

Accessibility Design Review Report

Project Title:	Greenwich Hospital Redevelopment River Road, Greenwich
Job Number:	20495

Date: 11 August 2022

Prepared For: TSA Management

Report Version:

20495_ADR _SSDA_v1.3

Ref: 20495 - River Rd, Greenwich-ADR-DA - v1.3

ABE Consulting Pty Ltd | ABN 69 163 787 826 Ph: 02 8065 0400 Level 1, 280 Norton Street, Leichhardt NSW 2040 info@abeconsulting.com.au | www.abeconsulting.com.au

1.0	INTRODUCTION
	1.1 Project Information & Classification4
	1.2 Purpose of the Report4
	1.3 Report Scope
	1.4 Limitations of the Report
	1.5 The Disability (Access to Premises – Building) Standards 20107
2.0	ACCESSIBILITY DESIGN REVIEW8
	BCA Part D3 – ACCESS FOR PEOPLE WITH DISABILITIES9
	Cl. D3.1: General building access requirements9
	Cl. D3.2: Access to Buildings12
	Cl. D3.3: Parts of buildings to be accessible13
	Cl. D3.4: Exemptions
	Cl. D3.5: Accessible carparking16
	Cl. D3.6: Signage
	Cl. D3.7: Hearing augmentation18
	Cl. D3.8: Tactile indicators
	Cl. D3.9: Wheelchair seating spaces in Class 9b assembly buildings20
	Cl. D3.10: Swimming pools20
	Cl. D3.11: Ramps
	Cl. D3.12: Glazing on an accessway21
	BCA Part E3 – LIFT INSTALLATIONS
	Cl. E3.6: Passenger lifts
	BCA Part F2 – SANITARY AND OTHER FACILITIES
	Cl. F2.4: Accessible sanitary facilities
3.0	SEPP SENIOR 2004 REQUIREMENTS
4.0	ACCESSIBILITY COMPLIANCE STATEMENT
5.0	REVIEW PROVIDED BY

Report Status	Revision	Date	Details
Draft	1.0	01 April 2022	For review and comment
Final	1.1	08 April 2022	For development application
Final	1.2	06 May 2022	For development application
Final	1.3	11 August 2022	For resubmission



ACCESSIBILITY DESIGN REVIEW

PROJECT:Greenwich Hospital Redevelopment**LOCATION:**River Road, Greenwich

1.0 INTRODUCTION

This report provides an Accessibility Design Review of the proposed works Greenwich Hospital, located on River Rd, Greenwich.

This Accessibility Design Review is submitted to the Department of Planning, Industry and Environment (DPIE) in support of a State Significant Development Application (SSD-13619238) for the redevelopment of Greenwich Hospital into an integrated hospital and seniors living facility on land identified as 97-115 River Road, Greenwich (the site). The extent of the site is shown below.



The Site

NOT TO SCALE

The subject proposal is for the detailed design and construction of the facility following its concept approval under SSD-8699. Specifically, SSD-13619238 seeks approval for the following:

- Demolition of the existing hospital building and associated facilities at the site;
- Construction of a new hospital facility and integrated healthcare campus comprising of hospital, residential aged care, seniors housing, overnight respite, across:
 - A new main hospital building up to RL 80.0;
 - Two new seniors living buildings, Northern building up to RL 56.36, and Southern building up to RL 60.65;



- A new respite care building up to RL 56.9;
- Construction of associated site facilities and services, including pedestrian and vehicular access and basement parking;
- Site landscaping and infrastructure works; and
- Preservation of Pallister House which will continue to host dementia care and administrative functions.

In accordance with section 4.39 of the Environmental Planning & Assessment Act 1979 (EP&A Act), the Secretary's Environmental Assessment Requirements (SEARs) for SSD-13619238 were issued on 24 February 2021. This report has been prepared to respond to the following SEARs:

SEARs	Report section
Key issues	Section 3.0
The EIS must address the following specific matters:	
Statutory Context, Strategic Context and Policies Address the statutory provisions contained in all relevant legislated and draft environmental planning instruments, including but not limited to:	
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004.	
Plans and Documents	Section 3.0
In addition to the plans and documents required in the General Requirements and Key Issues sections above, the EIS must include the following:	
• Accessibility Report, including addressing how the proposal would satisfy clause 26 of the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004.	

1.1 Project Information & Classification

It is understood the following Building Code of Australia 2019 building classification(s) apply to the subject building (to be confirmed by the BCA Consultant / PCA) –

Building/Level/Part	Building Classification	Use
Carparks	Class 7a	Parking
Seniors Living North & South	Class 9c	Residential SOUs
Health & Care Building	Class 9a/9c	Health care facilities
Respite Building	Class 9a/9c	Respite care

1.2 Purpose of the Report

TSA Management engaged the services of ABE Consulting as Accessibility Consultants for this project to undertake an assessment of the proposed design documentation in relation to the accessibility related requirements as identified in Part 1.3 of this report for SSDA submission.



1.3 Report Scope

This report provides an Accessibility Design Review of the relevant project architectural documentation in the context of the following –

- Part D3, Clause F2.4 and Clause E3.6 'deemed-to-satisfy' (DtS) requirements of the Building Code of Australia 2019 (BCA)
- The Disability (Access to Premises Buildings) Standards 2010;
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 -
 - Chapter 3, Part 2 Clause 26
 - Schedule 3 Standards concerning accessibility and usability for hostels and self-contained dwellings.

This Accessibility Design Review is based on -

• Architectural design documentation prepared by Bickerton Masters, Project No. 01605, as follows -

