



Morris Goding  
Access Consulting

Pymble PLC

**PLC Grey House Precinct**

**Accessibility Review Report**

19 July 2021

REPORT REVISIONS		
Date	Version	Drawing No / Revision
17/06/2021	1	B10-00-01-GENERAL ARRANGEMENT PLAN - LEVEL 00(05) B10-01-01-GENERAL ARRANGEMENT PLAN - LEVEL 01(05) B10-02-01-GENERAL ARRANGEMENT PLAN - LEVEL 02(05) B10-03-01-GENERAL ARRANGEMENT PLAN - LEVEL 03(05) B10-04-01-GENERAL ARRANGEMENT PLAN - LEVEL 04(05) B10-05-01-ROOF PLAN(05) D10-AA-01-SECTIONS - SHEET 1(04) D10-AA-02-SECTIONS - SHEET 2(03)
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This report prepared by:



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## 1. Executive Summary

This Access Review Report is a key element in the design application of the proposed Pymble Ladies' College Grey House Precinct located at the Pymble campus, Sydney NSW. It is reviewed against the relevant Australian Codes and Standards under the provision of the Commonwealth Disability Discrimination Act (DDA).

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

The aim of the review is to ensure that the accessibility considerations comply with the relevant statutory requirements, and in addition, consideration of accessibility to meet the intent of the DDA of inclusive, dignified, and equitable access.

## 2. Introduction

### 2.1 Background

Morris Goding Access Consulting has been engaged to provide a review of the proposed development.

The proposed development consists of a new home for Junior school Years 5 and 6, Out of School Hours Care (OSHC), Dance, Health Service, and an Early Learning Centre (ELC).

### 2.2 Building Classification

The development falls under the following BCA classifications to be verified by the principal certification authority (PCA):

- Class 5 – Offices.
- Class 7a – Carpark (to be advised by project team).
- Class 9b – School.

The general building access requirements for the above classifications are:

- Class 5 – to and within all areas normally used by the occupants.
- Class 7a – to and within any level containing accessible carparking spaces.
- Class 9b – to and within all areas normally used by the occupants.

### 2.3 Objectives

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), and relevant Australian Standards.

The objective is to ensure compliance with statutory requirements, and in addition, considers the over and above minimum regulatory requirements under best practice approaches.

It considers the building user groups and ensures equality, independence and functional access for people with disability, inclusive of people:

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

The report assessment aims to meet the intent of the Disability Discrimination Act; which is, as far as possible; to eliminate discrimination against persons on the ground of disability.

## 2.4 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.

## 2.5 Statutory Requirements

The relevant statutory and regulatory requirements are:

- Federal Disability Discrimination Act (DDA).
- Disability (Access to Premises – Buildings) Standards 2010.
- Building Code of Australia (BCA) Part D3, E3, F2.
- AS 1428.1:2009 – General Requirement for Access.
- 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.

Additional advisory standards not currently referenced, and other relevant guidelines may be considered include:

- Universal Design Principles.
- Premises Standard Guideline V2 2013.
- Guide to Building Code of Australia (BCA).
- AS1428.2:1992 – Enhanced and Additional requirements.

### 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 being made against the building owner.

Since the 1st of 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 utilising 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.

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

## 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:

- 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.

#### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to recommendations and comments on markups being addressed at subsequent design stages. As advised, this will be reviewed and comply at further design stages.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### 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 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 located no more than 50m distance from an accessible entry (for buildings greater than 500msq).
- All accessible doors with 850mm min. clear width opening and suitable door circulation area, compliant with AS1428.1:2009.
- An accessible path of travel eg. ramp or lift 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.



### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to recommendations and comments on markups being addressed at subsequent design stages. As advised, this will be reviewed and comply at further design stages.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### **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 not 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 should be considered as a minimum starting point.

Consideration of management systems and fire wardens for emergency egress for people with disabilities is advised.

### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to recommendations and comments on markups being addressed at subsequent design stages. Note off-set tread configuration has not been shown, refer markups. As advised, this will be reviewed and comply at further design stages.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

## 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) 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) 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) with 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 with at least 1000mm min. width when travelling in linear direction Note: Increased clear width paths of travel required for doorway circulation, turning areas etc.

#### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to recommendations and comments on markups being addressed at subsequent design stages. As advised, this will be reviewed and comply at further design stages.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### 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 with 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 with 1800mm min. clear width to allow two wheelchairs ability to space pass each other.

#### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail, all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

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

#### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to recommendations and comments on mark-ups being addressed at subsequent design stages. As advised, this will be reviewed and comply at further design stages.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### 5.4 D3.4 Exemptions

The following areas are not required to be accessible:

- An area where access would be inappropriate because of the particular purpose for which the area is used (plant room, cleaner, for example. Note some storage rooms will require access such as administration store for stationery, paper etc).
- An area that would pose a health or safety risk for people with a disability.
- The path of travel to those areas that are exempt.

#### Assessment:

Areas currently identified as applicable for D3.4 exemptions are:

Level 00: Plant Room, Cleaners.

Level 1: Main S/Room, Main Comms Room.

Level 4: Plant, Cleaners Store.

It would appear other areas may fall under this exemption. As advised, this will be reviewed and comply at further design stages.

## 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 5, 6, 7a, 9b: 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) within the building. Alternating LH/RH layouts on each subsequent level is the most appropriate and inclusive approach.
- Accessible WC with 2300mm x 1900mm around the pan with the basin to sit outside this area in accordance with AS1428.1.
- An ambulant cubicle within every standard toilet bank adjacent to an accessible toilet under DDA Access Code Part F2.4 compliant with AS1428.1:2009.

#### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

On the basis of the current level of detail, all access requirements appear capable of achieving compliance subject to recommendations and comments on mark-ups being addressed at subsequent design stages. As advised, this will be reviewed and comply at further design stages.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### 6.2 Accessible 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:

- Accessible car bays 2.4 metre with 2.4 metre shared area.
- All accessible car bays 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.

- 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).
- Class 5: 1:100 or part thereof.
- Class 9b School: 1:100 or part thereof.

#### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

Accessible carparking requirements has not yet been provided. Refer mark-ups for further comments. As advised, this will be reviewed and comply at further design stages.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### **6.3 Hearing Augmentation**

The BCA and the Premises Standards have access requirements for the provision of Hearing Augmentation Systems. The key requirements of this provision are:

- A hearing augmentation system must be provided where an inbuilt amplification system is provided (other than the emergency warning).
- In a room in a Class 9b building; or
- In an auditorium, conference room, meeting room or room for judicatory proposes; or
- At ticket office, teller's booth, reception area where the public is screened from the service provider.
- An induction loop to cover minimum 80% of the floor area.
- Receiver systems to cover minimum 95% of the floor area.

#### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

Hearing augmentation details have not been provided at this stage of the design process. Where required by the BCA, ensure details to BCA and AS 1428.1 requirements. Refer mark-ups for further comments. As advised, this requirement will comply.

Confirm all details at subsequent design stages.

## 6.4 Signage

The BCA and the Premises Standards have signage requirements. The key requirements are:

- Signage be provided to all male, female, accessible and ambulant toilets. It is to include:
  - Braille and tactile.
  - International symbol of access.
  - 'LH' or 'RH' to indicate a left-hand or right-hand transfer onto toilet pan.
  - Appropriate font size.
- At required fire exits.
- Where hearing augmentation systems are provided.
- Ensure all signage is detectable with raised symbols and 30% luminance contrast to its background, and in turn, contrasts with the background wall surface.
- Directional signage is required at:
  - Banks of toilets without an accessible toilet, to direct person to the nearest accessible toilet.
  - Non-accessible entrances to direct persons to an accessible entrance.
- Signage to be located on the wall, adjacent to latch side of the door, between 1200 - 1600mm AFFL (or for single line of tactile text: located between 1250 - 1350mm AFFL).

### Assessment:

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

Signage details is not provided at this early stage of the design process. Ensure details to BCA and AS 1428.1 requirements. Refer mark-ups for further comments.

Confirm all design development and construction details at subsequent design stages.

## 7. Conclusion

MGAC has reviewed the proposed scheme for Pymble Ladies' College Grey House Precinct. The drawings indicate that access requirements can readily be achieved subject to the recommendations noted in the marked plans and within this report being addressed in further design stages.

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.

