

AUSTRALAND

DISCOVERY POINT CONCEPT PLAN

ACCESSIBILITY REPORT FOR PART 3A CONCEPT PLAN

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FINAL v3

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Access Review

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1. INTRODUCTION

The proposed development is for a Concept Plan comprising 14 building envelopes for future residential (class 2), retail and commercial uses and associated works on land known as Discovery Point. The concept plan is to be submitted under Part 3A of the Environmental Planning and Assessment Act 1979, (the Act). The concept plan is accompanied by an Indicative Design Scheme prepared by Bates Smart Architects.

In summary, the proposed scope of works includes:

- * Long term living (class 2) Buildings 1b, 1c, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13
- * Retail Facilities (class 5) ground level of buildings 1b, 1c, 2, 3, 4, 5, 7 & 14
- * Commercial (class 6) Building 14
- * Car Park Facilities (class 7)
- * New roads associated with the development
- * Public Domain works including accessible walkways, park lands, footpaths and street lighting
- * Landscaping

This Report has been prepared to address those matters related to access consultancy and outlines the requirements under the Act, which are to be considered in all subsequent project applications for the development.

2. ACCESSIBILITY STATEMENT

2.1. Objectives

The objectives of the development will consider residents, workers and visitors with varying degrees of disabilities between all floors of all buildings and around and through the site.

The objectives attempt to deliver equality, independence and functionality to people with disabilities inclusive of:

- 1. People with sensory impairment
- 2. People with mobility impairments
- 3. People with dexterity impairments

The objective seeks to provide compliance with the DDA. In doing so, attempts to eliminate, as far as possible, discrimination against persons on the ground of disability.

As instructed the report will not make comments in relation to excluded area of the Concept Plan, which include the Greenbank, Verge, Site 4, St Magdalens Chapel, Tempe House and the Mount Olympus field.

2.2. Standards and Regulations

The statutory and regulatory guidelines to be encompassed in the developed design to ensure effective appropriate and safe use by all people including those with disability will be in accordance with:

- Federal Disability Discrimination Act (DDA)
- Draft DDA Premises Standards (to be incorporated in the BCA in May 2011)
- Building Code of Australia (BCA) Part D3
- AS 1428.1 (General Requirements for Access & Mobility)
- AS 1428.4 (Tactile Ground Surface Indicators)
- AS 1735.12 (Lift facilities for persons with disabilities)
- AS 2890.6 (Car Parking)

2.3. Accessibility Process

The proposed detailed design subject to separate Project Applications will utilize the Federal Disability Discrimination Act (DDA), AS 1428 series, and BCA part D3 to develop appropriate design documentation, to provide adequate access provisions for people with disabilities.

The concept plan consists of 14 proposed building envelopes for future residential, retail and commercial multi storey buildings, including public domain areas and linkages to existing public transport.

All future project applications will examine key physical elements, to identify physical barriers, and incorporate solutions as a suitable response to disability statutory regulations, during the detailed design phase.

Future building & public area, the design will be developed to ensure the principles of the DDA are upheld. Under the Disability Discrimination Act (DDA), it is unlawful to discriminate against people with disabilities in the provision of appropriate access, where the approach or access to and within a premises, makes it impossible or unreasonably difficult for people with disabilities to make use of a particular service.

The detailed design of these building will provide a consistent accessible environment through detailed design and planning of integrated accessible network of paths of travel. This will include the provision of appropriate continuous accessible paths of travel, circulation areas, signage, lighting, seating, handrails, stairs, ramps, lifts, accessible toilet facilities, accessible services and amenities, accessible car parking, accessible pedestrian and transport linkages.

General assessment of likely compliance for areas to all public domain elements (Discovery Point Park, Neighbourhood Park, Station, House and Chapel) is considered in this report.

