit—a wardrobe and a queen-size bed,	Complies for a hostel with a single-size bed.

Reference: P000961

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(b) a clear area around the area for the bed of at least— (i) 1,200mm at the foot of the bed, and (ii) 1,000mm on each side of the bed,	Complies
(c) at least 2 double general power outlets on the wall where the head of the bed is likely to be,	Capacity to comply
(d) at least one general power outlet on the wall opposite the wall where the head of the bed is likely to be.	Ensure detailed drawings are provided at time of CC detailing required dimensions and electrical elements
8 Bathroom	
(1) At least one bathroom in a dwelling must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling.	Complies
(2) The bathroom must have the following— (a) a slip resistant floor surface that achieves a minimum rating of P3 in accordance with AS 4586—2013, (b) a washbasin with tap ware capable of complying with AS 1428.1, including by future adaptation if the washbasin and tap ware continue to use existing hydraulic lines, (c) a shower that— (i) is accessible without a shower-hob or step, and (ii) complies with the requirements of AS 1428.1 for the entry, circulation space, floor gradient to the wastewater outlet and location of the mixer tap, and (iii) is in the corner of a room, and (iv) has a wall capable of accommodating the installation of a grab rail, portable shower head with supporting grab rail and shower seat, in accordance with AS 1428.1,	Capacity to comply Ensure detailed drawings are provided at time of CC



(d) a wall cabinet with shelving illuminated by an illumination level of at least 300 lux,	Ensure detailed drawings and electrical schedules are provided at time of CC
(e) a double general power outlet in an accessible location, in accordance with AS 1428.1.	Ensure detailed drawings and electrical schedules are provided at time of CC
9 Toilet	
(1) At least one toilet in a dwelling must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling.	Complies
(2) The toilet must have the following— (a) a water closet pan— (i) in the corner of the room, and (ii) with a centreline set-out in accordance with AS 1428.1, (b) a circulation space in front of the water closet pan that is— (i) at least 1,200mm long and at least 900mm wide, and (ii) clear of door swings and fixtures, other than a toilet paper dispenser or grab rails, (c) a circulation space around the water closet pan that complies with AS 1428.1, (d) a slip resistant floor surface that achieves a minimum rating of P3 in accordance with AS 4586—2013, (e) a wall capable of accommodating the installation of a back rest and grab rail that will comply with AS 1428.1.	Capacity to comply Ensure detailed drawings are provided at time of CC
(3) A removable shower screen may be located in the circulation space specified in subsection (2)(c).	Capacity to comply Ensure detailed drawings are provided at time of CC
10 Surfaces of balconies and external paved areas	



Balconies and external paved areas must have surfaces that are slip resistant and comply with— (a) the Building Code of Australia, or (b) the Standards Australia Handbook SA HB 198:2014, Guide to the specification and testing of slip resistance of pedestrian surfaces, published on 16 June 2014.	Capacity to comply Slip resistance details to be provided at time of CC
11 Door hardware	
(1) Door handles and hardware for all doors, including entry doors and external doors, must comply with AS 1428.1.	Door hardware has capacity to comply with AS1428.1-2021. Ensure during ongoing design and construction that a door schedule details this
(2) To avoid doubt, subsection (1) does not apply to cabinetry.	Noted
12 Switches and power points	
(1) Switches and power points must— (a) comply with AS 1428.1, or (b) be capable of complying with AS 1428.1 through future adaptation.	Capacity to comply Ensure during ongoing design and construction 1. General power outlets are be located 600mm-1100mm, not less than 500mm from corner. 2. Rocker action or toggle switches are provided 900mm-1100mm, not less than 500mm from corner.
2) Subsection (1) does not apply to— (a) remote controls, or (b) power points likely to serve appliances that are not regularly moved or turned off.	
13 Private passenger lifts	

Reference: P000961

RFI as part of the Development Application - Disability Access Report on a SEPP Seniors Housing - Hostel
Jubilee, 20 Jubilee Ave, Mullumbimby NSW 2482



(1) This section applies to a private passenger lift that is required by this schedule to be accessible only from inside a particular dwelling.	N/A
(2) The private passenger lift must— (a) be at least 1,100mm wide and at least 1,400mm long, measured from the lift car floor, and (b) have a clear indoor landing on all floors serviced by the lift, other than the floor on which the main area of private open space is located, at least 1,540mm long and at least 2,070mm wide, and (c) have controls that comply with— (i) AS 1735.12:2020, Lifts, escalators and moving walks, Part 12: Facilities for persons with disabilities, published on 26 June 2020, or (ii) AS 1735.15:2021, Lifts, escalators and moving walks, Part 15: Safety rules for the construction and installation of lifts — Special lifts for the transport of persons and goods — Vertical lifting platforms intended for use by persons with impaired mobility, published on 23 July 2021.	N/A
(3) The width of the door opening of the private passenger lift must be at least 900mm.	N/A
(4) The private passenger lift must not be a stairway platform lift.	N/A

