

BENIMA PTY LTD

ACCESS DESIGN REVIEW – STATE SIGNIFICANT DEVELOPMENT APPLICATION (SSDA)

Douglas Park Memorial Park – Stage 1

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1.0 Declaration

2.0 Introduction

This SSDA Access Design Review Report has been prepared by Jensen Hughes on behalf of Benima Pty Ltd for a combined Concept Plan approval and Stage 1 detailed works for a new multi-denominational cemetery at 430-490 Douglas Park Drive, Douglas Park (Douglas Park Memorial Park - Concept Plan and Stage 1).

The site is located at 430-490 Douglas Park Drive, Douglas Park within the Wollondilly Local Government Area (LGA). The site is irregular in shape with a total size of 16,7940m². It is legally described as Lot 2 in DP 250359. The site is mostly vacant with scattered vegetation and a single, residential dwelling with driveway accessible from Douglas Park Drive. The site comprises two street frontages, to the east is Mitchell Place and to the west is Douglas Park Drive.

This report accompanies a State Significant Development Application that seeks approval for a combined Concept Plan approval and Stage 1 detailed works for a new multi-denominational cemetery.

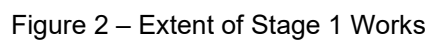
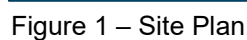
Concept approval is sought for the use and operation of the site as a cemetery with a maximum, staged capacity of up to 37,107 burial plots including a crematorium, chapel, administration building, vaults, remembrance sanctuaries, general site layout and all associated groundworks, roads, pathways, landscaping 135 car parking spaces and ancillary buildings. Refer to Figure 1.

The Stage 1 works comprise the following (refer to Figure 2):

- All preparatory site works including vegetation protection, enhancement and removal, demolition of existing structures, bulk excavation for burial zones, general ground works and utility service augmentation;
- Vehicular access / egress from Douglas Park Drive with separate vehicular egress only to Mitchell Place;
- Construction of internal roads, pathways and parking areas for 118 spaces;
- Perimeter memorial pedestrian pathway with remembrance sanctuaries;
- Burial zones with a maximum capacity of 15,447 comprising shallow, single and triple layered burial plots;
- Construction of single storey chapel, single storey administration and single storey Storage Shed/ Garage buildings;
- Site landscaping, fencing, lighting and entry signage; and
- The cemetery operating hours, including public access, will be between the hours of 6:00am and 6:00pm, 7 days a week. The opening hours of the Chapel and Administration Building (including café) will be between 8:00am and 5:00pm, 7 days a week.

The burial zone preparation works within Stage 1 will be carried out sequentially within each burial zone and will be based on the demand for burial plots.

For a detailed project description refer to the Environmental Impact Statement prepared by Ethos Urban.



3.0 SEARS

This SSDA for Douglas Park Memorial Park – Concept Plan and Stage 1 has been prepared under Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act), in accordance with the Secretary's Environmental Assessment Requirements (SEARs) issued by the Department of Planning, Housing and Infrastructure (DPHI).

This report has been prepared in response to the relevant requirements outlined within the SEARs. **Table 01** below addresses the relevant SEARs requirements and provides a project response.

Table 01 Secretary's Environmental Assessments Requirements

SEARs Item	SEARs	Relevant report section(s)
5	Concept Proposal: Built Form and Urban Design • Explain and illustrate the proposed design of the development, including a detailed site and context analysis to justify the proposed site planning and design approach. • Assess how the development complies with the relevant accessibility requirements. • Demonstrate that Aboriginal culture and heritage is considered and incorporated holistically in the design proposal consistent with the Connecting with Country Framework. Stage 1 Built Form and Urban Design • Explain and illustrate the proposed design of the development, including a detailed site and context analysis to justify the proposed site planning and design approach. • If buildings are proposed, demonstrate how: • the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. • the building design will deliver a high-quality development, including consideration of façade design, articulation, activation, roof design, materials, finishes colours, any signage and integration of services. • Assess how the development complies with the relevant accessibility requirements. • Demonstrate that Aboriginal culture and heritage is considered and incorporated holistically in the design proposal consistent with the Connecting with Cuntry Framework.	Section 4 Sections 7 Sections 8

Referral agency requirements do not apply to this SSDA Access Design Review Report

4.0 Report Summary

Jensen Hughes has reviewed the Development Application documents for the proposed residential development identified 430-490 Douglas Park Drive, Douglas Park (Douglas Park Memorial Park - Concept Plan and Stage 1).

The following report provides a summary of the findings relevant to the proposed works, highlighting the legislative and technical requirements to ensure all people working at or visiting the premises are afforded equitable, dignified access to the degree necessary.

4.1 PROJECT DESCRIPTION

The proposed Stage 1 works include the development of three (3) buildings required to be accessible within the cemetery grounds and additional landscaped spaces for quiet reflection and remembrance, as follows:

- + A large chapel used for all faith funeral services – Class 9b
- + An administration building incorporating a café/flower shop – Class 5 and 6
- + A Storage Shed/ Garage including workspace for 3 staff – Class 10a
- + Car Parking – Class 7a
- + Reflection pond
- + Chapel gardens

The site is entered via vehicular access from Douglas Park Drive, with an additional vehicular driveway exit via Mitchel Place, with the boundaries of the site delineated by Douglas Park drive, Mitchel Place and offset from the Hume Highway.

Refer to Section 2.0 for further project description.

