

PACE BUILDING GROUP PTY LTD

ACCESS DESIGN REVIEW – TOWN PLANNING

251-265 Lygon St & 1A Pitt St, Brunswick East



Project number: 251270

Revision: ADR 1.1

Date: 6 May 2026



Quality management

Revision	Date	Revision description	
ADR 1.0	4 June 2025	BADS & LHA Silver Assessment - Draft	
		Prepared by	Reviewed by
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ADR 1.1	6 May 2026	BADS & LHA Silver Assessment - Updated	
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1.0 Project Overview / Summary

Jensen Hughes has reviewed the Development Application documents for the proposed residential development identified 261-265 Lygon St & 1A Pitt St, Brunswick East for the purpose of reviewing the Better Apartments Design Standard (BADS) requirements.

The developer, Pace Building Group Pty Ltd intends to develop a nine-level mixed use development, which incorporates seven floors of apartment accommodation.

The following report provides a summary of the findings relevant to the proposed BADS requirements.

1.1 Building location plan



1.2 Review summary

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

- + Better Apartments Design Standard (BADS)

2.0 Legislative requirements

The minimum legislative requirements for this project comprise both Federal and State legislation. These are outlined below.

Federal

The Federal *Disability Discrimination Act 1992* (DDA) was enacted in 1993. The objects of the DDA are to eliminate as far as possible, discrimination against persons on the basis of their disabilities, in particular access to premises (as defined under the DDA); work; accommodation; the provisions of facilities, services; and land; to ensure, as far as practicable, that persons with disabilities have the same rights to equality before the law as the rest of the community; and to promote recognition and acceptance within the community of the principle that persons with disabilities have the same fundamental rights as the rest of the community.

The DDA is complaints-based legislation administered by the Australian Human Rights Commission (AHRC).

The DDA utilises legislative instruments known as Disability Standards to specify how the objects of the DDA are to be achieved. These standards include:

- + *Disability (Access to Premises – Buildings) Standards 2010,*
- + *Disability Standards for Education 2005; and*
- + *Disability Standards for Accessible Public Transport 2002.*

Where relevant, these Standards reference the Australian Standards for access and mobility (and others), including parts of the AS1428 series, primarily AS1428.1-2009, AS1428.4.1-2009 and others such as AS2890.6 2009.

This review has not considered the requirements of the *Disability (Access to Premises – Buildings) Standards 2010*, with the scope of review applicable to Council development control plans only.

State

With the introduction of the *Disability (Access to Premises – Buildings) Standards 2010*, the Building Code of Australia 2011 was modified to align with the federal legislation. The aim of this alignment/inclusion was to ensure that where a building complies with the relevant sections of the BCA, it is deemed to comply with the 'premises' component of the DDA relevant to buildings. However, it is to be noted that compliance with the BCA alone does not necessarily mean compliance with the Disability Discrimination Act, provisions of which extend beyond the building itself.

2.1 Council development approval / development control plans (DCPs)

Further to the above listed Federal and State based legislative considerations, adherence to the name of Development Control Plan is required. Specifically:

- + Standard D17 of Clause 58 of Merri-Bek Council's Planning Scheme
- + Better Apartments Design Standards (BADs)

The proposed development must not be inconsistent with the endorsed drawings and all relevant conditions will need to be satisfied and accurately reflect the construction issue drawings.

3.0 Documentation reviewed

This report is specific to the following key stage drawings.

Architectural Plans Prepared by Pace Building Group Pty Ltd			
Drawing Number	Revision	Date	Title
TP SECONDARY CONSENT	TP - D	10.04.2026	TP_BRUNSWICK_SECONDARY CONSENT

4.0 Design requirements

The following highlights the key accessibility features that are to be addressed as the design progresses. It should be noted that for technical specifications, relevant Australian Standards are to be utilised.

4.1 Class 2 better apartments design guideline

4.1.1 Accessibility Requirement

In accordance with the BCA, a Class 2 building has no minimum requirement for the provision of accessible units.

However, in accordance with Planning Victoria Provisions, Clause 55.07 (building less than 5 storeys; or 58 (5 storeys and above), the following is required.

The following Council requirements are also addressed:

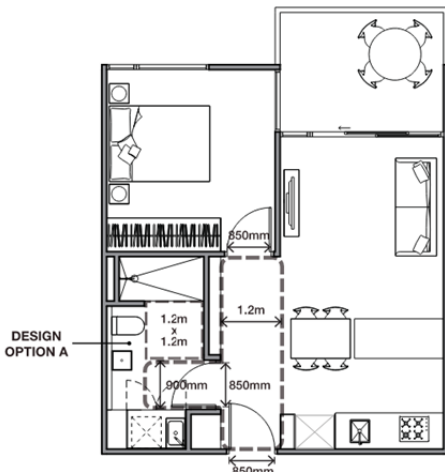
- + Standard D17 of Clause 58 of Merri-Bek Council's Planning Scheme
- + Better Apartments Design Standards (BADS)

4.1.2 Subject site – access assessment

The drawings demonstrate that they are capable of complying with the following accessibility components:

Item	Room/Item	Current Status
General Access		
1.	At least 50% of dwellings to meet the accessibility standards - Type 1 B - 1 bedroom – three apartments - Type 1 C-A - 1 bedroom – three apartments - Type 1 C-B - 1 bedroom – three apartments - Type 1 C-C - 1 bedroom – three apartments - Type 1 C-D - 1 bedroom – three apartments - Type 1 E-A - 1 bedroom – one apartment - Type 1 E-B - 1 bedroom – one apartment - Type 1 G-A - 1 bedroom – one apartment - Type 1 G-B - 1 bedroom – five apartments - Type 1 H-A - 1 bedroom – one apartment - Type 1 H-B - 1 bedroom – five apartments - Type 1 J - 1 bedroom – four apartments - Type 1 K - 1 bedroom – two apartments - Type 1 N-A - 1 bedroom – one apartment - Type 1 N-B - 1 bedroom – one apartment - Type 1 N-C - 1 bedroom – one apartment - Type 1 N-D - 1 bedroom – one apartment	Capable of complying

Item	Room/Item	Current Status
	- Type 1 P-A - 1 bedroom – two apartments - Type 1 P-B - 1 bedroom – two apartments - Type 1 U-A - 1 bedroom – four apartments - Type 1 U-B - 1 bedroom – two apartments - Type 1 X - 1 bedroom – one apartment - Type 2 C - 2 bedroom – three apartments - Type 2 D - 2 bedroom – three apartments - Type 2 E - 2 bedroom – three apartments - Type 2 L - 2 bedroom – two apartments - Type 2 P - 2 bedroom – one apartment - Type 2 Q - 2 bedroom – one apartment - Type 2 S - 2 bedroom – one apartment - Type 2 T - 2 bedroom – one apartment - Type 2 U - 2 bedroom – one apartment - Type 2 Y - 2 bedroom – two apartments - Type 2 Z - 2 bedroom – one apartment Total accessible apartments = 69 apartments	
2.	A clear opening width of at least 850mm is available at the entrance to the dwelling	Capable of complying
3.	A clear opening width of at least 850mm is available at the main bedroom	Capable of complying
4.	A clear path of travel with a minimum width of 1200mm which connects the dwelling entrance to the main bedroom	Capable of complying
5.	A clear path of travel with a minimum width of 1200mm which connects the dwelling entrance to an adaptable bathroom	Capable of complying
6.	A clear path of travel with a minimum width of 1200mm which connects the dwelling entrance the living area	Capable of complying
7.	A main bedroom with access to an adaptable bathroom (see below)	Capable of complying
Bathrooms		
8.	At least one adaptable bathroom that meets all the requirements of either Design A or Design B (Table D4 BADS)	Capable of complying
Design Option A		
9.	A clear 850mm wide door opening	Capable of complying
10.	Door Design Either:	

Item	Room/Item	Current Status
a	A sliding door	Not applicable
b	A door that opens outwards; or	Not applicable
c	A door that opens inwards that is clear of the circulation area and has readily removable hinges – lift off hinges would be required to be addressed as the design progresses	Compliance readily available
11.	Circulation area A clear circulation area that is:	
12.	A minimum area of 1200mm by 1200mm	Capable of complying
13.	Located in front of the shower and the toilet	Capable of complying
14.	Clear of the toilet, basin and the door swing. Note: The circulation area for the toilet and shower can overlap	Capable of complying
Path to circulation area		
15.	A clear path with a minimum width of 900mm from the door opening to the circulation area – based upon additional space noted beyond the 880mm detailed at the door.	Capable of complying
Shower		
16.	A hobless (step-free) shower	Capable of complying
Toilet		
17.	A toilet located in the corner of the room	Capable of complying
 1 BEDROOM ACCESSIBILITY Example Design Option A		
Design Option B		

Item	Room/Item	Current Status
1.	Clear 820mm wide door opening located opposite the shower	Not applicable
2.	Door Design Either:	
a	A sliding door	Not applicable
b	A door that opens outwards; or	Not applicable
c	A door that opens inwards and has readily removable hinges	Not applicable
	Circulation area A clear circulation area that is:	
3.	A minimum width of 1000mm	Not applicable
4.	The full length of the bathroom and a minimum length of 2700mm	Not applicable
5.	Clear of the toilet and basin Note: The circulation area can include a shower area	Not applicable
	Shower	
6.	A hobless (step-free) shower that has a removable shower screen and is located on the furthest wall from the door opening - shower screen to demonstrate it's removable in the next phases of design	Not applicable
	Toilet	
7.	A toilet located closest to the door opening and clear of the circulation area	Not applicable
 Example Design Option B		

It is expected that at Construction Certification stage documentation will address, in finer detail, information relevant to the above requirements.

5.0 Compliance summary

As a member of the Access Consultants Association (ACA), I have reviewed the Development Application documentation (refer above) against the current requirements for access and mobility against the following:

- + Standard D17 of Clause 58 of Merri-Bek Council's Planning Scheme
- + Better Apartments Design Standards (BADs)

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

It is anticipated that within the next stage of the design process, additional detail will be available and reviewed.

If you've any questions in relation to this report, please contact the writer.

Review undertaken by:

Iris Tran
Graduate Accessibility Consultant