

# **Disability Access Compliance Statement**

Development Application for a Proposed Self Storage Facility, 65-75 Lawford Street, Greenacre NSW



01 NORTH WEST FACADE



#### **Client: Allamcorp Pty Ltd**

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## 1. INTRODUCTION

#### 1.1 Purpose of Report

Urban Pathways has been engaged by Allamcorp Pty Ltd to provide disability access consulting services for a development application (DA) at 65-75 Lawford Street, Greenacre. The DA proposes a new 3 storey building above 1 basement level, comprising self-storage units with ancillary office, amenities, sanitary facilities and car parking.

Urban Pathways provided iterative reviews of the design as the concept was developed and reviewed the DA plans and documents listed at **Appendix A.** This purpose of the report is to:

- provide a compliance assessment of the referenced DA drawings against relevant accessible design criteria, in particular the Building Code of Australia within the National Construction Code 2022 (NCC2022);
- identify any compliance departures from the Deemed to Satisfy (DTS) provisions of NCC2022 that may give rise to a Performance Solution at the time of Construction Certificate (CC);
- identify requirements for further detail and assessment at CC stage; and
- provide the consent authority with confirmation that the architectural design has been reviewed by an appropriately qualified Access Consultant.

#### 1.2 Report Limitations and Exclusions

- All reasonable attempts have been made to identify Access compliance matters to the extent possible at DA stage.
- A detailed review at Construction Certificate stage of construction drawings, FF&E and specifications will be required to confirm compliance with the NCC and Australian Standards. Completed works will need to be checked prior to Occupation Certificate.
- This report does not address issues in relation to the design, maintenance or operation of
  electrical, mechanical, hydraulic or fire protection services, utility services provider
  requirements, building egress requirements, Local Government Act and Regulations, OHS or
  WHS legislation, discrimination and employment law, or any other matter outside the scope
  of the report. This includes any NCC provisions not specifically referenced in the report.
- The commentary within this report does not relieve the owner, occupier, building manager, principal designer, builder, contractors, and approval bodies and Certifying Authority from exercising their statutory obligations under any Act or Regulation and the relevant persons are to be satisfied that the proposal satisfies all relevant requirements.
- The report does not assess 'compliance' with the Disability Discrimination Act 1992 (DDA) nor relieve the building owner, manager and future occupants and employers from meeting the requirements of the DDA. Any person may submit a complaint alleging discrimination under the DDA or other anti-discrimination legislative pathways.

## 2. STATUTORY FRAMEWORK

### 2.1 Accessible Design Considerations and Criteria

Accessible design considerations and criteria contained in the following documents are addressed in Sections 2.2–2.6 and 4.3 of this report:

- The objects of the Disability Discrimination Act 1992 (DDA) regarding Access to Premises
- Disability (Access to Premises-Buildings) Standards 2010 (the Premises Standards)
- National Construction Code 2022 (NCC2022) Parts D4, E3D7-E3D8 and F4D5-F4D6
- Australian Standards referenced in NCC2022 relevant to the project scope
- Development controls contained in Canterbury Bankstown DCP 2023

### 2.2 Disability Discrimination Act 1992 (DDA)

The Commonwealth *Disability Discrimination Act 1992* (DDA) provides protection for everyone in Australia against discrimination based on disability and aims to promote equal opportunity and access.

Discrimination happens when people with a disability are treated less fairly than people without a disability – whether directly or indirectly. The DDA makes it illegal to discriminate against someone for having a disability, for example in the areas of work, accommodation, education, access to buildings and places; and in the provision of goods, facilities and services.

The definition of "disability" in the DDA is broad, and includes physical, intellectual, psychiatric, sensory, neurological, and learning disabilities, as well as physical disfigurement, and the presence in the body of disease-causing organisms. The disability may be present now, in the past, or may occur the future.

In the built environment, DDA Section 23 Access to Premises provides that it is unlawful for a person to discriminate against another person on the grounds of the other person's disability *in relation to the provision of access to a premises or public place*. Buildings and places are to be as easily accessible to those with a disability as to those without; not only to enter and move about without discomfort, but to use and enjoy the facilities without being deterred by inferior or unavailable access.

The DDA is a complaints-based law which applies to existing premises and places as well as new works. Any person can lodge a complaint with the Australian Human Rights Commission (AHRC) which may proceed to conciliation or be determined by the Courts. At a minimum, development must meet the requirements of the Premises Standards and BCA/NCC as set out below. However, due to factors including: the broad definition of disability; the limited scope of matters covered by the building code; and the complaints-based nature of the DDA, it is not possible to assess or confirm 'compliance' with the DDA.

### 2.3 The Premises Standards

The DDA sets out what must be done, but not <u>how</u> to do it. In response to legal uncertainty about the application of the DDA to buildings, the Disability (Access to Premises - Buildings) Standards were made under the DDA in 2010 to provide a minimum building standard for accessibility. Referred to as the *Premises Standards*, this Commonwealth legislation applies to all new building



work that requires a building approval from May 2011 onwards. The purpose of the Premises Standards is:

- to ensure that dignified, equitable, cost-effective and reasonably achievable access to buildings, and facilities and services within buildings, is provided for people with disability, and
- to give certainty to building certifiers, developers and managers that if the Standards are complied with, they cannot be subject to a successful complaint under the DDA in relation to the *particular matters* covered by the Premises Standards.

The Premises Standards contained an Access Code that establishes detailed Performance Requirements and deemed-to-satisfy provisions, which are now generally reflected in the disability access provisions of the BCA/NCC. Nevertheless, the Premises Standards retain an important role in determining the applicability of access provisions, particularly to existing buildings.

### 2.4 National Construction Code 2022 – Vol 1 Building Code of Australia

From 2011, the Access Code in the Premises Standards was incorporated into the Building Code of Australia (BCA). The relevant provisions for Class 2-9 buildings, plus disability access to Class 1b and Class 10 buildings, are now contained in Vol 1 of NCC2022.

The NCC is a performance-based code, in that all work must meet Performance Requirements. This is typically achieved by satisfying prescriptive provisions known as 'deemed-to-satisfy' (DTS) provisions. Alternatively, the requirements can be met by in whole or part through a 'Performance Solution', a collaborative design-based process that seeks to demonstrate how a Performance Requirement can be met by alternate means.

### 2.5 Referenced Australian Standards Relevant to Proposal

The DTS provisions of NCC2022 reference the following Australian Standards relevant to the works:

- AS1428.1 2009 Design for Access and Mobility: General requirements for Access New Building Work
- AS1428.4.1 2009 Design for Access and Mobility: Means to assist the orientation of people with vision impairment Tactile ground surface indicators
- AS1735.12 1999 Lifts, escalators and moving walks Facilities for persons with disabilities
- AS2890.6 2009 Parking facilities Off-street parking for people with disabilities
- AS4586 2013 Slip resistance classification of new pedestrian surface materials

### 2.6 Canterbury-Bankstown Development Control Plan 2023

Canterbury-Bankstown DCP 2023 Chapter 3.2 Parking contains provisions relevant to disability access, set out below.

#### Accessible parking rates

**2.7** Accessible parking is required to be designed and constructed in accordance with the following rates:

Development type	Accessible parking rates
Commercial and industrial premises (BCA Classes 5– 8) where development contains 10 or more car	1 accessible car space per 50 car spaces for staff;
spaces	1 accessible car space for visitors per 50 car spaces where a car park has less than 500 car spaces;
	1 additional accessible car space per 100 car spaces above 500 car spaces for visitors

The DCP parking rates suggest 1 accessible space for staff and 1 for visitors. Given the nature of the Storage Premises land use, very low staffing (1-2 staff maximum) and the small number of overall car spaces (14 in total), it is considered that 1 accessible space for the use of customers or staff is sufficient, and also meets the requirements of the NCC (1 per 100 spaces).