Dwg#	Title	Date - Rev
DD-HST-0100	H&C - OVERALL PLAN - L1	01.04.2022 - P18
DD-HST-0101	H&C - OVERALL PLAN - L2	01.04.2022 - P17
DD-HST-0102	H&C - OVERALL PLAN - L3	01.04.2022 - P20
DD-HST-0103	H&C - OVERALL PLAN - L4	01.04.2022 - P17
DD-HST-0104	H&C - OVERALL PLAN - L5	04.08.2022 – P24
DD-HST-0105	H&C - OVERALL PLAN - L6	04.08.2022 – P23
DD-HST-0106	H&C - OVERALL PLAN - L7	04.08.2022 – P22
DD-HST-0107	H&C - OVERALL PLAN - L8	01.04.2022 - P15
DD-HST-0108	H&C - OVERALL PLAN - L9	01.04.2022 - P15
DD-HST-0109	H&C - OVERALL PLAN - L10	01.04.2022 - P15
DD-RS-0200	RS -GENERAL ARRANGEMENT PLAN -L1	01.04.2022 - P2
DD-RS-0201	RS -GENERAL ARRANGEMENT PLAN -L2	01.04.2022 - P2
DD-RS-0202	RS -GENERAL ARRANGEMENT PLAN -L3	01.04.2022 - P2
DD-SL-0100	SL - OVERALL PLAN - L1	01.04.2022 - P8
DD-SL-0101	SL - OVERALL PLAN - L2	01.04.2022 - P8
DD-SL-0102	SL - OVERALL PLAN - L3	01.04.2022 - P8
DD-SL-0103	SL - OVERALL PLAN - L4	01.04.2022 - P8
DD-SL-0104	SL - OVERALL PLAN - L5	01.04.2022 - P8
DD-SL-0105	SL - OVERALL PLAN - L6	01.04.2022 - P8
DD-SW-0100	EXISTING SITE PLAN	01.04.2022 - P14
DD-SW-0101	PROPOSED SITE PLAN	01.04.2022 - P15

- The Building Code of Australia 2019 (BCA) prepared by the Australian Building Codes Board.
- The Guide to the BCA 2019, prepared by the Australian Building Codes Board.
- The Disability (Access to Premises Building) Standards 2010.
- Australian Standards AS1428.1-2009 Design for Access and Mobility Part 1: General requirements for access New building work.
- Australian Standards AS1428.4.1:2009 Design for Access and Mobility Part 4.1: Means to assist the orientation of people with vision impairment Tactile ground surface indicators.
- Australian Standards AS2890.6-2009 Off-street parking for people with disabilities.
- Australian Standards AS4299-1995 Adaptable housing.



- Australian Standards AS 2890.1-1993 Parking facilities, Part 1: Off street parking.
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 -
 - Chapter 3, Part 2 Clause 26
 - Schedule 3 Standards concerning accessibility and usability for hostels and self-contained dwellings.

1.4 Limitations of the Report

The Disability Discrimination Act (DDA - 1992) is a Federal Government legislation enacted in 1993 that seeks to ensure all new building infrastructure, refurbishments, services and transport projects provide functional, equitable and independent accessibility. The DDA is a complaints based legislation, which is administered by the Australian Human Rights Commission (AHRC). For any built environment the key requirement of the DDA is to ensure functionality, equity and independence of movement by people with disabilities, their companions, family and carer givers.

A key component of compliance to the DDA is the use of the Disability (Access to Premises - Buildings) Standards 2010, Part D3, Clause F2.4 and Clause E3.6 of the Building Code of Australia 2019 (BCA) and the relevant referenced standards primarily being Australian Standards Suite AS1428 and Australian Standards AS2890.6 – Off-street parking for people with disabilities. The AS 1428 series details technical requirements related to design for access and mobility.

The Building Code of Australia has adopted key accessibility and DDA legislation into the 2011 BCA. In particular adherence to the Access to Premises Standard (2010); AS1428.1 2009; AS1428.4.1 2009 and AS2890.6 2009 has become mandatory. However, compliance with these elements does not necessarily result in compliance with the Disability Discrimination Act if the elements of equality, independence and functionality remain compromised within an environment.

This report does not include or assess the following -

- The provisions of the BCA not directly referenced in Part 1.3 of this report;
- Standards not directly referenced in this report; including AS4299-1995 (Adaptable Housing) unless otherwise explicitly specified in Part 1.3 of this report;
- Disability Discrimination Act 1992 (as explored earlier);
- Federal / State / Local planning policies and/or guidelines unless otherwise explicitly specified in Part 1.3 of this report;
- Work Health & Safety considerations or Work Cover Authority requirements;
- This report does not provide any performance based assessments (Performance Solutions) of the BCA;
- This report does not provide any exemptions from the requirements of the BCA.
- This report is not a Part 4A compliance certificate under the Environmental Planning & Assessment Act 1979 or Regulation 2000;
- Review or specification of slip-resistance classification(s) for floor surface finishes / materials. We recommend surface finish advise be sought from an independent specialist slip safety consultant.



1.5 The Disability (Access to Premises – Building) Standards 2010

The Disability (Access to Premises - Buildings) Standards 2010 provides the prescriptive requirements set out regarding the upgrade of an existing building where works are being undertaken.

The Premises Standards apply to:

- a new building
- a new part of an existing building
- the *affected part* of an existing building.

The new parts of a building and any subsequent affected part are outlines as per the below extracts of The Disability (Access to Premises - Buildings) Standards 2010 –

New Part:

A part of a building is a **New Part** of the building if it is an extension to the building or <u>a modified part of</u> the building about which:

- An application for approval for the building work is submitted, on or after 1 May 2011, to the competent authority in the state or territory where the building is located; or
- All of the following apply:
 - *i.* The building work is carried out for or on behalf of the Crown;
 - *ii.* The building work commences on or after 1 May 2011;
 - *iii.* No application for approval for the building work is submitted, before 1 May 2011, to the competent authority in the state or Territory where the building is located.

Affected Part:

- the principal pedestrian entrance of an existing building that contains a new part and
- any part of an existing building that contains a new part, that is necessary to provide a continuous accessible path of travel from the entrance to the new part.

Furthermore, Part 4 of The Disability (Access to Premises - Buildings) Standards 2010 sets out applicable exceptions and concessions. In this instance the following lessee concession is provided –

Lessees:

If the lessee of a *new part* of a building submits an application for approval for the building work, the following people do not have to ensure that the *affected part* of the building complies with these Standards:

- The building Certifier.
- The building developer.
- The building manager.

It is understood that the proposed works are being undertaken by the building owner/operator. New works and any associated 'affected part' are required to comply with the current accessibility provisions of the BCA and Access Code provided with the above Disability Standard.



2.0 ACCESSIBILITY DESIGN REVIEW

The following tables provide an assessment of the architectural design documentation in relation to the DtS provisions of the BCA / Premises Standards in the context as outlined in Part 1 of this report.

