

SSDA/ BCA Access Report



Urban Health Access & Heritage Consultants

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Access to and within:

WILKINSON HOUSE

A: 167 Forbes Street, Darlinghurst, NSW 2010

Consent: **SSD-19989744**

Designed by:

Smart Design Studio

Co. Smart Design Studio

A. 15 Stokes Avenue
Alexandria, NSW 2016

On behalf of;

SCEGGS Darlinghurst

A. 215 Forbes Street
Darlinghurst, NSW 2010

Validated to accord with:

Building Code of Australia V1 2016

Part D3 Access for People with a Disability

Part E3.6 Accessible Elevators

Part F2.4 Accessible Sanitary Facilities

AS 1428.1 Part 1 General Requirements for Access-New Building Works

Commonwealth of Australia Disability Discrimination Act 1992

Disability (Access to Premises) Standard 2010

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0011 Document properties

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Accessibility review report for development application purposes.

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0012 Documents Referenced

- 1.1. Commonwealth Disability Discrimination act 1992 (DDA) and referenced standards.
 - 1.1.1. Disability (Access to Premises- Buildings) Standards 2010
 - 1.1.2. Access Code for Buildings (Schedule 1.)
- 1.3. Building Code of Australia 2019 Amendment 1 - Volume 1 (BCA 2019)
- 1.4. Australian Standards Design for Access and Mobility
 - 1.4.1. AS 1428.1 Part 1 General Requirements for Access - New Building Works
 - 1.4.3. AS 1428.4 Tactile Ground Surface indicators for orientation of people with vision impairment
 - 1.4.4. 2890.6 Parking Facilities, Part 6: Off-street parking for people with disabilities.

0013 Abbreviations

UH: Urban Health Consultants Pty Ltd

BCA: National Construction Code incorporating the Building Code of Australia 2014 edition.

DDA: Commonwealth Disability Discrimination Act 1992

CDC: Complying Development Certificate

SSDA: State Significant Development Application

CC: Construction Certificate

DA: Development Application

DTS: BCA type Deemed to Satisfy solution or provision

OC: Occupancy Certificate

PS: BCA type Performance Based Solution or Performance Based Design Brief

APS: Disability (access to Premises-Buildings) Premises Standard 2010

WHS: Work Health and Safety, Model WHS and NSW WHS Act, regulation and guides.

0014 Document Amendment Schedule

Section Revisions	Issue	Date	Comment
BCA Access Review	21382.1a	25/08/2021	Consultation release
BCA Access Review	21382.2a	10/09/2021	SSDA release
BCA Access Review	21382.3a	16/11/2021	SSDA release [final]

0100 Executive Summary

Description: - The project is a 5 level school building reconstruction.
Stage Approvals. SSDA



Street view rendered perspective, Smart Design Studio 2021

0220 DDA Premises Standard Summary

Project

Access to Premises Standard

Comment

The works include existing parts being restored and renovated, new parts, and affected parts or accessways to the new parts which are being upgraded.

Refer to addended diagrams of new and affected parts

For all new parts, the normal provision of the BCA applies.

0221 Existing Conditions

Existing Access to Wilkinson House

Early street access was via the main East entry in Forbes Street, yet for 40 plus years, Wilkinson House access has evolved to be campus oriented to the West and linked to other classrooms and school facilities via the school network of walkways and cloisters. Due to the steep natural terrain, equitable access within the campus and to the rear of Wilkinson House is challenging, and for this reason, the school has prepared a master plan for realising disability access by progressively linking buildings via walkways, ramps and lifts with each successive building upgrade.

The newly completed neighbouring Freeman Building established the main wheelchair access from a level drop off area in St Peters Street into the campus and the next piece in the jigsaw is to upgrade Wilkinson House with a new lift and walkway to interconnect the Freeman Building, Century Sports Hall and Wilkinson House.

Each new link and building upgrade have compounding networking benefits, providing choice ease of access and opportunities for people with access needs.

Existing access within Wilkinson House

The existing heritage building was built under the 1917 Local Government Act building regulations and was not required to be accessible. Due to the current fire regulations and geometric limitations, standard complying accessways cannot be formed within the existing without the substantial rebuilding for structural fire integrity, egress, and disability access.

Minor successive alterations and additions such as externally linked walkways have improved emergency egress, but no wheelchair access or egress.

Notwithstanding the need for wheelchair access, access for the anticipated volume of regular school-aged children, teachers and visitors is inadequate.