NB: Further Technical details regarding the following fixtures and finishes may be obtained from AS 1428.1 (Design for Access and Mobility) (2021)

3.2 BCA Part D4 and E3D7, E3D8 – Access For People with Disabilities

The following is a clause-by-clause assessment of the architectural drawings against BCA2022 Amdt 2 Part D4 – Access For People with a Disability, as well as Part E3D7, E3D8

Deemed to Satisfy Provision	Able to comply	Comments
D4D2 General building access requirements: • Class 3 (Hostell)	Design refinement required at CC	The drawings demonstrate that access is able to be provided to the maximum extent possible to and within all areas of the building that are required to be accessible. Accessible pathways are proposed to and within all common areas that will be normally used by the occupants such as: • Car parking areas, including accessible car parking spaces • Ground level pedestrian access paths including to mailboxes • Common areas between the building entrance and the entrance doorway of each sole-occupancy unit (SOU) (subject to design refinement at CC) • To and within communal facilities for residents (subject to design refinement at CC) • Accessible paths of travel, circulation spaces and passing spaces have been provided within the buildings, at the end of corridors and doorways (subject to design refinement at CC) The plans demonstrate the capacity to satisfy AS1428.1-2021. <u>Recommended Action</u> Ensure during ongoing design development: 1. Areas required to be accessible are to be located on an accessible path of travel with appropriate width, gradient, circulation and turning areas 2. External and internal pathways are to comply with AS1428.1-2021. 3. Doors that are required to be accessible have



Deemed to Satisfy Provision	Able to comply	Comments
		compliance with AS1428.1-2021 with respect to min 850mm clear opening widths, luminance contrast on doors, accessible door hardware, and door force is no more than 20N where a door closer is fitted. 4. Slip resistance certification for common area paving, ramp surfaces and stairs, is provided.
D4D3 Access to buildings	Design refinements required prior to CC	The drawings demonstrate that access is generally provided to the degree necessary to and within all areas of the buildings that are required to be accessible, although some design refinement is required. Access from allotment boundaries, through pedestrian entrances, and to other accessible buildings on the site There are a maximum of 1:20 graded walkways proposed pathways shown from the allotment boundary which lead to the main accessible entry points for Building A and B. Access from accessible car parking on the allotment • Accessible paths of travel and lift access are proposed to be provided to all levels. <u>Recommended Action</u> Ensure during ongoing design development:: 1. External accessible pathways to comply with AS1428.1-2021. 2. Entrance features to comply with AS1428.1-2021 with respect to clear openings, circulation space and luminance contrast on doorways, door opening force no greater than 20N.



Deemed to Satisfy Provision	Able to comply	Comments
D4D4 Parts of building to be accessible	✓ Detailed design required at CC	Accessible walkways and ramps within the site boundary Walkways and ramps are shown in concept to have appropriate dimensions, gradients and landing dimensions for access to Buildings A and B. Handrails and TGSIs are not yet shown on ramps however this can be readily incorporated at the CC stage. External pathways within the site have a minimum width of 1000mm with adequate turning and passing spaces. <u>Recommended Action</u> Ensure during ongoing design and construction accessible pathways comply with AS1428.1-2021: ☐ Section 3 - Continuous accessible paths of travel ☐ Section 4 Floor or ground surfaces on continuous accessible paths of travel and ☐ Section 7 Walkways, ramps and landings Internal walkways and turning spaces Internal paths of travel have been designed in accordance with the requirements of AS1428.1-2021 for width, gradient and turning spaces at the end of corridors required to be accessible of at least 1540mm x 2070mm. <u>Recommended Action</u> Ensure during ongoing design and construction accessible pathways comply with AS1428.1-2021:



Deemed to Satisfy Provision	Able to comply	Comments
		☐ Section 3 - Continuous accessible paths of travel ☐ Section 4 Floor or ground surfaces on continuous accessible paths of travel and ☐ Section 7 Walkways, ramps and landings Stairs Non-fire-isolated stairs are proposed within building A and B. Non-fire isolated stairs require compliance with all relevant design requirements of AS1428.1-2021. <u>Recommended Action</u> All non-fire-isolated stairs are to comply with AS1428.1-2021 Section 8 Stairways with regards to ☐ Minimum width of 1000mm between handrails ☐ Compliant landing dimensions at change of direction ☐ Handrails on both sides ☐ Handrail heights to be 865mm to 1000mm above step nosing ☐ No vertical section of handrail ☐ Opaque risers ☐ Handrail extensions at top and base ☐ Tactile indicators on top and bottom landing of steps ☐ Non-slip contrast strip to edge on stair nosings 50-75mm deep (30% contrast) Stairs - fire-isolated There are no fire-isolated stairs provided. Doors Doorways have the capacity to comply with AS1428.1-2021 subject to detailed design at CC stage.



