

Ref: Certis Access DA Report_20190125_YW

25 January 2019

James Buist

Attention: James Buist

Dear James:

Re: Certis DA Access Report
Project: Proposed new Jordan Springs Public School
Address: 14-28 Cullen Avenue, Jordan Springs, NSW 2747

Certis Access Consultancy provides the following professional opinion with regard to access for people with disabilities to and throughout the new building work for the proposed new public school development, located at 14-28 Cullen Avenue, Jordan Springs, NSW 2747. The subject of this report is to address access provisions of the new development for Development Application Submission.

1.0 PROJECT DESCRIPTION

This DA Report represents a review of all aspects of access to, and within, the new building work, with respect to Disability Discrimination Act 1992 (Cth) (DDA), the Building Code of Australia (BCA), Disability (Access to Premises – Building) Standard 2010, AS1428.1:2009 and other relevant Australian Standards as applicable to this project.

This report confirms accessibility has been appropriately addressed in the associated architectural documentation and confirms the Client's commitment to the development of an equitable and accessible environment for all.

The following documentation prepared by Group GSA Pty Ltd was reviewed as part of our assessment:

The following drawings were referenced as part of the assessment process in compiling this report.

Drawing No. Revision Name

Architectural

A3120	-	SITE SECTIONS
A2010	-	HALL, GROUND FLOOR PLAN
A2008	-	BLOCK B, LEVEL 1 FLOOR PLAN
A2004	-	BLOCK B, HOMEBASE GROUND FLOOR PLAN
A2002	-	BLOCK A, LIBRARY & ADMIN, LEVEL 1 FLOOR PLAN
A2001	-	BLOCK A, LIBRARY & ADMIN, GROUND FLOOR PLAN
A1121	-	SITE LEVEL 1 PLAN
A1120	-	SITE GROUNG FLOOR PLAN
A1101	-	PROPOSED SITE PLAN

2.0 NCC (BCA) CLASSIFICATION

The relevant Building Surveyor has advised that the proposed building is being assessed against NCC (BCA) 2016, and that the facility has been classified as follows:

Level	Proposed Use	Building Classification
Ground Floor Plan	School building	Class 9b
Upper Level Plan	School building	Class 9b

3.0 ACCESS PROVISIONS

BCA D3.1 requires a Class 9b premises to be accessible to:

Class	Parts of Building required to be accessible (unless exempted by D3.4)
Class 9b	<p><i>Schools and early childhood centres</i></p> <p><i>To and within all areas normally used by the occupants.</i></p> <p><i>An assembly building not being a school or an early childhood centre</i></p> <p><i>To wheelchair seating spaces provided in accordance with D3.9.</i></p> <p><i>To and within all other areas normally used by the occupants, except that access need not be provided to tiers or platforms of seating areas that do not contain wheelchair seating spaces.</i></p>

4.0 ACCESS CODE OF THE PREMISES STANDARD

The Building Code of Australia aligns with the requirements of the Access Code under the Premises Standards and therefore new building work that complies with the NCC (BCA) will also comply with the Premises Standards. However, the Premises Standard places additional requirements on existing buildings

where building work is being undertaken. The requirements for the new part of an existing building to comply with the Standards is limited to the actual work identified in the building approval and does not extend to other parts of the building which the new part is located. However, the Premises Standards recognises that in most circumstances it will be necessary to provide an accessible path of travel to the new or modified part and has therefore introduced the concept of 'affected part'.

An 'affected part' is the path of travel between and including the principal pedestrian entrance of an existing building to the new or modified part of the building. This path of travel must be a continuous accessible path of travel. It does not extend to the allotment boundary. Toilets alongside the 'affected part' path of travel are not required to be upgraded unless they are part of the building approval.

The Premises Standards do not apply to an existing building until an application for approval of building work is submitted. It also recognises that it is not always possible to upgrade all existing buildings and therefore allows some exceptions and concessions.

