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DISABILITY ACCESS REPORT

Adamstown RSL Residential Development
282 Brunker Road
ADAMSTOWN NSW

For:
Adamstown RSL

Our ref:
1245



1. Introduction

This Access Report considers the Proposed Adamstown RSL Development located at 282 Brunner Road Adamstown, against the requirements of The Building Code of Australia, The Disability Discrimination Act 1992 and AS4299 – Adaptable Housing.

The proposed development is of a residential nature. A total of 93 apartments are provided within the development five of which are nominated as adaptable. Lift access is provided to all levels of the development. Carparking at the Basement level caters for the existing RSL Club and we note that accessible carparking is provided in this location.

Development Application drawings prepared by The Design Partnership have been reviewed as follows.

- DA101 B Basement Level Plan
- DA102 B Ground Floor Plan
- DA103 B Level 1 Plan
- DA104 B Level 2 Plan
- DA105 B Level 3 Plan
- DA106 B Level 4 Plan
- DA107 B Level 5 Plan
- DA200 B Elevations Sheet 1
- DA201 B Elevations Sheet 2 + Sections

It is estimated that one in five people in Australia have a long-term disability (Australian Bureau of Statistics – 2003). This includes physical disability, intellectual disability, and sensory impairments such as vision and hearing. It does not include those with a short-term (temporary) disability or the continuing aging population.

Lindsay Perry Access + Architecture have adopted a best practice, performance based approach to access. Assessment is based on project specifics and takes into account various factors such as site topography, heritage and existing site conditions.

2. Legislation

The requirements of BCA 2012 have been adopted in the preparation of this access report. Access assessment has been made against Access Legislation including:

- The Commonwealth Disability Discrimination Act 1992 (DDA)
- The Building Code of Australia 2012 (BCA) Section D3 – Access for People with Disabilities
- Australian Standards AS1428.1(2009) Amendment 1, AS1428.2(1992), AS1428.4(2009) – Design for Access and Mobility
- Australian Standard AS2890.6 (2009) – Parking Facilities – Off street carparking For People With Disabilities.
- Australian Standard AS4299 – Adaptable Housing
- Australian Standard AS1735.12 – Lifts, escalators and moving walks: Facilities for persons with disabilities.

The DDA is a complaint based law. Compliance with the BCA alone will not offer protection from a complaint made under the DDA.



The accessibility of the proposed development has been considered in regard to the relevant access legislation. A summary of the requirements of relevant legislation follows.

- The **DDA** requires independent, equitable, dignified access to all parts of the building for all building users regardless of disability. The DDA makes it unlawful to discriminate against a person on the grounds of disability. The DDA is a complaint based law and is administered by the Human Rights and Equal Opportunities Commission.
- **BCA 2012** for Class 2 buildings, requires that common areas of the building be accessible from at least one floor of sole occupancy units and to the entrance doorway of each sole occupancy located at that level. It also requires access to and within not less than each type of room or space for use in the common areas of the development.
- **AS1428 – Design for Access and Mobility** requires the inclusion of a continuous accessible path of travel from the street footpaths and carparking areas to the entry and facilities within the building. It also includes requirements for doorways, stairs, toilets, etc.

Part 1 (2009) of this standard contains access requirements that are mandatory for the provision of access for persons with a disability and will be referred to by the BCA 2011. Amendment 1 of this document was released in 2010.

Part 2 (1992) provides enhanced and best practice requirements. While AS1428.2 is not mandatory, the inclusion of its requirements such as accessible reception counters reduce the risk of a complaint made under the DDA. AS1428.2 is referenced by the Human Rights and Equal Opportunities Commission Advisory Notes for Access to Premises that accompanies the DDA.

Part 3 (1992) – Requirements for Children and Adolescents with Physical Disabilities is applicable to purpose built developments and therefore has not been considered within this development.

Requirements for tactile indicators are included in Part 4 (2009) of this standard.

Part 5 (2010) provides requirements for Communication for people who are deaf or hearing impaired. It will not be referenced by BCA 2011. However, its requirements should be considered in the provision of hearing augmentation systems required by BCA.

- **AS2890.6** applies to the carparking areas generally. AS2890.6 was published on 22 October 2009 and is referenced by BCA 2011.
- **AS4299 – Adaptable Housing** provides housing for different community groups with different needs. It involves a move away from special accommodation for persons with a disability, avoiding social dislocation.
- **AS1735.12** contains requirements for passenger lifts for persons with a disability.