Deemed to Satisfy Provision	Able to comply	Comments
	Details required at CC	All doorways on an accessible path of travel must have a minimum clear opening width of 850mm for the active leaf, including but not limited to accessible toilet doors, and any door on path of travel to a lift lobby. Front entry doors to SOUs are measured to have 850 clear opening width. <u>Recommended Action</u> Ensure during ongoing design and construction that doors on all internal accessible paths of travel have compliance with AS1428.1-2021 with respect to: ☐ Minimum clear openings of 850mm for the active leaf ☐ Level circulation space (gradient no greater than 1:40) ☐ Luminance contrast on doorway elements ☐ Opening and closing force is no greater than 20N including where a door or gate closer is fitted ☐ Level threshold ☐ Door circulation Flooring The flooring schedule and other flooring details for both internal and external applications will need to be developed prior to the issue of the CC <u>Recommended Action</u> Ensure during ongoing design and construction ☐ Flooring joints or abutments to have vertical rise no longer greater than 3mm or 5mm if rounded ☐ Flooring to have compliant slip resistance as per Table 3B, SA HB 198:2014 Guide to the specification and testing of slip resistance of pedestrian surfaces - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC does not require slip resistance



Deemed to Satisfy Provision	Able to comply	Comments
D4D5 Exemptions	N/A	N/A
D4D6 Car parking spaces for people with a disability	Details required at CC	The BCA requires accessible parking for Class 3 dwellings or visitors - these are a DCP requirement. There are accessible car parking spaces for 3 seniors units which have dimensions in accordance with the requirements of AS2890.6-2009. And an additional accessible car space can be provided for visitors.
D4D7 Signage	Provide detail at CC	At this stage of the design signage is not required to be developed however the following actions are noted for CC. <u>Recommended Action</u> Accessible signage in accordance with BCA2022 Amdt 2 D4D7, BCA Specification 15, and AS1428.1-2021, will be required. ☐ Required exit doors stating 'Exit' and 'Level' followed by floor number. ☐ Hearing Augmentation (if required) ☐ Where an entry is not accessible, directions to the nearest accessible entrance
D4D8 Hearing augmentation	N/A	Not applicable to this DA
D4D9 Tactile indicators	Provide detail at CC	Stairs will be constructed. For all non-fire isolated stairs and ramps (1:14-1:20), tactile indicators will be required. <u>Recommended Action</u> Tactile indicators to be installed on the top and bottom of any non-fire isolated stairs and ramps to comply with AS1428.4.1.



Deemed to Satisfy Provision	Able to comply	Comments
D4D11 Swimming pools	N/A	Not applicable to the DA
D4D13 Glazing on an accessway	Provide detail at CC	On an accessway, where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening must be clearly marked in accordance with AS1428.1. <u>Recommended Action</u> Ensure during ongoing design and construction all glazed doors and glazed panels that form part of an accessible path of travel, provide a solid contrast line 75mm width at 900 - 1000mm and 30% luminance contrast when viewed against the floor surface or surfaces within 2m of the glazing on the opposite side
E3D7 and E3D8 Passenger lifts	Provide detail at CC	It is recommended that a lift be detailed at CC to provide access between the street level, ground and first floors. <u>Recommended Action</u> Ensure during ongoing design development and construction that the lift has accessible features in accordance BCA2022 Amdt 2 Part E3D8
F4D5 Accessible sanitary facilities	N/A	Not applicable to the DA

3.3 Compliance with Byron Shire Development Control Plan 2014- Section B13.2.3 Objectives Boarding Houses, Group Homes, and Hostels