The DA plans show 1 accessible space in the basement, which is capable of meeting the design requirements of AS2890.6. The at-grade parking does not include an accessible parking space, however 1 space near the entry is shown to have an approx 1.3m wide hatched area adjacent which could provide additional width for a visitor with mobility issues or a mobility device. No disability parking signage is proposed as the space is not required to be provided under the NCC and hence is not required to meet 2890.6.

#### **Parking Location**

**3.2** Parking areas for people with disabilities should be close to an entrance to development. Access from the parking area to the development should be by ramps or lifts where there are separate levels.

The accessible parking space in the basement is located close to a passenger lift to which it is connected by an accessible path of travel.

#### Minimum Headroom dimensions

**3.12** Clear headroom dimension is necessary to make sure that vehicles are clear of mechanical or service obstructions such as fire sprinklers, lighting fixtures and signs. The following minimum headroom dimension must be maintained in all development.

Minimum headroom	Dimension
Cars and light vans	2.4m
People with disabilities	2.3m
Small rigid vehicles	3.6m

It is noted that the above clearance requirements depart from current Australian Standards (eg accessible parking spaces require a clearance of 2.4 above the parking space and shared area, apart from permitted exceptions over the bonnet).

The DA drawings show that the basement level has floor to ceiling heights which are capable of exceeding the clearance requirements for persons with disabilities under the DCP and AS2890.6-2009.

#### **Other DCP Chapters**

The remainder of the DCP, including Chapter 9 Industrial, does not contain specific access provisions. As such, development is to be assessed against the requirements of NCC 2022 and referenced standards.

## 3. PROPOSED DEVELOPMENT

#### 3.1 Subject Site

The subject site is known as 65-75 Lawford Street, Greenacre, comprising a parcel of 5 allotments. The site is zoned IN2 Light Industrial under the Canterbury Bankstown LEP 2023. The site is relatively level and has its primary frontage to Lawford Street.



#### Figure 1: Location Plan (Crawford Architects)

### 3.2 Scope of Proposed Works

The proposed self- storage development comprises the following components:

- New 4-level Class 7b building:
  - 3 storeys above ground and 1 below ground (basement)
  - o All levels connected by a passenger lift
  - o All levels connected by fire isolated stairways and passageways
- Site access as follows:
  - Pedestrian entry from Lawford Street, line marked as a shared walkway (not steeper than 1:20) on the secondary vehicle entry driveway
  - Vehicle entry and exit driveways from Lawford Street, including the main basement entry / exit, a secondary entry and a secondary exit
- Car parking as follows:
  - Basement level 10 car parking spaces, including 1 accessible space
  - Ground level 4 at grade car parking spaces
- Internal all levels



- Self-storage units on all levels (including basement and ground)
- o Waste rooms
- o Trolley bays
- o Plant / service / comms spaces
- Internal Ground level reception and amenities
  - Reception/Office
  - Unisex Accessible Sanitary Facility
  - Unisex WC (small sanitary compartment with standard pan and basin)
  - o Tea room
  - o Cleaner's Room
- External Outdoor seating / staff area

### **3.3 DA Drawing Extracts**

Extracts of floor plans are provided below. The full list of DA drawings reviewed are provided in **Appendix A.** 



Figure 2: Crawford Architects Drawing A060 - Site Analysis Plan



Figure 3: Crawford Architects Drawing A100 – Basement Level



Figure 4: Crawford Architects Drawing A101 – Ground Floor Level



Figure 5: Crawford Architects Drawing A102 – First Floor Level



Figure 6: Crawford Architects Drawing A103 – Second Floor Level



## 4. ACCESS COMPLIANCE ASSESSMENT

#### 4.1 Building Classification

The project BCA consultant has advised the following building classifications, which have been adopted for the DA stage access assessment.

- Class 7b Self Storage
- Class 7a Carpark
- Class 5 Reception / Office

Building classification shall be confirmed at CC stage by the Certifying Authority.

#### 4.2 Key Access Requirements

- 'Accessway' (that is, a Continuous Accessible Path of Travel (CAPT) designed to meet AS1428.1) is to be provided to and through the principal building entrance from:
  - o the allotment boundary, and
  - o from an accessible car parking space to the building entry
- Access must be provided to and within:
  - all areas normally used by the occupants, unless exempted by D4D5, including reception, kitchen, waste room and outdoor break area; and
  - o any level containing accessible car parking spaces
- A minimum of 1 accessible car parking space is to be provided
- A Unisex Accessible Sanitary Facility is required to be provided on every level on which a sanitary compartment is provided.
  - Where more than one accessible facility is provided in a building, provide a balance of left- and right- handed fittings
  - Where there is one or more toilets in addition to an accessible unisex sanitary facility at a bank of toilets, ambulant sanitary compartments for use by males and by females (not unisex) are required. (Unisex requires a Performance Solution).
- Passenger lift selection and specification to meet NCC and AS1735.12 requirements and limitations for people with a disability
- Suitable handrails and contrast step nosing required on fire isolated stairs.



## 4.3 Compliance Summary

The relevant statutory framework and design criteria are set out in Section 2. Commentary on compliance is set out in the table below.

Criteria	Compliance Comment
DDA	As outlined in Section 2.2, due to the broad definition of disability, the complaints-based nature of the DDA, and the limited scope of matters covered by the NCC, it is not possible to assess DDA 'compliance'.
	Nevertheless, the DA drawings demonstrate the capacity to provide equitable and dignified access to premises and facilities within by meeting the performance requirements of the Premises Standards and NCC.
Premises Standards	As outlined in Section 2.3, the relevant provisions of the Premises Standards are reflected in the Building Code of Australia/NCC 2022, addressed below.
NCC 2022	An assessment under the NCC is provided in Section 4.3. The DA drawings demonstrate the capacity to provide access in accordance with the Performance Requirements of the NCC under the deemed-to-satisfy (DTS) pathway.
	Based on the reviewed DA drawings, 2 elements were identified that are likely to require a Performance Solution at CC stage: Access to storage cages and Unisex Ambulant toilet. Urban Pathways is of the opinion that these DTS departures are appropriate given the project specifics, and that robust Performance Solution can be developed.
Relevant Australian Standards	The DA drawings demonstrate the capacity to provide access to and within the building in accordance with relevant Australian standards listed in Section 2.5. Construction drawings, FF&E and specifications will be reviewed at CC stage to confirm design compliance, and departures from the standards may trigger a Performance Solution if required by the Certifier.
Canterbury-Bankstown DCP 2023	As discussed in Section 2.6, the DA drawings comply with the relevant accessibility provisions of the DCP, except for the number of accessible car parking spaces required for commercial and industrial development. The DCP requires accessible 2 spaces (1 for staff, 1 for visitors). However, with only 14 parking spaces in total, and the nature of the self-storage use with only 1-2 staff likely on site at one time, it is considered that 1 accessible space is adequate to cater for both staff and customers. The NCC requires only 1% of spaces to be accessible for a 7b class building (0.14 spaces, rounded up to 1 space), and hence the provision meets the NCC.



