



Access Compliance Statement

56-58 Knox Street, Goulburn - Alts & Adds



Prepared for: Cushman & Wakefield

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01	Access Capability Statement for DA Submission	3-Feb-25		
			Senior Access Consultant	Joel Lewis Director

Revision History

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01	Access Capability Statement for DA Submission	3-Feb-25	ACA Associate Member No. 713

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1 Executive Summary

MBC Group have assessed architectural design documents prepared by Lead Architects (refer appendix A) for compliance with the following Legislation:

- Federal Disability Discrimination Act 1992 (DDA);
<https://www.legislation.gov.au/C2004A04426/2022-12-13/text>
- Disability (Access to Premises - Buildings) Standards 2010 (DAPBS);
<https://www.legislation.gov.au/Details/F2010L00668>
- Disability (Access to Premises - Buildings) Amendment Standards 2020
Government of Australia;
<https://www.legislation.gov.au/Details/F2020L01245>
- Disability Standards for Accessible Public Transport 2002 (DSAPT 2002)
- Disability Standards for Accessible Public Transport Guidelines 2004 (No 3)
- The National Construction Code - Building Code of Australia Volume One 2022 (referred to as BCA).

Table D3D15: Slip Resistance Classification

Part D3.16 Thresholds

Part D3D22: Handrails

Part D4: Access for People with Disabilities

Section F4D5 / F4D6: Accessible Sanitary Facilities

Section F4D7: Ambulant Sanitary Facilities

Australian Standards series for Access, Mobility Specific and Guidelines

- AS1428.1:2009 - General Requirements for Access – New Building Work (Amendment 1 and 2)
- AS1428.4.1:2009 - Means to Assist the Orientation of People with Vision Impairment
- AS1428.2:1992 - Design for Access and Mobility- Enhanced and additional requirements – Buildings and Facilities
- AS1735.12:1999 - Lift Facilities for People with Disabilities

NCC BCA – Building Australian Code - 2022 Specific

- Part D4 - Access for People with Disability
- Part E3 - Lift Installations
- Part F4 - Sanitary and other Facilities

Reference and Guidelines

- Guide to the BCA, Current Version, Australian Building Codes Board, www.abcb.gov.au
- Guideline on the Application of The Premises Standards, 2013, Australian Human Rights Commission, <https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards>
- Guide to the BCA, Current Version, Australian Building Codes Board, www.abcb.gov.au
- Guideline on the Application of The Premises Standards, 2013, Australian Human Rights Commission, <https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards>
- AS1428.2:1992 Enhanced and Additional requirements <https://www.saiglobal.com/PDFTemp/Previews/OSH/as/as1000/1400/14282.pdf>
- AS1428.4.1 Draft Way-finding Standard <https://store.standards.org.au/reader/as-1428-4-2-2018?preview=1>
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture, <https://humanrights.gov.au/our-work/disability-rights/publications/advisory-note-streetscape-public-outdoor-areas-fixtures>
- Advisory Note on the streetscape, public outdoor areas, fixtures, fittings, and furniture (2013).
- Goulburn Mulwaree Local Council

Universal Design (UD)

Access is paramount in providing an inclusive environment for all users within the community. The Access Code is focused on ensuring that all users are equally catered for in society.

It is recommended to use the Universal Design principles in all projects as this will ensure a holistic approach in the provision of access for all members of society.

There are 7 Principles and their subsequent Guidelines to be considered when undertaking the design of a new project:

No.	Principle	Guidelines
1	Equitable use	<p>The design is useful and marketable to people with diverse abilities.</p> <ul style="list-style-type: none"> - Provide the same means of use for all users: identical whenever possible; equivalent when not. - Avoid segregating or stigmatizing any users. - Provisions for privacy, security, and safety should be equally available to all users. - Make the design appealing to all users.