Existing stairs

The existing internal stairs are inadequate and need replacing. Passage and stairway widths and stair amenity are less than required due to geometric constraints such as total stairwell widths and landing dimensions. The stairs cannot be upgraded to meet the performance requirements of the current NCC/ BCA within the current stairwell envelope.

Prior modifications to the existing balustrade and handrail include adding the top rail to improve the balustrade height and reduce the risk of falls, yet the handrail cannot be made continuous between landings and a second handrail is now required for ascending and descending traffic. The total width of the stairway cannot accommodate a second handrail and is already too narrow leading to gridlock during classroom changeovers.

0300 BCA Summary Assessment

The hierarchy of assessment level to be met prior to each relevant stage.

(Perf-) Performance Requirements;	PR;- Prior to Town Planning or Development Application
(DTS) Deemed to Satisfy;	DTS; - DTS Solutions or a PS prior to construction
(AS) Australian Standards;	AS; - prior to tender and (OC) Occupancy

Notes: -

(Complies)	Complies for this stage,
(Refer)	Refer to detailed comments,
(DA CC CDC, OC)	Further Detailing required prior to stage approvals

Achieving the Performance Requirements at SSDA stage ensures the base building dimensions are adequate to accommodate future detailed standard amenity and fixtures. Detailed Australian Standard type amenity is to be documented and audited for approval, and or installed prior to later CC to OC stage approvals.

0310 Part D3 – Access for people with disabilities

BCA 2019 Amendment 1 attainments.

Clause	Title	Perform	DTS	AS
D3.0	Deemed-to-Satisfy Provisions	Complies	CC	OC
D3.1	General building access requirements	Complies	CC	OC
D3.2	Access to buildings	Complies	CC	OC
D3.3	Parts of buildings to be accessible	Complies	CC	OC
D3.4	Exemptions	Na	CC	OC
D3.5	Accessible carparking	Na	CC	OC
D3.6	Signage	Complies	CC	OC
D3.7	Hearing augmentation	Complies	CC	OC
D3.8	Tactile Indicators	Complies	CC	OC
D3.9	Wheelchair seating spaces in Class 9b	Complies	CC	OC
D3.10	Swimming pools	Na	CC	OC
D3.11	Ramps	Na	CC	OC
D3.12	Glazing on an accessway	Complies	CC	OC

0310 Part E3 – Lift installations

Clause	Title	Perform	DTS	AS
E3.6	Passenger Lifts	Complies	P Solution	P Solution

0310 Part F2 – Sanitary and other facilities

Clause	Title	Perform	DTS	AS
F2.4	Accessible sanitary facilities	Complies	CC	OC

0400 Report Introduction

The venture subject of this report is a 5 level school building reconstruction within an existing historic building at 167 Forbes Street Darlinghurst NSW 2010, developed on behalf of the client SCEGGS Darlinghurst.

The client group of SCEGGS Darlinghurst engaged Urban Health Consultants to verify that the project accords with the human rights objectives and technical Performance Requirements of the Disability (Access to Premises/ Buildings) Standard 2010 (APS) and related parts of the Building Code of Australia (BCA) 2019 Amendment 1.

0410 Aim

An informative qualitative quantitative assessment of the proposed access and use arrangements.

0420 Review method:

A comparison of the provision of access against, inter alia, the BCA performance requirements, Disability (Access to Premises) Standard (APS) and Australian Standards (AS) for access and mobility. This report describes exceptions, concessions, and BCA performance-based solutions for consideration at later stages of building approval.

0430 Limited Scope

This report is an assessment using Expert Judgement of the proposed Building Solutions per BCA A2.3 Deemed to Satisfy Solutions (2)(b), limited to the herein referenced accessibility parts only, and is not a specification of the required building systems and amenity.

A detailed review is advisable prior to later design, tender and construction stage approvals, to confirm the inclusion of BCA-DTS and Australian Standard provisions prior to construction.

This report uses Expert Judgment in describing the proposed compliance strategies being employed by the applicant and is to be read in conjunction with the building code, standards, condition of consent, construction drawings, specifications, manufactures, and product literature.

0440 Legislation

Legislative Requirements

Commonwealth of Australia
The DDA and Access to Premises Standard

State of New South Wales
EPA Act and regulations / Referenced BCA

NSW State Significant Infrastructure

City of Sydney DCP

Acceptance Criteria

Identify the scope of works and application of APS
comply with Access Code parts of the BCA.