## 4.4 NCC 2022 – Access for People with Disabilities

#### 4.3.1 Compliance Assessment Table Key

Compliance	Interpretation
Capable of DTS	At DA stage, the key objective of the compliance assessment is to ensure that the design is fundamentally <i>capable of compliance</i> with the NCC deemed to satisfy (DTS) provisions.
Performance Solution	If the design departs from DTS provisions, a <i>Performance Solution</i> will be required at CC stage to demonstrate that compliance with the Performance Requirements of the NCC can still be achieved
Further Detail	Where DTS capability or compliance cannot be determined at DA stage, <i>further detail</i> will be required at CC stage

#### 4.3.2 Deemed to Satisfy (DTS) Compliance Assessment

Relevant NCC 2022 Deemed-to-Satisfy	Compliance	Comments
<ul> <li>D4D2 General building access requirements</li> <li>Class 7b (Self Storage)</li> <li>Class 5 (Office)</li> <li>Access to be provided to and within all parts of the building normally used by occupants, unless exempted by D4D5</li> </ul>	Capable of DTS + Performance Solution	<ul> <li>Capable of DTS The DA plans demonstrate that a continuous accessible path of travel is available to and within the Class 7b and Class 5 parts of the building. Subject to detailed design and assessment at CC stage, access is provided as follows: <ul> <li>To and within the Reception/office, Tea Room, Unisex Accessible Sanitary Facility, Waste rooms and Trolley storage</li> <li>To the lift on each level</li> <li>To and within each level containing Self Storage units, with accessible paths of travel to each unit</li> <li>Accessible paths of travel, circulation spaces within rooms (including the waste room) and passing spaces have been allowed for within the building, at the end of corridors and at doorways. </li> <li>Doorways to have the capacity to comply with AS1428.1-2009 subject to detailing at CC stage. This includes a minimum clear opening width of 850mm to any area required to be accessible, door circulation clearances, accessible door handles and luminance contrast. </li> <li>Performance Solution (Likely) - Access to and within Storage Units Due to the varying dimensions and configuration of the storage units, not all individual units would be accessible. Many smaller units could not provide wheelchair accessible internal turning areas or door circulation clearances. It is also expected that entry doors / gates to some unit types would not meet the technical provisions of AS1428.1 due to factors such as door type (roller door), door furniture (eg sliding padlocked latch rather than D-lever or D-pull</li></ul></li></ul>

The NCC clauses reference below are reproduced in full at Appendix B.

Relevant NCC 2022 Deemed-to-Satisfy	Compliance	Comments
		handle) and contrast luminance between the door and the frame (depending on materials used eg chainwire, steel).
		What are the requirements or benchmarks?
		There are no numerical requirements for the number of storage units that should be made accessible. However, by considering the principles and approach of the DDA, Premises Standards and NCC, the approach is <b>recommended</b> to comprise the following:
		• Identify up to 20% as accessible storage units.
		<ul> <li>This should include 10-20% of each unit type (including small storage cages which cannot be entered), in a range of locations, tenures and price points.</li> </ul>
		• Identified accessible storage units should provide the following accessible elements:
		<ul> <li>Corridor or approach to accessible storage provides 1550mm clear in front of the doorway.</li> </ul>
		<ul> <li>For hinged doors and gates, provide min 850mm clear door opening width, and add a D-lever handle to both sides</li> </ul>
		• For roller doors, include remote control operation
		<ul> <li>Provide contrast luminance at doorways (min 30% contrast, contrast element to have a minimum width of 50mm)</li> </ul>
		<ul> <li>Non-accessible units could also be designed to provide enhanced accessibility, by incorporating as many of the above- listed elements as practicable.</li> </ul>
		These preliminary recommendations would be worked and further developed through the Performance Solution process.
		What is the approach at CC?
		There may be two ways to approach the somewhat unique situation of Self Storage units at CC, at the Certifier's sole discretion:
		1. Performance Solution approach
		As the storage units are parts of the building that are 'normally used by occupants', some Certifiers hold the view that the NCC requires access to be provided 'to and within' every storage unit, hence they require a Performance Solution to be prepared at CC. As the provision of access is not achievable or appropriate to all storage units, a Performance Solution can be readily supported at CC stage.
		Through the Performance Solution Process, individual storage units would be nominated to provide suitable levels of access (even smaller units which cannot be entered), covering a selection of unit types, sizes and locations. Further, general principles for access to all unit types could be explored, and management processes documented.
		2. Exempt from Access approach
		An alternative approach taken by some Certifiers is that the storage units are identified as Exempt from the need to provide access under

Relevant NCC 2022 Deemed-to-Satisfy	Compliance	Comments
		D4D5, on the basis of the purpose of the space. This approach is discussed further in row D4D5 of this table. At CC stage, a similar process to that outlined above should be undertaken of identifying and detailing some accessible storage units. In addition, a written justification and management plan should be provided by the site owner or manager.
<ul> <li><u>Class 7a (Car Park)</u></li> <li>Access must be provided to and within any level containing accessible carparking spaces.</li> </ul>	Capable of DTS	<ul> <li>The DA plans demonstrate that a continuous accessible path of travel is available to and within the Class 7a basement car park.</li> <li>Subject to detailed design and assessment at CC stage, access is provided as follows <ul> <li>A passenger lift provides access between the basement car park and all levels of the building.</li> <li>Within the basement, a continuous accessible path of travel is provided from the lift to the accessible car parking spaces</li> <li>Turning and passing spaces have been allowed for on accessways, at the end of corridors and at doorways (including lift entrances).</li> </ul> </li> </ul>
<ul> <li>D4D3 Access to buildings</li> <li>Accessway to be provided from the main points of pedestrian entry at the allotment boundary</li> </ul>	Capable of DTS	<ul> <li>The DA drawings show an accessway (continuous accessible path of travel) from the allotment boundary to the building entrance (Reception). The pathway is shown to be sealed, with a gradient no steeper than 1:20 and a width exceeding 1000mm.</li> <li>The following shall be detailed at CC</li> <li>The accessway shall be detailed to demonstrate an AS1428.1 compliant, and safe, path of travel to the doorway</li> <li>Depending on design detail, it may be a requirement under D4D9 to provide Tactile Indicators (TGSIs) near the doorway to warn of the vehicle thoroughfare. Alternatively, a kerb or barrier may be adequate.</li> </ul>
<ul> <li>Accessway to be provided from any required accessible carparking space on the allotment.</li> </ul>	Capable of DTS	The DA drawings show a continuous accessible path of travel from the accessible parking space to the passenger lift, which then provides access to Ground, Level 1 and Level 2.
• Accessway must be provided through the principal pedestrian entrance and through not less than 50% of all pedestrian entrances	Capable of DTS	Accessway is shown to be provided through the principal pedestrian entrance (at Reception) from Lawford Street (into the Reception). A covered, level landing is shown outside the entry doorway, with adequate circulation space to accommodate the door approach as well as a 180-degree turn. A secondary pedestrian entrance is the egress/after hours door adjacent to the ground level driveway roller door. This entrance doorway is also shown to be accessible. All doorways are shown to have capacity to comply with AS1428.1- 2009 subject to detailing at CC stage. This includes a minimum clear opening width of 850mm (for double doorways, this applies to the active leaf unless the door is automatic), door circulation clearances, accessible door handles and luminance contrast.