4.2 CHAPEL BUILDING FLOOR PLAN

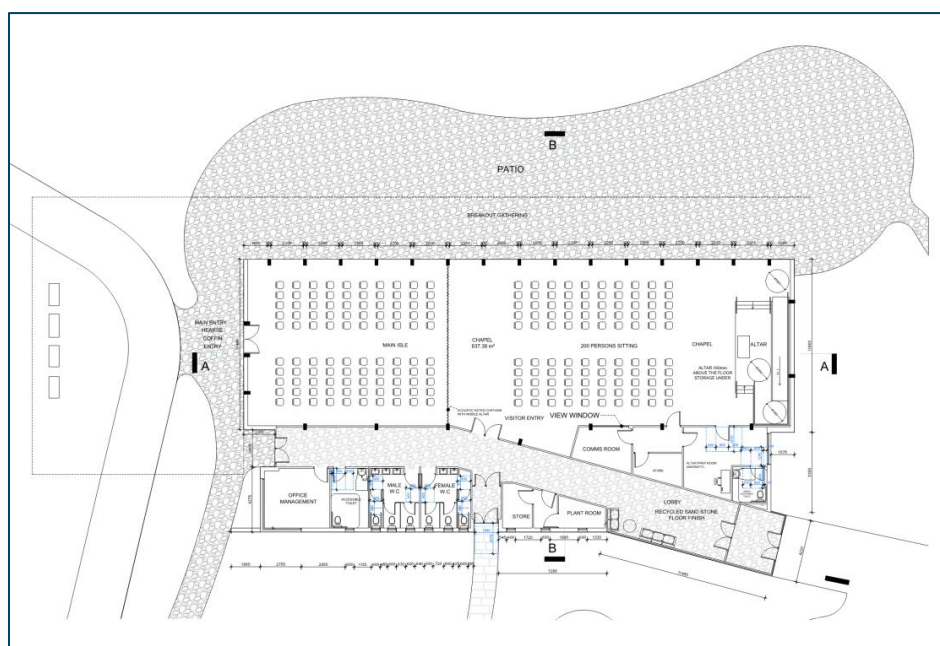


Figure 3 – Chapel Floor Plan
Source: Design Cubicle

4.3 ADMINISTRATION BUILDING FLOOR PLAN

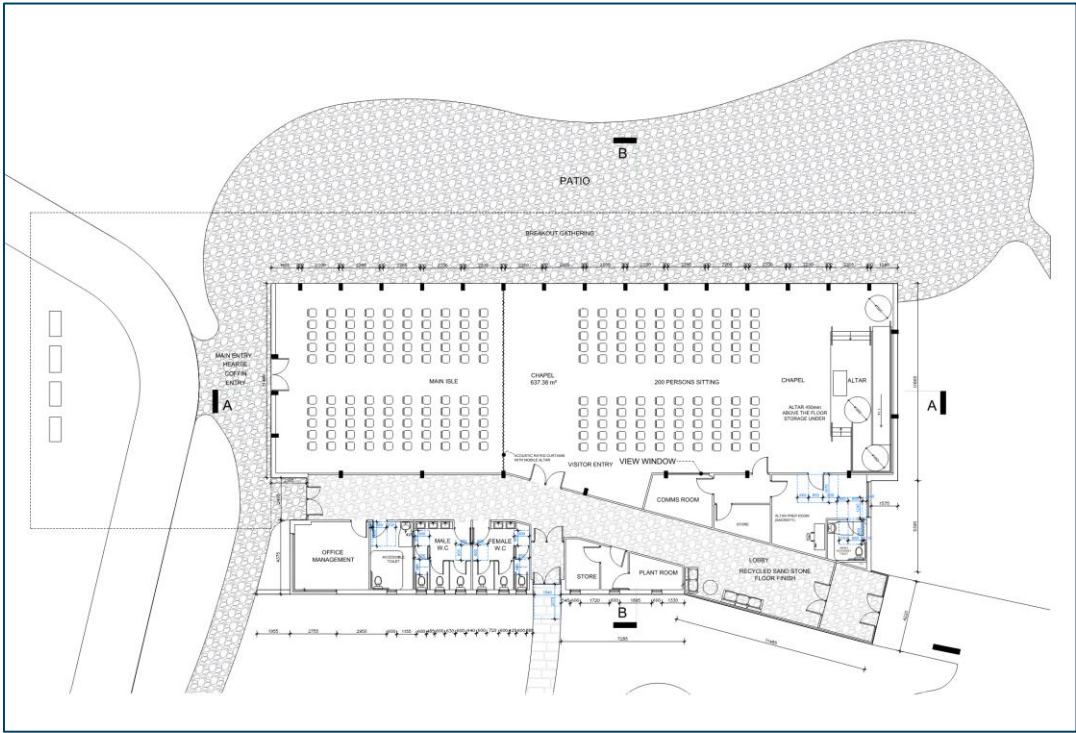


Figure 4 – Administration Building Floor Plan
Source: Design Cubicle

4.4 STORAGE SHED/ GARAGE FLOOR PLAN

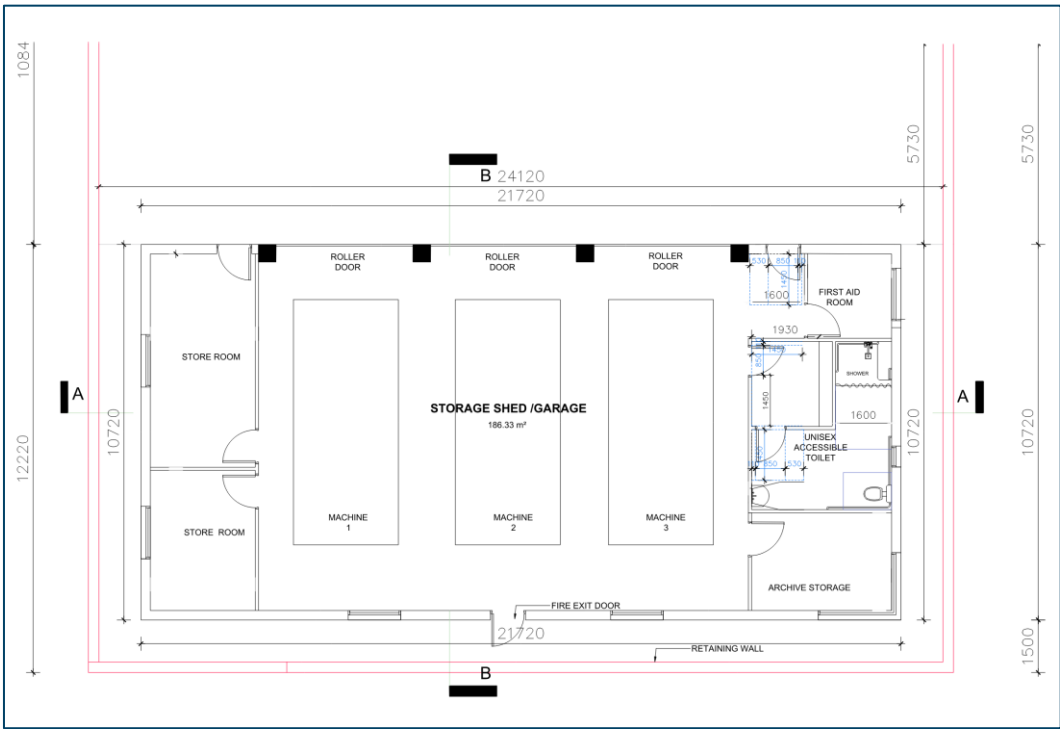


Figure 5 Storage Shed/ Garage Floor Plan
Source: Design Cubicle

4.5 REVIEW SUMMARY

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

- + Principles of Universal Design
- + Objects of the *Disability Discrimination Act 1992*
- + *Disability (Access to Premises- Buildings) Standards 2010; and*
- + Building Code of Australia 2022 (BCA2022) Volume 1 – Parts D4, F4D5, F4D6 and F4D.
- + Applicable Australian Standards AS1428.1:2009, and AS2890.6:2009

The design review includes general areas of the proposed development including but not limited to items as noted below:

- + Accessways (continuous accessible path of travel) from the allotment boundary and any accessible parking bay within the allotment associated with the building.
- + Building entrances.
- + Doors (hinged/sliding) and doorway circulation space.
- + Stairs, ramps, and walkway/pathway requirements.
- + Car parking.
- + Sanitary facilities including unisex accessible toilets and ambulant facilities.
- + Architectural landscape areas.

Subject to addressing the actions identified as necessary within the future design stages of the project, Jensen Hughes confirm that the project documentation provides accessibility capable of complying with the Disability (Access to Premises – Buildings) Standards 2010 (APS), National Construction Code (BCA) and Wollondilly Development Control Plan 2016 (DCP) requirements.

4.6 PERFORMANCE BASED SOLUTION SUMMARY

There are specific areas throughout the development where strict Deemed-to-Satisfy Premises Standards and BCA Compliance will not be achieved by the proposed design and site constraints. The assessment of the SSDA documentation has revealed that the following areas require assessment against the relevant performance requirements of the BCA2022:

- + The non-provision of a continuous accessible path of travel from the main points of entry at the property boundary.

These matters will need to be addressed in a detailed Performance Solution Report to be prepared for this development.

Refer to Section 7.2 for further information.

5.0 Legislative Requirements

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

Federal

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

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

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

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

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

This review has considered the requirements of the *Disability (Access to Premises – Buildings) Standards 2010*.

State

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

5.1 REFERENCED LEGISLATION AND STANDARDS

The design review has been undertaken against the following:

- + Objects of the *Disability Discrimination Act (DDA) 1992*.
- + *Disability (Access to Premises – Buildings) Standards 2010*.
- + National Construction Code (BCA) - Building Code of Australia (BCA) 2022 Volume 1. and referenced Australian Standards including:
 - AS1428.1 2009 Part 1: General Requirements for access – new building work.
 - AS2890.6 2009 Part 6: Off-street parking for people with disabilities.

5.2 COUNCIL DEVELOPMENT APPROVAL / DEVELOPMENT CONTROL PLANS (DCPS)

Further to the above listed Federal and State based legislative considerations, adherence to the Wollondilly Development Control Plan 2016 is required. Specifically:

✚ PART 2 – General considerations for all development

- Objective 2.1.1 - To ensure that developments are undertaken with due regard to human safety.
- Objective 2.1.3 - To ensure that developments achieve a satisfactory level of social equity.

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

6.0 Documentation Reviewed

This report is specific to the following key stage drawings.

Architectural Plans Prepared by Design Cubicle			
Drawing Number	Issue	Date	Amendment
Drawing Set Below	2	25.07.25	Stage 1 – Shadow Diagrams & Demolition Plan updated, GFA Plands added