The tables identify each of the relevant assessment outcomes into Six (6) main categories, as follows -

Capable of Complying (CoC) –	Spatial allowance has been made to accommodate compliance where the specification provided has been satisfied.
<u>Compliance Departure (CD) –</u>	A compliance departure with the DtS provisions of the BCA.
<u> Design Detail (DD) –</u>	A detail commentary/specification is offered within the report.
Performance Solution (PSR) –	A Performance Solution Report is being pursued to justify the compliance departures
Not Applicable (N/A) –	Not applicable or not relevant to the project. Commentary provided.
<u>Informational (Info) –</u>	Provided for informational purposes

Interpretation Note(s) -

• Readily moveable furniture has been treated as indicative only unless otherwise noted within the report as it is not considered to form part of the building as addressed by the BCA.



BCA Part D3 – ACCESS FOR PEOPLE WITH DISABILITIES

Cl. D3.1: General building access requirements

DtS Provision	Comment(s)/Recommendation(s)	Status
Buildings and parts of the building must be accessible as required by Table D3.1, unless exempted by D3.4. Table D3.1 requires that access is provided –	Access is generally proposed throughout the required portions of the building as prescribed by Cl. D3.1 of the BCA.	CoC
<u>Class 7a –</u>	Refer to mark-ups for areas to be addressed at the detailed design stage.	
 To and within any level containing accessible carparking spaces. <u>Class 9a –</u> 	Compliance is readily achievable with minor design development and/or specification to BCA & AS1428.1-2009 at the Detailed Design Stage.	
• To and within all other areas normally used by the occupants.	Accessible SOUs:	
 Class 9c – To and within all other areas normally used by the occupants, except that access need not be provided to tiers or platforms of seating areas that do not contain wheelchair seating spaces. 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. 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, 	The buildings containing the Independent Living SOUs are considered Class 9c, requiring a ratio of accessible SOUs be provided (in addition to all units complying with SEPP housing requirements). An accessible SOU requires AS1428.1 circulation space to all rooms/areas. <u>Performance Solution:</u> A Performance Solution will be provided with the construction cert. documentation to address the omission of Accessible SOUs. <u>Doorways</u> All doorways along an accessway are required to have a clear door opening width no less than 850mm clear (to the active leaf)	
 individual shop, dining room, public viewing area, ticket purchasing service, lunch room, lounge room, or the like. Where a ramp complying with AS 1428.1 or a passenger lift is installed— (a) to the entrance doorway of each sole-occupancy unit; and (b) to and within rooms or spaces for use in common by the residents, located on the levels served by the lift or ramp Sole-occupancy units 	and be provided with door circulation spaces as prescribed by AS1428.1-2009.	
If the building or group of buildings contain-	side is provided to sliding doorways in the open/closed position.	



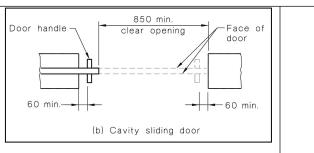
- 1 to 10 Class 3 SOUs require access to and within 1x accessible SOUs.
- 11 to 40 Class 3 SOUs require access to and within 2x accessible SOUs.
- 41 to 60 Class 3 SOUs require access to and within 3x accessible SOUs.
- 61 to 80 Class 3 SOUs require access to and within 4x accessible SOUs.
- 81 to 100 Class 3 SOUs require access to and within 5x accessible SOUs.
- 101 to 200 Class 3 SOUs require access to and within 5x accessible SOUs plus 1x additional accessible SOU for every 25 units or part thereof in excess to 100.

Not more than 2 required accessible soleoccupancy units may be located adjacent to each other.

Where more than 2 accessible sole occupancy units are required, they must be representative of the range of rooms available.

In the context of the BCA - Schedule 3 definitions (& The Disability (Access to Premises – Building) Standards 2010):

Accessible means having features to enable use by people with a disability.



Design Detail:

Ensure the prescribed doorway latch-side clearance is provided to the active leaf of all common area doorways used by the occupants in accordance with AS1428.1-2009.

This must be achieved from the inside edge of the opening, regardless of the opening width.

Design Detail:

Where sliding doorways are power operated, the latch-side clearance may be reduced to 0mm for a front on approach.

Ensure control buttons and card readers are located ≥ 500mm from an internal corner, over a level surface/landing and installed at a height between 900mm - 1250mm.

Design Detail:

Ensure <u>level</u> transitions or compliant ramps with landings are provided between internal and external areas (refer to mark-up options).

Design Detail:

Ensure minimum 30% luminance contrast between doorways and surrounding surfaces is provided.

Note the minimum width for the luminance contrast is to be 50mm when the architrave/frame is intended to provide this.

Verification of 30% luminance contrast between doorways and surrounding surfaces should be provided prior to OC sign off. This can be estimated by obtaining the luminance reflectance value (LRV) of the paint colour or



product from the manufacturer, laboratory testing or on site testing prior to completion.

The actual contrast may vary when applied.

Performance Solution:

A Performance Solution will be provided with the construction cert. documentation to address the omission of luminance contrast to select staff areas.

Access between areas

Access is required to and within all areas normally used by the occupants (excluding areas that are unsafe or unsuitable for everyday access, refer D3.4 exemptions).

Design Detail:

Ensure level transitions or compliant ramps with landings are provided for access between new and refurbished/ internal and external areas (*refer to example below or attached mark-up*).

Paths of travel

All pathways require a minimum unobstructed width of 1000mm. Pathways shall not include impediments such as steps or turnstiles without an accessible alternative provided.

Circulation spaces prescribed by AS1428.1-2009 are required at changes in direction and other circumstances may require a greater width than 1000mm.

Design Detail:

Verification of slip resistant surface finishes on all accessways should be provided prior to OC sign off. It is recommemnded to refer to HB-198 for area ratings and test in accordance with AS4586-2013.

Design Detail:

Ensure any tracks/grooves (including for water shedding or sliding doors) and grate slots/holes are no greater than 13mm wide (depending on orientation) and are recessed to maintain flush/level pathways.

7.5 Grates



Grates shall comply with the following:
(a) Circular openings shall be not greater than 13 mm in diameter.
(b) Slotted openings shall be not greater than 13 mm wide and be oriented so that the long dimension is transverse to the dominant direction of travel.
NOTE: Where slotted openings are less than 8 mm, the length of the slots may continue across the width of paths of travel.

