Morris Goding
Access Consulting

Taylor Construction

59- 73 Felton Road and Part of 183 Pennant Hills Road, Carlingford NSW, 2118.

SSDA High Level Accessibility Report - V2 (amended)

26th May 2021

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REPORT REVISIONS		
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29/04/2021	V1	DR-A-A100 Rev 4, DR-A-B100 Rev 2, DR-A-C140 Rev 2, DR-A-J100 Rev 4, DR-A-X100 Rev 3, DR-A-X101 Rev 3, DR-A-X102 Rev 3, DR-A-Y100 Rev 3, DR-A-Y101 Rev 3, DR-A-Y102 Rev 3, DR-A-S100 Rev 1, DR-A-S101 Rev 3, DR-A-S102 Rev 3.
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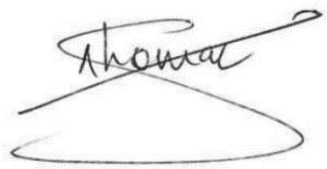
This report prepared by:



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1. Executive Summary

The Access Review Report is a key element in the design development located at 59- 73 Felton Road and Part of 183 Pennant Hills Road, Carlingford NSW, 2118 and an appropriate response to the AS1428 series, Building Code of Australia (BCA), DDA Access to Premises Standards (including DDA Access Code) and ultimately the Commonwealth Disability Discrimination Act (DDA).

Morris-Goding Accessibility Consulting has prepared the Access Report to provide advice and strategies to maximise reasonable provisions of access for people with disabilities.

The review will ensure that ingress and egress, paths of travel, circulation areas, and sanitary facilities comply with relevant statutory guidelines, and in addition, compliance with a higher level of accessibility and inclusiveness benchmarks set by the project.

1.2 Scope of Works

The following upgrades are proposed to Carlingford West Public School:

- Proposed upgrades will cater for a capacity of 1,610 students
- Construction of 2 new buildings:
    - Building X - A three storey building that contains 24 new homebases
    - Building Y - A 3 storey building containing 22 Homebases, 6 special program rooms and a single storey library, linking the 2 site entry points and includes a covered outdoor learning area below.
- Car park with 53 parking spaces for staff and visitors, and associated traffic strategy for the precinct
- Reconfiguration of the current kiss-and-drop zone at Felton Road East and West.
- Landscaping masterplan for the entire school
- Associated signage, civil works, utilities and services to support the proposed upgrades.

1.3 SEAR's Response

SEAR ITEM: 20 - DDA and accessibility report

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2. Introduction

2.1 Background

Taylor Construction has engaged Morris-Goding Accessibility Consulting, to provide a design review of Carlingford West Public School. The development consists of

The proposed development falls under a number of BCA classifications:

- Class 7a (carpark)
- Class 9b (school)

The requirements of the investigation are to:

- Review supplied drawings of the proposed development;
- Provide a report that will analyse the provisions of disability design of the development, and
- Recommend solutions that will ensure the design complies with the Disability Discrimination Act (DDA), Building Code of Australia (BCA), relevant Australian Standards, and enhanced benchmark requirements set by the project.

2.2 Objectives

The Report seeks to ensure compliance with statutory requirements and enhanced benchmark requirements set by the project. The Report considers user groups, who include students, staff, and members of the public. The Report attempts to deliver equality, independence and functionality to people with a disability inclusive of:

- People with a mobility impairment (ambulant and wheelchair);
- People with a sensory impairment (hearing and vision); and
- People with a dexterity impairment

The Report seeks to provide compliance the Disability Discrimination Act 1992. In doing so, the report attempts to eliminate, as far as possible, discrimination against persons on the ground of disability.

2.3 Limitations

This report is limited to the accessibility provisions of the building in general. It does not provide comment on detailed design issues, such as: internals of accessible/ambulant toilet, fit-out, lift specification, slip resistant floor finishes, door schedules, hardware and controls, glazing, luminance contrast, stair nosing, TGSIs, handrail design, signage etc. that will be included in construction documentation.