Relevant NCC 2022 Deemed-to-Satisfy	Compliance	Comments
D4D4 Parts of building to be accessible • Fire-isolated	Capable of DTS	The DA plans include fire isolated stairways which are capable of DTS compliance with D4D4, subject to specification of contrast nosing strips at CC stage.
stairways to have contrast stair nosing strip per D4D4 and handrail per D3D22		Part D3D22 requires at least one handrail on fire isolated stairs, with no vertical sections, continuous at landings and detailed to comply Cl12 AS1428.1 The DA drawings indicate 2 handrails with appropriate design to avoid vertical sections, and clear width of 1000mm between handrails.
		The following shall be detailed at CC
		<ul> <li>Provide specifications of contrast non-slip stair nosing which meets the design and luminance contrast requirements of AS1428.1 and slip rating per NCC Table D3D15</li> </ul>
		<ul> <li>Provide handrail details to meet Cl 12 AS1428.1 and NCC D3D22</li> </ul>
• Every passenger lift must comply with E3D7 and E3D8	Capable of DTS	Refer to rows E3D7-D8 in this compliance table.
<ul> <li>Accessways must have passing and turning spaces as specified</li> </ul>	Capable of DTS	The DA plans include internal paths of travel including areas providing access to doorways, sanitary and communal facilities, and lift lobbies. These accessways are shown to be capable of DTS compliance in accordance with the requirements of AS1428.1-2009 for width, gradient, turning spaces at the end of corridors and passing spaces where required. These elements shall be subject to detailed design and assessment
		at CC stage.
Flooring	Capable of DTS	Flooring is not selected at DA stage.
		At CC stage, provide detail to address the following:
		• The maximum pile height and overall thickness of any carpets and inset mats shall comply with NCC and AS1428.1;
		• At thresholds, where floor surfaces abut and gaps in decking are to be confirmed to comply with the NCC and AS1428.1.
		<ul> <li>Slip test certificates are to be provided for flooring materials showing testing under wet surface conditions in accordance with AS4586 – 2013. Slip resistance is to be in accordance with NCC for landings, stairs and ramps, or Table 3B, SA HB 198:2014 Guide to the specification and testing of slip resistance of pedestrian surfaces where NCC does not specify slip resistance</li> </ul>
D4D5 Exempt Areas	Capable of DTS	Capable of DTS
	+ Further detail required	The following areas are assessed as Exempt from the need to provide access, due to the particular purpose for which the area is used and the tasks undertaken:
		Comms IT, Cleaners, Plant (Ground Level)
		Plant and service rooms and spaces (Basement)

Relevant NCC 2022 Deemed-to-Satisfy	Compliance	Comments
		Further detail required at CC – Potentially exempt
		The following areas may be suitable to Exempt from the need to provide access, subject to further detail and assessment at CC stage.
		Waste Room
		The DA drawings show the waste rooms as being capable of DTS access by people with disabilities. However, it is possible for the waste rooms to be identified as Exempt from the need to be fully accessible if they are for the use of maintenance and service staff only. At CC stage, a letter should be obtained from the site owner or operator if it is necessary to exempt any waste rooms from access. The letter should set out the justification and describe the process for waste disposal by customers.
		Access to Storage Units
		As discussed in detail earlier in this table (see row D4D2 General building access requirements - Class 7b (Self Storage)) access will not be provided to and within all storage units.
		A Performance Solution is likely to be required by the Certifier, but if for some reason the Certifier does <u>not</u> require a Performance Solution, a D4D5 Exemption approach would need to be adopted.
		At CC stage, a process of identifying and detailing some accessible storage units would be required, as well as detailed any accessible elements in non-accessible units, as recommended in row D4D2.
		In addition, to address D4D4, a written justification and management plan would be provided by the site owner or manager.
D4D6 Accessible Car Parking • Class 7b Storage – 1	Capable of DTS	1 accessible car parking space designed to meet AS2890.6-2009, is provided. This meets the minimum requirements of D4D6 for Class 7b buildings (1 per 100 car parking spaces).
per 100 parking spaces.		The parking space is close to the lift and is located on an accessible path of travel.
• Accessible carparking spaces must be provided in a carparking area on the same allotment and must comply with AS/NZS 2890.		The external at-grade parking does not include an accessible parking space (nor is this required under the NCC if the accessible parking space in the basement is always available). Nevertheless, 1 space near the entry is shown to have a hatched area adjacent which could provide additional width for a visitor with mobility issues or a mobility device, thereby providing an enhanced outcome which exceeds the minimum requirements of the NCC. No disability parking signage for this space as the space is not intended to meet 2890.6. The following shall be detailed at CC in relation to the basement
		accessible parking space
		• The car parking space shall be designed to meet AS2890.6
		Minimum overhead clearance:
		<ul> <li>Clearance above the parking space and shared area of 2500mm (except where permitted above bonnet areas)</li> </ul>

Relevant NCC 2022 Deemed-to-Satisfy	Compliance	Comments
		<ul> <li>ii. Clearance from the car park entrance to all accessible parking spaces min 2200mm.</li> <li>Dimensions of parking space and adjacent shared area each to be min 2400x5400mm</li> <li>Compliant line marking and signage to designate space and shared area. Elevated signage recommended.</li> <li>1300mm high bollard correctly positioned within shared area.</li> <li>No other obstructions permitted except through a Performance Solution.</li> </ul>
D4D7 Signage	Capable of DTS	<ul> <li>Internal signage is not required to be detailed at DA stage.</li> <li>The following shall be detailed at CC <ul> <li>Braille and tactile signage incorporating the required content, dimensions and mounting position in accordance with Part D4D7, NCC Specification 15, and AS1428.1 shall be detailed, to identify: <ul> <li>i. Each sanitary facility, including Accessible and Ambulant sanitary facilities</li> <li>ii. Required Exit (egress) doors stating 'Exit' and 'Level' followed by floor number</li> <li>iii. Any hearing augmentation system</li> <li>iv. Where a pedestrian entrance is not accessible, directional signage must be provided to direct a person to the location of the nearest accessible pedestrian entrance</li> </ul> </li> <li>v. Where a bank of sanitary facilities is not provided with an accessible unisex sanitary facility, signage to direct a person to the location of the nearest accessible unisex sanitary facility</li> </ul> </li> </ul>
D4D8 Hearing augmentation	Capable of DTS	<ul> <li>Hearing augmentation is not detailed at this stage. A requirement for hearing augmentation may be triggered at CC stage:</li> <li>If an inbuilt amplification is to be installed in a meeting room, this may trigger the requirement for a hearing augmentation system and associated braille and tactile signage. Details to be provided at CC if relevant.</li> </ul>
D4D9 Tactile indicators	Capable of DTS + Further Detail Required	<ul> <li>The DA drawings do not indicate any TGSIs, and this will need to be assessed in detail at CC stage. TGSIs are required to warn of:</li> <li>ramps steeper than 1:20;</li> <li>a stairway other than a fire-isolated stairway</li> <li>in the absence of a suitable barrier, an accessway meeting a vehicular way adjacent to any pedestrian entrance to a building, if there is no kerb or kerb ramp at that point</li> <li>Where tactiles are required, CC shall document:</li> <li>The setout of TGSIs in accordance with AS1428.4.1</li> </ul>