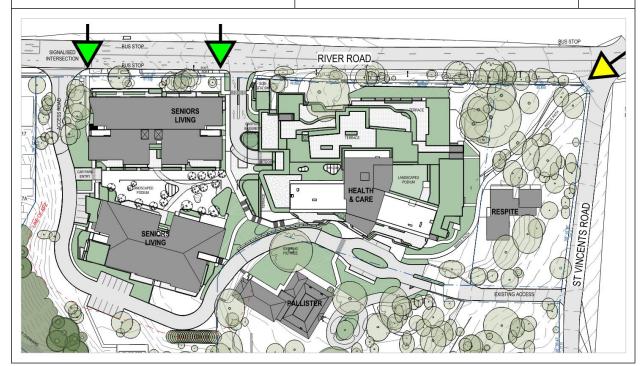
Cl. D3.2: Access to Buildings

DtS Provision	Comment(s)/Recommendation(s)	Status
An accessway must be provided to a building required to be accessible –	Access to new buildings is required from the main points of pedestrian entry at the	CoC
 from the main points of pedestrian entry at the allotment boundary; and from another accessible building connected by a pedestrian link; and 	allotment boundary, from associated accessible carparking spaces, and from another accessible building connected by a pedestrian link.	
 from any required accessible carparking 	Allotment Boundary	
space on the allotment.	There are 2x new (green arrows) and 1x	
In a building required to be accessible, an accessway must be provided through the principal pedestrian entrance, and –	existing pedestrian entry (yellow arrow) at the allotment boundary. Ensure step free access is provided to each building from the new/refurbished entries.	
• through not less than 50% of all pedestrian entrances including the principal pedestrian entrance; and	The existing entry marked yellow is no longer in use as a site entry.	
 in a building with a floor area more than 500m², a pedestrian entrance which is not accessible must not be located more than 	Any walkway/ramp landings proposed on council footpath must have a gradient of 1:40 in all directions.	
50m from an accessible pedestrian entrance.	Accessible parking	
except for pedestrian entrances serving only areas exempted by D3.4.	Accessible parking is proposed in the Health & Care building, accessed via passenger lifts.	
	Other accessible buildings	
	Ensure the pathways proposed between buildings are step free.	
	It is interpreted that only the new portion of pathways connecting to existing pathways is required to comply, though it is still recommended to upgrade access between all connected facilities.	



Access to the Respite building is proposed via the H&C building.

Compliance is readily achievable with minor design development and/or specification to BCA & AS1428.1-2009 at the Detailed Design Stage.



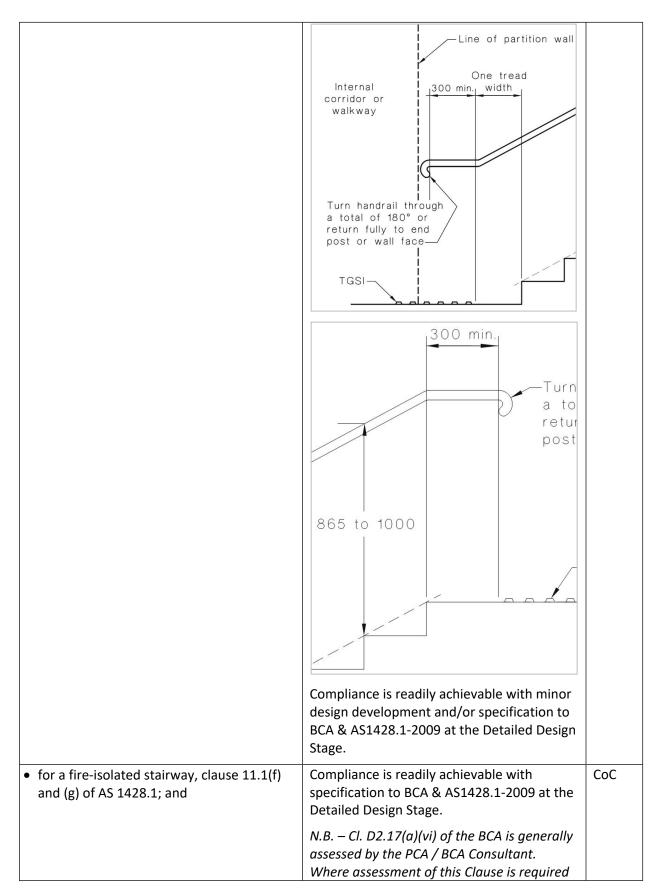
Cl. D3.3: Parts of buildings to be accessible

DtS Provision	Comment(s)/Recommendation(s)	Status
In a building required to be accessible every rastairways in areas exempted by D3.4, must co		
 for a ramp, except a fire-isolated ramp, clause 10 of AS 1428.1; and 	All non-fire-isolated ramps are required to comply with AS1428.1-2009. <i>Refer to mark-ups for areas to be addressed</i> <i>at the detailed design stage</i> . Ensure all walkways (regardless of gradient) and ramps are provided with the associated accessible features such as handrails and TGSIs in accordance with AS1428.1 & AS1428.4. <u>Design Detail:</u> Ensure a level landing is provided at changes in direction, prescribed intervals and doorways along walkways and ramps in accordance with AS1428.1-2009.	CoC/ DD



	Design Detail:	
	Ensure one of the following forms of abutment from AS1428.1-2009 will be provided to either side of all walkways (1:20 or shallower).	
	 The floor or ground surface abutting the sides of the walkway shall provide a firm and level surface of a different material to that of the walkway at the same level of the walkway, follow the grade of the walkway and extend horizontally for a minimum of 600mm; Kerb in accordance with Figure 18 (AS1428.1); Kerb rail and handrail in accordance with Figure 19; or A wall not less than 450 mm in height. Compliance is readily achievable with minor design development and/or specification to BCA & AS1428.1-2009 at the Detailed Design Stage. 	
 for a stairway, except a fire-isolated stairway, clause 11 of AS 1428.1; and 	All non-fire-isolated stairways are required to comply with AS1428.1-2009.	CoC
	Ensure all non fire-isolated stairways are provided with the associated accessible features such as handrails and TGSIs in accordance with AS1428.1 & AS1428.4.	
	Design Detail:	
	Ensure handrail extensions are provided at top and bottom landings of common area stairways and setback/protected by a wall or similar in accordance with AS1428.1-2009.	







	by this office please confirm and provide detail.	
 Accessways must have— passing spaces complying with AS 1428.1 at maximum 20 m intervals where a direct line of sight is not available turning spaces complying with AS 1428.1 at 20m intervals or within 2m of the termination of an accessway. 	Design Detail:Ensure 180° turning (2070mm x 1540mm)space and is provided within 2m of atermination or at maximum 20m intervalsalong any new or altered accessways (e.g.,bin rooms).Ensure passing (2000mm x 1800mm) spaceand is provided at maximum 20m intervals	CoC
	along any accessways where there are obstructed lines of sight along any new or altered accessways. Compliance is readily achievable with minor design development and/or specification to BCA & AS1428.1-2009 at the Detailed Design Stage.	