2.4 Accessibility of Design

The proposed design will utilise the Federal Disability Discrimination Act (DDA), Disability (Access to Premises – Buildings) Standards 2010, BCA/DDA Access Code, Universal Design principles, the AS 1428 Series, and other design guidelines, to develop appropriate design documentation, to provide reasonable access provisions for people with disabilities.

The Project Architect and an appropriately qualified accessibility consultant will examine key physical elements during design development stage, to identify physical barriers and incorporate solutions as a suitable response to disability statutory regulations and other project objectives.

The design will be developed to ensure the principles of the DDA are upheld. Under the 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 premise, makes it impossible or unreasonably difficult for people with disabilities to make use of a particular service or amenity.

The design will comply with the requirements of the DDA Access to Premises Standards and include requirements for accessible buildings, linkages and the seamless integration of access provisions compliant with AS1428.1. The developed design will consider all user groups, who include members of the public, visitors, students and staff members.

2.5 Statutory Requirements

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 disabilities will be in accordance with:

- Federal Disability Discrimination Act (DDA);
- Disability (Access to Premises – Buildings) Standards 2010;
- Building Code of Australia (BCA) Part D3, F2, E3;
- AS 1428.1:2009 - (General Requirement of Access);
- AS1428.2 – 1992, Part 2: Enhanced and Additional Requirements – Buildings and Facilities.
- AS 1428.4.1:2009 - (Tactile Ground Surface Indicators);
- AS 2890.6:2009 - (Parking for People with Disabilities);
- AS 1735.12:1999 - (Lift Facilities for Persons with Disabilities);
- Educational Facilities Standards and Guidelines (EFSG); DG19 Access for People with Disabilities (19.01- 19.04)

Please note that there are also additional advisory standards (not currently referenced by BCA or DDA Premises Standards) as well as other relevant guidelines that will be considered, as relevant to promote equity and dignity in line with over-arching DDA principles and aspirational objectives. These include:

- Universal Design Principles;
- Human Rights Commission (HEREOC)
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture;
- AS1428.2:1992 Enhanced and Additional requirements;
- AS1428.4.1 Draft Way-finding Standard;
- AS3745:2010 – Planning for Emergencies in Facilities (to assist with design strategies for provision for escape for people with disability that may require assistance)

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3. General Access Planning Considerations

The Disability Discrimination Act 1992 (DDA) is a legislative law that protects the rights of all people. The Act makes disability discrimination unlawful and promotes equal rights, equal opportunity and equal access for people with disabilities. The Australian Human Right Commission is the governing body who control and enforce DDA compliance.

Nevertheless, building elements that provide insufficient accessible provisions for people with disabilities remain subject to the DDA. The improvement of non-compliant building elements and areas to meet current access requirements will mitigate the risk of a DDA complaint be made against the building owner.

Since the 1st May 2011, the Commonwealth's Disability (Access to Premises – Buildings) Standards 2010 (DDA Premises Standards) apply to all new building works and to affected parts of existing buildings.

The DDA Premises Standards' requirements (DDA Access Code) are mirrored in the access provisions of the BCA. New building work and affected parts must comply with the DDA Premises Standards and AS1428.1-2009 in the same manner as they would comply with the BCA by meeting deemed-to-satisfy provisions or by adopting an alternative solution that achieves the relevant performance requirements.

By utilizing AS 1428 suite of Standards, the overall aim is to provide continuous accessible paths of travel to connect the proposed development to and through public domain areas and between associated accessible buildings in accordance with the DDA Access Code.

MGAC supports the use and consideration of universal design (UD) principles into the design to maximize access for all people. We will assist the design team to incorporate UD principles where possible within the project, while still meeting mandatory compliance requirements.

A UD approach has numerous benefits for the client as an education provider, for businesses within the building, for individual users and for society in general. An inclusive environment that can be accessed, understood and used by as many people as possible, is good business sense, is more sustainable and is socially progressive, in line with the aims of the DAP.

Universal design principles consider the needs of a broad range of people including older people, families with children and pushing prams, people from other cultures and language groups, visitors in transit and people with disability. By considering the diversity of users, the design will embed access into and within it, so that benefits can be maximized, without adding on specialized 'accessible' features that can be costly, visually unappealing and may perpetuate exclusion and potential stigma.