Relevant NCC 2022 Deemed-to-Satisfy	Compliance	Comments
D4D14 Glazing on an accessway	Capable of DTS	<ul> <li>Luminance contrast and slip rating of specified TGSIs to be detailed.</li> <li>Further Detail Required - TGSIs outside building entry door</li> <li>Due to the configuration of the building entry and driveway, it may be necessary to provide TGSIs near the reception entry doorway if there is no suitable barrier, kerb or kerb ramp. This can be readily resolved through the detailed design of this area. If required, TGSis would be documented at CC stage.</li> <li>Full height glazing is indicated to the Reception/Office area façade and potentially other locations.</li> <li>The following shall be detailed at CC stage:         <ul> <li>Detail of any full height glazed external and internal walls, doors, windows and sidelights shall be provided.</li> <li>All glazed doors and panels that could be mistaken for an opening, on or adjacent to an accessible path of travel, are to be provided with a solid contrast strip (visual indicator).</li> <li>The glazing strip or band is to be 75-100mm wide with the base 900-1000mm above FFL. It shall provide min. 30%</li> </ul> </li> </ul>
E3D7 + E3D8 Passenger lifts	Capable of DTS	<ul> <li>luminance contrast when viewed against the floor surface within 2m of the glazing on the opposite side.</li> <li>The DA drawings indicate that the passenger lift is capable of meeting key DTS provisions as follows:</li> <li>Lift floor dimensions of not less than 1400mm wide x</li> </ul>
		<ul> <li>1600mm deep for any lift that travels more than 12m;</li> <li>Turning space at lift landings.</li> <li>The following shall be detailed at CC stage</li> <li>The lifts will be required to be certified as compliant with relevant provisions of AS1735.12 Lifts, escalators and moving walks, Part 12: Facilities for persons with disabilities.</li> <li>The positioning of lift call buttons should be documented to ensure the button is positioned at least 500mm away from any internal corner or obstruction (such as a column).</li> </ul>
<ul> <li>F4D5 Accessible sanitary facilities</li> <li>Provision of accessible unisex sanitary compartments / showers in accessible parts of the building</li> <li>Included elements, circulation spaces, fixtures and fittings to comply with the</li> </ul>	Capable of DTS + Performance Solution	<ul> <li>Capable of DTS</li> <li>The DA drawings indicate that compliance can be achieved with the following DTS provisions in F4D5: <ul> <li>A Unisex Accessible Sanitary Facility is provided in an accessible part of the building</li> <li>It is shown to contain a closet pan (toilet) and washbasin and can accommodate a shelf or bench top and sanitary product disposal bin</li> <li>The room dimensions are sufficient to accommodate circulation spaces, fixtures and fittings to comply with the requirements of AS 1428.1 at CC stage.</li> </ul> </li> </ul>

Relevant NCC 2022 Deemed-to-Satisfy	Compliance	Comments
requirements of AS1428.1. Aat each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided		<ul> <li>The following shall be detailed at CC stage:</li> <li>Construction set to include detailed floor plans and internal elevations with fixture and fitting dimensions and clearances shown.</li> <li>Drawings shall detail wall types, wall reinforcement and falls of wet areas slab</li> <li>FF&amp;E schedule to detail all specified fixture and fittings, colours, slip rating of floor surfaces</li> <li>Performance Solution - Ambulant toilet <ul> <li>The plans show a 'Unisex WC' (small bathroom with standard pan and sink) adjacent to the Unisex Accessible Sanitary Facility.</li> <li>F4D4 DTS provisions require that <i>IF</i> one or more toilets are provided <i>IN ADDITION TO</i> the Accessible toilet, then an Ambulant facility is required. <ul> <li>The plans do not show the Unisex WC to be an Ambulant facility, which has specific dimensional, clearance, pan setout and fitout requirements including grabrails.</li> <li>However, the Unisex WC could be readily adjusted at CC stage to provide a single compliant Ambulant facility</li> </ul> </li> <li>F4D4 DTS provisions also require 'not less than' 1 male and 1 female Ambulant facility and does not allow for 'Unisex' ambulant as DTS.</li> <li>A Performance Solution could be prepared in support of the Unisex Ambulant facility. Given the building use and low staffing numbers, a Performance Solution is likely to be supported at CC stage.</li> </ul></li></ul>
<ul> <li>F4D6 Accessible unisex sanitary compartments</li> <li>Provide 1 accessible sanitary compartment at a bank of toilets, on every storey containing sanitary compartments;</li> </ul>	Capable of DTS	A Unisex Accessible Sanitary Facility is provided on every storey containing sanitary compartments (Ground Floor only).
F4D7 Accessible unisex showers	Capable of DTS	Showers are not currently <u>required</u> to be provided for this Class of building under F4D4, hence no accessible showers are <u>required</u> under F4D7. Should a shower be proposed at CC stage (for example, for End of Trip purposes), it is <u>recommended</u> that this be provided within the Unisex Accessible Sanitary Facility. The room dimensions on the DA drawings could accommodate this.

#### 4.3.3 Performance Solutions

Performance Requirements prescribe the minimum necessary requirements for buildings, and must be met to demonstrate compliance with the NCC. Three options are available to meet the Performance Requirements: A Performance Solution, a DTS Solution, or a combination of the two.

The Performance Solution process is a collaborative process involving the preparation of a Performance Based Design Brief, an assessment against the brief, and the preparation of a final Performance Solution Report. This typically occurs prior to issue of a relevant Construction Certificate, for the acceptance of the Certifier.

The table in Section 4.3.2 identifies matters evident at DA stage that may potentially trigger the need to prepare a Performance Solution, at the discretion of the Certifier. These are summarised below.

DTS Clause	Element	Performance Solution Required
D4D2 General building access requirements <u>Class 7b (Self Storage)</u> Access to be provided to and within all parts of the building normally used by occupants, unless exempted by D4D5	Access to and within Storage Units Due to the varying dimensions and configuration of the storage units, not all individual units would be accessible. Many smaller units could not provide wheelchair accessible internal turning areas or door circulation clearances. It is also expected that entry doors / gates to some unit types would not meet the technical provisions of AS1428.1 due to factors such as door type (roller door), door furniture (eg sliding padlocked latch rather than D- lever or D-pull handle) and contrast luminance between the door and the frame (depending on materials used eg chainwire, steel).	As the storage units are parts of the building that are 'normally used by occupants', some Certifiers hold the view that the NCC requires access to be provided 'to and within' every storage unit, hence they require a Performance Solution to be prepared at CC. As the provision of access is not achievable or appropriate to all storage units, a Performance Solution can be readily supported at CC stage. Through the Performance Solution Process, individual storage units would be nominated to provide suitable levels of access (even smaller units which cannot be entered), covering a selection of unit types, sizes and locations. Further, general principles for access to all unit types could be explored, and management processes documented.
F4D5 Accessible sanitary facilities (c) At each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided	<ul> <li>Provision of Male and Female Ambulant Cubicle</li> <li>F4D4 DTS provisions require that <i>IF</i> one or more toilets are provided <i>in addition to</i> an Accessible toilet, then an Ambulant facility is required. The Unisex WC could be readily adjusted at CC stage to provide a single compliant Ambulant facility</li> <li>F4D4 DTS provisions also require 'not less than' 1 male and 1 female Ambulant facility ambulant as DTS.</li> </ul>	A Performance Solution could be prepared in support of a single Unisex Ambulant facility. Given the building use and low staffing numbers, a Performance Solution is likely to be supported at CC stage.

### 5. SUMMARY AND CONCLUSION

The proposed development demonstrates a high level of compliance with relevant access codes and standards suitable to achieve dignified and equitable access, to the degree necessary.

Based on our assessment, the architectural drawings for the Self Storage facility **demonstrate the capacity to satisfy and comply with** the following:

- The Premises Standards under the Disability Discrimination Act 1992 (DDA)
- NCC 2022 Performance Requirements relating to access for people with a disability:
  - a. Predominantly satisfied through compliance with the DTS provisions as set out in Part D4, E3D7-D8 and F4D5 -D6, and relevant Australian Standards; and
  - b. Where full DTS compliance is not achieved in detailed design, Performance Requirements can be met through Performance Solutions prior to the issue of a Construction Certificate.