3. Access and Approach

The approach to the building needs to be considered when considering access for persons with a disability. The BCA has three requirements for the approach to the building for persons with a disability.

An accessible path of travel is required to the building entrance from the allotment boundary at the main points of pedestrian entry, from accessible carparking areas and from any adjacent and associated accessible building.

In this instance, the approach to the building has been considered from the street footpaths along Date Street and Victoria Street to the building entrances and from the accessible carparking areas to the main entrances. The link to the existing RSL Club has also been considered.

An accessible path of travel is provided from each of the street footpaths to the building entrances / foyer areas. On grade access is available from Date Street while an accessible ramp and stairs provide access from Victoria Street. Lifts are available to all levels of the building and an accessible link is provided from the lift lobby on the eastern side of the proposed building to the existing RSL lifts.

The approach from each of these areas is considered to meet the requirements of the BCA being accessible to persons with a disability.

3.1 Ramp

A pedestrian ramp is provided to facilitate an accessible path of travel from the street footpath along Victoria Street to the northern entrance. Access requirements for the ramp are as follows and should be addressed during preparation of the construction certificate documentation, prior to commencement of construction.

- a. Maximum allowable gradient of the accessible ramp is 1:14 and maximum length between landings to be 9m (for 1:14 gradient). Landings to be a minimum 1200mm in length (where there is no change in direction). For changes in direction of 180°, landings to be 1540mm in length – refer to AS1428.1(2009), Clause 10.8.
- b. The minimum unobstructed width of the ramp is to be 1000mm (AS1428.1, Clause 6.3). A width of 1200mm is preferred for compliance with AS1428.2.
- c. Ramp is to be constructed with no lip or step at joints between abutting surfaces (a construction tolerance of 3mm is allowable, 5mm for bevelled edges -refer to Figure 6).
- d. The maximum allowable crossfall of the ramp is to be 1:40.
- e. Surface of the accessible path of travel to be slip-resistant.
- f. The accessible ramp is required to be set back a minimum 900mm from the property boundary (AS1428.1, Clause 10.3 (f)). This allows tactile indicators and handrail extensions to occur within the boundary and not protrude into the footpath area.
Drawings indicate compliance with this requirement.
- g. Provide handrails, with extensions, to both sides of the ramp to comply with AS1428.1, Clause 12. Handrails to have an external diameter between 30-50mm to assist persons with a manual disability such as arthritis. Handrails are required on both sides of the ramp to cater for left and right handed disabilities.



- h. Where ramp is not enclosed, provide kerb rails in accordance with AS1428.1. The height of kerb rails is to be less than 65mm or greater than 150mm above the finished surface level. This is to ensure that the foot plate of a wheelchair cannot become lodged on the kerb rail.
- i. Provide tactile indicators at the top and bottom of the ramps to comply with BCA Clause D3.8 and AS1428.4. Tactile indicators to be detectable, durable, non-slip and have a minimum 30% luminance contrast to the background colour.

Tactile indicators at the top and bottom of the ramps to be 600-800mm deep across the width of the ramp and set back 300mm from the edge of the ramp (refer AS1428.4, Figure A1).

7.2 Stairs

Stairs are provided along the Victoria Street facade. These are considered of a public nature as they provide access to the entry foyer. AS1428.1 has access requirements for all public access stairs and is applicable in this instance.

Access requirements for public access stairs are as follows and should be implemented during preparation of the construction certificate documentation.

- a. Stair construction to comply with AS1428.1, Clause 11.1.
- b. Stairs to have closed or opaque risers. Open risers cause confusion for persons with a vision impairment and may trigger conditions such as epilepsy due to light penetrating through the open risers.
- c. Stairs are required to be set back a minimum 900mm from the property boundary (Clause 10.3 (f)). This allows tactile indicators and handrail extensions to occur within the boundary and not protrude into the footpath area.
Drawings indicate compliance with this requirement.
- d. Provide handrails, with extensions, to both sides of the stair (AS1428.1, Clause 11.2). Handrails to have an external diameter between 30-50mm to assist persons with a manual disability such as arthritis. Handrails should be continuous around the landings where possible.