ENVIRONMENTAL PLANNING AND ASSESSMENT
REGULATION 2000 - REG
Compliance with the BCA is achieved by meeting the
relevant BCA Performance Requirements. V1 2019
Amendment 1 DTS Parts:

- Part D3 Access for People with a Disability
- Part E3.6 Elevators
- Part F2.4 Accessible Sanitary Facilities

State Significant Infrastructure
No known additional requirements pertaining to
accessability.

Access is to meet the requirements of the Disability
Discrimination Act, 1992 (DDA), the relevant Australian
Standards and the Building Code of Australia (BCA)

Extent or limits of assessment

To and within areas normally used by the occupants.

Client Specified

Client access and emergency egress policy and procedures

Client requested beyond legislative requirements

Meet all statutory obligations by conformance with the BCA Performance Requirements.

0450 Findings

Further detailed findings are within the body of the report including:

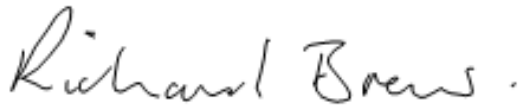
- 0510 Exemptions, Exceptions and Concessions
- 0520 Summary of Performance Solutions
- 0530 Building Classification
- 0600 Review of Building Solutions & BCA Performance Requirements
- 0700 Documents subject of review

0460 Conclusion & Statement of Conformity

For this SSDA stage report, the firm provides that conforming accessways and amenity are achievable within the proposed envelope dimensions.

This report applies to the SSDA stage documentation only and shall not be read as an endorsement of CC or a final OC stage construction. Further detailed resolution of the design during the construction stages is required to ensure the built solution meets the current BCA and conditions of consent for disability access, health, and amenity.

For more information, questions and queries or any other matters arising from this report; please contact the undersigned.



Richard Brew
Urban Health Consultants Pty Ltd
B. Architecture, Dip. Risk, WHS and ISO 9001 Quality Auditing

0510 Premises Standard & BCA Exemptions, Exceptions and Concessions

Summary of applicable PS and BCA exemptions and concessions

Clause	Exemption	Exception	Concession	Area Applied
D3.4	Areas that pose WHS risks and considered inappropriate for people with disability.			<ul style="list-style-type: none">Mechanical, Power, and electric Communications rooms, sprinkler / fire services room.Lift overruns and service pits.Sports storeroomPaths of travel dedicated to the above-mentioned rooms and spaces

0520 Performance Solutions Summary

In compliance with Environmental Planning and Assessment Act 1979 No 203 BCA Performance Solutions not grounds for refusal. Table below is a summary of the building solutions proposed, subject to a detailed BCA Performance Solutions document and PCA approvals.

E3.6 Passenger lifts

A Performance Solution is proposed to permit lift car internal width dimensions that vary to the BCA DTS provisions. A performance solution design brief is to prepare prior to construction; prepared and assessed using the BCA assessment methods.

Technical Variation	Performance Solutions
<p>E3.6 A 1200 x 2000 mm car is proposed in lieu of a 1400 x 1600 mm lift car.</p> <p>A Performance Solution is proposed to permit lift car internal width dimensions that vary to the BCA E3.6.</p> <p>A performance solution design brief is to prepare prior to construction for assessment using the BCA assessment methods.</p>	<p>This preliminary Performance Solution design brief proposes that the car floor area is greater than the BCA E3.4 tabled dimensions and AS 1735.12 standard car amenity including through car access.</p> <p>The lift is a European community (EC) complying lift for people with disability, registered in Australia and all other lift amenity is to be provided to the maximum extent possible.</p>

0530 Building classification and use

Item	Criteria	Comment
1.1	Existing building use description	Class 9b
1.1	Existing Building Classification. (BCA A3.2 Classification)	Class 9b — an assembly building including a trade workshop or laboratory in a primary or secondary school
1.2	Proposed Planning use description	A 5 level school building reconstruction
1.4	Proposed BCA building Classification	Status Quo/ Class 9b