Cl. D3.4: Exemptions

DtS Provision	Comment(s)/Recommendation(s)	Status
 The following areas are not required to be accessible – An area where access would be 	Exemptions are to be reviewed on a case-by- case basis. We highlight that the following parts of the building have been offered an access exemption (not exhaustive) –	Info
 inappropriate because of the particular purpose for which the area is used. An area that would pose a health or safety risk for people with a disability. Any path of travel providing access only to an area exempted by (a) or (b). 	 Storage rooms Plant rooms Caretaker/Cleaner only areas Laundry (staff only) Kitchens for food prep (staff only) Nurses' stations 	

Cl. D3.5: Accessible carparking

DtS Provision	Comment(s)/Recommendation(s)	Status
Accessible carparking spaces are to be	5x accessible parking spaces are proposed	CoC/
provided in accordance with Table D3.5 of	within the Health & Care building.	DD
the BCA in a Class 7a building and a carparking area on the same allotment as a building required to be accessible.	Confirm the total number of parking space, including staff parking, within the H & C building for assessment.	
Accessible carparking spaces –	Confirm if any outpatient parking is	
• are to comply with AS2890.6-2009.	proposed as greater accessible parking is	
• need not be provided in a Class 7a building	required.	
or a carparking area where a parking		
service is provided and direct access to any		



of the carparking spaces is not available to	Design Detail:
the public <u>Class 9a</u>	Accessible parking has not been indicated within the residential parking areas.
(a) Hospital (non-outpatient area)1x space for every 100 carparking spaces	Ensure 1x accessible parking space with adjacent shared zone is provided.
or part thereof.	Design Detail:
(b) Hospital (outpatient area) up to 1000 carparking spaces;	Ensure accessible parking spaces and shared zones are 5400mm long and provided on a gradient of 1:40 or shallower in all
 1x space for every 50 carparking spaces or part thereof. 	directions.
 + 1 space for each additional 100 carparking spaces or part thereof in excess 	A similar 2.4m x 2.4m, 1:40 zone is also required behind the accessible spaces.
of 1000 carparking spaces.	Ensure a head height of 2.2m is provided leading to all accessible parking, with 2.5m
(c) Nursing home1x space for every 100 carparking spaces	provided directly above all accessible parking/shared zones.
or part thereof.	Compliance is readily achievable with minor
(d) Clinic or day surgery not forming part of a hospital.	design development and/or specification to BCA & AS2890.6-2009 at the Detailed Design Stage.
 1x space for every 50 carparking spaces or part thereof. 	Refer to Section 3.0 of this report for
<u>Class 9c</u>	residential carparking spaces requirements.
 1x space for every 100 carparking spaces or part thereof. 	

Cl. D3.6: Signage

DtS Provision	Status
In a building required to be accessible signage complying with Spec. D3.6, AS1428.1-2009 and incorporating the appropriate recognised symbol (as appropriate) for persons with disability must be provided as follows —	DD
 braille and tactile signage must identify each sanitary facility and space with hearing augmentation; 	
• braille and tactile signage must identify each door required by E4.5 to be provided with an exit sign and state "Exit" and "Level" followed by the floor level number;	
 signage must be provided within a room containing a hearing augmentation system identifying; the type of system, the area covered within the room and if receivers are being used and where the receivers can be obtained; 	
• signage must be provided for accessible unisex sanitary facilities to identify if the facility is suitable for left or right handed use;	
• signage to identify an ambulant accessible sanitary facility must be located on the door of the facility;	
 directional signage where a pedestrian entrance is not accessible. 	



• directional signage where a bank of sanitary facilities are not provided with an accessible sanitary facility.

A design compliance certificate should be obtained from the signage designer/contractor to confirm compliance with the relevant provisions of the BCA and Australian Standards.

Cl. D3.7: Hearing augmentation

DtS Provision	Comment(s)/Recommendation(s)	Status
 A hearing augmentation system must be provided where an inbuilt amplification system, other than one used only for emergency warning, is installed – in a room in a Class 9b building; in an auditorium, conference room, meeting room or room for judicatory purposes; at any ticket office, teller's booth, reception area or the like, where the public is screened from the service provider. 	If an inbuilt amplification system (other than one used solely for emergency warning) is provided within the building, suitable hearing augmentation systems are to be provided in these areas and a design and installation certificate are to be obtained from the relevant consultant to Cl. D3.7.	DD

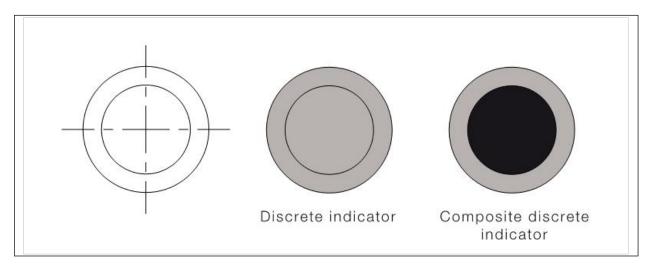
Cl. D3.8: Tactile indicators

DtS Provision	Comment(s)/Recommendation(s)	Status
 DtS Provision Tactile ground surface indicators complying with sections 1 and 2 of AS1428.4.1-2009 must be provided to warn people who are blind or have a vision impairment that they are approaching – a stairway, other than a fire-isolated stairway; an escalator/moving walk; a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp; in the absence of a suitable barrier an overhead obstruction less than 2 m and where an accessway meeting a vehicular way adjacent to any pedestrian entrance to a building. 	Comment(s)/Recommendation(s) Ensure TGSIs are provided to common area stairways, ramps and overhead hazards under 2m (unless suitably barricaded). TGSIs are not required in fire-isolated stairways or on elements leading solely to D3.4 exempt areas. Performance Solution: A Performance Solution will be provided with the construction cert. documentation to address the omission of TGSIs at the H&C building entry/drop off area. Design Detail: Ensure TGSIs are provided where a building entry meets a carriage way in accordance with AS1428.4.1-2009 if there is no kerb or kerb ramp at that point. Design Detail: TGSIs need only be a depth of 300mm -	Status CoC/ DD
	400mm in locations where the next hazard/building element is \leq 3000mm away.	