The seven key Universal design principles to consider in the on-going design include:

- Principle 1: Equitable Use
- Principle 2: Flexibility in Use
- Principle 3: Simple and Intuitive Use
- Principle 4: Perceptible Information
- Principle 5: Tolerance for Error
- Principle 6: Low Physical Effort
- Principle 7: Size and Space for Approach and use

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4. Ingress & Egress

4.1 External Linkages

The BCA and DDA Premises Standards contain requirements for site approaches for the use of persons with disabilities. These requirements can be summarised as follows:

- It will be necessary to provide an accessible path of travel from main pedestrian entry points at the site allotment boundary to all building entrances compliant with AS1428.1:2009.
- An accessible path of travel between buildings (or parts of buildings) that are connected by a pedestrian linkage, within the site allotment boundary, compliant with AS1428.1:2009 is also required.
- An accessible path of travel to building entrances (required to be accessible) from associated accessible car-parking bays, compliant with AS1428.1:2009 is required.

In addition, the provision for Educational Facilities Standards and Guidelines and AS1428.2-2009 are also required to be integrated within the design of the premises. The requirements can be summarised for external linkages:

- Unobstructed width of walkway, corridor and ramps must not be less than 1350mm Compliant with EFSG.
- Path of travel less than 1800mm wide shall be provided with passing bays every 6m.

Assessment

Capable of achieving compliance.

Provide an accessible path of travel compliant with AS1428.1 and EFSG from all main pedestrian entry points at the site boundary to the principal pedestrian entrance/s of the building.

For multiple building entries, ensure to provide an accessible path of travel, compliant with AS1428.1 and EFSG to and through 50% of entrances including the principal pedestrian entrance.

Ensure any direct pedestrian linkages (i.e. not public footpath) from associated accessible buildings are compliant with AS1428.1 and EFSG. These are yet to be detailed.

Further detail demonstrating linkages must show gradients and intervals.

Provide an accessible path of travel, compliant with AS1428.1 and EFSG from accessible car parking space/s on the site to the main entrance.

Confirm all details at further design stages.

4.2 Entrances

The BCA and DDA Premises Standards contain requirements for building entry for the use of persons with disabilities. These requirements can be summarised as follows:

- Access is required through at least 50% of entrances, including the principal pedestrian entrance/s to all buildings or parts of buildings (ie. when they have a separate function and/or use eg. external retail tenancy). Note it is preferred that all entrances are accessible.
- A non-accessible entry cannot be located more than 50m distance from an accessible entry (for buildings greater than 500m2).
- All accessible doors to have 850mm min. clear width opening and suitable door circulation area, compliant with AS1428.1:2009. Note: Manual doors require lightweight door forces to be operable by people with disabilities (20N max.). We recommend that main entrances include automated sliding doors to be used where possible. Revolving doors are not accessible, if maintained an alternate accessible door is required adjacent.
- An accessible path of travel eg. ramp or lift needs to be provided adjacent (or in reasonable proximity) to any stair access. Note: providing choice of access route directly adjacent so that people can start and finish in the same location/travel similar route promotes inclusion and UD principles.

In addition, the provision for Educational Facilities Standards and Guidelines and AS1428.2-2009 are also required to be integrated within the design of the premises. The requirements can be summarised for Entrances:

- Entrances are to be provided with an 850mm min. clear width opening in conjunction with a 50mm increase in horizontal dimensions requirements (i.e. latch side 510mm clearance now requires 560mm) and 100mm increase in longitude dimensions (i.e. 1450mm depth is not 1550mm depth)

Assessment

Capable of achieving compliance.

Ensure entrances to all facilities are provided with level threshold.

Confirm all details at further design stages.

4.3 Emergency Egress

BCA 2016 Part D2.17 has requirements for all fire-isolated egress stairs from areas required to be accessible (not communication stairs) to include at least one continuous handrail designed to be compliant with AS1428.1 Clause 12. Provision of an off-set tread at the base of stair flights or an extended mid-landing that will allow a 300mm extension clear of egress route is considered appropriate for achieving a consistent height handrail (without vertical or raked sections). Such an off-set tread configuration has been shown at the majority of stairs and would appear to be possible elsewhere, subject to further detail design.