3. ACCESSIBILITY OF DESIGN

This section of the report discusses accessibility of design in relation to the indicative design scheme which accompanies the concept plan. It is noted that the uses and access points to each building is indicative only at this stage and future detailed design of each building may differ from the design shown in the indicative design scheme.

3.1. Building 1(b)

The indicative design scheme shows proposed Building 1b as a mixed retail/residential building with a supermarket on ground floor with residential and communal open space area above. Access to the building is possible via arterial footpaths alongside Magdalene Terrace, Brodie Spark Drive and Spark Lane.

The building, located between buildings 1C and 4 is sited within close accessible distance to the proposed Neighbourhood Park (1a), Discovery Point Park and the existing Wolli Creek Train Station.

An accessible entrance can be achieved from the main pedestrian footpath to the supermarket entry and the ground floor residential lobby area, compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

3.2. Building 1(c)

The indicative design scheme shows Building 1c as a mixed retail/residential building with retail at ground level and a residential tower above. Building 1c is located in the southern precinct. Access to the building main entry is possible via the pedestrian footpath along Brodie Spark Drive.

The building is sited within close accessible distance to the proposed Neighbourhood Park (1a), Discovery Point Park and the existing Wolli Creek Train Station.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor will likely be made available via the use of 2 passenger lift(s), traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of passenger lifts will achieve a level of equitable, dignified and independent linkage from all residential units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.3. Building 2

The indicative design scheme shows Building 2 as a mixed retail/residential building with retail at ground level and a residential tower above. The building is located in the southern precinct of the site on the corner of Brodie Spark Drive and Magdalene Terrace. Access to the building main entry will be possible via the footpaths alongside Magdalene Terrace and Brodie Spark Drive.

The building, located between buildings 3 and 1c is sited within close accessible distance to the proposed Neighbourhood Park (1a), Discovery Point Park and the existing Wolli Creek Train Station.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor will likely be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of the 2 passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the buildings.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.4. Building 3

The indicative design scheme shows Building 3 as a mixed retail/residential building with retail at ground level and apartment building above. The building is located in the southern precinct of the site along Magdalene Terrace.

Access to the building main entry will be possible via the footpaths alongside Magdalene Terrace. Furthermore accessible entrances could be provided to the retail tenancies from the park side of this building.

The building is sited within close accessible distance to the proposed Neighbourhood Park (1a), Discovery Point Park and the existing Wolli Creek Train Station.

The indicative concept plan layout for the accessible entrances can be achieved from the main pedestrian footpath along Magdalene Terrace to building entrances including the ground floor residential lobby area, which will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from each residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of each individual passenger lift will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.5. Building 4

The indicative design scheme shows Building 4 as a mixed retail/residential building with retail at ground level and apartment building above. The building is located in the southern precinct of the site. Access to the building main entry is shown along the Eastern perimeter of the building, via the footpaths spanning North/South between Brodie Park Drive and Spark Lane.

The building is sited within close accessible distance to the proposed Neighbourhood Park (1a), Discovery Point Park and the existing Wolli Creek Train Station.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of the 2 passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.6. Building 5

The indicative design scheme shows Building 5 as a mixed retail/residential building with retail at ground level and apartment building above. The building is located in the southern precinct of the site. Access to the building main entry is shown along the Western perimeter of the building, via the footpaths along Magdalene Terrace.

The building is found on the corner of Magdalene Terrace and Sparks Lane. Currently this building is sited within close distance to the proposed Neighbourhood Park.

The distance from Building 5 to the Discovery Point Park and the existing Wolli Creek Train Station is further than the other buildings in the Concept Plan; however, the use of level pathways and appropriate road crossings provided would make this journey more efficient for wheelchair users and compliant with the equity and dignity principles of the DDA. This would be addressed in the detailed application for the building.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of the 2 passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.7. Building 6

The indicative design scheme shows Building 6 as a residential building. The building is located in the northern precinct of the site. Access to the building main entry is possible via the pedestrian footpath along Brodie Spark Drive.