No.	Principle	Guidelines
		Example: Online content that is designed so that it is accessible to everyone, including staff who are blind and using text-to-speech software.
2	Flexibility in use	<p>The design accommodates a wide range of individual preferences and abilities.</p> <ul style="list-style-type: none"> - Provides choice in methods of use. - Accommodate right- or left-handed access and use. - Facilitate the user's accuracy and precision. - Provide adaptability to the user's pace. <p>Example: A civic facility that allows a visitor to choose to read or listen to a description of the contents of a display case employs this principle.</p>
3	Simple and intuitive use	<p>Use of the design is easy to understand regardless of the user's experience, knowledge, language skills, or current concentration level.</p> <ul style="list-style-type: none"> - Eliminate unnecessary complexity. - Be consistent with user expectations and intuition. - Accommodate a wide range of literacy and language skills. - Arrange information consistent with its importance. - Provide effective prompting and feedback during and after task completion. <p>Example: Control buttons on specific equipment for common use (staff and visitors) are labelled with text and symbols that are simple and intuitive to understand.</p>
4	Perceptible information	<p>The design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities.</p> <ul style="list-style-type: none"> - Use different modes (pictorial, verbal, tactile) for redundant presentation of essential information. - Provide adequate contrast between essential information and its surroundings. - Maximise "legibility" of essential information. - Differentiate elements in ways that can be described (i.e., make it easy to give instructions or directions). - Provide compatibility with a variety of techniques or devices used by people with sensory limitations. <p>Example: Broadcasting television closed captions for user (staff and visitors) with hearing loss.</p>
5	Tolerance for error	<p>The design minimizes hazards and the adverse consequences of accidental or unintended actions.</p> <ul style="list-style-type: none"> - Arrange elements to minimize hazards and errors: most used elements, most accessible; hazardous elements eliminated, isolated, or shielded. - Provide warnings of hazards and errors. - Provide fail safe features. - Discourage unconscious action in tasks that require vigilance. <p>Example: Online content that is designed to be accessible to everyone, including staff who are blind or partially blind or visitors/users using text-to-speech software.</p>
6	Low physical effort	<p>The design can be used efficiently and comfortably and with a minimum of fatigue.</p> <ul style="list-style-type: none"> - Allow user to maintain a neutral body position. - Use reasonable operating forces. - Minimize repetitive actions.

No.	Principle	Guidelines
		<ul style="list-style-type: none"> - Minimize sustained physical effort. <p>Example: Automated doors, windows, lighting, air-conditioning, etc. Sensor doors and basin and sink taps/water mixers.</p>
7	Size and space for approach and use	<p>Appropriate size and space are provided for approach, reach, manipulation and use regardless of user's body size, posture or mobility.</p> <ul style="list-style-type: none"> - Provide a clear line of sight to important elements for any seated or standing user. - Make reach to all components comfortable for any seated or standing user. - Accommodate variations in hand and grip size. - Provide adequate space for the use of assistive devices or personal assistance. <p>Example: Adjustable workbenches for visitors, users and adjustable desks for staff.</p>

Base Extracted from [Universal Design Principles | RL Mace Universal Design Institute \(udinstitute.org\)](https://www.udinstitute.org/)

2 Introduction

2.1 Purpose

The purpose of this statement is to assess the current design proposal against the Deemed-to-Satisfy (DtS) provisions of the National Construction Code 2022 - Building Code of Australia (referred to as BCA), DDA Premises Standards 2010, and AS1428.1 Suite and provide surety to the Consent Authority that the design is capable of compliance without significant design amendments.

The following MBC Group Team Members have contributed to this assessment:

- Jhoana Colorado

This Capability Statement review summarizes the major spatial issues that need to be addressed at early stages, in alignment with the NCC BCA, DDA Premises Standards, and AS1428.1 Suite. Additional detailed issues will be appropriately addressed during the detailed design and tender phases before issuing the Construction Certificate.

This report aims to provide achievable recommendations related to the provision of access to premises based on current legislation and best practice options, enabling independent, equitable and functional access for all.

2.2 Methodology

The methodology applied in undertaking this assessment has included: -

- A desktop review: A comprehensive review of architectural plans, as detailed in Appendix A, to assess compliance with relevant accessibility standards and codes.
- Code Compliance Assessment: Evaluation of the architectural plans against the following relevant accessibility standards and codes:
- National Construction Code Series (Volume 1) Building Code of Australia 2022, Parts D, E & F.
- Australian Standard Suite Disability (Access to Premises - Buildings) Standards 2010 (Premises Standards) and relevant State-based regulations
- Discussions with the design development team to gain an understanding of the development proposed.