Handrails are required on both sides of the stair to cater for left and right handed disabilities. A central handrail is also an acceptable solution where adequate width is available.

- e. Stair nosings to have minimum 30% luminance contrast strip 50-75mm wide to the top of the stair tread to assist persons with a vision impairment. The strip can be set back 15mm from the edge of the riser.
- f. Stair nosings shall not project beyond the face of the riser.
- g. Provide tactile indicators at the top and bottom of the stair to comply with BCA Clause D3.8 and AS1428.4.



Tactile indicators to be detectable, durable, non-slip and have a minimum 30% luminance contrast to the background colour.

Tactile indicators at the top and bottom of the stair to be 600-800mm deep across the width of the stair set back 300mm from the edge of the stair.

3.2 Accessible Carparking – Club Parking

Accessible carparking is provided within the basement level carparking area to cater for the RSL Club. Three accessible spaces are provided in this location.

Access requirements for the accessible carparking are as follows and should be addressed during preparation of the construction certificate documentation.

- a. Accessible carparking to be a minimum of 2400mm wide with a shared area to one side of the space 2400mm wide. Circulation space can be shared between adjacent accessible carparks. For a single space, a total width of 4800mm is required.
Current carparking arrangement offers a configuration in accordance with this requirement.
- b. Provide a bollard to the shared circulation space as illustrated in AS2890.6, Figure 2.2.
- c. The maximum allowable crossfall of accessible carparking area to be, 1:33 (for outdoor spaces). This crossfall applies both parallel and perpendicular to the angle of parking.
- d. For covered carparking, a section of the accessible space is to have a clear height of 2500mm as illustrated in AS2890.6, Figure 2.7.
- e. Designated accessible carparking is to be identified using the International Symbol for Access (ISA) –ground and vertical signage is required. Signage is to comply with AS1428.1.
- f. Provide an accessible path of travel, within the meaning of AS1428.1, from the accessible carparking areas to the building entrance.

3.4 Entrances

There are multiple entrances to the building all of which are required to be accessible. These include the two residential lobbies and the link to the RSL Club at the ground floor level.

Access requirements for the entrances are as follows and should be addressed during preparation of the construction certificate documentation, prior to commencement of construction.

- a. Entrance to comply with AS1428.1(2009), Clause 13 as part of the accessible path of travel.
- b. Doors are to have a minimum clear opening width of 850mm to comply AS1428.1(2009), Clause 13.2 as part of the accessible path of travel.
- c. Door thresholds to be level to provide seamless entry as part of the accessible path of travel. Maximum allowable construction tolerance is 3mm for compliance with AS1428.1(2009), 5mm where beveled edges are provided between surfaces – refer to Figure 6.



- d. Doors to have hardware within the accessible height range of 900-1100mm above the finished floor level (AS1428.1(2009), Clause 13.5)
- e. For glass doors, provide decals to assist persons with a vision impairment. Decals to be solid and have a minimum 30% luminance contrast to the background colour and be not less than 75mm high located within the height range of 900-1100mm above the finished floor level. Decals are to be solid. AS1428.1, Clause 6.6.

4. Residential Common Areas

The common areas of the development are required to be accessible to persons with a disability. As lifts are provided to all levels of the building, we consider that this requirement is met. Common areas include the Public Terrace and Common Room located at Level 4.

4.1 Doorways Generally

AS1428 has requirements for doorways within the accessible path of travel. In this instance, doorways within the accessible path of travel are the doorways that provide access communal areas such as the garden and bins.

Access requirements for doorways within the accessible path of travel are as follows.

- a. Doorways within the accessible path of travel to have a minimum clear opening width of 850mm (AS1428.1(2009), Clause 13.2).
- b. All doorways within the accessible path of travel to have complying circulation areas as illustrated in AS1428.1(2009), Figure 31. Circulation areas to have a maximum crossfall of 1:40.
- c. For doorways to external areas such as the garden at Level 1, thresholds to be level to provide seamless entry as part of the accessible path of travel. Maximum allowable construction tolerance is 3mm for compliance with AS1428.1(2009), 5mm where beveled edges are provided between surfaces – refer to Figure 6.
- d. Doorways to have minimum 30% luminance contrast as described in AS1428.1(2009), Clause 13.1.
- c. Doors to have hardware within the accessible height range of 900-1100mm above the finished floor level (AS1428.1(2009), Clause 13.5)

4.2 Passing Bays

Corridors to have passing bays complying with AS1428.1 at maximum 20m intervals where a direct line of sight is not available. They are required within 2m of the end of the pathway where it is not possible to continue travelling along the pathway.