The building is sited within close accessible distance to the proposed Discovery Point Park and the existing Wolli Creek Train Station.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lift(s), traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.8. Building 7

The indicative design scheme shows Building 7 as a mixed retail/residential building with retail at ground level and apartment building above. The building is located in the northern precinct of the site. Access to the building main entry is possible via the pedestrian footpath found off Brodie Spark Drive.

The building, adjacent to building 6 is sited within close accessible distance to the proposed Discovery Point Park and the existing Wolli Creek Train Station.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lift(s), traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.9. Building 8

The indicative design scheme shows Building 8 as a residential building. The building is located in the northern precinct of the site. Access to the building main entry is possible via the pedestrian footpath found along Brodie Spark Drive.

The building is sited within close accessible distance to the proposed Discovery Point Park and the existing Wolli Creek Train Station. Access to the building main entry is found along the Northern perimeter of the building, via the pedestrian footpaths off Brodie Spark Drive.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.10. Building 9

The indicative design scheme shows Building 9 as a residential building. The building is located in the northern precinct of the site. Access to the building main entry is possible via the pedestrian footpath found off Brodie Spark Drive.

The building is sited within close accessible distance to the proposed Discovery Point Park and the existing Wolli Creek Train Station. Access to the building main entry is found along the southern perimeter of the building, via connecting pedestrian footpaths along Chisholm Street (parallel to the Cooks River Foreshore)

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor will likely be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.11. Building **10**

The indicative design scheme shows Building 10 as a residential building. The building is located in the northern precinct of the site.

The building is found on the corner of Spark Lane and Chisholm Street near residential buildings 9 and 12. Access to the building main entry is shown along the southern perimeter of the building, via the footpaths spanning North/South between Chisholm Street and Spark Lane.

The indicative design scheme also shows there are 2 entrances to this building either side of the station.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of the 2 passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.12. Building 11

The indicative design scheme shows Building 11 as a residential building. The building is located in the northern precinct of the site.

The building is sited within close accessible distance to the proposed Discovery Point Park and the existing Wolli Creek Train Station. Access to the building main entry is shown along the Northern perimeter of the building, via the arterial pedestrian footpaths spanning East/West off Chisholm Street.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.13. Building 12

The indicative design scheme shows Building 12 as a residential building. The building is located in the western area of the site.

The building is found on the corner of Spark Lane and Brodie Spark Drive. Access to the building main entry is shown along the eastern perimeter of the building, via the footpaths spanning East/West, off Chisholm Street.

The distance from Building 12 to the Discovery Point Park and the existing Wolli Creek Train Station is further than the other buildings in the Concept Plan; however, the use of level pathways and appropriate road crossings provided would make this journey more efficient for wheelchair users and compliant with the equity and dignity principles of the DDA. This would be addressed in the detailed application for the building.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lifts, traversable by wheelchair

users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of the 2 passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.14. Building 13

The indicative design scheme shows Building 13 as a residential building. The building is located in the central west portion of the site.

The building is sited within close accessible distance to the proposed Discovery Point Park and existing Wolli Creek Train Station. Access to the building main entry is shown along the southern perimeter of the building, via connecting pedestrian footpaths that are found parallel to the Wolli Creek Train Station.

The distance from the building 13 to the Discovery Point Park and the existing Wolli Creek Train Station would be seen as suitable for wheelchair users compliant with the equity and dignity principles of the DDA and AS1428.2.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor residential lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the residential lobby area to each unit above the ground floor is likely to be made available via the use of 3 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the likely use of the 2 passenger lifts will achieve a level of equitable, dignified and independent linkage from all units to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all residential units, including adaptable units contained within the building. Accessible pathways can also be achieved to adaptable unit car bays, which will be required for each adaptable unit.

3.15. Building 14

The indicative design scheme shows Building 14 as a mixed retail/commercial building with retail at ground level and commercial floors above. The building is located in the northern precinct of the site.