## 8. Marked Plans





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2	14/04/21	For Information
3	28/05/21	For Information
4	02/06/21	For Information
5	07/06/21	For Information
6	25/06/21	Issued for Schematic Design
7	07/07/21	For Information
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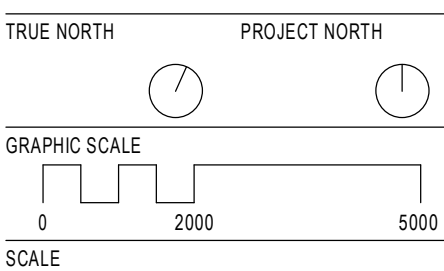
PYMBLE LADIES COLLEGE  
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GREY HOUSE PRECINCT

BVM PROJECT NUMBER

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1 : 200@A1

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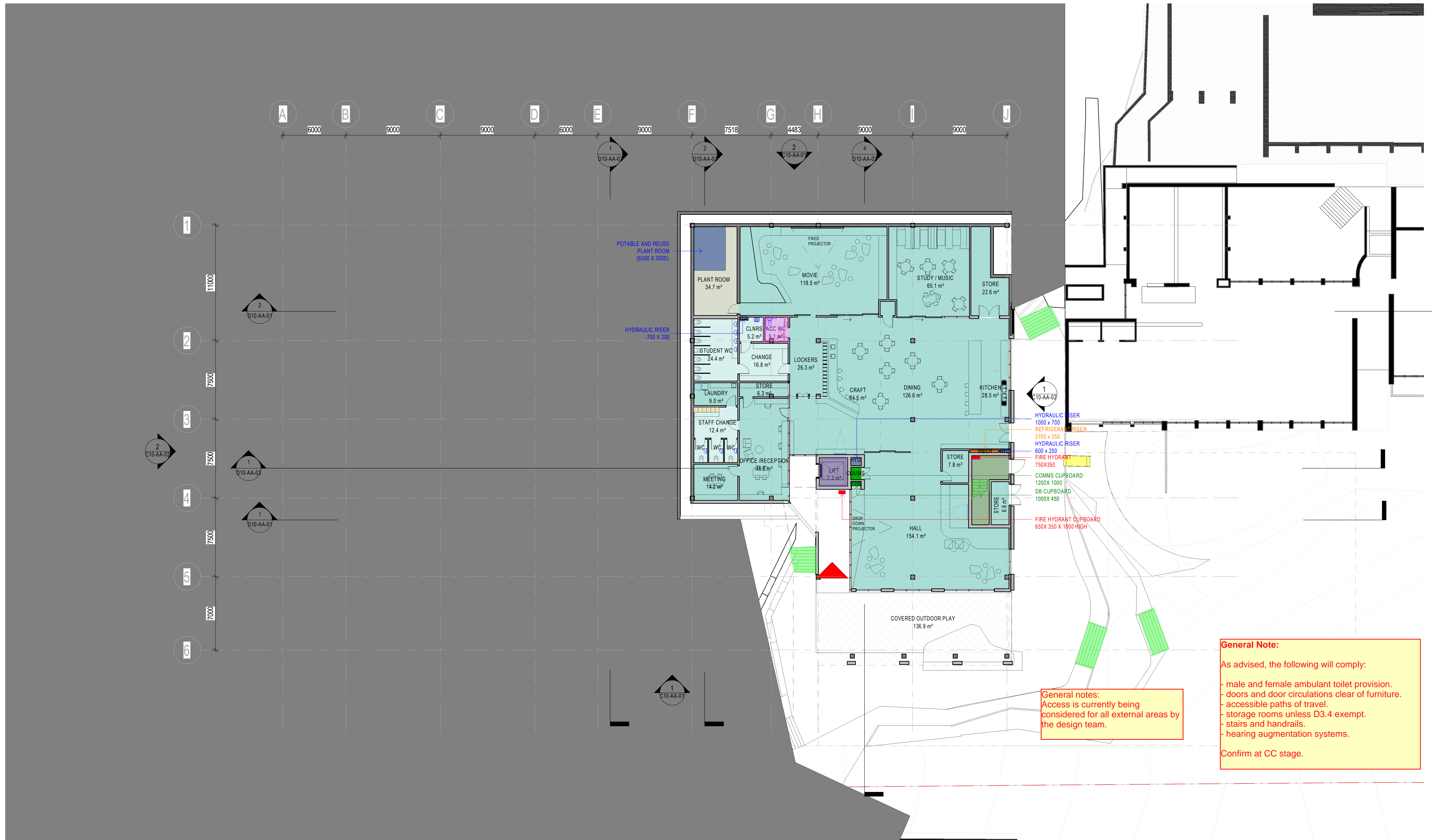
SCHEMATIC DESIGN  
DRAWING