LOT 2 DOUGLAS PARK, MEMORIAL PARK
ARCHITECTURAL DRAWING LIST

NO.	SHEET TITLE	SCALE ON A1
DA101	DEMOLITION PLAN	1:1000
DA102	SITE PLAN – CONCEPT MASTER PLAN & STAGE 1	1:1000
DA200	CHAPEL – (STAGE 1) – SITE PLAN	VARIES
DA201	CHAPEL – FLOOR PLAN	1:100
DA202	CHAPEL – ROOF PLAN	1:100
DA203	CHAPEL – ELEVATIONS	1:100
DA204	CHAPEL – SECTIONS	1:100
DA205	CHAPEL – GFA PLAN	1:100
DA300	ADMINISTRATION BUILDING – (STAGE 1) – SITE PLAN	VARIES
DA301	ADMINISTRATION BUILDING – FLOOR PLAN	1:100
DA302	ADMINISTRATION BUILDING – ROOF PLAN	1:100
DA303	ADMINISTRATION BUILDING – ELEVATIONS	1:100
DA304	ADMINISTRATION BUILDING – SECTIONS	1:100
DA305	ADMINISTRATION BUILDING – GFA PLAN	1:100
DA400	STORAGE SHED/ GARAGE – (STAGE 1) – SITE PLAN	VARIES
DA401	STORAGE SHED / GARAGE – FLOOR PLAN	1:50
DA402	STORAGE SHED / GARAGE – ROOF PLAN	1:50
DA403	STORAGE SHED / GARAGE – ELEVATIONS	1:100
DA404	STORAGE SHED / GARAGE – SECTIONS	1:100
DA405	STORAGE SHED / GARAGE – GFA PLAN	1:50
DA500	CRYPTS – (CONCEPT MASTER PLAN) – SITE PLAN	VARIES
DA501	CRYPTS – CONCEPT FLOOR PLAN	1:100
DA502	CRYPTS – CONCEPT ELEVATIONS	1:100
DA503	CRYPTS – CONCEPT 3D MASSING	NTS
DA504	CRYPTS – GFA PLAN	1:100
DA600	CREMATORIUM – (CONCEPT MASTER PLAN) – SITE PLAN	VARIES
DA601	CREMATORIUM – CONCEPT FLOOR PLAN	1:100
DA602	CREMATORIUM – CONCEPT ELEVATIONS	1:100
DA603	CREMATORIUM – CONCEPT 3D MASSING	NTS
DA604	CREMATORIUM – GFA PLAN	1:100
DA700	MATERIAL FINISH SCHEDULE	NTS
DA800	SHADOW DIAGRAMS – 9AM 21ST JUNE	1:500
DA801	SHADOW DIAGRAMS – 12PM 21ST JUNE	1:500
DA802	SHADOW DIAGRAMS – 3PM 21ST JUNE	1:500

7.0 Exemptions and Performance Based Solutions

7.1 EXEMPTIONS

Based on the use of some areas within a building, it is reasonable to not provide access to some spaces where it is deemed inappropriate because of the required tasks which are to be performed in the space or if the area poses as a health or safety risk for people with a disability. These areas include:

- + An area where access would be 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).

Examples of these rooms/spaces as outlined within the Guideline on the Application of The Premises Standards, Version 2, February 2013, developed by the Australian Human Rights Commission could include: cleaners store rooms, commercial kitchens, staff serving areas behind bars, cool rooms, rigging lofts, waste-containment areas, foundry floors, abattoir animal process areas, railway shunting yards, electrical switch rooms, chemical and hazardous material store areas, loading docks, fire lookouts, plant and equipment rooms and other similar areas.

7.1.1 Subject site – exemptions from the requirements of access

It is expected that comms rooms, plant rooms, some store rooms, the commercial kitchen and the servery area would meet the parameters of exemption as outlined above.

7.2 PERFORMANCE BASED SOLUTIONS

Where compliance via the current Deemed-to-Satisfy (DtS) building legislation cannot be met, these departures are to be addressed via the Performance Based Solution (PBS) assessment process. This assessment when utilised, will be unique to each building and/or site, combining an understanding of the principles of access with alternative methods to assist the design team, building owners/operators and occupants to achieve an effective solution.

Item	BCA Clause	Relevant Performance Requirement	Technical Requirement	Technical Departure
1.	Part D4D2(1) Part D4D2(8) Part D4D3(a)	D1P1(a)(i)	Access must be provided to the degree necessary to enable people with disability to access the building via a continuous accessible path of travel from the main points of a pedestrian entry at the allotment boundary.	The proposed performance solution will support the non-provision of an accessway from the property boundary on the basis that: + No pedestrian pathway is provided from the property boundary into the site, and + All building occupants will only access the subject site via vehicle drop-off or parking due to there being no public transport, and no public pedestrian footpaths associated with the site.

Item	BCA Clause	Relevant Performance Requirement	Technical Requirement	Technical Departure
				Where future pedestrian footpaths or public transport routes are developed to service the site, the proposed performance solution will no longer be applicable and building management shall endeavour to provide the required accessway from the main points of a pedestrian entry at the allotment boundary.

8.0 Design Requirements

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

8.1 GENERAL BUILDING ACCESS REQUIREMENTS

Buildings and parts of buildings must be accessible in accordance with relevant parts of BCA 2022. Unless subject to an exemption under Part D4D5, access is required to the three (3) subject buildings and car parking within the Douglas Park Memorial Park Stage 1 project as follows:

Building Classification	Access Requirements
Class 5 – office building used for professional or commercial purposes	Access is required to and within all areas used by occupants.
Class 6 – shop or other building for the sale of goods by retail, or supply of services direct to the public	Access is required to and within all areas used by occupants
Class 7a – a car park	Access is required to and within any level containing accessible carparking spaces
Class 10a – a non-habitable building	Access is required to and within i. an accessible sanitary facility; and ii. a change room facility; and iii. a public shelter or the like.
Class 9b – an assembly building	Access is required to and within i) wheelchair seating spaces provided in accordance with D4D10 ii) 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.

8.1.1 BCA Clauses and referenced Australian Standards reviewed:

BCA Clauses – BCA 2022 references	
D4D2 General building access requirements	Applicable
D4D3 Access to buildings	Applicable
D4D4 Parts of buildings to be accessible	Applicable
D4D5 Exemptions	Applicable
D4D6 Accessible car parking	Applicable

BCA Clauses – BCA 2022 references	
D4D7 Signage	Not applicable at planning stage
D4D8 Hearing augmentation	Not applicable at planning stage
D4D9 Tactile indicators	Not applicable at planning stage
D4D10 Wheelchair seating spaces in a Class 9b assembly building	Applicable
D4D11 Swimming Pools	Not applicable
D4D12 Ramps	Applicable
D4D13 Glazing on an accessway	Not applicable at planning stage
E3D7 Passenger lift types and their limitations	Not applicable
F4D5 Accessible sanitary facilities	Applicable
Australian Standard references	
AS1428.1-2009	Applicable
AS 2890.6-2009	Applicable
AS1428.4.1-2009	Not applicable at planning stage
AS1428.2-1992	Applicable
AS1735.12-1999	Not applicable

8.2 EXTERNAL APPROACHES TO BUILDINGS – ASSESSWAYS

8.2.1 Access Requirements - Accessways

An accessway (continuous accessible path of travel) is required to the new buildings as follows:

- + from the main points of a pedestrian entry at the allotment boundary; and
- + from another accessible building connected by a pedestrian link; and
- + from any required accessible car parking space on the allotment.