0540 Disability Access to Premises -Buildings Standards 2010

APS	APS Criteria	Comment
	The Access to premises Standard and Access Code apply to specified Class 1b building; or a Class 2 building that has accommodation available for short-term rent and Class 3, 5, 6, 7, 8, 9 or 10 building where an application for approval for its construction is submitted, on or after 1 May 2011.	<p>The 'Premises Standard' applies to the works subject of the application for alterations, restorations, and additions to an existing building.</p> <p>The works include existing parts being restored and renovated but unaffected. There are no new parts dependant on the existing heritage parts for access.</p> <p>And new parts and affected parts or accessways to the new parts which are being upgraded. All accessways proceeding the new parts are either presently complying or subject to upgrades.</p> <p>Addended 1 provides A detailed analysis of the application of the upgrade provisions to specific spaces subject to exemptions and concessions.</p>
(4)	A part of a building is a new part of the building if it is an extension to the building or a modified part of the building about which: (a) an application for approval for the building work is submitted,	<p>New parts; All classrooms and new building floor levels are considered 'new parts'.</p>
(5)	An affected part is: (a) the principal pedestrian entrance of an existing building that contains a new part; and (b) 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.	<p>From the principal entrance, into the new parts.</p> <ul style="list-style-type: none"> • The building is accessed from the public footpath in St Peters Street. A relatively new (within the last 10 years) accessible entry and accessway was constructed for the adjoining Joan Freeman science and technology building and interconnects with the subject Wilkinson House entry, via ramps walkways and lifts. • The new works propose to keys into the Joan Freeman building accessways, with new connected complying accessways, to accord with this part. • Heritage rooms and building elements undergoing restoration and conservation are not considered upgraded or affected unless stated otherwise. <p><u>Summary of Findings.</u> For preservation conservation and restoration of existing heritage spaces; no change is proposed to the base building dimensions of those spaces, therefore upgrade provisions are not applicable.</p> <p><u>Affected parts;</u> Spaces that lead to upgraded or new areas include the main entry passage from Joan Freeman to and into the upgraded areas.</p> <p><u>New parts;</u> The normal provision of the BCA Performance Requirements apply to new parts.</p>

0600 Review of Building Solutions & BCA Performance Requirements

DP1 Access for people with disability

Access must be provided, to the degree necessary, to enable—

- (a) people to—*
 - (i) approach the building from the road boundary and from any accessible car parking spaces associated with the building; and*
 - (ii) approach the building from any accessible associated building; and*
 - (iii) access work and public spaces, accommodation and facilities for personal hygiene;*
- and*
- (b) identification of accessways at appropriate locations which are easy to find.*

Proposed Access to Wilkinson House

Wheelchair/disability access to Wilkinson House from the street is via the existing route starting at the campus entry in St Peter's Street through the Joan Freeman Building entrance foyer. The existing complying accessway will be augmented by a new lift in Wilkinson House linking all levels of the upgraded building, as well as bridging to intermediate levels in connected buildings.

Campus access is via the footpath and kiss-and-ride drop-off point in St Peter's Street and through the main entry foyer in the Joan Freeman science and technology building.

The Joan Freeman Building entrance foyer and central accessway constructed recently in 2010 is the main pedestrian route to the existing Wilkinson House, linking the main street entry to the adjoining buildings and basement car park via lifts and ramps walkways and landings.

An existing lift node at the nexus of Centenary Sports Hall, the John Freeman Building and Wilkinson house provides and will continue to provide complying vertical transfer between the three buildings.