2.3 Limitations

This statement **does not include** or imply any detailed assessment for design, compliance or upgrading for:

- Work Health & Safety Act 2011 and Regulations: Compliance with these is not covered.
- Workcover Authority Requirements: These are outside the scope of this report.
- Structural and Services Design Documentation: No assessment of these elements is included.
- BCA and Standards: Only the sections directly referenced in this report are assessed; all other parts are excluded.
- Fittings and Fixtures: Any fittings and fixtures not provided in the architectural documentation are excluded. Loose furniture shown on the plan is considered indicative only. Those responsible for furnishing should ensure their layout does not cause circulation deficiencies per AS 1428.1-2009.
- Crossfalls and Floor Levels: These are excluded if not provided in the documentation.
- Regulatory Authorities: Requirements from other authorities, such as Telstra, Telecommunications Supply Authority, Water Supply Authority, Electricity Supply Authority, Workcover, and Roads and Maritime Services, are not included.
- BCA2019/2022 Sections: Sections B, C, G, H, I, J, and Parts D1 and D2 are excluded and covered in a separate BCA Report.
- Australian Standards: Unless specifically referred to, these are not assessed.
- Services and Equipment: Any operating services or equipment within the design are not covered.
- Federal, State, and Local Policies/Legislation: Only those directly referenced in this report are included.
- Disability Discrimination Act 1992 (DDA): Although this report covers the Disability (Access to Premises – Buildings) Standards 2010 according to BCA accessibility requirements, adhering to the DDA does not ensure protection from complaints. The DDA is outcome-focused and does not provide specific compliance measures.
- The recommendations in this report represent the professional opinion and interpretation of MBC DDA and Access division and may differ from those of other consultants
- Any drawings not included in Appendix A are not reviewed.

3 Development Description

3.1 Proposed Development

The proposed development comprises alterations and additions to the office premises within the existing NSW State Emergency Services facility.

3.2 Location

The site is located at 56-58 Knox Street, Goulburn.



Figure 1. Site Location - Google Maps Source

3.3 Use and Building Class – Accessibility

The proposed development shall contain the following classifications:

Use	Class	Access Requirements
Class 5	Offices	Access is required -to and within all areas normally used by the occupants. This includes the storerooms.

4 Assessment

4.1 Relevant BCA Edition

MBC Group has been contracted to assess the subject building against the Building Code of Australia (Access Provisions) Volume One 2022 (referred to as BCA Compliance). Development Application and Construction Certificate provisions are not applicable to the project.

4.2 Compliance with the BCA Access Provisions

A desktop assessment was carried out against the technical DDA and Access provisions of the BCA access provisions and compliance matters will be addressed in the Construction Certificate documentation. It is noted that the proposed development must comply with the relevant requirements, and this can be achieved by complying with the Performance Requirements of the BCA:

4.3 Performance Solutions – Accessibility

The assessment of the design documentation has revealed that the following areas or items are departures from the NCC BCA 2022 and are required to be assessed against the relevant Performance Requirements of the NCC BCA. These are as following:

DTS Clause	Description of Non-Compliance	Performance Requirement
Threse are not Performance Solutions identified in this review.		

5 Mandatory Requirements, Accessibility Assessment and Recommendations for Access for People with a Disability

The following details the accessibility compliance of the proposed development. The assessment is limited to the significant issues ascertainable from the Development application documentation. Further detailed assessment will be required at the detailed design stage/construction certificate stage to demonstrate full compliance with the relevant access provisions.

5.1 NCC BCA Part D4 – Access to Buildings (Entrances)

DTS Clause	Description of Non-Compliance	Compliance Status
D4	-Is understood that building entry provides threshold level.	Achieved

5.2 Continuous Accessible Path of Travel (CAPT)

A continuous accessible path of travel is defined as an uninterrupted pathway to and from within a premises or building environment which provides linkage to all programs, goods and services within a premises or building. Therefore, the following items are located via this pathway.