An accessway can include a walkway, ramp, step ramp, kerb ramp, and landings. But cannot include a step, stairway, or other impediment. Accessways are required to incorporate the following provisions:

- + A minimum width of 1000mm if straight, or 1500mm if curved (AS 1428.1-2009 Clauses 6.6 & 10.4(d)),
- + A 1500mm x 1500mm (with permissible splayed internal corner) circulation space at locations where a 60°-90° turn is required (AS 1428.1-2009 Clauses 6.5.1),
- + A 1540mm (W) x 2070mm (L) circulation space at locations where a >90°-180° turn is required, where it is not possible to continue within 2m of the end of the accessway, and at minimum intervals of 20m along an accessway (BCA2022 D4D4(c)(ii) and AS 1428.1-2009 Clause 6.5.3).
- + A 1800 (W) x 2800mm (L) passing space (with permissible splayed corners) is required at maximum 20m intervals, where a direct line of sight is not available within an accessway.
- + Landings at doorways and gates within accessways are to incorporate circulation space to both sides of the gate/door, (AS 1428.1-2009 Figures 31 & 32).
- + Any part of an accessway that does not exceed a gradient of 1:20 is defined as a walkway. It must incorporate landings, edge protection, and crossfall where relevant (AS 1428.1-2009 Clauses 10.1 10.2 & 10.8).
- + Where the accessway has a gradient steeper than 1:20 but does not exceed 1:14, it is defined as a ramp and must incorporate landings, handrails, kerb rails, and TGSIs (AS 1428.1-2009 Clauses 10 & 12).
- + A step ramp with a gradient up to 1:10 is permitted where the length between landings does not exceed 190mm. However, it must not have overlapping landings with another ramp (BCA2022 Part D4D12(b) and AS 1428.1-2009 Clauses 10.6).
- + A series of consecutive ramps must not have a combined rise of more than 3.6m (BCA2022 Part D4D12(a))
- + Where a kerb ramp is installed at an external pedestrian accessway, it must incorporate sharp transitions, splayed edges and landings sized according to the direction of travel and/or any required change of direction (AS 1428.1-2009 Clause 10.7)
- + Accessways must be constructed of a firm, hardstand surface, with any crossfalls and camber that does not exceed 1:40 (or 1:33 where the surface is bitumen), and falls towards the centre of a curved accessway (AS1428.1-2009 Clauses 7, 10.1 & 10.4)
- + Ground surfaces are required to incorporate finishes which are slip resistant, including the abutment of surfaces which don't limit the movement of a person with disability, with the orientation and placement of elements such as drains and decking also important considerations (AS 1428.1-2009 Clause 7).
- + Where there is no environmental cue to identify a hazard available for people with vision loss e.g., level transition at a road crossing point, the incorporation of tactile ground surface indicators (TGSIs) in accordance with the requirements of AS1428.4.1-2009 is necessary.

8.2.2 Subject site – accessway assessment

The accessways as currently detailed on the site plan appear capable of meeting the BCA2022 requirements, however, further design development will refine the accessways to ensure full compliance with required access provisions and Australian Standards.

Stage 1 of the Douglas Park Memorial Park development includes three (3) accessible buildings: a chapel, an administration building with a café and flower shop, and a Storage Shed/ Garage, along with key landscaped areas such as various burial zones, a reflection pool, and a chapel garden. Accessible parking

bays have been provided near the chapel and administration building, strategically located to ensure equitable access for all users.

The topography of the site supports accessibility, with gradients across the various accessways generally not exceeding 1:20. However, specific accessible accessway requirements, including landings at changes in direction and passing spaces every 20 metres, will be addressed in later stages of design development. Additionally, ramps provisions will be incorporated where gradients exceed 1:20, and where kerb ramps are required at accessible parking bays and at vehicle driveway intersections.

Access has been provided from the two parking areas as shown in the Stage 1 Works Plan (fig 2). The accessible parking bays to the main parking area near the Douglas Park Drive main entry is provided with an accessible path to the principal pedestrian entrance of the Administration building and the Chapel. A secondary parking area to the north of the Administration Building and associated accessible path from the accessible parking bays forms the principal accessible pathway between the two buildings, meeting the deemed-to-satisfy requirements of BCA 2022 D4D3(b) & (c). The chapel leads out into the Reflection Pond and the Burial Zones beyond.

As the site does not have associated pedestrian footpaths or public transport services along the Douglas Park Drive main entry, all visitors and staff are required to arrive by motor vehicle contravening requirement under BCA D1P1. A performance-based solution is proposed to address performance requirement under D1P1 in lieu of providing an accessway from the property boundary.

8.3 VEHICLE ACCESS INTO THE SITE

8.3.1 Access requirements – Carparking

Carparking is required in association with the new buildings required to be accessible as per the building classification as follows:

- + For Class 5, 7, 8 or 9c buildings: one (1) accessible space is required for every one-hundred (100) carparking spaces or part thereof.
- + For Class 6 buildings, with up to one-thousand (1000) carparking spaces, one (1) accessible space for every fifty (50) carparking spaces or part thereof; and for each additional one-hundred (100) carparking spaces or part thereof in excess of one-thousand (1000) carparking spaces, one (1) accessible space is required.
- + Class 9b assembly buildings: with up to one-thousand (1000) carparking spaces, one (1) accessible space for every fifty (50) carparking spaces or part thereof; and for each additional one-hundred (100) carparking spaces or part thereof in excess of one-thousand (1000) carparking spaces, one (1) accessible space is required.