A passing space shall have a minimum width of 1800 for a minimum length of 2000mm. Refer to AS1428.1, Clause 6.4.



4.3 Floor Finishes

All floor finishes are to be flush to provide an accessible path of travel throughout the different areas of the building. Maximum allowable construction tolerance is 3mm (5mm for bevelled edges) as part of the accessible path of travel. Refer to AS1428.1(2009), Clause 7.2 for further details. This should be implemented during construction to ensure compliance.

4.4 Controls

New controls such as light switches, GPOs, alarm keypads, card swipes, intercoms, etc are to be located within the accessible height range of 900-1100mm above the floor level to comply with AS1428.1(2009), Clause 14. This should be implemented during construction to ensure compliance.

5. Vertical Circulation

Lifts and stairs provide the vertical circulation throughout the proposed building.

5.1 Lift

A lift is provided for access between levels. The size of the lift appears to satisfy the requirements of AS1735.12. The following access requirements apply to the lift.

- a. Lift is to comply with AS1735.12 and be fully automatic as required by the BCA, Clause E3.6.
- b. Minimum internal dimensions of the lift car to be 1100mm wide x 1400mm deep to offer compliance with AS1735.12.
- c. Clear opening of the lift door to be minimum 900mm.
- d. Provide a handrail complying with the provisions for a mandatory handrail in AS1735.12.
- e. All lift control buttons are to be in the accessible height range of 900-1100mm affl and have a minimum 30% luminance contrast to the background colour. This includes buttons within the lift car and at each public lift lobby. All buttons are to be provided with information in Braille and tactile formats.
- f. Auditory / voice cues are to be provided within the lift car to assist persons with a vision impairment.
- g. Series of door opening devices that will detect a 75mm diameter rod across the door opening between 50 mm and 1550mm above the floor level.
- h. Emergency hands-free communication, including a button that alerts a call centre of a problem, a light to signal that the call has been received by the call centre and a light indicating assistance is being dispatched.

5.2 Stairs – Private

Stairs within individual apartments are not subject to the requirements of AS1428.1.



5.3 Stairs – Egress Stairs

Stairs are provided throughout the development that are considered egress stairs.

Designated fire egress stairs are not considered public access stairs and therefore are not subject to the requirements of AS1428.1 with the exception of contrasting nosing strips. These are required by AS1428.1.

- h. Stair nosings to have minimum 30% luminance contrast strip 50-75mm wide to the top of the stair tread to assist persons with a vision impairment. The strip can be set back 15mm from the edge of the riser.
- i. Stair nosings shall not project beyond the face of the riser.

5.4 Fire Egress for Persons with a Disability

The Access Code for Buildings states that in the event of an emergency, provision must be made for people with vision impairment to locate the exit path (Clause H2.14).

We also recommend that as a part of the emergency evacuation plan for the building, egress for persons requiring assistance be addressed. The provision of places of comparative safety within fire isolated passages would be advantageous to persons with a disability. This consists of a waiting area large enough to accommodate a wheelchair where persons can wait for assistance from emergency services. The waiting area should be identified with appropriate signage that incorporates the International Symbol for Access.

6. Adaptable Apartments

An adaptable housing unit is defined by AS4299 as follows:

A housing unit which is designed and constructed to meet the performance requirements stated in the standard. It is designed in such a way that it can be modified easily in the future to become accessible to both occupants and visitors with disabilities of progressive frailties.

The following requirements for adaptable apartments are based on AS4299, Section 4 – Design of the Housing Unit, essential criterion as listed in Appendix 1, AS4299 Schedule of Features for Adaptable Housing. Compliance with the following features will achieve a Class C adaptable housing unit.

A total of five adaptable apartments have been provided within the development.

6.1 Private Car Accommodations

Private carparking spaces for adaptable housing units shall be large enough to enable a person with a wheelchair to get in and out of both the car and the parking space. A width of 3.8m is necessary to enable the driver to alight, open the passenger door and assist a person with a disability into a wheelchair.