DCP 2014 Control	Complies	Comments
Prescriptive Measures 1. Design and Access in accordance with BCA Part D3; AS1428.1 – Design for Access and Mobility – General Requirements for Access – New Buildings for class 3, 4 and 9 buildings; and AS 4299 - Adaptable Housing must be provided to and within new developments and major alterations for residential development to which this Section applies as follows: a) If the complex contains less than 20 beds: A minimum of two bedrooms plus associated bathroom/toilet facilities should be adaptable. b) If the complex contains more than 20 beds: At least 10% or part thereof, plus 10% or part thereof of bathrooms/toilets, rounded up to the nearest whole number should be adaptable. c) Access: Access via a continuous accessible path of travel must be available to all communal areas including lounge, bathroom, kitchen, laundry, drying area and recreation areas.	✓	The proposed development includes compliance with Adaptable Housing standards, ensuring that a total of 3 units meet the requirements for adaptable housing as per the Byron Bay DCP. <u>Unit Breakdown:</u> Ground Level Building A (Acc. Unit 1) Ground Level Building B (Acc. Unit 2) Ground Level Building B (Acc. Unit 3) The adaptable dwellings are identifiable on the submitted Development Application (DA) plans as the accessible units. <u>Recommended Action:</u> • The design and documentation process leading up to and including CC should include a review and incorporation of adaptable design features in the plans and design details for units. • Detailed design and construction should have regard to the key inclusions and requirements noted on the 1:50 DA plans.

DCP 2014 Control	Complies	Comments
d) Car Parking: Accessible car parking spaces equivalent in number to the number of adaptable housing units must be provided close to the entrance to the development, with a continuous accessible path of travel between the entrance and the car spaces. Car parking must be in accordance with the requirements of BCA Section D Part D3.5 and Australian Standard AS/NZS 2890.6:2009 Parking Facilities – Part 6: Off-street parking for people with disabilities..		

4. Conclusion

Based on our assessment, we confirm that the revised DA plans for the proposed hostel development have the capacity to achieve the following:

1. State Environmental Planning Policy (Housing) 2021
 - a. Schedule 4 Standards concerning accessibility and usability for hostels and independent living units
 - i. Part 1 Standards applying to hostels and independent living units
2. Meet the Performance Requirements of the Disability (Access to Premises-Buildings) Standards 2010 Performance requirements of NCC 2022 Amdt 2 Volume 1 – BCA Parts D4, E3D7, E3D8, and E4D5 through a combination of Deemed-to-Satisfy (DTS) provisions and Performance Requirements Performance requirements of the Disability (Access to Premises—Buildings) Standards 2010.
3. Relevant provisions of Byron Bay DCP 2014 - 10% Adaptable units (3 units)
4. The intent and objects of the Disability (Access to Premises- Buildings) Standards (2010).

Further Considerations

Some design refinements are required during the detailed design stage (prior to CC) to ensure full access compliance, as outlined in Sections 3.1, 3.2, and 3.3 of this report. A detailed design review at the CC stage will also be necessary to confirm compliance throughout the development.

Statement of Qualifications

	Prepared by
Full Name	Christine Boesenberg née Cheung
Position Title	Managing Director
Company Name	Cheung Access Pty Ltd Trading as Inclusive Places
Company Address	GPO Box 1380, Sydney NSW 2001
Qualifications and Accreditations	B. App Sc (Occupational Therapy), Masters of Environmental Studies Registered Occupational Therapist (Occupational Therapy Board/ AHPRA) Accredited with the Access Consultants Association 
Signature	 Declaration: I declare that I am an appropriately qualified and competent person practising in the relevant area of work. I have recognised relevant experience in the area of work assessing disability access compliance and hold appropriately current insurance policies.
Date	27 October 2025

Appendix A: Drawings Received

The following documentation has been reviewed, referenced and/or relied upon in the preparation of this report received on the 25 October 2025

Sheet List		
Sheet Number	Sheet Name	Drawing Scale

0.00	COVER PAGE	
0.01	GENERAL NOTES	
0.02	CONTENT	
0.03	DESIGN INTENT	
0.04	DEVELOPMENT SUMMARY	
0.05	SITE LOCATION	
0.06	SITE CONTEXT	
0.07	SITE ANALYSIS	

Sheet List		
Sheet Number	Sheet Name	Drawing Scale

0.08	SITE LOCAL CHARACTER	
1.00	SURVEY (BY OTHERS)	1:200
1.01	DEMOLITION PLAN	1:200
1.02	SITE 1:200	1:200
1.03	FLOORPLAN - GF	1:100
1.04	FLOORPLAN - FF	1:100
1.05	ROOF PLAN	1:100
1.08	UNIT TYPES	1:50
2.00	FRONT & BACK ELEVATIONS	1:100

Sheet List		
Sheet Number	Sheet Name	Drawing Scale

2.01	ELEVATIONS - BUILDING A	1:100
2.02	ELEVATIONS - BUILDING B	1:100
2.03	SECTIONS	1:100
2.04	MATERIAL SCHEDULE	1:100
3.00	SHADOW DIAGRAMS - SUMMER	1:100
3.01	SHADOW DIAGRAMS - WINTER	1:100
4.00	GFA	1:200