Based on the DA drawings listed in Appendix A, two elements have been identified which would trigger the need to prepare a Performance Solution under the NCC, being:

- D4D2 General building access requirements Access to and within Storage Units
- F4D5 Accessible sanitary facilities Provision of Unisex (instead of Male and Female) Ambulant Cubicle

In our professional opinion, the above Performance Solutions are appropriate in the context of this specific project.

- c. Elements have been identified would require further detail confirm DTS compliance
  - Potentially exempt areas Waste room, Storage units
  - TGSIs outside building entry door
- d. Prior to CC, a letter is required to be provided by the building owner or manager confirming the basis for identifying parts of building as Exempt from access.
- e. Finally, as identified throughout Section 4.3.2, design detail and refinement is required at CC stage for documentation in construction drawings and specifications, to ensure that access is provided to the degree necessary to meet the Performance Requirements of the NCC.



### **APPENDIX A: Schedule of Referenced Documents**

This report is based on the following referenced documents:

### DA drawings prepared by Crawford Architects

Issue DA01, date 17 December 2024

DA01	24.12.17	DA ISSUE
ISSUE	DATE	AMENDMENTS

A001	COVER SHEET	N/A
A002	LOCATION PLAN	1:500
A050	SURVEY - SITE PLAN	1:500
A060	SITE ANALYSIS	1:500
A100	BASEMENT FLOOR PLAN	1:100
A101	GROUND FLOOR PLAN	1:100
A102	FIRST FLOOR PLAN	1:100
A103	SECOND FLOOR PLAN	1:100
A104	ROOF PLAN	1:100
A105	GROUND FLOOR GFA PLAN	1:100
A106	FIRST FLOOR GFA PLAN	1:100
A107	SECOND FLOOR GFA PLAN	1:100
A300	ELEVATIONS - SHEET 01	1:100
A301	ELEVATIONS - SHEET 02	1:100
A310	SECTIONS	1:100
A320	MATERIALS BOARD	N/A
A700	NOTIFICATION PLAN	1:200
A900	SHADOW DIAGRAMS	1:500
A901	SHADOW DIAGRAMS	1:500
A910	3D VIEW - SHEET 01	N/A
A911	3D VIEW - SHEET 02	N/A

#### APPENDIX B: Relevant Extract of NCC 2022 (BCA) Deemed to Satisfy Provisions -Access for People with a Disability

Below is a **project-specific schedule** of **relevant** National Construction Code / Building Code of Australia (NCC2022) requirements relating to access requirements for people with a disability in the specified class/es of building. It contains relevant Deemed-to-Satisfy provisions from Part D4, E3D7-8 and F4D5-D7 which include design requirements for people with a disability.

NCC 2022 Clause	Deemed-to-Satisfy (DTS) Requirements	
D4D2 General building access requirements	(1) Buildings and parts of buildings must be accessible as required by this clause, unless exempted by D4D5.	
D4D2 General building access requirements <u>Class 5</u> <u>Class 7b</u> D4D2 General building access requirements Class 7a	<ul> <li>(6) For Class 5, 6, 7b, 8 and 9a buildings, access must be provided to and within all areas normally used by the occupants</li> <li>(7) For a Class 7a building, access must be provided to and within any level containing accessible carparking spaces.</li> </ul>	
D4D3 Access to buildings	<ol> <li>An accessway must be provided to a building required to be accessible–         <ul> <li>a. from the main points of a pedestrian entry at the allotment boundary; and</li> <li>b. from another accessible building connected by a pedestrian link; and</li> <li>c. from any required accessible carparking space on the allotment.</li> </ul> </li> <li>In a building required to be accessible, an accessway must be provided through the principal pedestrian entrance, and–         <ul> <li>a. through not less than 50% of all pedestrian entrances including the principal pedestrian entrance; and</li> <li>b. in a building with a total floor area more than 500 m2, a pedestrian entrance which is not accessible must not be located more than 50 m from an accessible pedestrian entrance, except for pedestrian entrances serving only areas exempted by D4D5.</li> </ul> <li>Where a pedestrian entrance required to be accessible has multiple doorways–         <ul> <li>a. if the pedestrian entrance consists of nor more than 3 doorways – not less than 1 of those doorways must be accessible; and</li> <li>b. if a pedestrian entrance consists of more than 3 doorways – not less than 50% of those doorways must be accessible.</li> </ul> </li> <li>except for pedestrian entrances serving only areas exempted by D4D5.</li> <li>For the purposes of (3)–         <ul> <li>a. an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where–             <ul> <li>i. all doorways serve the same part or parts of the building; and</li> <li>ii. the distance between each doorway is not more than the width of the widest</li> </ul> </li> </ul></li></li></ol>	

<u> </u>	
	doorway at that pedestrian entrance (see Figure D4D3); and
	b. a doorway is considered to be the clear, unobstructed opening created by the
	opening of one or more door leaves (see Figure D4D3).
	5. Where a doorway on an accessway has multiple leaves, (except an automatic opening
	door) one of those leaves must have a clear opening width of not less than 850 mm in
	accordance with AS 1428.1.
D4D4 Parts of building	In a building required to be accessible
to be accessible	a. every ramp and stairway, except for ramps and stairways in areas exempted by D4D5,
	must comply with-
	i. for a ramp, except a fire-isolated ramp, clause 10 of AS 1428.1; and
	ii. for a stairway, except a fire-isolated stairway, clause 10 of AS 1428.1; and
	iii. for a fire-isolated stairway, clause 11.1(f) and (g) of AS 1428.1; and
	b. every passenger lift must comply with E3D7 and E3D8;and
	c. accessways must have—
	i. passing spaces complying with AS 1428.1 at maximum 20 m intervals on
	those parts of an accessway where a direct line of sight is not available; and
	ii. turning spaces complying with AS 1428.1–
	(A) within 2 m of the end of accessways where it is not possible to continue
	travelling along the accessway; and
	(B) at maximum 20 m intervals along the accessway; and
	d. an intersection of accessways satisfies the spatial requirements for a passing and
	turning space; and
	e. a passing space may serve as a turning space; and
	f. a ramp complying with AS 1428.1 or a passenger lift need not be provided to serve a
	storey or level other than the entrance storey in a Class 5, 6, 7b or 8 building–
	i. containing not more than 3 storeys; and
	ii. with a floor area for each storey, excluding the entrance storey, of not more
	than 200 m2 ; and
	g. clause 7.4.1(a) of AS 1428.1 does not apply and is replaced with 'the pile height or pile
	thickness shall not exceed 11 mm and the carpet backing thickness shall not exceed 4
	mm'; and
	h. the carpet pile height or pile thickness dimension, carpet backing thickness dimension
	and their combined dimension shown in Figure 8 of AS 1428.1 do not apply and are
	replaced with 11 mm, 4 mm and 15 mm respectively.
D4D5 Exemptions	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.
	<ul> <li>c. Any path of travel providing access only to an area exempted by (a) or (b).</li> </ul>
D4D6 Accessible	
D4D6 Accessible	1. Accessible carparking spaces—