Carparking spaces for the adaptable units to have a minimum floor plan dimension of 3.8m x 6.0 (AS4299, Clause 3.7.2). A clear vertical clearance of 2.5m is desirable.



The introduction of AS2890.6 in 2009 offers an approach to the provision of accessible carparking that can be easily accommodated in a standard carparking layout. It offers an accessible space 2400mm wide with a circulation area 2400mm wide adjacent to the space (4800mm for a single space). The circulation area can be “shared” between two accessible spaces (7200mm for two spaces). This offers carparking spaces in excess of the minimum requirement of AS4299 (3800mm).

The abovementioned configuration has been adopted in the provision of carparking for the adaptable apartments. With regard to the strata plan, the shared space could become a part of the common title to ensure it remains a circulation area. Access requirements for the adaptable carparking are as follows and should be addressed during preparation of the construction certificate documentation.

- a. Accessible carparking to be a minimum of 2400mm wide with a shared area to one side of the space 2400mm wide. Circulation space can be shared between adjacent accessible carparks. For a single space, a total width of 4800mm is required.
Current carparking arrangement offers a configuration in accordance with this requirement.
- b. Provide a bollard to the shared circulation space as illustrated in AS2890.6, Figure 2.2.
- c. The maximum allowable crossfall of accessible carparking area to be, 1:33 (for outdoor spaces). This crossfall applies both parallel and perpendicular to the angle of parking.
- d. For covered carparking, a section of the accessible space is to have a clear height of 2500mm as illustrated in AS2890.6, Figure 2.7.
- e. Designated accessible carparking is to be identified using the International Symbol for Access (ISA) –ground and vertical signage is required. Signage is to comply with AS1428.1.
- f. Provide an accessible path of travel, within the meaning of AS1428.1, from the accessible carparking areas to the building entrance.

6.2 Letterboxes

Letterboxes to adaptable housing units should be located on a hard standing area connected by an accessible path of travel to the adaptable housing unit.

Letterboxes are provided at the residential entrances, satisfying AS4299 requirements.

An accessible path of travel is provided from the letterboxes to the entrance of the adaptable apartments.

Letterboxes to adaptable apartments should be provided within the accessible height range of 900-1100mm affl.

6.3 Accessible Entrance

Entrances to adaptable housing units are to comply with AS4299 Clauses 4.3.1 and 4.3.2. AS4299 which require that the entry doors comply with AS1428.2. The minimum clear opening width of the doorway is to be 850mm and allow for wheelchair maneuverability (provide minimum 1550mm long area in front of the doorway). Entrances to the adaptable housing units to be weatherproofed.



Door hardware is to comply with AS1428. In this regard, entry door hardware is to be in the accessible height range of 900-1100mm above finished floor level. The use of lever handles is encouraged to assist persons with a manual disability such as arthritis.

The entry doorways to each adaptable apartment appear to offer areas conducive to an accessible entrance subject to detailing at the construction certificate stage

6.4 Doorways

Doorways throughout adaptable housing units are required to have a clear opening width of 820mm. Door circulation areas are to comply with AS1428.1 on adaption of the unit.

All door hardware is to be operable with one hand and in the height range of 900-1100mm above the floor level. The use of lever handles is encouraged to assist persons with a manual disability such as arthritis.

Doorways within the adaptable apartments meet these requirement in term of circulation areas. Door leaf sizes to be addressed in the preparation of the construyction certificate documentation.

6.5 Internal Corridors

There is a requirement for all corridors to be minimum 1000mm.

Corridors within adaptable apartments provide adequate width for compliance.

6.6 Visitable Toilet

Each adaptable housing unit is required to have a toilet on the entry floor that is a visitable toilet within the meaning of AS4299. The toilet is to be installed in compliance with AS1428 (correct set-out distance from fixed walls) and have the capacity to accommodate a grabrail that complies with Figure 4.5 of AS4299. Slip resistant floors are also required.

Bathrooms within each of the adaptable apartments meet this requirement.

6.7 Bathrooms

Bathrooms within an adaptable housing unit are to comply with AS1428 after adaption. Issues to be considered include slip resistant floor, shower minimum 1100x1160mm with future provision for accessible features including handheld shower and grabrails, shower waterproofing to AS3740, recessed sop holder, washbasin with knee clearance, adequate circulation areas, automatic control of hot water, double GPO next to the mirror and the provision of capstan or lever taps. Refer to AS4299, Clause 4.4.4.