· · · · · · · · · · · · · · · · · · ·	
	TGSIs shall be 600mm - 800mm deep when the hazard is ≥ 3000mm away.
	Design Detail:
	TGSIs are required at every stairway/ ramp landing where either 1 or both handrails are not continuous. Either provide continuous handrails or TGSIs at all landings with a discontinuous handrail.
	Design Detail:
	Confirm where any overhead obstruction is provided below 2m as these areas are required to be treated with either a barrier or TGSIs.
	Design Detail:
	Ensure all integrated TGSIs (tiles) have a minimum 30% luminance contrast to the ground surface they are fixed to.
	Design Detail:
	Ensure all individual discrete TGSIs have a minimum 45% luminance contrast to the ground surface they are fixed to.
	Design Detail:
	Ensure all individual discrete composite TGSIs have a minimum 60% luminance contrast to the ground surface they are fixed to.
	LC can be estimated by obtaining the luminance reflectance value (LRV) of the paint colour or product from the manufacturer, laboratory testing or on site testing prior to completion.
	Compliance Notes:
	TGSIs shall be specified and installed to comply with AS1428.4.1-2009 including size, spacing, width, depth and luminance contrasting as follows –
	30% - Integrated TGSIs
	 45% - Discrete TGSIs 60% - Composite Discrete TGSIs





Cl. D3.9: Wheelchair seating spaces in Class 9b assembly buildings

N/A - Fixed seating areas are not proposed.

Cl. D3.10: Swimming pools

DtS Provision	Comment(s)/Recommendation(s)	Status
 Not less than 1 means of accessible water entry/exit in accordance with Specification D3.10 must be provided for each swimming pool required by Table D3.1 to be accessible. An accessible entry/exit must be by means of— a fixed or movable ramp and an aquatic wheelchair; or a zero depth entry at a maximum gradient of 1:14 and an aquatic wheelchair; or a platform swimming pool lift and an aquatic wheelchair; or a sling-style swimming pool lift. Where a swimming pool has a perimeter of more than 70 m in length, at least one accessible water entry/exit must be provided by a means specified in (b)(i), (ii) or (iii). Latching devices on gates and doors forming part of a swimming pool safety barrier need not comply with AS 1428.1. 	 The main pool perimeter is >40m but <70m; therefore, one of the following accessible pool entrances is required – a fixed or movable ramp and an aquatic wheelchair; or a zero depth entry at a maximum gradient of 1:14 and an aquatic wheelchair; or a platform swimming pool lift and an aquatic wheelchair. A sling-style swimming pool lift. 	DD



Cl. D3.11: Ramps

DtS Provision	Comment(s)/Recommendation(s)	Status
On an accessway, a series of connected ramps must not have a combined vertical rise of more than 3.6 m; and a landing for a step ramp must not overlap a landing for another step ramp or ramp.	Compliance is readily achievable with minor design development and/or specification to AS1428.1-2009.	CoC

Cl. D3.12: Glazing on an accessway

DtS Provision	Comment(s)/Recommendation(s)	Status
Where there is no chair rail, handrail or transc	Where there is no chair rail, handrail or transom, all frameless or fully glazed doors,	
sidelights and any glazing capable of being mis	staken for a doorway or opening, must be	
clearly marked in accordance with AS 1428.1.		
Summary of AS1428.1-2009 Requirements fo	r Visual Indicators on Glazing –	
 Summary of AS1428.1-2009 Requirements for Visual Indicators on Glazing – Shall be clearly marked for their full width with a solid and non-transparent contrasting line. contrasting line shall be not less than 75 mm wide and shall extend across the full width of the glazing panel. The lower edge of the contrasting line shall be located between 900 mm and 1 mm above the plane of the finished floor level. Any contrasting line on the glazing shall provide a minimum of 30% luminance contrast when viewed against the floor surface or surfaces within 2 m of the glazing on the opposite side. 		he 1000

BCA Part E3 – LIFT INSTALLATIONS

Cl. E3.6: Passenger lifts

DtS Provision	Comment(s)/Recommendation(s)	Status
Every passenger lift must –	The proposed passenger lifts shall have the	CoC
	 Passenger protection system complying with AS1735.12, 	
	• Lift landing doors at the upper landing,	
	 Lift car and landing control buttons complying with AS1735.12, 	
	• Lighting in accordance with AS1735.12,	



 Automatic audible/visual information within the lift car and at the landings as prescribed, Emergency hands-free communication, including a button that alerts a call centre of a problem and a light to signal that the call has been received.
A design compliance certificate is be obtained from the lift designer to confirm compliance with the relevant provisions of the BCA and Australian Standards.
<u>Design Detail –</u>
Ensure lift landing controls are provided no less than 500mm from an internal corner.
There are several locations that appear unable to achieve this (refer to mark-ups).

BCA Part F2 – SANITARY AND OTHER FACILITIES

Cl. F2.4: Accessible sanitary facilities

DtS Provision	Comment(s)/Recommendation(s)	Status
In a building required to be accessible:	Accessible sanitary compartments	CoC/
 In a building required to be accessible: Accessible unisex sanitary compartments must be provided as in accordance with Table F2.4(a), Accessible unisex showers must be provided in accordance with Table F2.4(b), At each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, a sanitary compartment suitable for a person with an ambulant disability in accordance with AS 1428.1 must be provided for use by males and females. An accessible unisex sanitary compartment females. An accessible unisex sanitary compartment disposal of sanitary towels. Circulation spaces, fixtures and fittings of all accessible sanitary facilities must comply with AS1428.1. An accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one 	Accessible sanitary compartments Several accessible sanitary compartments are proposed throughout the H & C building. Standard sanitary facilities may be considered in D3.4 exempt areas (abled bodied staff?) at the detailed design stage. Performance Solution: A Performance Solution will be provided with the construction cert. documentation to address the omission of Acc. SOUs & associated accessible sanitary facilities within. Design Detail: Alternate LH/RH transfer for the common area accessible unisex sanitary compartments on levels 7-10 of the H & C building. Design Detail: Common areas & Class 9a areas provided with showers will need to be reviewed prior	CoC/ DD



 Where two or more of each type of accessible unisex sanitary facility are 	to CC to determine the appropriate number of accessible showers required.	
provided, the number of left and right handed mirror image facilities must be provided as evenly as possible.	Ensure FF&E is installed as per clause 15 of AS1428.1-2009.	
provided as evenity as possible.	Ambulant sanitary compartments	
	Ambulant sanitary facilities are proposed at every bank of facilities in addition to 1x or more accessible unisex sanitary compartments.	
	Ensure FF&E is located as per clause 16 of AS1428.1-2009.	
	Design Detail:	
	900mm x 900mm doorway circulation space is not achieved in either prescribed location to the entry door of either bank f toilets within the Rehab. Gym airlock.	
	Compliance is otherwise readily achievable with minor design development and/or specification to BCA & AS1428.1-2009 at the Detailed Design Stage.	