carparking	a. subject to (b), must be provided in accordance with (2) in–
	i. a Class 7a building required to be accessible; and
	<ul> <li>a carparking area on the same allotment as a building required to be accessible; and</li> </ul>
	b. need not be provided in a Class 7a building or a carparking area where a parking
	service is provided and direct access to any of the carparking spaces is not available to the public; and
	c. subject to (d), must comply with AS/NZS 2890.6; and
	d. need not be designated where there is a total of not more than 5 carparking spaces, so
	as to restrict the use of the carparking space only for people with a disability.
D4D6 Accessible	2. For each class of building to which the carpark or carparking area is associated, the
carparking - Number of	number of accessible carparking spaces required is as follows:
spaces – Class 7b Building	<ul> <li>Class 5, 7, 8 or 9c buildings – 1 accessible space for every 100 carparking spaces or part thereof.</li> </ul>
D4D7 Signage	1. In a building required to be accessible-
	a. braille and tactile signage complying with Specification 15 must—
	i. incorporate the international symbol of access or deafness, as appropriate, i
	accordance with AS 1428.1 and identify each-
	(A) sanitary facility, except a sanitary facility within a sole-occupancy unit in Class 1b or Class 3 building; and
	(B) space with a hearing augmentation system; and
	<ul> <li>identify each door required by E4D5 to be provided with an exit sign and state-</li> <li>(A) "Exit"; and</li> </ul>
	(B) "Level" ; and either
	(C) the floor level number or floor level descriptor or a combination of the two
	<ul> <li>b. signage including the international symbol for deafness in accordance with AS 1428.1 must be provided within a room containing a hearing augmentation system identifying—</li> </ul>
	i. the type of hearing augmentation; and
	ii. the area covered within the room; and
	iii. if receivers are being used and where the receivers can be obtained; and
	c. signage in accordance with AS 1428.1 must be provided for accessible unisex sanitar
	facilities to identify if the facility is suitable for left or right handed use; and
	d. signage to identify an ambulant accessible sanitary facility in accordance with AS
	1428.1 must be located on the door of the facility; and
	e. where a pedestrian entrance is not accessible, directional signage incorporating the international symbol of access, in accordance with AS 1428.1 must be provided to

2	<ul> <li>direct a person to the location of the nearest accessible pedestrian entrance; and</li> <li>f. where a bank of sanitary facilities is not provided with an accessible unisex sanitary facility, directional signage incorporating the international symbol of access in accordance with AS 1428.1 must be placed at the location of the sanitary facilities that are not accessible, to direct a person to the location of the nearest accessible unisex sanitary facility.</li> <li>In a building that is subject to F4D12 and is required to be accessible, directional signage complying with Specification 15 to direct a person to the location of the nearest accessible adult change facility within that building must be provided at the location of each—</li> <li>a. bank of sanitary facilities; and</li> <li>b. accessible unisex sanitary facility, other than one that incorporates an accessible adult change facility.</li> </ul>
augmentation	amplification system must be calculated according to D2D18

1. For a building required to be accessible, tactile ground surface indicators must be
provided to warn people who are blind or have a vision impairment that they are
approaching—
a. a stairway, other than a fire-isolated stairway; and
b. an escalator; and
c. a passenger conveyor or moving walk; and
d. a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp; and
e. in the absence of a suitable barrier—
i. an overhead obstruction less than 2 m above floor level, other than a doorway; and
ii. an accessway meeting a vehicular way adjacent to any pedestrian entrance to a
building, excluding a pedestrian entrance serving an area referred to in D4D5, if
there is no kerb or kerb ramp at that point, except for areas exempted by D4D5.
2. Tactile ground surface indicators required by (1) must comply with sections 1 and 2 of
AS/NZS 1428.4.1.
3. A hostel for the aged, nursing home for the aged, a residential aged care building Class 3
accommodation for the aged, Class 9a health-care building or a Class 9c building need not
comply with (1)(a) and (d) if handrails incorporating a raised dome button in accordance
with the requirements for stairway handrails in AS 1428.1 are provided to warn people who
are blind or have a vision impairment that they are approaching a stairway or ramp.
NOT APPLICABLE
NOT APPLICABLE
NOT APPLICABLE
On an accessway-
a. a series of connected ramps must not have a combined vertical rise of more than 3.6
metres; and
b. a landing for a step ramp must not overlap a landing for another step ramp or ramp.
On an accessway, where there is no chair rail, handrail or transom, all frameless or fully glazed
doors, sidelights and any glazing capable of being mistaken for a doorway or opening must be
clearly marked in accordance with AS1428.1.
1. In an accessible building, every passenger lift must be one of the following lift types,
<ol> <li>In an accessible building, every passenger lift must be one of the following lift types, subject to the limitations (if any) of each lift type:</li> </ol>
subject to the limitations (if any) of each lift type: a. There are no limitations on the use of electric passenger lifts, electrohydraulic
subject to the limitations (if any) of each lift type:
<ul><li>subject to the limitations (if any) of each lift type:</li><li>a. There are no limitations on the use of electric passenger lifts, electrohydraulic passenger lifts or inclined lifts.</li></ul>

JRBAN	PATHWAY

·	
	ii. be used in a high traffic public use area such as a theatre, cinema, auditorium, transport interchange, shopping centre or the like; or
	iii. be used where it is possible to install another type of passenger lift; or
	iv. connect more than 2 storeys; or
	v. where more than 1 stairway lift is installed, serve more than 2 consecutive storeys; or
	vi. when in the folded position, encroach on the minimum width of a stairway required by D2D8 to D2D11
	c. A low-rise platform lift must not travel more than 1000 mm.
	d. A low-rise, low-speed constant pressure lift must not-
	i. for an enclosed type, travel more than 4 m; or
	ii. for an unenclosed type, travel more than 2 m; or
	iii. be used in a high traffic public use areas in buildings such as a theatre, cinema, auditorium, transport interchange, shopping complex or the like.
	e. A small-sized, low-speed automatic lift must not travel more than 12 m.
	2. A passenger lift referred to in (1) must not rely on a constant pressure device for its
	operation if the lift car is fully enclosed.
E3D8 Accessible	In an accessible building, every passenger lift must have the following features where
features required for	applicable:
passenger lifts	a. A handrail complying with the provisions for a mandatory handrail in AS 1735.12 for all lifts except-
	a. a stairway platform lift; and
	b. a low-rise platform lift.
	b. Lift floor dimensions of not less than 1400 mm wide x 1600 mm deep for all lifts which travel more than 12 m.
	c. Lift floor dimensions of not less than 1100 mm wide x 1400 mm deep for all lifts which travel not more than 12 m, except a stairway platform lift.
	d. Lift floor dimensions of not less than 810 mm wide x 1200 mm deep for a stairway platform lift.
	e. Minimum clear door opening complying with AS 1735.12 for all lifts except a stairway platform lift.
	f. Passenger protection system complying with AS 1735.12 for all lifts with power- operated doors.
	g. Lift landing doors at the upper landing for all lifts except a stairway platform lift.
	h. Lift car and landing control buttons complying with AS 1735.12 for all lifts except-
	a. a stairway platform lift; and
	b. a low-rise platform lift.
	i. Lighting in accordance with AS 1735.12 for all enclosed lift cars.
	j. For all lifts serving more than 2 levels-