GENERAL ARRANGEMENT  
PLAN - LEVEL 00

AR-B10-00-01

ISSUE

8



AMENITIES	ELC	OSHC	STEM
CIRC	HEALTH	OUTDOORS	
COLA	JUNIOR SCHOOL	SERVICES	
DANCE	JUNIOR SCHOOL BREAKOUT	STAFF	

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SCHEMATIC DESIGN  
DRAWING

GENERAL ARRANGEMENT  
PLAN - LEVEL 01

AR-B10-01-01	8
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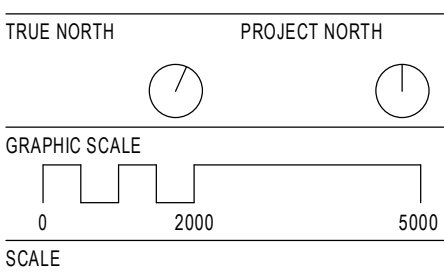
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BVM PROJECT NUMBER

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DRAWING KEY



1:200@A1

STATUS

SCHEMATIC DESIGN

DRAWING

GENERAL ARRANGEMENT  
PLAN - LEVEL 02

AR-B10-02-01

ISSUE

8



#### General Note:

As advised, the following will comply:

- male and female ambulant toilet provision.
- doors and door circulations clear of furniture.
- accessible paths of travel.
- storage rooms unless D3.4 exempt.
- stairs and handrails.
- hearing augmentation systems.

Confirm at CC stage.

AMENITIES	JUNIOR SCHOOL	STAFF
CIRC	JUNIOR SCHOOL BREAKOUT	STEM
COLA	OSHC	
DANCE	OUTDOORS	
ELC	SERVICES	
HEALTH		

MGAC Review  
19/07/2021  
By: Lee-May Whong



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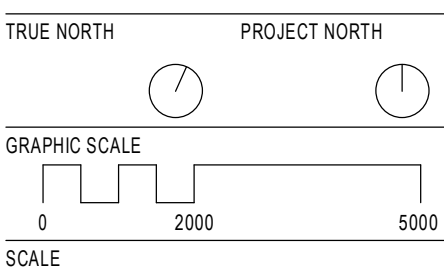
PYMBLE LADIES COLLEGE  
PROJECT