3.0 SEPP HSPD 2004 REQUIREMENTS

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

The following is a summary and check list of the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, specifically assessing the development against the requirements of Chapter 3, Part 2 and Schedule 3.

Provisions	Comment	Status
 "(1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the proposed development will have access that complies with subclause (2) to: (a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and (b) community services and recreation 	 The development relies upon the provisions of clause 26(2) (a) & (b) regarding access to an appropriate range of services and shops or public transport within walking distance (400m). Safe passage is proposed via the existing council footpaths and crossings. (4) For the purposes of subclause (2): a) a suitable access pathway is a path of travel by means of a sealed footpath or 	CoC/ DD
facilities, and (c) the practice of a general medical practitioner."	other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the	
(2) Access complies with this clause if: "(a) the facilities and services referred to in subclause (1) are located at a distance of not more than 400 metres from the site of the proposed development that is a distance accessible by means of a suitable access pathway and the overall average gradient for the pathway is no more than 1:14, although the following gradients along the pathway are also acceptable:	 <i>like,</i> <u>Design Detail:</u> Rectification works will be required to the footpath to achieve the prescribed average gradients. Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage 	
 (i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time, (ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time, (iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time, or 		
(b) in the case of a proposed development on land in a local government area that is within the Sydney Statistical Division—there		



Part 1 Standards applying to hostels and self-c	ontained dwellings	
Schedule 3 - Standards concerning accessibility dwellings.	y and use-ability for hostels and self-contained	
 (i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time, (ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time, (iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time." 		
"(3) For the purposes of subclause (2) (b) and (c), the overall average gradient along a pathway from the site of the proposed development to the public transport services (and from the transport services to the facilities and services referred to in subclause (1)) is to be no more than 1:14, although the following gradients along the pathway are also acceptable:		
and the gradient along the pathway from the site to the public transport services (and from the transport services to the facilities and services referred to in subclause (1)) complies with subclause (3).		
(iii) that is available both to and from the proposed development during daylight hours at least once each day between 12pm and 6pm each day from Monday to Friday (both days inclusive),		
 (ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and 		
 (i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and 		
is a transport service available to the residents who will occupy the proposed development:		

1 Application of standards in this Part



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

Superseded. **N.B.** Despite the provisions of clauses 2, 7, 8, 9, 10, 11, 12, 13 and 15–20 of Schedule 3, a self-contained dwelling, or part of such a dwelling, that is located above the ground floor in a multi-storey building does not have to comply with the requirements of those provisions if the development application is made by, or by a person jointly with, a social housing provider.

Provisions	Comment	Status
2 Siting standards	Compliance is readily achievable	CoC
(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 (within the meaning of AS 1428.1) to an adjoining public road.		
(2) If the whole of the site does not have a gradient of less than 1:10:		
(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		
(b) the wheelchair access provided must be by a continuous accessible path of travel (within the meaning of AS 1428.1) to an adjoining public road or an internal road or a driveway that is accessible to all residents.		
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 subclause. 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.		



 3 Security Pathway lighting: (a) must be designed and located so as to avoid glare for pedestrians and adjacent dwellings, and (b) must provide at least 20 lux at ground level. 	Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage	СоС
 4 Letterboxes Letterboxes: (a) must be situated on a hard-standing area and have wheelchair access and circulation by a continuous accessible path of travel (within the meaning of AS 1428.1), and (b) must be lockable, and (c) must be located together in a central location adjacent to the street entry or, in the case of self-contained dwellings, must be located together in one or more central locations adjacent to the street entry. 	Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage	CoC
 5 Private car accommodation If car parking (not being car parking for employees) is provided: (a) car parking spaces must comply with the requirements for parking for persons with a disability set out in AS2890, and (b) 5% of the total number of car parking spaces (or at least one space if there are fewer than 20 spaces) must be designed to enable the width of the spaces to be increased to 3.8 metres, and (c) any garage must have a power-operated door, or there must be a power point and an area for motor or control rods to enable a power-operated door to be installed at a later date. 	Compliance is readily achievable. This clause originally referred to AS 2890, Parking facilities, Part 1: Off street parking. The minimum clear width of car parking spaces was required to be 3.2m which is currently proposed on plan. 5% of the proposed spaces are capable of accommodating 3.8m width. Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage	CoC
6 Accessible entry Every entry (whether a front entry or not) to a dwelling, not being an entry for employees, must comply with clauses 4.3.1 and 4.3.2 of AS 4299.	<u>Design Detail:</u> Ensure circulation space is provided to the courtyard entry gates.	CoC



	 Design Detail: An 850mm clear opening with appropriate latch side clearance. Lighting complying with AS1680.2 and achieving a minimum 150 lux. Call buttons at entrances shall be located between 900-1100mm from the floor and not less than 500mm from internal corners. D shaped lever latch set located between 900-1100mm from the floor. Compliance is readily achievable with minor design development and/or specification at the Detailed Design Stage 	
 7 Interior: general (1) Internal doorways must have a minimum clear opening that complies with AS 1428.1. 	Compliance is readily achievable.	CoC
(2) Internal corridors must have a minimum unobstructed width of 1,000 millimetres.		
(3) Circulation space at approaches to internal doorways must comply with AS 1428.1.		
8 Bedroom	Ensure the adjacent design elements are	CoC
At least one bedroom within each dwelling must have:	incorporated at detailed design stage.	
(a) an area sufficient to accommodate a wardrobe and a bed sized as follows:		
 (i) in the case of a dwelling in a hostel—a single-size bed, 		
(ii) in the case of a self-contained dwelling— a queen-size bed, and		
(b) a clear area for the bed of at least:		