Where fire-isolated egress stairs will also be used for communication stair purposes between levels, they should be designed to meet AS1428.1:2009. Confirmation is required on the likely use of certain stairs for this purpose.

There is currently no mandatory requirement within BCA or DDA Premises Standards for provision of independent accessible egress for people with a disability in accordance AS1428.1 and this remains an important DDA issue. Consideration of an accessible egress strategy with emergency evacuation plan will be needed as a minimum starting point.

Consideration of waiting spaces within fire-stairs should be strongly considered for people with mobility impairment. The current configuration of stairs suggests the spatial requirements would not be incorporated without layout amendments, but if provided with future design development these would generally require:

- 850mm min. clear width egress door and 510mm min. external door circulation area, compliant with AS1428.1:2009;
- Wheelchair space (800mm W x 1300mm L min. dimensions) within fire-isolated stair, outside of the required egress path, that can be accessed on a continuous path of travel.
- Alternative evacuation means eg. emergency passenger lift/s could be provided instead of/or only in addition to ‘waiting spaces’ in line with ABCB Handbook and/or consideration of stair evacuation devices (with appropriate storage and staff training) within fire stairs.

Assessment:

Capable of achieving compliance.

All fire isolated stairways appear to comply.

Confirm all details at further design stages.

5. Paths of Travel

5.1 Circulation Areas

The BCA and DDA Premises Standards contain requirements for circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- Wheelchair passing bays (1800mm width x 2000 length) are also required when a direct line of sight is not available and are to be provided at 20m max. intervals along access-ways.
- Turning spaces (at least 1540mm W x 2070mm L) are required within 2m of every corridor end and at 20m.max intervals along all access-ways. This is needed for wheelchairs to make a 180-degree turn, compliant with AS1428.1:2009.
- All common-use doors (ie. not excluded under Part D3.4) to have 850mm min. clear width opening (each active door leaf) and suitable door circulation area, compliant with AS1428.1:2009.
- All common-use corridors and accessible paths of travel to be at least 1000mm min. width when travelling in linear direction). Note: Increased clear width paths of travel required for doorway circulation, turning areas etc.

In addition, the provision for Educational Facilities Standards and Guidelines and AS1428.2-2009 are also required to be integrated within the design of the premises. The requirements can be summarised for Circulation Areas:

- Doorways are to be provided with an 850mm min. clear width opening in conjunction with an increase in door circulation requirements (i.e. latch side 510/530mm clearance now requires 560/580mm) and 100mm increase in longitude dimensions (i.e. 1450mm depth is not 1550mm depth)
- Unobstructed width of walkway, corridor and ramps must not be less than 1350mm Compliant with EFSG.
- Path of travel less than 1800mm wide shall be provided with passing bays every 6m.
- Any abrupt change in level greater than 3mm shall be provided with a kerb ramp, ramp or a lift.

Assessment

- *Path of Travel*
  - *Capable of achieving compliance.*
  - *Slip resistance at all paths, ramps and stairs to comply with SA:HB198.*
  - *Lift or ramp sections to be provided at non accessible path of travel (where stairs are provided only) to ensure compliance with AS1428.1 and the DDA Premises Standards.*

- *Where corridors are less than 2000mm, passing bays (1800mm W x 2000mm L) are to be provided at 6m max. intervals, and within areas where direct line of sight are not provided in accordance with AS1428.2 and Educational Facilities Standards and Guidelines.*

- *Ensure a vertical change of not more than 3mm occurs between two surfaces along a continuous accessible path of travel in accordance with AS1428.2 and Educational Facilities Standards and Guidelines.*

- *Unobstructed width of a walkway, corridors and ramps must not be less than 1350mm, except a ramp providing access to the raised platform within a hall which need only have an unobstructed clear width of a 1000mm.*

- *Door Circulation*

  - *Clear width of door openings are required to be minimum 850mm clear width.*

  - *Hinged doors require greater hinge side clearance to ensure 160mm min. width on hinge side (door opens both towards and away from user) to comply with AS1428.2 and Educational Facilities Standards and Guidelines.*

  - *Hinged doors require greater latch side clearance to ensure 560mm min. width on latch side (door opens away from the user) to comply with AS1428.2-2009 and Educational Facilities Standards and Guidelines.*

  - *Hinged doors (common use) require greater latch side clearance to ensure 580mm min. width on latch side (door opens toward user) to comply with AS1428.2. and Educational Facilities Standards and Guidelines.*

Confirm all details at further design stages.