PYMBLE LADIES COLLEGE  
GREY HOUSE PRECINCT

BVN PROJECT NUMBER

2010018

DRAWING KEY



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STATUS

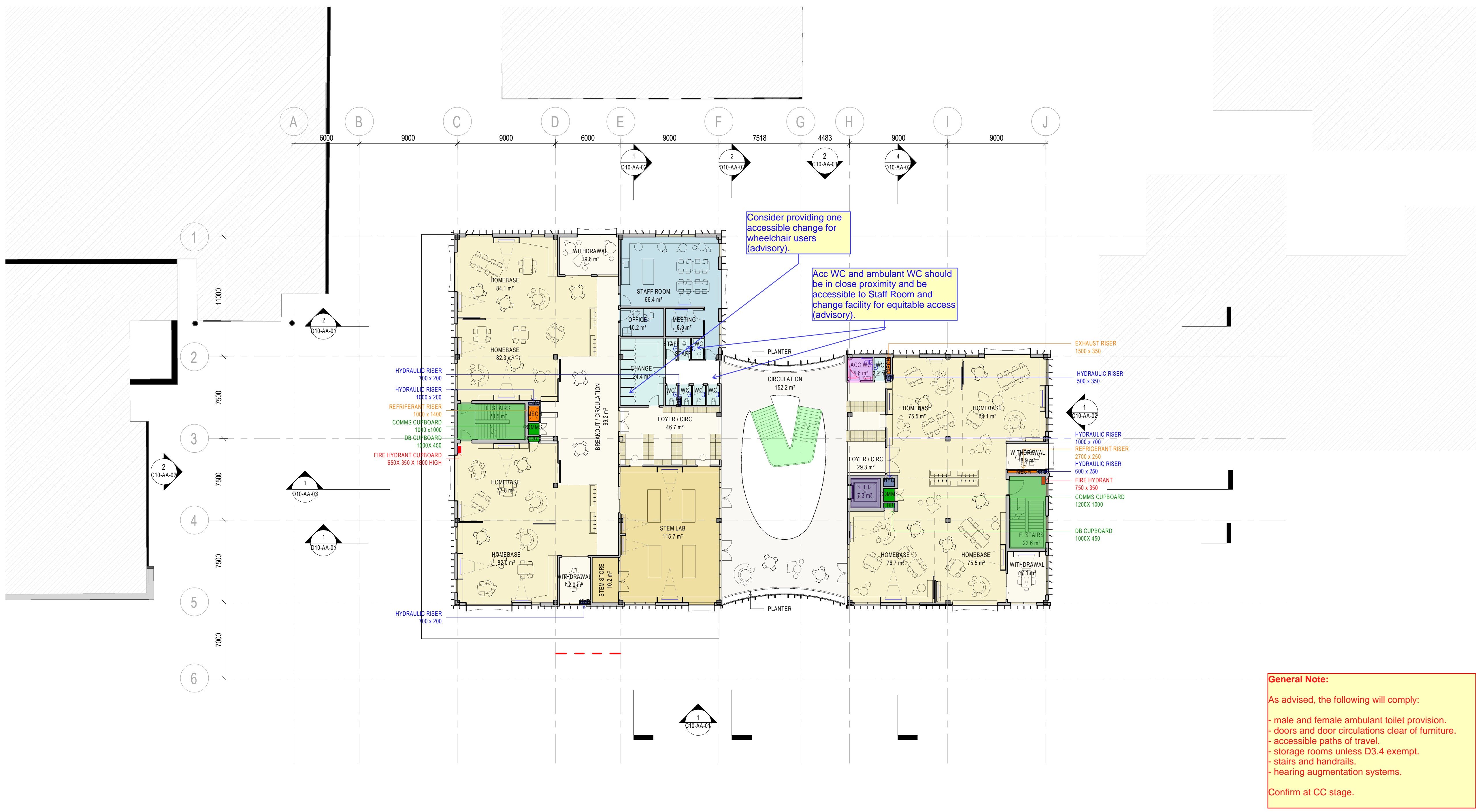
SCHEMATIC DESIGN  
DRAWING

GENERAL ARRANGEMENT  
PLAN - LEVEL 03

AR-B10-03-01

ISSUE

8



MGAC Review  
19/07/2021  
By: Lee-May Whong

ISSUE	DATE	FOR
1	18/03/21	Issue to Town Planner
2	14/04/21	For Information
3	28/05/21	For Information
4	02/06/21	For Information
5	07/06/21	For Information
6	25/06/21	Issued for Schematic Design
7	07/07/21	For Information
8	09/07/21	For Information

[illegible]

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CONSULTANT  
WILLOW TREE PLANNING  
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PROJECT MANAGER

KATE BIMSON  
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CLIENT

LYMBLE LADIES COLLEGE

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PROJECT

LYMBLE LADIES COLLEGE  
GREY HOUSE PRECINCT

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OWN PROJECT NUMBER

010018

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









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## GENERAL ARRANGEMENT PLAN - LEVEL 04

AR-B10-04-01	ISSUE 8
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- |   |           |   |                           |   |       |
|---|-----------|---|---------------------------|---|-------|
|  | AMENITIES |  | JUNIOR SCHOOL             |  | STAFF |
|  | CIRC      |  | JUNIOR SCHOOL<br>BREAKOUT |  | STEM  |
|  | COLA      |  | OSHC                      |   |       |
|  | DANCE     |  | OUTDOORS                  |   |       |
|  | ELC       |  | SERVICES                  |   |       |
|  | HEALTH    |   |                           |   |       |
- MGAC Re  
19/07/202  
By: Lee-M

MGAC Review  
19/07/2021  
By: Lee-May Whong





ARCHITECTS' REGISTRATION BOARD /  
NOMINATED ARCHITECTS

NSW  
9356 NINDSCHKA TITCHKOSKY  
4937 JAMES GROSE  
7115 JULIAN ASHTON  
7033 MATTHEW BLAIR  
7428 PETER THOMAS  
10447 ALISON BOUNDS

QLD  
5537 NEIL LOGAN  
3708 BRIAN DONOVAN  
1355 MARK GRIMMER  
3533 DAVID KELLY  
3517 CATHERINE SKINNER  
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NOTE

CONTRACTOR TO CHECK AND VERIFY ALL DIMENSIONS ON SITE PRIOR TO COMMENCEMENT OF WORK OR PREPARATION OF SHOP DRAWINGS. DO NOT SCALE THIS DRAWING.