Section 21B and 29A of the DDA allow for an exception to the requirement to not discriminate in situations where avoiding discrimination would impose an unjustifiable hardship and this has therefore been incorporated in the Premises Standards. An application can be made to the relevant State Access Panel.

Lessees – Where a building is occupied by a number of lessees and an application for approval of building work is made by one of the lessees, there is no requirement for the lessee or any other person to provide a continuous accessible path of travel to the area of new work that the person leases.

Lift Concession – Where a lift travels more than 12m and has a floor area of not less than 1100 x 1400mm (i.e. it complies with the access requirements imposed by the BCA prior to commencement of the Premises Standards) it does not have to be upgraded to the current requirements of 1400 x 1600mm. All other features should still comply.

Toilet Concession - Where existing sanitary compartments comply with the circulation and fit out requirements of AS1428.1 2001 then there is no requirement to upgrade to comply with AS1428.1 2009.

However, any areas of the building that are not in accordance with the current day standards are exposing the owner and occupier to risk of a complaint being made against them under DDA legislation.

Certis Access confirms that access to and throughout the subject development has been addressed to a certain extent, a satisfactory standard as per the architectural documentation provided to date for the proposed building layout.

5.0 DISABILITY STANDARDS FOR EDUCATION 2005

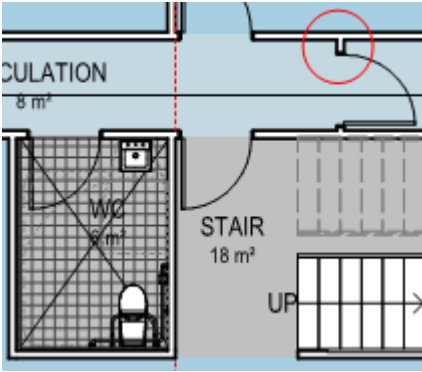
The Disability Standards for Education 2005 are applicable to education providers and have the objective to eliminate, as far as possible, discrimination against persons on the grounds of disability in the area of education and training and to ensure, as far as practicable, that persons with disabilities have the same rights to equality before the law in the area of education and training as the rest of the community. It also aims to promote recognition and acceptance within the community of the principle that persons with disabilities have the same fundamental rights as the rest of the community.

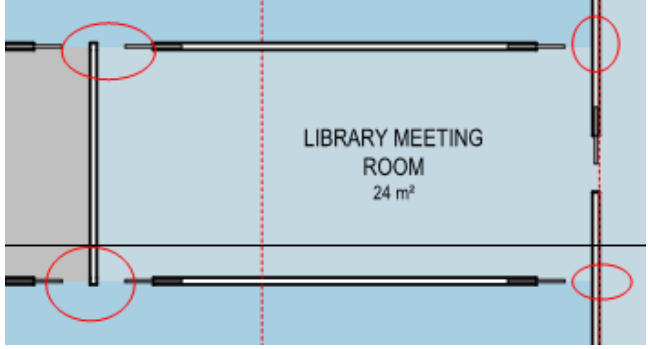
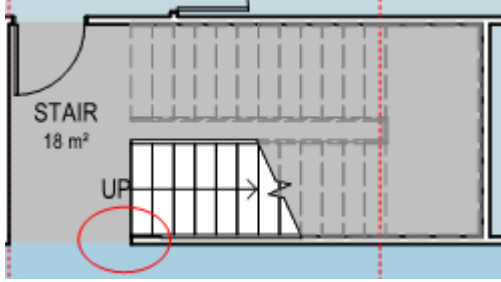
These standards aim to specify how education and training are made accessible to students with disabilities. They cover the following areas:

- Enrolment
- Participation
- Curriculum development, accreditation and delivery
- Student support services

- Elimination of harassment and victimization.