Accessible parking bays must incorporate the following provisions:

- + The design of the angled or parallel accessible parking bay and shared area must comply with AS/NZS 2890.6-2009, including the provision of a bollard within the shared area.
- + Where 5 or less spaces in total are provided, the accessible bay need not be identified with signage, as it's use should not be restricted (BCA2022 Part D4D6(1)(d)). However, sufficient size and shared space provisions as per AS/NZS 2890.6-2009 must still comply.

8.3.2 Subject site – Carparking assessment

The carparking as currently detailed on the site plan appears capable of meeting the BCA2022 requirements, however, further design development will refine the accessways to ensure full compliance with

required access provisions and Australian Standards. In total, stage 1 has 118 car parking spaces while the concept stage has 135 car parking spaces.

The Storage Shed/ Garage building includes two (2) car parking spaces. There are no requirements for the provision of accessible parking bays for a Class 10 building.

The administration and the chapel buildings share the visitor car park, containing fifty-eight (58) spaces, with five (5) accessible bays, and the staff parking area containing twenty (20) spaces, with three (3) accessible bays. This provision exceeds the minimum BCA2022 requirements and aligns with universal design principles, considering the high proportion of elderly visitors expected.

Additionally, fifty-five (55) visitor parking spaces have been provided as parallel bays near the various burial zones. Whilst not a mandatory requirement, it is recommended, for further design development, that some of these spaces be designated as accessible bays to ensure equitable access to the burial zones.

8.4 BUILDING ENTRANCES AND INTERNAL DOORS

8.4.1 Access requirements – Building entrances and internal doors

Entrances into each new buildings on site are required to be accessible as follows:

- + Accessway must be provided through the principal pedestrian entrance of the building.
- + Through not less than 50% of all pedestrian entrances (including the principal pedestrian entrance).
- + In a building with a floor area greater than 500m², an inaccessible entrance must not be located more than 50m from an accessible entrance.

All internal doors and doorways within a building required to be accessible, providing access to an area required to be accessible must incorporate BCA2022 and AS 1428.1-2009 provisions.

Requirements of accessible doors and doorways include:

- + Unobstructed clear opening widths to be a minimum of 850mm (a 920mm door leaf is required for a hinge swing door; 1020mm required for a swing door (AS 1428.1-2009 Clause 13.2).
- + Controls including after-hours swipe cards, key locks, auto door controls etc. located on a level landing, in an accessible location (AS 1428.1-2009 Clauses 13.5 & 14).
- + Circulation spaces which consider the angle of approach and direction of swing/slide at both sides of the entrance door (AS 1428.1-2009 Figures 31 & 32).
- + Light operational forces (less than 20 N) (AS 1428.1-2009 Clause 13.5.2(e)).
- + Appropriately designed and installed door/gate controls and hardware (BCA D3D16 and AS 1428.1-2009 Clause 13.5.2).
- + Luminance contrast which is measured at not less than 30% ((AS 1428.1-2009 Clause 13.1).
- + Fully glazed doors or sidelights to incorporate a visual contrast strip no less than 75mm wide for the full width of the glazing, with the lowest edge at 900-1000mm above the finished floor.
- + Doorway threshold ramps are only permitted on the exterior side of building entrance doorways and must have edge protection (BCA2022 Part D3D16 and AS 1428.1-2009 Clause 10.5)

8.4.2 Subject site – Entrances and Door assessment

A detailed review of the SSDA plans for the Storage Shed/ Garage, administration, and chapel buildings indicates that the relevant doors and doorways as currently detailed appear capable of meeting BCA 2022

accessibility requirements for clearance and circulation space. However, further door provisions, such as controls and luminance contrast, will be assessed during design development and construction documentation stages.

Access has been provided through 100% of the external doorways in each of the subject buildings within the Stage 1 works, exceeding the minimum 50% requirement. This design approach meets universal design principles and ensures equitable access for all staff and visitors, including those with disability.

All accessible doors, including the active leaf of double swing doors, have been provided with the required 850mm minimum clear opening. Additionally, airlocks have been designed with the required 1450mm minimum clearance between the opening door leaves.

All internal doors in each building are either single swing or double swing doors. Sliding doors are only included in the café kitchen, which will be exempt from access requirements as per BCA D4D5. All doors providing access to areas required to be accessible appear to have been designed with adequate circulation space with consideration for the direction of approach in accordance with Figure 31 of AS 1428.1-2009. It is noted that some doors to various storerooms have reduced clearance, but these storerooms are expected to be exempt from accessibility requirements as per BCA D4D5.

8.5 STAIRS AND RAMPS

8.5.1 Access requirements – Stairs and Ramps

Stairs within the site are to incorporate (excluding fire isolated stairs):

- + Handrails to both sides which are continuous, consistent, and incorporate a diameter of 30-50mm, extensions and terminations at the top and base, a clear unobstructed width of no less than 1000mm between them.
- + Opaque risers.
- + Nosing strips which provide a luminance contrast of no less than 30%.
- + Tactile ground surface indicators (TGSIs) at the top and base which incorporate a luminance contrast of 30-60% dependent upon the installation type.

Ramps within the site are to incorporate (excluding fire isolated ramps):

- + A gradient of not more than 1:14.
- + Landings which are incorporated at the intervals required based upon the gradient of the ramp and which do not exceed 1:40, taking into consideration the direction of travel, and adjusting the landing depth/width, as necessary.
- + Handrails to both sides which are continuous, consistent, and incorporate a diameter of 30-50mm, extensions and terminations at the top and base, a clear unobstructed width of no less than 1000mm between them.
- + Kerb rails installed to both sides of the ramp.
- + Tactile ground surface indicators (TGSIs) at the top and base which incorporate a luminance contrast of 30-60% dependent upon the installation type.

A set back is required from transverse paths of travel, typically 700mm from an internal corner and 900mm from the allotment boundary.