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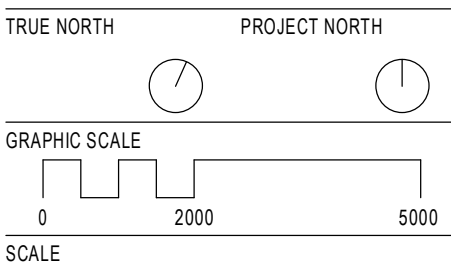
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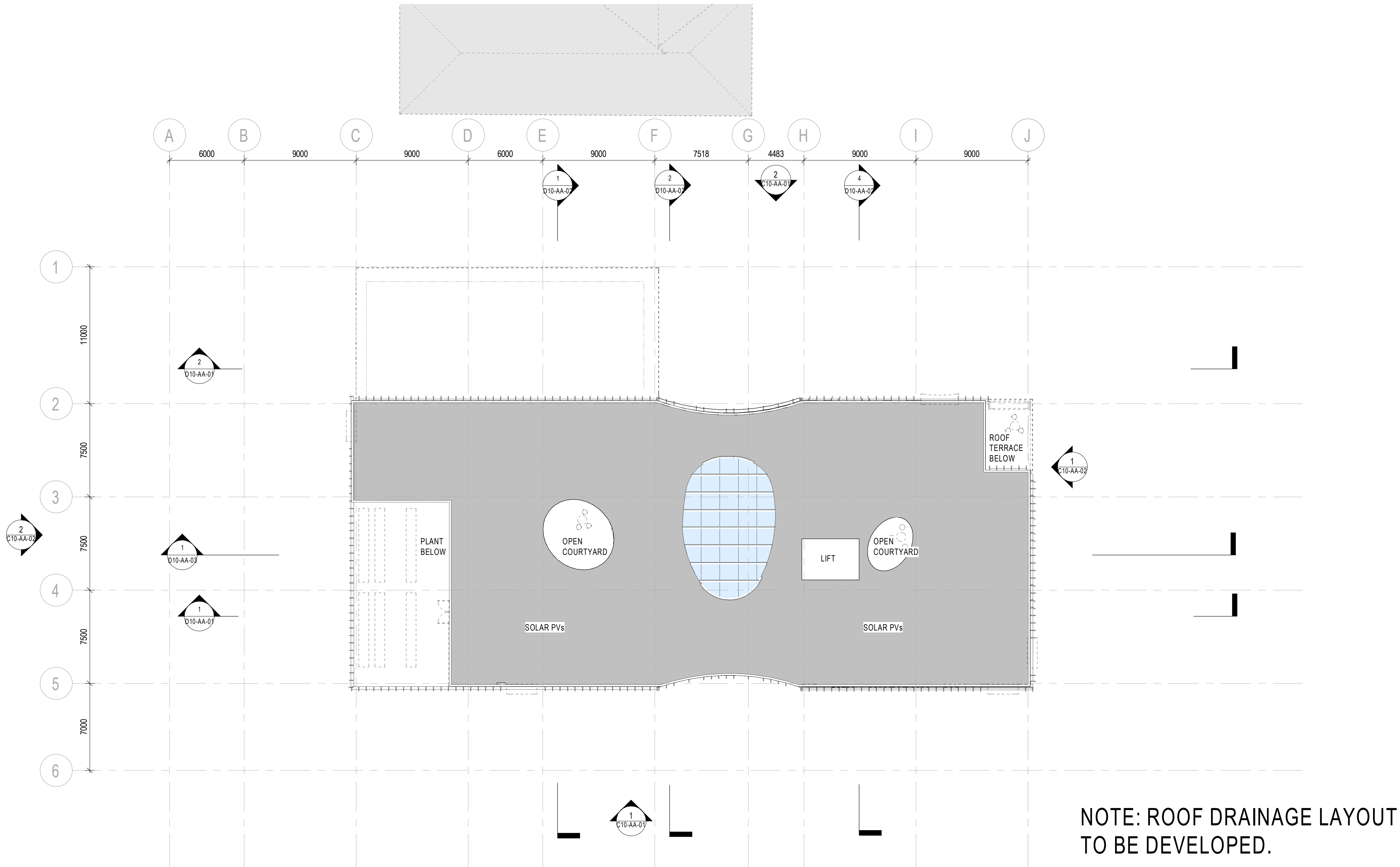


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STATUS

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ROOF PLAN

AR-B10-05-01	ISSUE
	8



NOTE: ROOF DRAINAGE LAYOUT  
TO BE DEVELOPED.

- |           |                        |       |
|-----------|------------------------|-------|
| AMENITIES | JUNIOR SCHOOL          | STAFF |
| CIRC      | JUNIOR SCHOOL BREAKOUT | STEM  |
| COLA      | OSHC                   |       |
| DANCE     | OUTDOORS               |       |
| ELC       | SERVICES               |       |
| HEALTH    |                        |       |

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