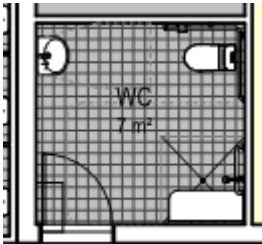
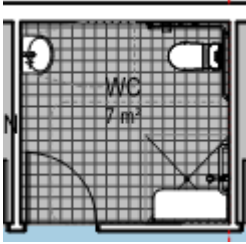
Part 3 of the Standards requires that reasonable adjustments are made in respect of providing education for people with a disability. For this assessment we are only going to consider adjustments in respect to physical access into buildings and associated 'premises', therefore the applicable standard is the Disability (Access to Premises- Buildings) Standards 2010.

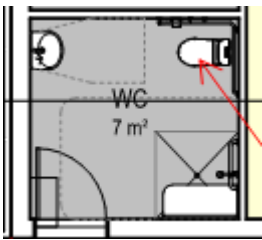
Part D3	Access for people with a disability	Comment
D3.1	General building access requirements	<p>A continuous accessible path of travel is to be provided to any building required to be accessible from:</p> <ul style="list-style-type: none"> - The main points of pedestrian entry at the allotment boundary; and - From another accessible building connected by a pedestrian link; and - From any required accessible car parking space on the allotment. (BCA Clause D3.1) <p>A dedicated accessible path is to be provided from the allotment boundary on the path of travel to access the principle entrance of the building, further information is required.</p>
D3.2	Access to buildings	<p>Doorways:</p> <ul style="list-style-type: none"> • The doorway located on the path of travel to access the PWD WC shall have 530mm latch side clearance.  <ul style="list-style-type: none"> • Sliding doors to have a minimum 395mm latch side clearance.

		
D3.3	Parts of buildings to be accessible	<p>Clause D3.3 (a): Communication stairway to comply with Clause 11 of AS1428.1 (2009), including (but not limited to):</p> <ul style="list-style-type: none"> - Minimum 1000mm unobstructed width; - Handrails to both sides; - Appropriate handrail extensions top and bottom of the stairway; - TGSIs to the top and bottom of the stairway (to AS 1428.4.1:2009); - Opaque risers; <p>Unable to determine the above by the information provided.</p> <p>Current review issues:</p> <p>The communication stairway located on the Ground Level _Building A:</p> <p>Please note,</p> <p>The bottom of the stairway shall be setback 400mm + one tread width, so the handrail extensions do not protrude into accessway, causing an entanglement hazard.</p>  <p>Please refer to the attached markups for details.</p>

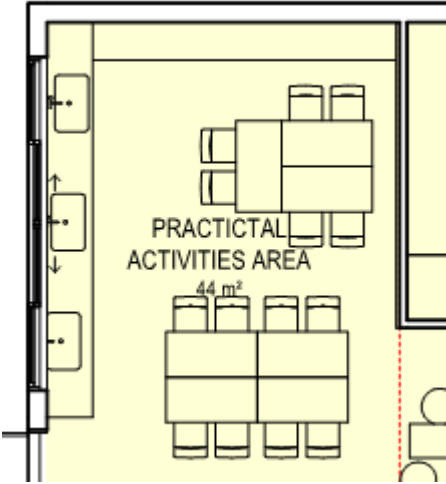
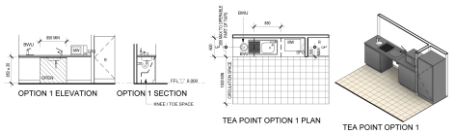
D3.4	<p>Exemptions</p> <p>The following areas are not required to be accessible:</p> <ul style="list-style-type: none"> (a) An area where access would be inappropriate because of the particular purpose for which the area is used. (b) An area that would pose a health or safety risk for people with a disability. (c) Any path of travel providing access only to an area exempted by (a) or (b). (BCA Clause D3.4). 	<p>The following areas may be considered to be exempt areas, due to the health and safety issues to the occupants:</p> <ul style="list-style-type: none"> - Ground Level, Building C Storage area, such as Bulk Store, Chair Store, COSH Store and Cleaning Store. - Level 1 Cleaning Store and building distribution room. - Ground Floor b02a Cleaning Store and building distribution room. <p>However, further information is required in respect to the function and use of the basement storage.</p>
D3.5	Accessible carparking	Further information is required in relation to the new accessible parking provision of the proposed development.
D3.6	Signage	<p>Braille and tactile signage complying with BCA Specification D3.6 and incorporating the international symbol for access or deafness as appropriate, must be provided to identify the following:</p> <ul style="list-style-type: none"> - Accessible unisex facilities and indicate whether the facility is suitable for left or right handed use; - Each door required by BCA Clause E4.5 to be provided with an exit sign and state "FIRE EXIT" and the floor level number. <p>Further information is required at CC stage.</p>
D3.7	Hearing augmentation	<p>As advised by AS1428.5:2010, the locations that may require hearing augmentation within the subject development context are:</p> <ol style="list-style-type: none"> 1. Counters connected with services provision to the public without partitions (e.g. reception, enquiry desks) 2. Meeting areas seating more than 5 participants (e.g. conference rooms, theatre) 3. Lifts 4. Intercommunication systems 5. Emergency warning systems 6. Where public address systems are provided