The building is sited within close accessible distance to the proposed Neighbourhood Park (1a), Discovery Point Park and the existing Wolli Creek Train Station.

An accessible entrance can be achieved from the main pedestrian footpath to the main entry and the ground floor commercial lobby area, and will be compliant with BCA, the draft DDA Premises Standards and the Rockdale Council Access DCP.

The path of travel from the commercial lobby area to each unit above the ground floor is likely to be made available via the use of 2 passenger lifts, traversable by wheelchair users, compliant with BCA and the draft DDA Premises Standards. In addition, the use of the 2 passenger lifts will achieve a level of equitable, dignified and independent linkage from all commercial areas to any common use facilities associated within the building.

The proposed building envelope demonstrates that sufficient floor area will exist for, the circulation areas in front of all lifts on all floors to be able to achieve appropriate circulation spaces as to allow for appropriate manoeuvrability for wheelchair users.

It is envisaged that a continuous accessible path of travel can be provided to all commercial floors within the building.

3.16. External Domain

The site facilitates access to and from the Princess Highway and Magdalene Terrace to and within all other neighbouring streets to the Discovery Point Park, Tempe House, Chapel, Discovery Point Park and the Wolli Creek Train Station.

The use of appropriate firm and level walkways can be achieved to allow continuous accessible path of travel to be achieved to all prominent areas. The accessible paths of travel will provide appropriate linkages to primary and secondary walkways found outside of the development.

From a review of the Concept Plan drawings, it appears that continuous accessible paths of travel can be achieved from all future residential buildings and commercial building to the Discovery Point Park via a network of accessible pathways.

Detailed levels of compliance with accessible paths of travel will be demonstrated in the detailed applications for each building.

Figure 1 overleaf shows the key access points for the indicative design scheme.

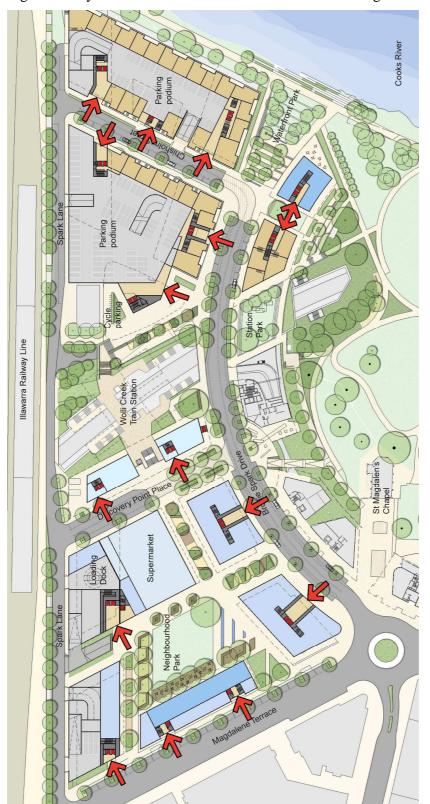


Figure 1: Key Access Points shown for the Indicative Design Scheme:

Source: Bates Smart Architects

4. CONCLUSION

A review of the concept plan documentation reveals that the proposed building envelopes are capable of complying with the Standards and Regulations cited within Section 2.2 of this report.

Confirmed demonstration of compliance will occur during the detailed application stage for each building, including consideration of public domain areas for each stage.

Recommendations to be provided within DA stage for each building (where relevant):

- Provide 10% adaptable units in accordance with Rockdale Council DCP
- Provide 1 adaptable unit car bay for each adaptable unit in accordance with Rockdale Council DCP
- Provide accessible toilet with every bank of male and female toilets in retail and commercial areas. The accessible toilet to have internal dimensions in accordance with AS1428.1-2009
- Retail accessible car bays will be 2% of total retail car bays and commercial accessible car bays will be 1% of total commercial car bays