5.2 Passenger Lifts

The BCA and DDA Premises Standards contain requirements for passenger lifts and circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- Passenger lifts to have min. internal size at floor of 1400mm width x 1600mm depth, compliant with BCA/DDA Access Code Part E3.6 and AS1735.12.
- All lift lobbies and main corridors on each level to have 1800mm min. clear width to allow two wheelchairs ability to space pass each other.

In addition, the provision for Educational Facilities Standards and Guidelines and AS1428.2-2009 are also required to be integrated within the design of the premises. The requirements can be summarised for Passenger Lifts:

- Lifts shall comply with AS 1735.12 except that floor area in lifts shall be increased 300mm in each direction, from the minimum size specified in AS1735.12

Assessment

Capable of achieving compliance.

In accordance with AS1428.2 and Educational Facilities Standards and Guidelines, lifts are now required to be increased 300mm in each direction from the minimum size specified in AS1735.12. Lift compartment sizes are now to be in min. dimension of 1700mm wide x 1900mm length.

Confirm all details at further design stages.

5.3 Stairs & Ramps

The BCA and DDA Premises Standards contain requirements for stairs and ramps for the use of persons with disabilities. These requirements can be summarised as follows:

- Ramps are to have maximum 1:14 gradient with landings at no more than 9 metre intervals.
- Ramps are to have handrails on both sides with minimum 1 metre clearance in accordance with AS1428.1
- Landings are to have 1200mm length with 1500mm length at 90 degree turns.
- Stairs are to have handrails on both sides in accordance with AS1428.1
- Stairs and ramps are to be offset to ensure no encroachment of handrail extensions into from transverse path of travel at top and bottom of stair/ramp.

In addition, the provision for Educational Facilities Standards and Guidelines and AS1428.2-2009 are also required to be integrated within the design of the premises. The requirements can be summarised for Stairs & Ramps:

- Stairs are now required to have an additional set of handrails compliant with AS1428.2
- (Advisory) Grabrails are now required to be slip-resistant in wet and outdoor areas.
- Ramps are to be provided with landings every 6m in accordance with EFSG.
- Walkways are now required to be provided with a min. 1350mm clear width.

Assessment

- *Stairs*
  - *Capable of achieving compliance.*
  - *Nosings to comply with AS1428.1 at all stairs.*
  - *Two handrails are to be fitted at stairs as per AS1428.2 with sufficient 1000mm minimum clearance between handrails at consistent heights at both 865-900mm and 665mm-700mm throughout. Handrail's extensions and arch and gap clearances to comply with AS1428.2 as well.*
  - *TGSI's to be fitted at top and bottom of all stairs in accordance with AS1428.1 and AS1428.4.1.*

- *Ramps and Walkways*

  - Kerbing to all ramps and walkways to comply with AS1428.1.

  - Ramp handrails to comply with AS1428.1. Handrails to be fitted at stairs as per AS1428.1 and AS1428.2 with sufficient 1000mm minimum clearance between handrails and at one consistent height between 865-1000mm throughout. Handrail's extensions and arch and gap clearances to comply with AS1428.1.

  - TGSI's to be fitted at top and bottom of all stairs in accordance with AS1428.1 and AS1428.4.1.

  - Ramps are to have 1:14 gradient and appropriate level landings top and bottom, at 6m intervals in accordance with the Educational Facilities Standards and Guidelines.

  - Walkways with landings at intervals no greater than 25m are required to be constructed at a gradient of 1:33.
  - Ensure walkway 1:20 walkways have suitable landings at 15m max. intervals, compliant with AS1428.1 (see Landings section).