DTS Clause	Description of Non-Compliance	Compliance Status
D4	-There is no major level threshold level proposed.	Achieved

General Recommendations:

*All new doors thresholds are to ensure compliance with AS1428.1.

5.3 Stairs, Ramps and Walkways (Common Use)

Every stairway, except for ramps and stairways in areas exempted by D4D5 (service maintenance, Back-of-House etc).

DTS Clause	Description / Recommendations	Compliance Status
D4D5	-New stair is to allow for one treat and 300mm handrail extension handrail extensions at the base without protruding into transversal circulation space.	Achieved

DTS Clause	Description / Recommendations	Compliance Status
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General Recommendations:

*Allow suitable circulation for handrail extensions top and bottom in accordance with AS1428.1.

5.4 Passenger Lifts – BCA Part E3 and D4 & AS1735.12

New lifts required to be accessible must comply with BCA E3 and D4 and relevant parts of AS1735.12.

DTS Clause	Description / Recommendations	Compliance Status
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F4	-Proposed lift size is suitable with 2000mm Wx 2300mmL and lift lobbies are 1850mm L and 2400mm W.	Achieved
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General Recommendations:

*Ensure buttons are 500mm from internal corner at 900mm – 1250mm above FFL.

5.5 Sanitary and other Facilities

DTS Clause	Description / Recommendations	Compliance Status
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F4	-Female and male toilets lack ambulant facilities. However, there is enough space for adjustment to be made to achieve compliance.	Capable of compliance
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	-Unisex accessible WC - Unisex accessible WC is to provide a basin with 430mm projection minimum clear of 2300mm pan circulation space, therefore this will be 225mm basin encroachment into pan circulation space in lieu of 100mm max, which is not in accordance with AS1428.1. However, there is enough space for adjustment to be made to achieve compliance.	Capable of compliance
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General Recommendations:

*Male and female WC are to provide ambulant facilities. Doors is to be swing out and cubicle is to be 1510mm L clear of doors swing. Is recommender to swing the doors out for compliance

*Length of the unisex accessible WC is to be adjusted for compliance.

5.6 Communal and Exempted Areas – BCA D4D5

Under the DDA Premises Standards and BCA all common use rooms normally used by occupants of the building are to be accessible, except areas exempt under BCA D4D5 (former D3.4) Services /maintenance only use areas, which are areas where access would be inappropriate because of the particular purpose for which the area is used or that would pose a health or safety risk for people with a disability.

- Accessibility is required to common use terraces, open/outdoor spaces within buildings.

DTS Clause	Description / Recommendations	Compliance Status
D4	All commonly use areas appear to be accessible by all building occupants.	Achieved

6 Conclusion

This Access capability statement outlines the findings of an assessment of the referenced architectural documentation for the proposed development against the Deemed-to-Satisfy provisions of the National Construction Code Series (Volume 1) Building Code of Australia 2022.

In view of this assessment, we can confirm that compliance with the National Construction Code Series (Volume 1) Building Code of Australia 2022 amendment 1 is readily achievable. Subject to minor adjustment in sanitary facilities that can be addressed at a later stage.

We trust that the above submission is of assistance to Goulburn Mulwaree Council and should you wish to discuss any aspect of this advice, please do not hesitate to contact the undersigned.

Best regards,



Jhoana Colorado
Senior Access Consultant
MBC Group

7 Appendix A – Design Documentation

The following documentation by Lead Architects was used in the assessment and preparation of this statement:

Drawing No.	Title	Date	Drawn By	Revision
A01	cover page	22/10/2024	Lead Architects	SD9
A02	existing ground floor plan	22/10/2024	Lead Architects	SD9
A03	proposed ground floor plan	22/10/2024	Lead Architects	SD9
A04	proposed level 1 floor plan	22/10/2024	Lead Architects	SD9
A05	existing 3d image 1	22/10/2024	Lead Architects	SD9
A06	proposed 3d image 1	22/10/2024	Lead Architects	SD9
A07	proposed 3d image 2	22/10/2024	Lead Architects	SD9
A08	proposed 3d image 3	22/10/2024	Lead Architects	SD9
A09	proposed 3d image 4	22/10/2024	Lead Architects	SD9