 (i) 1,200 millimetres wide at the foot of the bed, and (ii) 1,000 millimetres wide beside the bed between it and the wall, wardrobe or any other obstruction, and (c) 2 double general power outlets on the wall where the head of the bed is likely to be, and (d) at least one general power outlet on the wall opposite the wall where the head of the bed of the bed is likely to be, and (e) a telephone outlet next to the bed on the side closest to the door and a general power 		
outlet beside the telephone outlet, and		
(f) wiring to allow a potential illumination level of at least 300 lux.		
9 Bathroom	Compliance is readily achievable with minor design development and/or specification at	CoC
(1) At least one bathroom within a dwelling must be on the ground (or main) floor and have the following facilities arranged within an area that provides for circulation space for sanitary facilities in accordance with AS 1428.1:	the Detailed Design Stage.	
(a) a slip-resistant floor surface,		
(b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS 1428.1,		
(c) a shower that complies with AS 1428.1, except that the following must be accommodated either immediately or in the future:		
(i) a grab rail,		
(ii) portable shower head,		
(iii) folding seat,		
 (d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it, 		
(e) a double general power outlet beside the mirror.		



(2) Subclause (1) (c) does not prevent the installation of a shower screen that can easily be removed to facilitate future accessibility.		
10 Toilet A dwelling must have at least one toilet on the ground (or main) floor and be a visitable toilet that complies with the requirements for sanitary facilities of AS 4299.	The main bathroom config. appears to accommodate the visitable toilet circulation space (1250mm x 900mm).	CoC
11 Surface finishes Balconies and external paved areas must have slip-resistant surfaces.	Slip resistivity to be nominated at detailed design stage.	CoC
Note. Advise regarding finishes may be obtained from AS 1428.1.		
12 Door hardware Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS 4299.	Door hardware to be nominated at detailed design stage.	СоС
13 Ancillary items Switches and power points must be provided in accordance with AS 4299.	Location of GPOs to be nominated at detailed design stage.	CoC
14 Application of standards in this Part		
The standards set out in this Part apply in addit housing consisting of self-contained dwellings.	tion to the standards set out in Part 1 to any ser	niors
15 Living room and dining room	Location of telephone and illumination level	CoC
(1) A living room in a self-contained dwelling must have:	to be nominated at detailed design stage.	
(a) a circulation space in accordance with clause 4.7.1 of AS 4299, and		
(b) a telephone adjacent to a general power outlet.		
(2) A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux.		
16 Kitchen	Configuration of kitchen to be confirmed at detailed design stage.	CoC
A kitchen in a self-contained dwelling must have:		



A self-contained dwelling must have a laundry that has:	design development and/or specification at the Detailed Design Stage	
In a multi-storey building containing separate self-contained dwellings on different storeys, lift access must be provided to dwellings above the ground level of the building by way of a lift complying with clause E3.6 of the <i>Building Code of Australia</i> . 19 Laundry	Compliance is readily achievable with minor	СоС
18 Lifts in multi-storey buildings	Compliance is readily achievable	CoC
In a multi-storey self-contained dwelling, the kitchen, main bedroom, bathroom and toilet must be located on the entry level.		
17 Access to kitchen, main bedroom, bathroom and toilet	Compliance is readily achievable.	CoC
(ii) one of which is provided for a refrigerator in such a position as to be easily accessible after the refrigerator is installed.		
(e) general power outlets:(i) at least one of which is a double general power outlet within 300 millimetres of the front of a work surface, and		
 (d) "D" pull cupboard handles that are located towards the top of below-bench cupboards and towards the bottom of overhead cupboards, and (a) concerning payment outlates 		
(iv) an oven (see clause 4.5.8), and		
(iii) cooktops (see clause 4.5.7), except that an isolating switch must be included,		
(ii) a tap set (see clause 4.5.6),		
(i) benches that include at least one work surface at least 800 millimetres in length that comply with clause 4.5.5 (a),		
(c) the following fittings in accordance with the relevant subclauses of clause 4.5 of AS 4299:		
(b) a circulation space at door approaches that complies with AS 1428.1, and		
(a) a circulation space in accordance with clause 4.5.2 of AS 4299, and		



(a) a circulation space at door approaches that complies with AS 1428.1, and		
(b) provision for the installation of an automatic washing machine and a clothes dryer, and		
(c) a clear space in front of appliances of at least 1,300 millimetres, and		
(d) a slip-resistant floor surface, and		
(e) an accessible path of travel to any clothes line provided in relation to the dwelling.		
20 Storage for linen	Compliance is readily achievable with minor	CoC
A self-contained dwelling must be provided with a linen storage in accordance with clause 4.11.5 of AS 4299.	design development and/or specification at the Detailed Design Stage	
21 Garbage A garbage storage area must be provided in an accessible location.	Ensure bin rooms etc are provided with doorway & turning circulation space within (2070mm x 1670mm minimum).	CoC
	Compliance is readily achievable with minor design development and/or specification at	



4.0 ACCESSIBILITY COMPLIANCE STATEMENT

This report has provided a review of the referenced project design documentation to determine the compliance status of the proposed development against Part D3, Cl. F2.4 & Cl. E3.6 'deemed-to-satisfy' (DtS) requirements of the Building Code of Australia 2019 (BCA), The Disability (Access to Premises - Buildings) Standards 2010 and related Australian Standards.

This review has also provided review of the compliance statues of the design with SEPP (Housing for Seniors or People with a Disability) 2004 Clause 26 & Schedule 3.

Following this review and with the adoption of the recommendations/Performance Solutions proposed, ABE Consulting are able to confirm that at the SSDA stage, the development can readily achieve compliance with the aforementioned provisions.

5.0 REVIEW PROVIDED BY

Prepared by:

<u>Sam Freeman</u> Accessibility Consultant

Reviewed by:

<u>Abe Strbik</u> Director Member - Association of Consultants in Access Australia # 405

DISCLAIMER

This document has been prepared solely for the use of our client in accordance with our current professional standards and as per our agreement for providing compliance consulting services. Although all due care has been taken in the preparation of this document, no warranty is given, nor liability accepted (except that required by law) in relation to the information contained within this document. This document represents the opinions of ABE Consulting based on the facts and matters known at the time of preparation of this document. Opinions, judgments and recommendations detailed in this document, which are based on our understanding and interpretation of current statutory and regulatory obligations and standards, should not be construed as legal opinions.