F405 Accessible unisex sanitary compartment suitable for a person with an ambulant disability for use by females, each in a cordance with F407, and         e.       a decessible unisex sanitary compartment suitable for a person with an ambulant disability for use by females, each in a cordance with F407, and         e.       a coessible unisex sanitary compartment suitable for a person with an ambulant disability for use by females, each in a coessible unisex sanitary compartment suitable for a person with an ambulant disability for use by females, each in a coessible unisex sanitary compartment suitable for a person with an ambulant disability for use by females, each in a coessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary facilities provided, and         f.       an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and         e.       the circulation spaces, fixtures and fittings of all accessible unisex sanitary facilities provided in a accordance with f406 and f407 must comply with the requirements of AS 1428.1; and         f.       an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and         g.       where wo or more of each type of accessible unisex sanitary facilities are only required at a separate location to female sanitary facilities are only required to the socressible unisex sanitary facilities are only required at an on of those locations; and         i.       an accessible unisex sanitary compartment or an accessible unisex shower need not be provided at a sep		
Iff car, and         c. audible information and audible indication required by (i) and (ii) is to be provided in a range of between 20 - 80 dB(A) at a maximum frequency of 1500 Hz.         k. Emergency hands-free communication, including a button that alerts a call centre of a problem and a light to signal that the call has been received, for all lifts except a stairway platform lift.         F4D5 Accessible sanitary facilities       In a building required to be accessible—         a. accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and         b. accessible unisex showers must be provided in accordance with F4D7; and         c. at each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided; and         d. an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and         e. the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; and         f. an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and         g. where two or more of each type of accessible unisex sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; and         h. where male sanitary facilities are provided at a separate location to female sanitary		
provided in a range of between 20 - 80 dB(A) at a maximum frequency of 1500 Hz.           k. Emergency hands-free communication, including a button that alerts a call centre of a problem and a light to signal that the call has been received, for all lifts except a stairway platform lift.           F4D5 Accessible sanitary facilities         In a building required to be accessible—           a. accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and           b. accessible unisex showers must be provided in accordance with F4D7; and           c. at each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided; and           d. an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and           e. the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; and           f. an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and           g. where two or more of each type of accessible unisex sanitary facility are provided as evenly as possible; and           h. where male sanitary facilities are only required at one of those locations; and           i. an accessible unisex sanitary facilities are only required at one		-
problem and a light to signal that the call has been received, for all lifts except a stairway platform lift.F4D5 Accessible sanitary facilitiesIn a building required to be accessible – a. accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and b. accessible unisex showers must be provided in accordance with F4D7; and c. at each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided; andd.an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and e. the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; andf.an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and g. where two or more of each type of accessible unisex sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; andh.where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; andi.an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a pa		provided in a range of between 20 - 80 dB(A) at a maximum frequency of
sanitary facilities       a. accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and         b. accessible unisex showers must be provided in accordance with F4D7; and       c. at each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with AS 1428.1, must be provided; and         d. an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and         e. the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; and         f. an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and         g. where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right handed mirror image facilities must be provided as evenly as possible; and         h. where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.         F4D6 Accessible unisex       (1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building is as follows:		problem and a light to signal that the call has been received, for all lifts except
<ul> <li>a. accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and</li> <li>b. accessible unisex showers must be provided in accordance with F4D7; and</li> <li>c. at each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided; and</li> <li>d. an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and</li> <li>e. the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; and</li> <li>f. an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and</li> <li>g. where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right handed mirror image facilities must be provided as evenly as possible; and</li> <li>h. where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; and</li> <li>i. an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.</li> <li>F4D6 Accessible unisex sanitary bruiting is as follows:         <ul> <li>a. For a Class 1b building –</li> </ul> </li> </ul>		In a building required to be accessible-
c.at each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided; andd.an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; ande.the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; andf.an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; andg.where two or more of each type of accessible unisex sanitary facility are provided as evenly as possible; andh.where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; andi.an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.F4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building is as follows: a.a.For a Class 1b building-		
F4D6 Accessible unisexanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided; andd.an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; ande.the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; andf.an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; andg.where two or more of each type of accessible unisex sanitary facilities must be provided as evenly as possible; andh.where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; andi.an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.F4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building –		b. accessible unisex showers must be provided in accordance with F4D7; and
shelf or bench top and adequate means of disposal of sanitary products; ande.the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; andf.an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; andg.where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right handed mirror image facilities must be provided as evenly as possible; andh.where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; andi.an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.F4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building –		unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and not less than one sanitary compartment suitable for a person with an ambulant disability for use by females, each in accordance with AS 1428.1, must be provided;
F4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartmentsF4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments(1) Where required by building–		
F4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary for a Class 1b building-		in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1;
number of left and right handed mirror image facilities must be provided as evenly as possible; andh. where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; andi. an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.F4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building is as follows: a. For a Class 1b building-		
facilities, accessible unisex sanitary facilities are only required at one of those locations; andi. an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.F4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building is as follows: a. For a Class 1b building-		number of left and right handed mirror image facilities must be provided as evenly as
be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.F4D6 Accessible unisex sanitary compartments(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building is as follows: a. For a Class 1b building-		facilities, accessible unisex sanitary facilities are only required at one of those
sanitary compartments for each class of building is as follows: a. For a Class 1b building–		be provided on a storey or level that is not required by D4D4(f) to be provided with a
sanitary compartments compartments for each class of building is as follows: a. For a Class 1b building-	F4D6 Accessible unisex	(1) Where required by F4D5(a), the minimum number of accessible unisex sanitary
	sanitary compartments	
i. not less than 1; and		a. For a Class 1b building—
		i. not less than 1; and

	<ul> <li>where private accessible unisex sanitary compartments are provided for every accessible bedroom, common accessible unisex sanitary compartments need not be provided.</li> </ul>
	<ul> <li>For a Class 2 building, where sanitary compartments are provided in common areas, not less than 1.</li> </ul>
	c. For Class 3 and Class 9c buildings—
	<ul> <li>in every accessible sole-occupancy unit provided with sanitary compartments within the accessible sole-occupancy unit, not less than 1; and</li> </ul>
	ii. at each bank of sanitary compartments containing male and female sanitary compartments provided in common areas, not less than 1.
	d. For Class 5, 6, 7, 8 or 9 buildings, where F4D4 requires closet pans—
	i. 1 on every storey containing sanitary compartments; and
	ii. where a storey has more than 1 bank of sanitary compartments containing male and female sanitary compartments, at not less than 50% of those banks.
	e. For a Class 10a building, at each bank of sanitary compartments containing male and female sanitary compartments, not less than 1.
	(2) The requirements of (1)(d) do not apply within a ward area of a Class 9a health-care building.
	(3) The requirements of (1)(e) do not apply to-
	1. a Class 10a appurtenant to another class of building; or
	2. a sanitary compartment dedicated to a single caravan/camping site.
F4D7 Accessible unisex showers	(1) Where required by F4D5(b), the minimum number of accessible unisex showers for each class of building is as follows:
	a. For a Class 1b building—
	i. not less than 1; and
	<ul> <li>where private accessible unisex showers are provided for every accessible bedroom, common accessible unisex showers need not be provided.</li> </ul>
	b. For a Class 2 building, where showers are provided in common areas, not less than 1.
	c. For Class 3 and 9c buildings—
	<ul> <li>in every accessible sole-occupancy unit provided with showers within the accessible sole-occupancy unit, not less than 1; and</li> </ul>
	ii. 1 for every 10 showers or part thereof provided in common areas.
	d. For Class 5, 6, 7, 8 or 9 buildings, where F4D4 requires 1 or more showers, not less than 1 for every 10 showers or part thereof.
	e. For a Class 10a building, where showers are provided, 1 for every 10 showers or part thereof.
	(2)The requirements of (1)(d) do not apply within a ward area of a Class 9a health-care building.
	(3) The requirements of (1)(e) do not apply to-
	a. a Class 10a appurtenant to another class of building; and



	b. a sanitary compartment dedicated to a single caravan/camping site.
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