		<p>Noting,</p> <p>AS1428.5:2010 states that meeting areas seating more than 5 participants, hearing augmentation is required.</p> <p>Although the Standard is not referenced under the Premises Standards or the BCA, omission of the hearing augmentation system in the meeting rooms specified under the Standard would make the building owners continue to be vulnerable to discrimination complaints, if a person with hearing impairment was not able to access the meeting room.</p> <p>A portable hearing augmentation system can be considered as an alternative, where no in-built amplification system is installed.</p> <p>Further information is required at CC stage.</p>
D3.8	Tactile indicators	At CC stage, a third-party test report, or product specifications is to be provided, which identifies the color contrast provision between 30%-60%.
D3.9	Wheelchair seating spaces in Class 9b assembly buildings	N/A
D3.10	Swimming pools	N/A
D3.11	Ramps	It is unclear as to any ramped access are proposed in the development, please advise.
D3.12	Glazing on an accessway	Further information is required at CC Stage.
Part D4	Braille and tactile signs	Comments
D4.2	Location	<p>For signage provisions, noting:</p> <ul style="list-style-type: none"> - Signages are to be provided at 1200mm – 1600mm AFFL. - The line of tactile characters is to be located no less than 1250mm and not higher than 1350mm AFFL. - To be located on the wall, on the latch side of the door with the leading edge of the sign to be located between 50mm and 300mm from the architrave, if provided. <p>Further information is required at CC stage.</p>

D4.4	Luminance contrast	Further information is required at CC stage.
D4.5	Lighting	The illumination of signs must be available to ensure that the level of luminance contrast is achieved at times when the sign is required to be read.
D4.6	Braille	Specialist suppliers' responsibility at CC stage.
Part D5	Accessible water entry / exist for swimming pool	Comments
D5.5	This part sets out the requirements of the Access Code in relation to specifications for the provision of swimming pool access.	N/A
Part E3	Lift insulations	Comments
E3.6	Passenger lifts	Capable of compliance
Part F2	Accessible sanitary facilities	Comments
F2.4 (a) (b)	Accessible unisex sanitary facilities	<p>Non-compliant items are:</p> <ul style="list-style-type: none"> - Backrest is to be provided to the pan of the PWD located on the ground level, B02a.  <ul style="list-style-type: none"> - Level 1, Building A, backrest is to be provided to the pan.  <ul style="list-style-type: none"> - Level 1, B02a

		 <p>Further information is required.</p>
F2.4 (c)	Ambulant sanitary facilities	No ambulant toilet appears to be proposed in the development, please advise.