Bathrooms within each of the adaptable apartments meet this requirement.

6.8 Kitchens

Essential requirements for kitchens within an adaptable housing unit allow for future adaption and include items such as sinks, taps, cooktops, location of oven, cupboard handles, general power outlets, dimensions of the space and location of refrigerator.



Kitchens are required to have a clear space between benches of 1550mm. An area of bench top 800mm wide is required that can be adjusted through the height range of 750 – 850mm above floor level. Alternatively, a section of this dimension needs to be easily replaceable to achieve this requirement.

Kitchens offer circulation areas as described above. Other requirements to be addressed at the construction certificate stage.

6.9 Bedrooms

At least one bedroom within an adaptable housing unit is required to have adequate space for a wardrobe and a queen size bed with minimum 1540mm wide circulation at the foot of the bed (for compliance with AS1428.2, Clause 6.1).

Non-essential items include window sills at a maximum of 600mm affl to enable outlook for persons who may be confined to a bed for a length of time.

There are also requirements for locations of GPOs and telephone outlets and illumination levels.

Bedrooms offer circulation areas as described above. Other requirements to be addressed at the construction certificate stage.

Other items should be addressed during preparation of the construction certificate documentation.

6.10 Living Area

Living areas within an adaptable housing unit are required to have circulation areas that allow a wheelchair to maneuver within the space. In this regard, an area with 2250mm diameter is required, clear of furniture. AS4299, Clause 4.7 outlines this requirement. A telephone outlet adjacent to a general power outlet is also a requirement for living areas.

Non-essential items include window sills at a maximum of 730mm affl and at least four double GPOs should be provided to maximise the layout of the room.

The living area within the adaptable apartments is an open-plan area which is capable of meeting circulation requirements of AS4299.

Other items should be addressed during preparation of the construction certificate documentation.

6.11 Laundry

Requirements for laundry areas within adaptable housing units include the provision for an automatic washing machine / clothes dryer with clear space in front of the appliances. An area of 1550mm diameter will achieve this requirement. Laundries are to have slip resistant floors and door circulation areas in compliance with AS1428.1.

Laundry Cupboards offer circulation areas as described above. Other requirements to be addressed at the construction certificate stage.



6.12 Floors Generally

AS4299 requires that all floor surfaces including bathrooms, laundry and external paved surfaces be slip resistant to comply with AS3661.1.

Non-essential items include that after modification, carpets should have short pile and consideration should be given to the fire hazard indices. Floors should be easily cleanable and bold patterns should be avoided to eliminate confusion for persons with vision impairment.

These items should be addressed during preparation of the construction certificate documentation.

6.13 Ancillary Items

Ancillary items are not considered essential items. Switches such as light switches must be located within the accessible height range of 900-1100mm above the floor level.

Power outlets should be located at a height not less than 600mm affl – a height of 1000mm is preferred. They should be located not less than 500mm from internal corners.

These items should be addressed during preparation of the construction certificate documentation.



7. Summary

The Proposed Adamstown RSL Development located at 282 Brunner Road Adamstown has been considered with regard to access for persons with a disability.

We consider that the drawings presented for assessment generally comply with The Building Code of Australia 2012 and the intent of the Disability Discrimination Act 1992, subject to the recommendations made in this report being implemented during preparation of the construction certificate documentation.

All dimensions quoted throughout this report and within Australian Standards are CLEAR dimensions, not structural. This needs to be considered in the preparation of the construction certificate documentation to account for wall linings and the like.

Construction is to be in accordance with the recommendations made in this access report to ensure compliance. Where construction differs from the drawings, further assessment will be required to ascertain compliance.

This report is limited to items within development application drawings only. Future alterations and additions to the building will render the recommendations in this report null and void as we cannot guarantee continued compliance where changes to the building fabric are made. A high level of maintenance is recommended to ensure continued compliance with access legislation.

Lindsay Perry is a qualified Access Advisor, being an accredited member of The Association of Consultants in Access, Australia – membership number 136. Lindsay Perry carries public liability insurance, professional indemnity insurance and income protection.

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