8 Appendix B – General Recommendations for Construction Stage

The following recommendations will have an impact on the building sign off under the DDA Access Code for Buildings or the NCC BCA Accessibility provision. Recommendations details are provided below:

Floor Finish

- Tiles and Vinyl: Flooring materials such as tiles and vinyl must be firm, even, and slip-resistant to reduce the likelihood of slips, trips, and falls. In wet areas, these materials must comply with specific waterproofing and water-resistance requirements. For example, in wet areas like bathrooms, floors must be P3 R10.
 - Carpet Requirements: The pile height or thickness should not exceed 6 mm, with carpet backing no thicker than 4 mm. Exposed edges must be securely fastened to prevent tripping hazards, with appropriate trims.
 - Entry Recessed Matting: Entry mats that are recessed within a continuous accessible path of travel should be flush with or slightly above the surrounding surface. If the mat is made of metal or bristle-type construction, the surface should not exceed 3 mm if vertical or 5 mm if rounded or beveled above the surrounding surface.
- Lineal drain is not to exceed 13mm. lines to be in the direction of the path of travel.

Accessible Paths of Travel

- Continuous Accessible Path of Travel: Minimum width of 1000 mm,
 - Passing Bays: To be provided when there in line-of-sight at 20m intervals, 1800 mm wide by 2000 mm long in the direction of travel.
 - Paths must be unobstructed by fixtures like lights or fire extinguishers.
- Circulation Spaces at Doors: (internal and external). Minimum space for wheelchair to manoeuvre in accordance with AS1428.1 Fig. 31 and 32. Specific clearances are required at different angles of approach.

Doors and Clear Circulation Spaces

- 850mm Clear Width Opening: All doors within accessible paths of travel should provide a clear opening width of at least 850 mm. Door hardware must include lever handles with at least 20 mm turns to ensure ease of use.
- Thresholds: If a door threshold exceeds 5 mm, a door threshold ramp is to be compliant with AS 1428.1 Fig 21 must be provided.
- Door operation: 20N force must be provided.
- Door latch side: 530mm latch side clearance (door opening towards) the user and 510mm latch side clearance (door opening away from the user)
- Door Automation Controls: Controls should be placed between 900 mm and 1100 mm above floor level and 1-2 meters away from the door swing, 500mm from the internal corner. Button to be mushroom type.

Ramps

- Ramp Gradients and Landings: Maximum gradient is 1:14, with a minimum width of 1000 mm clear. Landings must be at least 1200 mm long (one direction of travel) 1500mm (90-degrees turn). Switch back landing 1540mm wide minimum.
 - 9m landings intervals.
- Handrails should extend 300 mm beyond the ramp's start and end, (excluding the turn) with a clear distinction between the ramp and landing areas.

Visual Indicators on Glazing (Non-Transparent Decals)

Visual Indicators on Glazing: Glazing must include a 75 mm wide contrasting line across its full width, located 900-1000 mm above the floor. This line should provide at least 30% luminance contrast.

BCA F2.4 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 Table F2.4(a); and F2.4(b)
- (b) accessible unisex showers must be provided in accordance with Table F2.4(b); 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, a sanitary compartment suitable for a person with an ambulant disability in accordance with AS 1428.1 must be provided for use by males and females; and
- (d) an accessible 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 Table F2.4(a) and Table F2.4(b) 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 facilities are only required at one of those locations; and
- (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 D3.3(f) to be provided with a passenger lift or ramp complying with AS 1428.1.

Unisex accessible toilets are to comply with AS1428.1.

Ambulant Cubicles

In a building required to be accessible

- (a) accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with Table F2.4(a); and F2.4(b)
- (b) accessible unisex showers must be provided in accordance with Table F2.4(b); and
- Female and male ambulant cubicles are to be provided at each bank of toilets.
- The cubicle should include appropriate fixtures such as coat hooks, which should be installed at a height between 1350 mm and 1500 mm from the floor.
- The cubicle must provide sufficient circulation space 900mmx900mm clear circulation space (in front of the pan) and out side of the cubicle, at the entry door and entrance airlock (exclusive of the door swing) to the bank to allow easy access and manoeuvrability within the cubicle

Ambulant Cubicles

- Grabrails are to ensure 200mm – 250mm from the pan seat to the inner face of the grabrails.