8.5.2 Subject site – Stair and Ramp assessment

Both the Storage Shed/ Garage building and the administration building are single-storey structures and do not contain any stairways or ramps at this stage of design.

The chapel building is also single-storey but incorporates a level change at the altar, with two stairways providing access from either side and a 1:14 ramp accessing it from the rear. Both the stairs and ramp provide the required minimum 1000mm path of travel and include handrails on both sides. The ramp also incorporates sufficient 180° turning space at the landing. Therefore, they appear capable of achieving compliance with accessibility requirements. Detailed provisions for TGSIs, handrails, kerb rails, and stair tread nosings will be assessed during design development and construction documentation stages.

Externally, within the landscaping, stairways are also noted to access the reflection pool. These appear to provide a minimum 1000mm path of travel. Whilst not a mandatory requirements, we strongly recommend that accessible stairway provisions, including handrails on both sides, tread nosings, and TGSIs, be incorporated as the design progresses to ensure accessibility and safety for all users of the external stairways.

8.6 INTERNAL ACCESSWAYS – CORRIDORS & ROOMS

8.6.1 Access requirements – Internal accessways

Access is required via a continuous accessible path of travel (accessway) throughout all areas of a building required to be accessible, unless the path of travel is only serving an area that is exempt from access provisions under BCA2022 Part D4D5.

A continuous accessible path of travel can include a walkway, ramp, step ramp, kerb ramp, and landings. But cannot include a step, stairway, turnstile, revolving door, escalator, moving walk or other impediment. Accessways are required to incorporate the provisions as noted above in section 10.2.1, with the additional considerations for internal accessways:

- + The minimum width and circulation space must be measured between finished surfaces, and can not be intruded by skirting boards, shelving, fire extinguishers or any other fixtures or fittings (AS 1428.1-2009 Clause 6.3 & Figure 2).
- + An unobstructed height of 2000mm (or 1980mm through doorways) is required (AS 1428.1-2009 Clause 6.2 & Figure 2).
- + Doorways must provide flush thresholds, and any floor surface transitions must ensure a maximum tolerance of 5 mm level change at abutting floor surfaces (AS 1428.1-2009 Clause 7.2).
- + Where there is no chair rail, handrail or transom, all full height glazing on an accessway capable of being mistaken for a doorway or opening must be provided with a solid, non-transparent contrasting line no less than 75mm wide with the lower edge installed at 900-1000mm AFFL across the full width of the glazing panel (BCA Parts D4D9 & D4D13, AS 1428.1-2009 Clause 6.6 and AS/NZS 1428.4.1-2009 Clause 2.2).
- + A 1540mm (W) x 2070mm (L) circulation space to allow for a wheelchair user to perform a 180° turn is required within every area required to be accessible and within 2m of a doorway in a corridor, where it is not possible to continue forwards without going through the doorway (BCA2022 D4D4(c)(ii) and AS 1428.1-2009 Clause 6.5.3).

8.6.2 Subject site – Internal accessway assessment

A detailed review of the SSDA plans for the Storage Shed/ Garage, administration, and chapel buildings indicates that the internal accessways within each building, as currently detailed, appear to be capable of meeting BCA 2022 accessibility requirements for clearance and circulation space.

All rooms and corridors required to be accessible have been designed with sufficient space to allow a wheelchair user to perform both 90° and 180° turns where needed. Additionally, the altar area in the chapel also appears to provide this required turning space. Generally, rooms and corridors have been generously sized to provide ample passing spaces and facilitate easy counterflow of people moving throughout the building, in line with best practice universal design principles.

At this stage, floor surfaces and glazing within the accessways will be assessed during design development and construction documentation stages.

8.7 SANITARY FACILITIES

8.7.1 Access requirements – Sanitary facilities

Requirements for accessible and ambulant sanitary facilities within a building required to be accessible are as follows:

- + Unisex accessible sanitary facilities are required on each floor level where sanitary facilities are available within common areas. An equal distribution of right hand (RH) and left hand (LH) configured unisex accessible sanitary facilities are to be provided, where there is more than one available within a building.
- + The plan circulation space and fit out of these facilities are to meet the provisions of AS1428.1-2009 Clause 15. Where one or more toilets are provided in addition to a unisex accessible sanitary facility, an ambulant cubicle for male and female use is required within each bank.
- + Raised tactile and Braille signage is required to identify each of the sanitary facilities and provide direction where a bank of sanitary facilities does not incorporate an accessible facility, directing the user to the location of the nearest accessible facility. Where gendered shower facilities are available, an accessible shower facility is required.

8.7.2 Subject site – Sanitary facilities assessment

A detailed review of the SSDA plans for the Storage Shed/ Garage, administration, and chapel buildings indicates that the sanitary facilities required to be accessible within each building, as currently detailed, appear to meet BCA 2022 accessibility requirements for clearance and circulation space.

In the Storage Shed/ Garage building, one accessible toilet (LH) and shower are provided, accessed via an airlock from the machine workspace. Within the chapel building, an accessible toilet (RH) is located in the sacristy, and a public accessible toilet (LH) is provided off the main hallway. Additionally, male and female ambulant toilets are included in this bank of sanitary facilities off the main hallway.

The administration building contains two (2) banks of sanitary facilities. The sanitary facilities associated with the café/flower shop are accessed via an external building entrance and include male and female ambulant toilets, as well as an accessible toilet (RH). The internal bank of sanitary facilities is split, with the male and female facilities containing requisite ambulant toilets located in the south wing of the building, and the accessible sanitary facility (LH) located in the north wing. While this layout complies with accessibility requirements, we note that the north wing may be a secure staff area. Therefore, consideration should be given to public access to this accessible facility in future design development, as it would not be equitable to require a visitor to use the external sanitary facilities when internal facilities are provided.

Fixtures and fittings within the sanitary facilities will be assessed during design development and construction documentation stages.