  - Ensure walkway 1:40 walkways compliant with AS1428.1.

  - Walkways are to also be ensured to comply with Educational Facilities Standards and Guidelines under AS1428.2, with the exclusion of cl. 8.1a, where walkways are now required to be 1350mm wide.

Confirm all details at further design stages.

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6. Facilities & Amenities

6.1 Sanitary Facilities

The BCA and DDA Premises Standards contain requirements for sanitary facilities suitable for the use of persons with disabilities. These requirements can be summarised as follows:

- For Class 9b: Provide at least 1 unisex accessible toilet, adjacent to every bank of toilets (where provided) on each storey, compliant with AS1428.1 under BCA/DDA Access Code part F2.4. If more than 1 toilet bank provided on each level, accessible toilet is required at 50% min. of toilet banks at each level.
- For Class 9b: If common-use change facilities provided (ie. both toilets and showers) a separate combined accessible WC/shower adjacent to male and female change rooms is required, compliant with AS1428.1 under BCA/DDA Access Code Part F2.4.
- An even number of left hand (LH) and right hand (RH) transfer WC pans (accessible toilets) is required within the building. Alternating LH/RH layouts on each subsequent level is the most appropriate and inclusive approach.
- Accessible WC requires 2300mm x 1900mm around the pan with the basin to sit outside this area in accordance with AS1428.1.
- An ambulant cubicle is required within every standard toilet bank adjacent to an accessible toilet under DDA Access Code Part F2.4 compliant with AS1428.1:2009.

In addition, the provision for Educational Facilities Standards and Guidelines and AS1428.2-2009 are also required to be integrated within the design of the premises. The requirements can be summarised for Sanitary Facilities:

- Provision of the door circulation spaces mentioned in cl. 11.5.2 of AS1428.2

<u>Assessment</u>

Capable of achieving compliance.

Ensure a balance of left and right-handed WC pans within the building.

Provide amenities within ACC WC same as the change rooms or make change rooms compliant with AS1428.1.

PCA to confirm whether Unisex Ambulant Cubicles are permitted within Block Y.

Confirm all details at further design stages.

6.2 Common Areas

The BCA and DDA Premises Standards contain requirements for common use areas suitable for the use of persons with disabilities. These requirements can be summarised as follows:

- Accessibility is required to common use courtyards within buildings
- Mailboxes and garbage rooms will require appropriate accessibility.
- Wheelchair access is required to any external and outdoor terrace areas including roof terraces compliant with AS1428.1.

Assessment

Capable of achieving compliance.

Despite the difficulties with the nature of the site, further detail will be required to ensure linkages to common areas are deemed compliant under AS1428.1 and Educational Facilities Standards and Guidelines.

Confirm all details at further design stages.

6.3 Car Parking

The BCA and DDA Premises Standards contain requirements for parking which are applicable to this project. These requirements can be summarised as follows:

- 9b development: Provide 1 accessible car bay for every 100 car bays or part thereof, compliant with AS2890.6.
- Accessible car bays require 2.4 metre with 2.4 metre shared area.
- All accessible car bays to be located near relevant lifts and/or associated building entry points to minimise distance to relevant lift and ensure accessible path of travel between these areas.
- Ensure 2.5m min. height clearance, compliant with AS2890.6 fig 2.7 over accessible car bays with 2.2 m min. vertical clearance leading to the accessible and adaptable unit car bays (Note: consideration for 2.3 or 2.4m min. height preferred for higher vans/adapted vehicles is recommended as good practice).

Assessment

Capable of achieving compliance.

Car Parking Bays are compliant with AS2890.6.

Confirm all details at further design stages.

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7. Conclusion

MGAC has assessed the proposed scheme for Buildings X and Y of 59- 73 Felton Road and Part of 183 Pennant Hills Road, Carlingford NSW, 2118. The proposed drawings indicate that accessibility requirements, pertaining to external site linkages, building access, common area access, sanitary facilities and parking can be readily achieved. It is advised that MGAC will work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in building design and external domain design.