Tactile Indicators - TGSi (Tactile Ground Surface Indicators) - Compliant to AS1428.4.1.

- Ramp Requirements: Tactile indicators should have sufficient luminance contrast (30% Tiles/45%discrete/60% two material) with surrounding surfaces and be slip-resistant. They should cover the full width of the path and be placed 300 mm from the hazard.
- Stair Requirements: 300mm depth (when 3m or under to an obstruction is provided) 600mm-800mm depth (when over 3m to an obstruction is provided).
- Contrast: 30% Tiles: This could indicate that 30% of the surface area is covered with standard tiles.
45% Discrete: This might refer to 45% of the area using discrete TGSi indicators (like small dots or bars).
60% Two Material: This could imply that 60% of the TGSi uses a combination of two different materials.

Signage

- Braille and Tactile Signage: Must comply with AS 1428.1 and NNCC BCA, including Braille for identifying sanitary facilities.
- Signage should indicate the presence and type of hearing augmentation systems and their coverage.
Braille text to be 1250mm -1350mm above FFL(one line) and 1200mm -1600mm above FFL(two lines or more).

Hearing Augmentation

System Requirements: Required in areas with built-in amplification systems like meeting rooms, classrooms and auditoriums. Where speakers other than emergency are provided. The system must cover critical areas of communication.

Accessible Car Parking Bays

Dimensions and Location: Must be clearly marked and located near building entrances. The pavement should have minimal slope of 1:40maximum or 1:33 bitumen, and dimensions should comply with AS/NZS 2890.6.

Passenger Lifts

- Passenger Lifts: Minimum internal dimensions should be 1400 mm wide by 1600 mm deep for lifts traveling more than 12 meters. Features like handrails, audible systems, and sufficient door width are mandatory.
- Minimum internal dimensions should be 1100 mm wide by 1400 mm deep for lifts traveling less than 12 meters.
- Platform Lifts: Typically, platform lifts should not travel more than 1 meter unless no other lift types are feasible. They are generally not suitable for high-traffic areas.
- All doors in the continuous accessible path of travel are to provide threshold level. 70mm recess pit to enable Platform lift to provide threshold level.
Lift lobbies: to provide 2000mm x 1800mm clear circulation space in the direction of travel.

Egress Signage

Requirements for Exit Signage: Exit signs must be clearly visible to persons approaching the exit, installed on or above doors leading directly to a required exit, including enclosed and external stairways, passageways, or ramps.

Walkways

Ambulant Cubicles

1:20 Walkways: These walkways have a gradient of 1:20 and do not require landings but must maintain a crossfall for drainage, typically 1:40.

Stairs

- **Handrails on Both Sides:** Handrails are required on both sides of stairs, must be continuous, and should extend one tread width plus an additional 300 mm horizontally beyond the last riser at both the top and bottom of the stair.
- **Solid nosings and Risers:** Stair nosings should be solid, with no projections beyond the face of the riser. They must have a contrasting colour strip providing at least 30% luminance contrast, 50-75 mm wide.

Handrail Extensions: Handrails should extend horizontally one tread width plus 300 mm beyond the stair's base and top, excluding the turn. 300mm is to provide at the top of the stair, excluding the turn.

Handrails and Circulation Spaces

- **Handrails Not Protruding into Circulation Space:** Handrails on stairs must not protrude into the transversal circulation space to ensure clear and safe movement.

Kerb Ramps

- **Kerb Ramp Specifications:** Kerb ramps must meet the specifications outlined in AS 1428.1, which includes considerations for gradient, landing size, and alignment.

Signage and Visual Indicators and Door Contracts

- **30% Luminance Contrast:** Signage, tactile indicators, and stair nosing strips must have a luminance contrast of at least 30% against the background to enhance visibility for visually impaired users.



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