8.8 WAYFINDING (SIGNAGE COMPONENT) – COMMON USE AREAS

8.8.1 Access requirements

Requirements for statutory accessible signage within a building required to be accessible are as follows:

- + Where a pedestrian entrance is not accessible, raised tactile and Braille directional signage incorporating the international symbol of access is required to direct a person to the location of the nearest accessible pedestrian entrance.
- + Further raised tactile and Braille signage is required to be installed at accessible sanitary facilities, identifying the configuration of the facility, ambulant sanitary facilities (where available), spaces which incorporate hearing augmentation, including information about the type of system in use and the availability/location of receivers. Signage is also required at exit doors identifying the location.
- + A signage and wayfinding strategy should be created to ensure key accessible transition points are identified and captured around a building and/or site e.g., highlighting the location of accessible sanitary facilities, parking bays etc.
- + See AS BCA2022 Specification 15 and AS 1428.1-2009 Clause 8 for signage design requirements.

8.8.2 Subject site – access assessment

Signage compliance was not assessed at this concept design stage. However, it is noted that raised Braille and tactile signage will be required for this project, including signage for all emergency exits and rooms equipped with hearing augmentation (as detailed in section 10.9 below).

All building entrances are currently detailed as fully accessible and, therefore, do not require directional signage. However, within the administration building, directional signage will be necessary at the south wing bank of internal sanitary facilities to indicate the direction to the accessible toilet in the north wing.

In line with universal design principles, additional accessible signage is recommended to be provided to indicate accessible parking, building entrances, and other key locations across the site to ensure clear and equitable wayfinding for staff and visitors.

8.9 HEARING AUGMENTATION

8.9.1 Access requirements

Hearing augmentation is to be provided where an inbuilt amplification system is installed (Other than one used only for emergency warning):

- + In a room in a Class 9b building.
- + In an auditorium, conference room, meeting room or room for judicatory purposes; or
- + At any ticket office, teller's booth, reception area or the like, where the public is screened from the service provider.

The area covered within the room/area that the system is provided must extend across 80-95% of the floor area, dependent upon the type of system utilised. Receivers where required must accommodate the number of anticipated users, based upon the number of people the room or space accommodates.

Screens or scoreboards associated with a Class 9b building, capable of displaying public announcements must be capable of supplementing any public address system, other than a public address system used for emergency warning purposes only.

8.9.2 Subject site – hearing augmentation assessment

Hearing augmentation compliance was not assessed at this concept design stage. However, it is noted that hearing augmentation systems will be required in the following rooms within each building:

- + The Class 10 Storage Shed/ Garage building does not have any spaces that require hearing augmentation.
- + The Class 5 and 6 administration building will require hearing augmentation systems in the two consulting rooms.
- + The Class 9b chapel building will require hearing augmentation in the main chapel auditorium.

Additionally, considering the high proportion of elderly people expected as building occupants, who may have a higher incidence of hearing loss, we recommend the inclusion of a sound field amplification system and acoustic materials to reduce reverberation within the chapel to provide a more comfortable and accessible environment.

8.10 EMERGENCY EGRESS AND EVACUATION

8.10.1 Access considerations

Any emergency evacuation strategy should address the operational considerations relevant to the evacuation of people with disability and should detail the following:

- + Fire-isolated lift lobbies and use of lifts in emergency.

Fire evacuation plans should include provision of management plans to assist known occupants with disability. Individuals with mobility limitations should be provided with a “fire buddy” to escort them to pre-determined areas of refuge.

AS 3745 - 2010 Planning for emergencies in facilities can be utilised as a guideline to assist in the implementation of any Emergency Plan.

8.10.2 Subject site – access assessment

Note for consideration.

8.11 LANDSCAPING, STREETSCAPES AND TERRACES

8.11.1 Access considerations

The following are some design considerations for providing equitable access to the external public space:

- + Lighting installations which minimise glare.
- + Luminance contrast of features such as bike racks, bollards, bins etc.

8.11.2 Subject site – access assessment

Note for consideration.

8.12 LIGHTING

8.12.1 Access considerations

The inclusion of quality light assists people in navigating their way through an environment and assist in the effective use of a building, potentially affecting working satisfaction and productivity.

Consideration should be given to lighting as follows:

Location	Lux level
Entrances, passageways, and walkways	150lx
Stairs	150lx
Ramps	150lx
Toilets and locker rooms	200lx
Counter tops	200lx
General displays	200lx

8.12.2 Subject site – access assessment

Note for consideration.

9.0 Compliance Summary/Conclusion

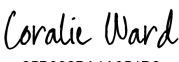
Jensen Hughes has reviewed the SSDA documentation (refer above) against the current requirements for access and mobility against the following:

- + Principles of Universal Design
- + Objects of the Disability Discrimination Act 1992
- + Disability (Access to Premises- Buildings) Standards 2010; and
- + Building Code of Australia 2022 (BCA2022) Volume 1 – Parts D4, F4D5, F4D6 and F4D.
- + Applicable Australian Standards AS1428.1:2009, and AS2890.6:2009

This report provides the reader with an overview of the project with respect to achieving compliance against the above. The SSDA documentation indicate that accessibility requirements, pertaining to external site linkages, building access, common area access, sanitary facilities can be readily achieved.

It is anticipated that as the scheme progresses to design development and construction documentation stages, additional detail will be available for review to ensure appropriate outcomes are achieved in building design and external domain design.

REVIEW UNDERTAKEN BY:

DocuSigned by:

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Coralie Ward

Accessibility Consultant

10.0 Mitigation Measures

Table 3: Mitigation Measures

Project Stage Design (D) Construction (C) Operation (O)	Mitigation Measures	Relevant Section of Report
D	The report has identified a departure of the SSDA application from the Performance Requirements of the BCA which Jensen Hughes has proposed to be met under a Performance Based Solution Report.	Section 7.2 & 8.2.2.