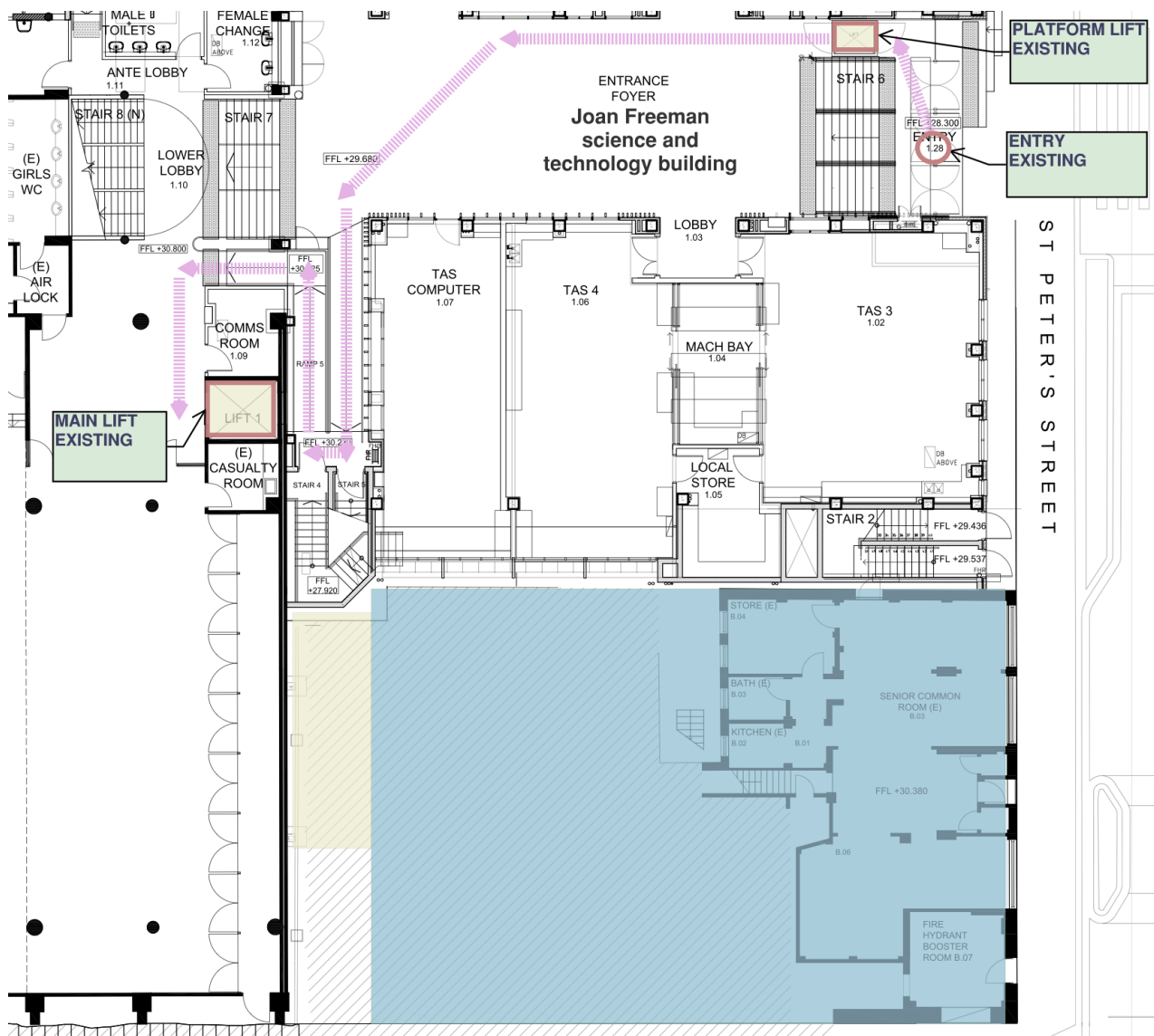
A proposed new lift in the void between Wilkinson house and Centenary Sports Hall will augment the existing lift, bridge existing with new levels in neighbouring buildings and extend access to new levels in the renewed Wilkinson House

The progressive realisation of disability access as per the objectives of the DDA Access to Premises Standard are fully supported in spirit and intent by the proposed new works.

Illustrated below; The Accessways from the street to the existing lift and from the lift to the site of the new entry and new lift.