5.0 DDA ASSESSMENT AND RECOMMENDATIONS

Item		Comments
1	Access provisions to the reception counters.	Where provided, detailed information in relation to the accessible reception counter is required at CC stage.
2	Access provisions to the practical activities' areas	<p>Ground floor and Level 1:</p> <p>There are two practical activity areas are proposed on the ground floor, as a common area, the benches shall be made fully accessible, details as per the below kitchen bench.</p> 
2	Access provisions to staff kitchen	<p>Consider providing accessible tea making or kitchen facilities:</p> <ul style="list-style-type: none"> - Bench top height of 850mm±20mm; - Counter to achieve a minimum 30% luminance contrast with the counter face to which it is viewed; 

		<ul style="list-style-type: none"> - Where instant boiling water units are provided, they are to be provided within 300mm from the front edge of the sink and bench; - One of GPOs to be within 300mm from the front edge of the bench; - Height of sink to be between 850mm±20mm; - Depth of main sink to be maximum 150mm; - Operating handle of tap to be within 300mm from the front edge of sink and bench throughout the arc of the movement; - Knee clearance of not less than 720mm in height - Consider providing foot clearance of not less than 300mm in height for a depth of 200mm to the sink. <p>Further information is required.</p>
3	Outdoor landscaped areas	Further information will be required at CC stage.
4	Outdoor furniture	Furniture specifications are required at CC stage, if any.
5	Slip-resistance floor finishes	Further information will be required at CC stage.
6	Personal Emergency Egress Plans	<p>School management is to provide an Operational Management Plan to meet the intent of the DDA, as well as to justify the following:</p> <ol style="list-style-type: none"> 1. School Management is to provide a Personal Emergency Egress Plan to address the exit path for people with a disability in the event of an emergency.

6.0 TECHNICAL DOCUMENTATION USED FOR ASSESSMENT

The following documentation has been used as reference material (where appropriate), in making recommendations:

- Disability Discrimination Act 1992 (DDA)
- National Construction Code Series (Building Code of Australia) – Volume One
- Australian Standard AS1428.1 – 2009 – Design for access and mobility. Part 1: General requirement for access – New building work
- Australian Standard AS1428.2 - 1992 – Design for access and mobility. Part 2: Enhanced and additional requirements – Buildings and facilities
- Advisory Notes on Access to Premises 1996 (Human Rights and Equal Opportunities Commission)

- Disability Standards for Education 2005
- Disability (Access to Premises – Buildings) Standard 2010
- Penrith Development Control Plan 2014 (E12 Penrith Health and Education Precinct)

7.0 LIMITATIONS OF REPORT

It is important to note that following the recommendations within this report will not in itself provide exemption from action under the DDA. Certis Access Consultancy cannot accept any responsibility for loss resulting due to any non-compliance with the BCA (NCC), DDA or associated legislation.

The process of accessibility under the DDA is much broader than just the built environment; it covers management issues, staff approach and training and ongoing maintenance issues. As part of any documentation passed on to interested parties (such as relevant managers) they should be made aware of their responsibilities under the DDA. This is particularly important in this case when focusing on employers and staff responsibilities.

In preparing this report, the Consultant has taken reasonable skill care and diligence in performing her duty professionally. The advice given is based on a professional judgement and an assessment of the information that could be derived from the details provided.

It is important to note that as with all aspects of the built environment, there is often more than one way of resolving any issue identified. It is for the client to ultimately assess the recommendations put forward and fully assess their suitability for the proposal and the likely use(s) that the facilities will be utilised for (and by whom).

8.0 CONCLUSION

This report has been prepared at the request of the applicant and does not absolve the applicant and owner of the requirements pursuant of the Disability Discrimination Act 1992 (Cth).

Certis Access Consultancy has endeavored to ensure all key aspects of access provision have been addressed and that all reasonable attempts have been made to identify the main matters pursuant to the DDA. This professional opinion is based upon assessment of the architectural documentation to date, and to ensure the design principles are adhered to throughout the construction stage. On this basis, we believe that the development at the current stage is capable of attaining the required compliance(s) without any major concern and that the building can achieve a reasonable level of access and meet statutory requirements once the items outlined within the report have been addressed.



Yolanda Wang
Senior Access Consultant
Certis Access Consultancy