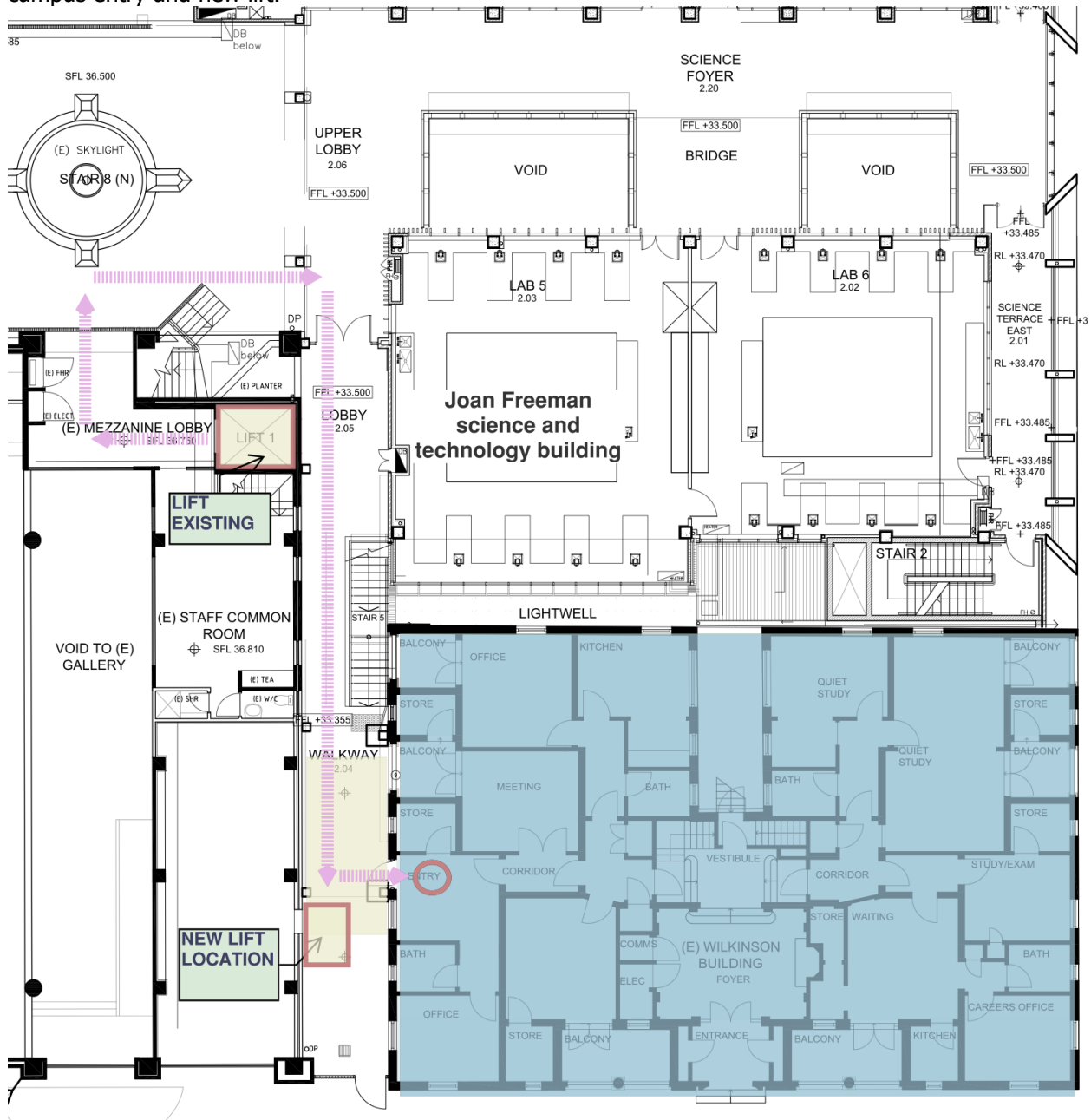
Below. Path of travel from St Peter's Street Level Entry to the existing lift.

Existing street level access in St Peters Street. Highlighted in purple, accessway from the street to the existing lift in Centenary Sports Hall.



Below. Proposed access route from the existing lift to the new Wilkinson House entry and lift.

Access from the existing lift in Centenary Sports Hall to the proposed site of the main Wilkinson House campus entry and new lift.



DP2 Safe movement to and within a building

So that people can move safely to and within a building, it must have—

- (a) walking surfaces with safe gradients; and*
- (b) any doors installed to avoid the risk of occupants—
 - (i) having their egress impeded; or*
 - (ii) being trapped in the building; and**

Compliance is achievable.

DP2 Safe movement to and within a building (Stairs & Ramps)

(Continued)

- (c) any stairways and ramps with—
 - (i) slip-resistant walking surfaces on—
 - (A) ramps; and*
 - (B) stairway treads or near the edge of the nosing; and**
 - (ii) suitable handrails where necessary to assist and provide stability to people using the stairway or ramp; and*
 - (iii) suitable landings to avoid undue fatigue; and*
 - (iv) landings where a door opens from or onto the stairway or ramp so that the door does not create an obstruction; and*
 - (v) in the case of a stairway, suitable safe passage in relation to the nature, volume and frequency of likely usage**

Achievable; Specify step amenity prior to Construction

DP8 Carparking for people with a disability

Carparking spaces for use by people with a disability must be—

- (a) provided, to the degree necessary, to give equitable access for carparking; and*
- (b) designated and easy to find*

Limitation:

DP8 does not apply to a building where—

- (a) a parking service is provided; and*
- (b) direct access to any carparking spaces by the general public or occupants is not available*

Accessible parking for the campus is in the Joan Freeman building basement parking, accessed via the car park lift.

D3.4 Exemptions (Within D-T-S/ WHS)

The following areas are not required to be accessible:

- (a) an area where access would be inappropriate because of the particular purpose for which the area is used.*
- (b) an area that would pose a health or safety risk for people with a disability.*
- (c) any path of travel providing access only to an area exempted by this clause.*

Note: The intent of the Act to provide access for PWD's is preserved by the exemption, although in practice, care is required to ensure that the exception is not used to discriminate.

Zones subject to the exemption include -

- Plant rooms
- Electrical, mechanical, hydraulic service areas, ducting and access panels.
- Storeroom, document room, server

These areas are to have controlled access, limited to single purpose and task orientated areas for people with specialist skill, and

- The inherent requirement of the job for work in these areas is a level of manual dexterity to meet the task demands above.
- Authorisation and responsibilities for work in these locations is to be documented within the facilities management quality documentation and staff job descriptions.

EP3.4 Lift access for people with a disability

When a passenger lift is provided in a building required to be accessible, it must be suitable for use by people with a disability.

A Performance Solution is proposed to permit a lift car internal width dimensions that vary to the BCA E3.6 A larger 1200 x 2000 mm stretcher lift car is proposed in lieu of a 1400 x 1600 mm lift car.

A Performance Solution design brief proposes that the car floor area is greater than the BCA E3.4 tabled dimensions and AS 1735.12 standard car amenity including through car access. The select lift is a European (EC) complying lift certified by a 'Notified Body' for person with limited mobility.

A performance solution design brief is to prepare prior to construction, and to be assessed using the BCA assessment methods.

FP2.1 Personal hygiene facilities

Suitable sanitary facilities for personal hygiene must be provided in a convenient location within or associated with a building, to the degree necessary, appropriate to—

- (a) the function or use of the building; and*
- (b) the number and gender of the occupants; and*
- (c) the disability or other particular needs of the occupants*

Compliance is Achievable

Campus sanitary facilities are provided in the existing Joan Freeman Science building, and new complying accessible and ambulant accessible sanitary facilities are proposed at ground level, level 2 and level 3.

¹ Cited; © WorkCover NSW Catalogue No.WC01433

0600 Documents Reviewed

Smart Design Studio 15 Stokes Avenue Alexandria NSW 2016		
SUBJECT SITE PLAN	2022_DA003 DA P2	15.10.2020
100		
L00 PLAN	2022_DA100 DA A	15.10.2020
L01 PLAN	2022_DA101 DA A	15.10.2020
L02 PLAN	2022_DA102 DA A	15.10.2020
L03 PLAN	2022_DA103 DA A	15.10.2020
RF PLAN	2022_DA104 DA A	15.10.2020
LG PLAN	2022_DA105 DA A	15.10.2020
400		
EAST ELEVATION	2022_DA400 DA A	15.10.2020
NORTH ELEVATION	2022_DA401 DA A	15.10.2020
WEST ELEVATION	2022_DA402 DA A	15.10.2020
SOUTH ELEVATION	2022_DA403 DA A	15.10.2020

0700 About the Author

Rich Brew is an Access and Building Ergonomics Consultant and director of Urban Health Consultants Pty Ltd. He has over 20 years of experience, with ten years specialising in building codes and standards to achieve national recognitions as an expert in the field of human perception and movement on stairs, stairway ergonomics, fall engineering, and heritage stairway conservation.

As a Graduate Architect from RMIT University, he has cross-disciplinary qualifications and expertise in building ergonomics, construction, heritage, product certification, work health and safety and public policy research.

Rich Brew has been the Director of Urban Health Consultants since 2003, providing practical and objective advice on Building Code of Australia (BCA), building amenity, access and egress, lifts, ramps, and stairway construction. Urban Health Consultants are typically contracted by architects, builders, developers, the government, and non-governmental aid organisations to provide advice on planning and development, building and construction, compliance, heritage asset conservation, work health and safety (WHS), and disability access complaint resolution.

His extensive and continuous research and practice experience on stairway ergonomics is the expert justification for new and innovative performance-based compliance-solutions, documented for approval with consistent, impartial and objective precision. Investing in practice research has enabled his clients to venture beyond compliance gridlock to new design frontiers.

As an expert witness, Rich has a reputation for decisive resolution of construction and building code disputes and civil complaints with accurate and historic knowledge of both the building compliance and work health and safety statutory framework, biomechanics and building ergonomics.